

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: International Joint Commission (IJC)

Follow-up to OGE Report Number: 24-62I

Report No.: 25-48IF

Date: April 4, 2025

**UNITED STATES OFFICE OF
GOVERNMENT ETHICS**Preventing Conflicts of Interest
in the Executive Branch

As a result of its review of the IJC ethics program, the Office of Government Ethics (OGE) issued three recommendations in its September 2024 review report. OGE conducted a follow-up review to assess whether IJC has taken sufficient action to resolve the deficiencies underlying these recommendations. The results of the follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
1	Destroy all public financial disclosure reports that exceed the 6-year retention period in accordance with OGE/GOVT-1.	IJC did not have any hardcopy reports- but did need to delete old reports stored in OGE's <i>Integrity</i> online filing system. After receiving guidance from an <i>Integrity</i> Help Desk Analyst, IJC confirmed that they were able to successfully delete all reports that exceeded the 6-year retention period.	Closed
2	Ensure that new employees receive initial ethics training within three months of their appointment.	Three employees were required to receive initial ethics training at IJC in 2024. Two were trained within three months, as required. The remaining employee was trained nine days after the three-month deadline due to technical difficulties accessing the online training portal. IJC confirmed that this employee's technical difficulties were unique to them and stated that they did not anticipate any future employees would face the same issue. It is therefore OGE's finding that the employee's late training is not indicative of a larger systemic issue, and this recommendation will be closed.	Closed
3	Ensure that PAS employees receive live training at least once every two years.	IJC had three PAS employees in 2024. All three received live ethics training. Furthermore, IJC confirmed that they will continue to provide live ethics training at least once every two years.	Closed

Based on the results of OGE's follow-up review, all recommendations are closed.