

**ETHICS PROGRAM REVIEW FOLLOW-UP REPORT**

Agency: U.S. International Development Finance Corporation  
(formerly Overseas Private Investment Corporation)

Follow-up to OGE Report Number: 20-29I

Report No.: 21-25IF

Date: May 25, 2021

UNITED STATES OFFICE OF  
**GOVERNMENT ETHICS**

  
Preventing Conflicts of Interest  
in the Executive Branch

As a result of its inspection of the U.S. International Development Finance Corporation's (DFC) ethics program, the Office of Government Ethics (OGE) issued two recommendations in its June 2020 inspection report. OGE conducted a follow-up review in April 2021 to assess whether DFC had 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 the DAEO annually reviews written procedures as required by 5 CFR § 2638.303(c), 304(f) and 306(d).	OGE received confirmation that DFC's written procedures were reviewed for calendar year 2021 as required by 5 CFR § 2638.303(c), 304(f) and 306(d).	Closed
2	Ensure that all SGE Board members indicate their reporting status on the first page of the confidential report as "New Entrant" in accordance with 5 CFR § 2634.903(b)	At the time of OGE's follow-up review, DFC had two SGE members serving on its Board of Directors who were required to file confidential reports. OGE examined both confidential reports and found the reporting status on the first page of both reports to indicate "New Entrant" in accordance with the applicable requirement.	Closed

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