

April 15, 2021

Ambassador Susan Rice  
Assistant to the President for Domestic Policy  
1600 Pennsylvania Avenue NW  
Washington, D.C. 20500

Ambassador Rice,

As non-profit groups dedicated to a transparent and accountable government, we write to urge you to formally begin the process of elevating ethics as a core value in the Biden-Harris administration by fulfilling a campaign promise and relaunching Ethics.gov. This central repository would help ensure that every citizen can have confidence that federal government officials are serving the public interest, not personal interests. Below we outline some of the critical elements that such a repository must have if it is to serve this purpose.

As an initial matter, we note that this effort will build both on efforts undertaken in the Obama-Biden administration to collect information on an Ethics.gov website and on important steps already taken by the Biden-Harris administration to make ethics information more accessible by specifying that ethics waivers be made public within 10 days of being granted. We appreciate these steps and the efforts that ethics officials within the White House and within federal agencies, including the Office of Government Ethics, are taking to implement this policy. We recognize that the creation of a new resource like an Ethics.gov demands substantial planning and resources - and we believe the time to start this process is now.

*Scope.* In addition to the previous scope of the Ethics.gov website as it existed in the Obama-Biden administration (White House Visitor Records; Office of Government Ethics Travel Reports; Lobbying Disclosure Act Data; Department of Justice Foreign Agents Registration Act Data; Federal Election Commission Individual Contribution Reports; Federal Election Commission Candidate Reports; Federal Election Commission Committee Reports) the new Ethics.gov should include ethics information on all appointees within 60 days of appointment, including but not limited to financial disclosures, ethics waivers, transaction reports, ethics agreements, certificates of compliance, and other relevant documents.

*Usability.* The information published on the Ethics.gov website should be in structured data format (searchable, sortable, downloadable and machine readable). While information quality is important for any government website, we emphasize that it is critical to the operation of Ethics.gov as we conceive it. One of the main reasons to create a single website that collects ethics-related information is to facilitate cross-comparison of information in the different data sets published on the website, and that type of analysis cannot be done effectively if the information is poorly presented.

*Future functionality.* We also encourage you to design the Ethics.gov website so that it is amenable to future functionality that may not be available when it is initially

launched. For example, we believe that in the future, a digital tool could be developed to help the public analyze ethics filings, such as by mapping related entities or listing entities in which the filer has financial interests, or to connect ethics information to other information such as the public calendars of senior government officials or records of public funds expended on USAspending.gov.

It should be easy for the public to understand whether officials are acting ethically. Unfortunately, under existing ethics rules, a tremendous amount of ethically questionable conduct can occur under the radar because disclosures are complicated, opaque, or untimely. Transparency in ethics-related information is critical to ensure that the public can play an appropriate role in holding government officials accountable to the public interest and to ensure public confidence that these efforts are successful. We stand ready to work with you to begin the process of achieving these ends, and we look forward to a day when Ethics.gov can stand as an innovative example to other democracies committed to the rule of law and equitable, inclusive government.

Please contact Jennifer Ahearn with any questions [jahearn@citizensforethics.org](mailto:jahearn@citizensforethics.org).

Sincerely,

American Oversight  
Campaign Legal Center  
Center for Media and Democracy  
Citizens for Responsibility and Ethics in Washington (CREW)  
The Digital Democracy Project  
Government Accountability Project  
Government Information Watch  
International Corporate Accountability Roundtable (ICAR)  
Issue One  
National Taxpayers Union  
Open The Government  
Project On Government Oversight (POGO)  
Public Citizen  
Transparency International U.S. Office