

Adopt Accountability and Transparency Procedures for the Department of Treasury's Office of Foreign Assets Control

October 1, 2013

Jacob J. Lew, Secretary
U.S. Department of the Treasury
1500 Pennsylvania Avenue, NW
Washington, DC 20220

Dear Secretary Lew,

On behalf of the undersigned organizations concerned with government openness and accountability, we are writing to you in support of new transparency and accountability guidelines for the Office of Foreign Assets Control (OFAC) licensing procedures.

An open and transparent process would provide more guidance to the public, promote even-handed enforcement and ensure that OFAC responds quickly when humanitarian crises occur, saving lives in the process. OFAC's current process for determining when to issue licenses, and to whom, is opaque and inefficient. Many civil society organizations working in conflict zones where terrorist groups operate, such as Somalia, Syria or Mali, have complained that OFAC takes months, or even years to issue a response to license requests, and often denies them based on arbitrary reasoning. In some cases charities cannot obtain the name and contact information for the OFAC official processing their request.

We strongly support recommendations provided by the Charity and Security Network that standards for approving licenses for humanitarian assistance and peace-building projects must be clearly defined and easily available to the public, and that all licensing determinations describing the scope of approved work must be publicly available. We also agree that applicants must be provided with the name and contact information for the OFAC official responsible for processing the application. Additionally, we agree that the Treasury Department should provide Congress with an annual report concerning OFAC's administration of license regulations, and urge you to make a copy of any such report available to the public.

Making OFAC's process more open and efficient will help to ensure a more timely response to human suffering around the world. We appreciate your time and attention to this issue, and urge you to adopt transparency and accountability guidelines for OFAC.

Sincerely,

Center for Effective Government (formerly OMB Watch)

Center for Media and Democracy

Citizens for Responsibility and Ethics in Washington –CREW

The Constitution Project

Government Accountability Project –GAP

James Madison Project

Liberty Coalition

National Coalition Against Censorship

OpenTheGovernment.org

Project On Government Oversight – POGO

Society of American Archivists

Sunlight Foundation