

**ETHICS PROGRAM REVIEW FOLLOW-UP REPORT**

Agency: United States Agency for International Development

Follow-up to OGE Report Number: 21-16I

Report No.: 22-31IF

Date: May 20, 2022

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

As a result of its review of the United States Agency for International Development's (USAID) ethics program, the Office of Government Ethics (OGE) issued four recommendations in its April 2021 review report. OGE conducted a follow-up review to assess whether USAID 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	Ensure that all new entrant non-PAS public financial disclosure reports are filed timely.	<p><b><u>Agency Response:</u></b></p> <p>USAID ethics officials stated that they have taken multiple steps to ensure that non-PAS new entrant reports are filed timely. These steps include:</p> <ul style="list-style-type: none"><li>• Working with the agency's Office of Human Capital and Talent Management (HCTM) to include language in assignment cables for Senior Foreign Service positions that remind them to file public financial disclosure reports.</li><li>• Working with HCTM to ensure the ethics office receives notification of appointments to and departures from political appointee and SES positions.</li><li>• Working with HCTM to update their database of filing positions.</li><li>• Training administrative and executive officers (domestic and overseas) on financial disclosure requirements.</li><li>• Working to finalize updated written procedures governing the administration of the public and confidential financial disclosure systems.</li><li>• Created a webpage on the agency's intranet that covers financial disclosure requirements and publicized this webpage via agency-wide notices.</li></ul> <p>However, USAID ethics officials indicated that they needed more time to implement the necessary changes to their program.</p> <p><b><u>OGE Finding:</u></b></p> <p>OGE's examination of a sample of twenty-five non-PAS new entrant public financial disclosure reports filed in 2021, found that 60% were filed timely.</p>	Open

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2	Ensure that all non-PAS termination public financial disclosure reports are filed timely.	<p><b><u>Agency Response:</u></b> USAID ethics officials stated that they have taken multiple steps to ensure non-PAS termination reports are filed timely. These steps include the actions taken for rectifying recommendation 1 above and now requiring that employees contact the ethics office before separating.</p> <p><b><u>OGE Finding:</u></b> OGE's examination of a sample of twenty-five non-PAS termination public financial disclosure reports filed in 2021 found that 84% were filed timely.</p>	Closed
3	Ensure that all new entrant confidential financial disclosure reports are filed timely.	<p><b><u>Agency Response:</u></b> USAID ethics officials stated that they have taken multiple steps to ensure that new entrant confidential financial disclosure reports are filed timely. These steps include:</p> <ul style="list-style-type: none"><li>• Working with HCTM to update position descriptions to include filing requirements.</li><li>• Working with HCTM to update their database of filing positions.</li><li>• Incorporating filing requirements in the onboarding process.</li><li>• Working on the updated written procedures covering financial disclosures.</li></ul> <p><b><u>OGE Finding:</u></b> OGE examined a sample of twenty-five new entrant confidential financial disclosure reports filed in 2021 and could only identify three (12%) that were filed timely.</p>	Open
4	Submit the Semiannual Report of Payments Accepted from a Non-federal Sources for the period April 1, 2020 through September 30, 2020, which was due on November 30, 2020.	<p><b><u>Agency Response:</u></b> USAID ethics officials provided OGE with the Semiannual Report of Payments Accepted from Non-federal Sources for the period of April 1, 2020 through September 30, 2020. In addition, USAID also provided two separate semiannual reports that became due since OGE's 2021 inspection.</p>	Closed

Based on the results of OGE's follow-up review, recommendations 2 and 4 are closed. OGE will conduct an additional follow-up review in approximately 6 months to assess whether USAID has taken sufficient action to resolve the deficiencies underlying the recommendations which remain open.