



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

June 13, 2013

Doris M. Martin
General Counsel
United States African Development Foundation
1400 I Street N.W., Suite 1000
Washington DC 20005-2248

Dear Ms. Martin:

The United States Office of Government Ethics (OGE) has conducted a follow-up review of the ethics program at the African Development Foundation (ADF) to determine how the recommendations and suggestions from our May 2013 report have been addressed.

OGE recommended that ADF develop a revised process to ensure financial disclosure reports are assessed for retention at the beginning of each calendar year and destroyed when appropriate. ADF responded that each year the DAEO and ADAEO will add an automatic alert to their calendars that reminds them each January to determine whether financial disclosure reports that were filed six years earlier should be destroyed. OGE considers this action responsive to the recommendation. Therefore, the recommendation is closed.

OGE recommended that ADF develop a plan to ensure that annual ethics training provided to covered employees includes a review of the Principles, the Standards, the criminal conflict of interest statutes, and ethics official contact information. ADF responded that it would ensure that all future annual ethics training plans include the required topics stated in the recommendation. OGE verified that ADF's 2013 annual ethics training plan includes coverage of the Principles, the Standards, the criminal conflict of interest statutes, and ethics official contract information. OGE considers ADF's actions responsive to the recommendation. Therefore, the recommendation is closed.

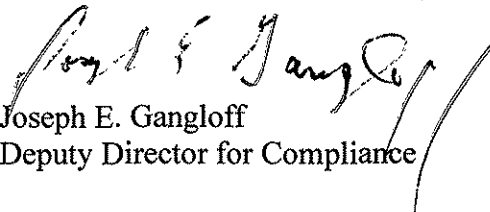
OGE recommended that ADF develop a plan to ensure appropriate annual ethics training is provided to SGEs. ADF responded that ethics training will be incorporated into the annual schedule of SGE's meetings. OGE considers this action responsive to the recommendation. Therefore, the recommendation is closed.

OGE also suggested that ADF develop a system for tracking and maintaining evidence that SGEs receive initial and annual ethics training. ADF responded that the agency will require its SGEs to sign certificates upon completion of their training. OGE considers this action responsive to the suggestion. Therefore, the suggestion is closed.

OGE suggested that ADF develop a system for tracking and maintaining evidence that employees receive initial ethics training. ADF responded that the recent designation of the DAEO as a liaison with the agency's human resources service provider will enable early notice to ethics officials of any new hire. In addition, initial ethics training will be integrated into the new hire orientation, and the employee will receive a training certificate upon completion. OGE considers these actions responsive to the suggestion. Therefore, the suggestion is closed.

Based on OGE's follow-up, we have determined that ADF has adequately addressed the three recommendations and two suggestions from the May 2013 report. Thank you for your assistance during the follow-up process. Please contact me at 202-482-9220 if you require any additional information.

Sincerely,



Joseph E. Gangloff
Deputy Director for Compliance