

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: Millennium Challenge Corporation (MCC)

Follow-up to OGE Report Number: 23-33I

Report No.: 24-56IF

Date: September 4, 2024

**UNITED STATES OFFICE OF
GOVERNMENT ETHICS**Preventing Conflicts of Interest
in the Executive Branch

As a result of its review of the Millennium Challenge Corporation (MCC) ethics program, the Office of Government Ethics (OGE) issued three recommendations in its May 2023 review report. OGE conducted a follow-up review to assess whether MCC has 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 late filing fee is collected from the filer OGE identified in the 2023 program review, or waived, as appropriate.	MCC granted a waiver for the late filer identified in the initial program review.	Closed
2	Ensure that new entrant confidential financial disclosure reports are filed timely.	OGE reviewed all nine new entrant confidential financial disclosure reports filed in 2024 and found that eight (89%) were filed beyond the due date.	Open
3	Ensure that SGEs receive ethics training before the first meeting of each calendar year.	MCC's SGE met on March 20, 2024 and was provided ethics training on July 23, 2024.	Open

Based on the results of OGE's follow-up review, recommendation 1 is closed. OGE will conduct an additional follow-up review in approximately 12 months to assess whether MCC has taken sufficient action to resolve the deficiencies underlying the recommendations which remain open.