

In response to the written inquiry of “lravaban.net” dated July 7, 2015 submitted to the Commission on Ethics of High-Ranking Officials, we inform that:

1. From April 29 to May 1 of 2015, the Delegation of the Commission on Ethics of High-Ranking Officials, including the Chairperson and three members of the Commission (representatives of other state agencies were also part of the Delegation), participated in the World Bank’s seminar on “Conflict of interest, asset and income declaration regulations, in Armenian public sector” organized in Washington DC, USA. During the meeting issues related to the Armenian asset declarations system (particularly, non-submission or late submission of the declarations, lack of sanctions for evidently false or incomplete data submission, shortcomings of conflict of interest regulations, scope for declarants and their related persons, lack of methodology to analyze the data, deficiencies of the mechanism to compare data available in databases of other state agencies, existence of thresholds for transactions subject to declaration, etc.) and their solutions, achievements and challenges of the Ethics Commission, as well as on-going initiatives and perspectives of the overall public ethics system were presented and discussed.

Out of the initiatives, the package of legislative amendments, elaborated with the participation of the Ethics Commission on establishment of sanctioning measures for non-submission or late submission, expansion of data subject to disclosure, establishment of the mechanisms verification of the data available in the databases in other state agencies, establishment of risk-based analysis methodology and development of automatic data analysis system were particularly presented.

During the visit, the Commission had a meeting with the specialists of the financial unit of the World Bank Headquarters, when electronic declaration system, conflict of interest related issues were discussed as well as the international experience on regulations and sanctions on non-submission or false submission by the high-ranking official declaration were presented by WB experts. The experts of World Bank also presented the list of countries with the best practice in electronic declaration system (Argentina, Romania, Singapore, etc.) and emphasized the importance of establishing declarations’ electronic analysis system in Armenia.

2. Members of the Commission were hosted by Frank Heemskerk, Executive Director for Armenia, Bosnia and Herzegovina, Bulgaria, Croatia, Cyprus, Georgia, Israel, Macedonia, Moldova, Montenegro, Netherlands, Romania and Ukraine. During the meeting, he presented the World Bank activities in the region, while highlighting the activities implemented in Armenia directed to good governance, public sector modernization and their need for further continuation.

By the outcomes of the seminar, steps directed towards the reviewee of the Ethics Commission functions within the “Public Sector Modernization Project 3”, as well as the further improvement of electronic declaration system, including establishment of electronic declarations analysis system were determined.

Please be informed, that **all the** declarations submitted to the Commission are published on the official website of the Commission on Ethics of High-Ranking Officials (www.ethics.am). Only non-submitted declarations are absent from the declaration registry of high-ranking officials. Thus, by using the declaration registry you can withdraw the list of officials and their related persons, who have not submitted declarations.

The date of declaration submission is also open information and using the declaration registry you can get information regarding the officials and their related persons, who submitted the declaration late.

The Commission on Ethics of High-Ranking Officials has additionally informed all officials, who did not submit declarations, perform the duties defined by the law, whereas the Commission is not yet authorized to apply sanctions measures for non-submission of declarations or late submission.