



United States  
**Office of Government Ethics**

1201 New York Avenue, NW., Suite 500  
Washington, DC 20005-3917

March 19, 2014

Donna Brickers  
Designated Agency Ethics Official  
Vietnam Education Foundation  
2111 Wilson Blvd, Suite 700  
Arlington, VA 22201

Dear Ms. Brickers:

As a result of an onsite plenary review of the Vietnam Education Foundation (VEF), the United States Office of Government Ethics (OGE) issued five recommendations in its July 2013 ethics program review report. In February 2014, OGE conducted a follow-up review to assess the implementation of the recommendations. Based on the follow-up review, we have determined that all five of the recommendations have been implemented. However, as noted below, the follow-up review found evidence that indicated an additional recommendation and follow-up review are needed.

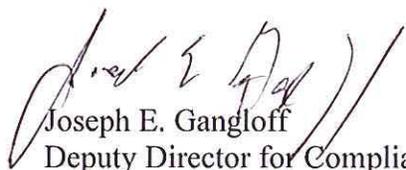
	Recommendation	Agency Action	Status
1	Finalize written procedures to administer the public and confidential financial disclosure systems.	VEF provided OGE with final, written procedures to administer the public and confidential financial disclosure systems.	Closed
2	Collect, review and certify missing public financial disclosure reports of the Executive Director.	VEF has technically met the requirement to collect, review and certify the missing public financial disclosure reports of the Executive Director and OGE has closed the related recommendation. However, OGE's follow-up work produced findings that have resulted in a new recommendation as noted below.	Closed
3	Develop an annual training plan.	VEF provided OGE with the required annual ethics training plan.	Closed
4	Collect, review and certify missing 2012 annual reports from the Board Chairman and five members of the Board and certify the 2013 annual reports to bring VEF into compliance with financial disclosure requirements.	VEF has collected, reviewed and certified the missing reports.	Closed

5	Develop written procedures to address annual collection, review and certification of SGEs financial disclosure reports. These can be incorporated into VEF's overall procedures for administering the financial disclosure program.	VEF provided OGE with final, written procedures to administer the financial disclosure system as it applies to SGEs.	Closed
1a	<p>New Recommendation:</p> <p>Require the Executive Director to fully disclose the asset identified as "Fidelity IRA" and conduct a conflict-of-interest analysis based on the full disclosure of the asset.</p>	<p>OGE found that on the three reports filed by the Executive Director, the filer listed as an asset on Schedule A "Fidelity IRA." When reporting IRAs, filers must provide the full name of the specific account. Simply reporting the fund's "family" name does not provide sufficient information to allow a reviewer to conduct a conflict-of-interest analysis, which provides the basis for certifying financial disclosure reports. Further, unless the IRA meets the definition of excepted investment fund, the underlying assets of the IRA must also be reported. The reviewer could not have conducted a conflict-of-interest analysis without the additional information. OGE will conduct further follow-up within 30 days of the date of this report to verify that the three public financial disclosure reports have been amended to include full disclosure of assets and that a conflict-of-interest analysis has been conducted.</p>	

As noted, OGE will follow up within 30 days regarding the three reports filed by the Executive Director as a result of the recommendation made in OGE's initial report. Additionally, based on concerns raised by the certification of reports which did not provide full disclosure of assets, OGE will schedule another follow-up review to examine all financial disclosure reports filed during the 2014 annual filing cycle. This additional follow-up will be scheduled after VEF has had time to collect, review, and certify reports filed during the 2014 annual filing cycle and will focus on verifying that report certification is based on full disclosure of reported assets.

Thank you for your assistance during the follow-up process. We encourage you to contact your Desk Officer for ethics program support.

Sincerely,



Joseph E. Gangloff  
Deputy Director for Compliance