

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: International Boundary and Water Commission

Follow-up to OGE Report Number: 25-53I

Report No.: 25-93IF

Date: September 25, 2025

UNITED STATES OFFICE OF
GOVERNMENT ETHICSPreventing Conflicts of Interest
in the Executive Branch

As a result of its review of the International Boundary and Water Commission’s (IBWC) ethics program, the Office of Government Ethics (OGE) issued one recommendation in its April 2025 review report. OGE conducted a follow-up review to assess whether the IBWC has taken sufficient action to resolve the deficiencies underlying this recommendation. The results of the follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
1	Ensure that confidential financial disclosure reports are submitted timely.	<p>IBWC was required to collect one new entrant confidential financial disclosure report during the review period (1/1/25 – 9/1/25). OGE found that the report was filed two weeks late despite email reminders sent to the filer by IBWC ethics officials.</p> <p>Based on OGE’s review suggestion IBWC has developed and implemented an escalation plan which includes requesting support from first-line supervisors and leadership to enforce timely filing of financial disclosure reports. OGE reviewed this plan and found that it addresses financial disclosure filer identification, training and tracking</p> <p>OGE notes that IBWC has implemented a process likely to significantly improve the agency’s ability to timely collect reports from filers .</p>	Open

Based on the results of OGE’s follow-up review the recommendation remains open. OGE will conduct an additional follow-up review in approximately six months to assess whether IBWC has taken sufficient action to resolve the deficiencies underlying this recommendation.