



United States
Office of Government Ethics
1201 New York Avenue, NW, Suite 500
Washington, DC 20005-3917

March 26, 2013

Susan E. Daniel
Designated Agency Ethics Official
International Joint Commission
2000 L Street, NW
Suite 615
Washington, DC 20036

Dear Ms. Daniel:

The United States Office of Government Ethics (OGE) has conducted a follow-up review of the ethics program at the International Joint Commission (IJC) to determine how the recommendation and suggestion from our August 2012 report have been addressed.

OGE recommended that IJC ensure coverage of all sections of the criminal conflict of interest statutes contained in 18 U.S.C. § 202-209 during annual training. In October 2012, IJC informed OGE that its annual ethics training plan for 2012 was amended to include coverage of all sections of the criminal conflict of interest statutes. IJC conducted a training session that covered the statutes that same month. In addition, IJC also required its filers to take an on-line training module covering the same content. OGE received confirmation that all filers were trained on the conflict of interest statutes. OGE considers this action responsive to the recommendation. Therefore, the recommendation is closed.

OGE suggested that IJC establish a formal relationship through a memorandum of understanding with the Department of State's Office of Inspector General (IG) for investigatory services on potential ethics violations. IJC stated that since the agency functions as an annex of the Department of State, they would utilize the Department of State's IG. OGE considers this to be responsive to the suggestion. Therefore, the suggestion is closed.

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Based on OGE's follow-up, we have determined that the IJC has adequately addressed the recommendation and suggestion from the August 2012 report. Thank you for your assistance during the follow-up process. Please contact me at 202-482-9317 if you require any additional information.

Sincerely,

A handwritten signature in black ink that reads "Rashmi Bartlett". The signature is written in a cursive, flowing style.

Rashmi Bartlett
Chief, Professional Staff Group 1
Program Review Branch
Compliance Division