

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: U.S. International Development Finance Corporation (DFC)

Follow-up to OGE Report Number: 23-21I

Report No.: 25-22IF

Date: December 4, 2024

UNITED STATES OFFICE OF GOVERNMENT ETHICS

Preventing Conflicts of Interest
in the Executive Branch

As a result of its review of the International Development Finance Corporation (DFC) ethics program, the Office of Government Ethics (OGE) issued five recommendations in its March 31, 2023 inspection report. In February 2024, OGE closed three recommendations. OGE conducted a second follow-up review to assess whether DFC has taken sufficient action to resolve the deficiencies underlying the open recommendations. The results of the follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
2	Ensure all public financial disclosure reports moving forward are reviewed and certified timely.	<p>OGE examined 40 public financial disclosure reports filed in 2023 during its first follow-up inspection and found that 27 (68%) were certified more than 60 days after submission.</p> <p><u>OGE Finding:</u> In November 2024, OGE reviewed 34 public financial disclosure reports filed in 2024. Of these reports, 33 (97%) were reviewed and certified within 60 days after submission.</p>	Closed
3	Ensure confidential financial disclosure reports are reviewed and certified timely.	<p>OGE examined 47 confidential financial disclosure reports filed in 2023 during its first follow-up inspection and found that 45 (96%) were reviewed and certified more than 60 days after submission.</p> <p><u>OGE Finding:</u> In November of 2024, OGE reviewed a sample of 47 confidential financial disclosure reports filed in 2024. Of these reports, 46 (98%) were reviewed and certified within 60 days after submission.</p>	Closed

Based on the results of OGE's follow-up review, recommendations 2 and 3 are closed.