

ETHICS PROGRAM INSPECTION REPORT

Agency: Morris K Udall and Stewart L Udall Foundation

Report No.: 21-131

Date: March 26, 2021

Period Covered by Review: January 1, 2020 through December 31, 2020

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

1.0 AGENCY DATA		
EMPLOYEES		
1.1	Number of full-time agency employees.	29
1.2	Number of Presidentially appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed.	0
1.3	Number of non-PAS public financial disclosure reports required to be filed.	2
1.4	Number of confidential financial disclosure reports required to be filed.	18
ETHICS PROGRAM		
1.5	Title of Designated Agency Ethics Official (DAEO).	General Counsel
1.6	Grade level of DAEO.	SES
1.7	Title of Alternate DAEO (ADAEO).	Director of Finance and Operations
1.8	Grade level of ADAEO.	GS-15
1.9	Title of the primary, day-to-day ethics program administrator.	General Counsel
1.10	Grade level of the primary, day-to-day ethics program administrator.	SES
1.11	Current number of full-time ethics officials.	0
1.12	Current number of part-time ethics officials.	2
1.13	Number of reporting levels between the DAEO and the agency head.	1
COMMENTS		
<p>The Morris K Udall and Stewart L Udall Foundation (Udall Foundation) is led by a Board of Trustees (Board). The Board is composed of nine trustees who are Presidentially appointed, Senate-confirmed officials (PAS). Additionally, and by statute, the Secretary of Education and the Secretary of the Interior, or their designees; the Chairperson of the President's Council on Environmental Quality, and the President of the University of Arizona serve on the Board.</p> <p>The trustees serve part-time as special government employees (SGE). Therefore, they file confidential financial disclosure reports. OGE examined the ethics-related services provided to the trustees and the President of the University of Arizona separately from the services provided to the rest of the Udall Foundation's employees. OGE found that they received the required annual ethics training in 2020. OGE also examined the confidential financial disclosure reports filed by these employees and found that 90% their reports were filed timely, but only 60% of the reports were certified within 60 days of the date they were filed.</p> <p>OGE did not review the ethics-related services provided the remaining three statutory Board members. Their home agencies are responsible for providing training and collecting and conducting the primary review of their financial disclosure reports. However, the Udall Foundation should obtain a copy of the financial disclosure reports the three Statutory Board members file at their home agencies and review them for conflicts of interest related to the work these individuals perform as Board members. Ethics officials advised OGE that they were not reviewing financial disclosure reports filed by the three statutory Board members. OGE recommends that the Udall Foundation make this part of their normal practice and include it in their written procedures.</p>		

2.0 LEADERSHIP						
COMPLIANCE REQUIREMENTS				Yes	No	N/A
2.1	OGE has received an up-to-date designation from the agency head naming the DAEO. <i>See 5 C.F.R. § 2638.107(a).</i>			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.2	OGE has received an up-to-date designation from the agency head naming the ADAEO. <i>See 5 C.F.R. § 2638.107(a).</i>			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
None						

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3.0 PUBLIC FINANCIAL DISCLOSURE (OGE Form 278e, OGE Form 278-T)						
COMPLIANCE REQUIREMENTS				Yes	No	N/A
The agency has written policies and procedures in place governing: <i>See</i> 5 U.S.C. app. IV, § 402(d)(1).						
3.1	• Collection of public financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
3.2	• Review/evaluation of public financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
3.3	• Public availability of public financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
3.4	The agency can demonstrate that late filing fees are collected or, where appropriate, waivers are issued when public filers do not timely file financial disclosure reports.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
3.5	Public financial disclosure reports are securely maintained. <i>See</i> OGE/GOVT-1.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
3.6	Public financial disclosure reports are retained in accordance with the retention requirements. <i>See</i> 5 C.F.R. § 2634.603(g)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
3.7	There is reasonable assurance that the lead human resources official or designee promptly (no later than 15 days after appointment) notifies the DAEO of all appointments to positions that require incumbents to file public financial disclosure reports. <i>See</i> 5 C.F.R. § 2638.105(a)(1).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
3.8	There is reasonable assurance that the lead human resources official or designee promptly (no later than 15 days after termination) notified the DAEO of terminations of employees in positions that require incumbents to file public financial disclosure reports. <i>See</i> 5 C.F.R. § 2638.105(a)(2).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
DATA ANALYSIS				%		
3.9	Percentage of sampled non-PAS new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(b).	N/A				
3.10	Percentage of sampled non-PAS annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(a).	100%				
3.11	Percentage of sampled non-PAS termination reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(e).	N/A				
3.12	Percentage of sampled non-PAS public financial disclosure reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	100%				
3.13	Percentage of sampled non-PAS public financial disclosure reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	100%				
3.14	Percentage of sampled PAS annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(a).	N/A				
3.15	Percentage of sampled PAS termination reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(e).	N/A				
3.16	Percentage of sampled PAS annual reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	N/A				
3.17	Percentage of sampled PAS annual reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	N/A				
COMMENTS						
<p>(3.4) It was not necessary to impose the late filing fee or grant a waiver during the period covered by the inspection.</p> <p>(3.7, 3.8) The requirement for human resources officials to notify the DAEO of appointments to or terminations from positions that require incumbents to file public financial disclosure reports is intended to ensure the DAEO can timely advise employees of relevant filing requirements. The Udall Foundation only has two positions whose incumbents are required to file public financial disclosure reports, one of which is the agency head. The other public filer is the DAEO. The DAEO (who is also the Udall Foundation's Deputy Executive Director) would be aware of all pending appointments and terminations. Therefore, formal notification from human resources officials is not necessary to ensure public filers receive timely notification of filing requirements.</p> <p>(3.9, 3.11) During the period covered by this inspection, there were no appointments to, or terminations from, these positions.</p> <p>(3.14-3.17) The Udall Foundation does not have any PAS who file public financial disclosure reports.</p>						

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4.0 CONFIDENTIAL FINANCIAL DISCLOSURE				
	COMPLIANCE REQUIREMENTS	Yes	No	N/A
	The agency has written policies and procedures in place governing: <i>See</i> 5 U.S.C app. IV, § 402(d)(1).			
4.1	<ul style="list-style-type: none">Collection of confidential financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.2	<ul style="list-style-type: none">Review/evaluation of confidential financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.3	Confidential financial disclosure reports are securely maintained. <i>See</i> OGE/GOVT-2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.4	Confidential financial disclosure reports are retained in accordance with the retention requirements. <i>See</i> 5 C.F.R. § 2634.604.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.5	The agency’s OGE-approved alternative confidential financial disclosure system complies with plans approved by OGE. <i>See</i> 5 C.F.R. § 2634.905(a).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.6	There is reasonable assurance that the lead human resources official or designee promptly (no later than 15 days after appointment) notifies the DAEO of all appointments to positions that require incumbents to file confidential financial disclosure reports. <i>See</i> 5 C.F.R. § 2638.105(a)(1).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	DATA ANALYSIS	%		
4.7	Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b).	67%		
4.8	Percentage of sampled confidential annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(a).	100%		
4.9	Percentage of sampled reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	94%		
4.10	Percentage of sampled confidential financial disclosure reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. §§ 2634.605(a) and 2634.909(a).	94%		
	COMMENTS			
	(4.5) The Udall Foundation does not have an OGE-approved alternative financial disclosure system.			
	(4.6) The requirement for human resources officials to notify the DAEO of appointments to positions that require incumbents to file confidential financial disclosure reports is intended to ensure the DAEO can timely advise employees of relevant filing requirements. The DAEO (who is also the Udall Foundation’s Deputy Executive Director) would be aware of all pending appointments. Therefore, formal notification from human resources officials is not necessary to ensure confidential filers receive timely notification of filing requirements.			
	(4.7) Only three reports were required to be filed during the period covered by the inspection. One was filed after its due date.			

5.0 Notices to Prospective Employees				
COMPLIANCE REQUIREMENTS				
				Yes No N/A
Written offers of employment for positions covered by the Standards of Conduct provide: <i>See</i> 5 C.F.R. § 2638.303.				
5.1	• A statement regarding the agency's commitment to government ethics.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.2	• Notice that the individual will be subject to the Standards of Conduct and the criminal conflict of interest statutes as an employee.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.3	• Contact information for an appropriate agency ethics office or an explanation of how to obtain additional information on applicable ethics requirements.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.4	• Where applicable, notice of the time frame for completing initial ethics training.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5.5	• Where applicable, a statement regarding financial disclosure requirements and an explanation that new entrant reports must be filed within 30 days of appointment.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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5.6	The agency has established written procedures for issuing the notice to prospective employees. <i>See</i> 5 C.F.R. § 2638.303(c).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5.7	The agency's written procedures are reviewed by the DAEO each year. <i>See</i> 5 C.F.R. § 2638.303(c).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5.8	The agency can demonstrate that there is an effective process for ensuring all covered employees receive the required information with their written offer of employment. <i>See</i> 5 C.F.R. § 2638.303.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
COMMENTS				
<p>(5.4) OGE examined a sample of notices. None of the notices in the sample included the time-frame for completing IET. The Udall Foundation prepared a template for future notices during the course of the inspection. The template included the required language.</p> <p>(5.5) OGE examined a sample of notices. None of the notices in the sample included a statement regarding financial disclosure requirements and an explanation that new entrant reports must be filed within 30 days of appointment. The Udall foundation prepare a template for future notices during the course of the inspection. The template includes the required language.</p> <p>(5.6) The Udall Foundation does not have written procedures for issuing the required notice to prospective employees. OGE recognizes that, notwithstanding the absence of written procedures, prospective employees did receive notices. However, those notices did not include all required content. Written procedures can serve as a reminder of relevant requirements and are important for preserving institutional memory.</p>				

6.0	Notices to New Supervisors			
	COMPLIANCE REQUIREMENTS	Yes	No	N/A
	The agency must provide each employee upon initial appointment to a supervisory position with: <i>See</i> 5 C.F.R. § 2638.306.			
6.1	• Contact information for the agency's ethics office.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.2	• The text of 5 C.F.R. § 2638.103.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.3	• A copy of, a hyperlink to, or the address of a Web site containing the Principles of Ethical Conduct.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.4	• Other information the DAEO deems necessary.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.5	The agency has established written procedures for supervisory ethics notices. <i>See</i> 5 C.F.R. § 2638.306(d).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.6	The agency's written procedures are reviewed by the DAEO each year. <i>See</i> 5 C.F.R. § 2638.306(d).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.7	The agency can demonstrate that there is an effective process for ensuring that new supervisors receive the required information within one year of appointment. <i>See</i> 5 C.F.R. § 2638.306(b).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
COMMENTS				
<p>(6.1-6.7) The DAEO advised OGE that the Udall Foundation did not hire or promote anyone into a supervisory position during the period covered by the inspection. OGE's assessment was based on the template provided by the Udall Foundation. The DAEO did not deem it necessary to include information other than what is generally required.</p> <p>(6.5) The Udall Foundation does not have written procedures for issuing the required notices to new supervisors. OGE recognizes that, notwithstanding the absence of written procedures, new supervisors did receive notices. However, those notices did not include all required content. Written procedures can serve as a reminder of relevant requirements and are important for preserving institutional memory.</p>				

7.0	Initial Ethics Training			
	COMPLIANCE REQUIREMENTS	Yes	No	N/A
	Each new employee of the agency subject to the Standards of Conduct must complete initial ethics training. <i>See</i> 5 C.F.R. § 2638.304.			
7.1	The training presentation(s) addressed concepts related to conflicts of interest, impartiality, misuse of position and gifts. <i>See</i> 5 C.F.R. § 2638.304(e)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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7.2	The agency provided new employees with either the following written materials or written instruction for accessing them: The summary of the Standards of Conduct distributed by the Office of Government Ethics or an equivalent summary prepared by the agency; provisions of any supplemental agency regulation that the DAEO determines to be relevant or a summary of those provisions; such other written materials as the DAEO determines should be included; instructions for contacting the agency’s ethics officials. <i>See</i> 5 C.F.R. § 2638.304(e)(2).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.3	The agency has established written procedures for initial ethics training. <i>See</i> 5 C.F.R. § 2638.304(f).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7.4	The agency’s written procedures are reviewed by the DAEO each year. <i>See</i> 5 C.F.R. § 2638.304(f).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
DATA ANALYSIS		%		
7.5	Percentage of new employees who received initial ethics training. <i>See</i> 5 C.F.R. § 2638.304.	100%		
7.6	Percentage of new employees who received initial ethics training within three months of appointment. <i>See</i> 5 C.F.R. § 2638.304(b).	100%		
COMMENTS				
	(7.3-7.4) The agency provided no written procedures for IET. DAEO noted, IET...”is provided by the DAEO to new employees as part of the on-boarding process.”			

8.0	Annual Ethics Training			
	COMPLIANCE REQUIREMENTS	Yes	No	N/A
	Each calendar year, public filers, confidential filers, and certain other employees must complete ethics training which meets specified requirements. See 5 C.F.R. §§ 2638.307 and 2638.308.			
8.1	The training presentation(s) addressed concepts related to financial conflicts of interest, impartiality, misuse of position and gifts. See 5 C.F.R. §§ 2638.307(e)(1) and 2638.308(f)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.2	The agency provided employees with either the following written materials or written instruction for accessing them: The summary of the Standards of Conduct distributed by the Office of Government Ethics or an equivalent summary prepared by the agency; provisions of any supplemental agency regulation that the DAEO determines to be relevant or a summary of those provisions; such other written materials as the DAEO determines should be included; instructions for contacting the agency’s ethics officials. See 5 C.F.R. § 2638.304(e)(2).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8.3	The agency’s annual ethics training complies with the formatting requirements for public filers, confidential filers, and certain other employees. See 5 C.F.R. §§ 2638.307(d) and 2638.308(e).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.4	The agency’s program for annual ethics training complies with the tracking requirements for public filers, confidential filers, and certain other employees. See 5 C.F.R. §§ 2638.307(f) and 2638.308(g).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.5	The agency can demonstrate it has an effective process for ensuring covered public filers, other than those whose pay is set at Level I or Level II of the Executive Schedule, complete live annual ethics training at least once every two years. See 5 C.F.R. § 2638.308(e)(2).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
DATA ANALYSIS		Training Format		
		Live	Interactive	
	Percentage of public filers who completed annual ethics training before the end of the calendar year. See 5 C.F.R. § 2638.308(a).			
8.6	• Executive Schedule Level I and Level II. See 5 C.F.R. § 2638.308(e)(1).	N/A	N/A	
8.7	• Other PAS and Equivalent. See 5 C.F.R. § 2638.308(e)(2).	N/A	N/A	
8.8	• SES and Equivalent. See 5 C.F.R. § 2638.308(e)(3).	0%	0%	
	Percentage of confidential filers and certain other employees who completed annual ethics training before the end of the calendar year. See 5 C.F.R. § 2638.307(a)(d).			

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8.9	• Employees required to file an annual confidential financial disclosure report. <i>See</i> 5 C.F.R. § 2638.307(a)(1).	0%	0%
8.10	• Employees appointed by the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).	N/A	N/A
8.11	• Employees of the Executive Office of the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).	N/A	N/A
8.12	• Contracting officers described in 41 U.S.C. § 2101. <i>See</i> 5 C.F.R. § 2638.307(a)(3).	N/A	N/A
8.13	• Other employees designated by the head of the agency. <i>See</i> 5 C.F.R. § 2638.307(a)(4).	N/A	N/A
COMMENTS			
(8.5-8.13) The Udall Foundation did not conduct annual ethics training in 2020.			
(8.2) Presented documents did fall within acceptable standards. However, agency-wide AET was not conducted in 2020.			

9.0	ETHICS ADVICE AND COUNSELING			
	COMPLIANCE REQUIREMENT	Yes	No	N/A
9.1	Based on a sample collected by OGE, guidance provided by agency ethics officials to employees appears to be consistent with applicable laws and regulations. <i>See</i> 5 C.F.R. § 2638.104(c)(4).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	COMMENTS			
	(9.1) No ethics advice or counseling was provided in CY 2020.			

10.0 Special Government Employees (SGE) Serving on Advisory Committees and Boards						
Confidential Financial Disclosure						
10.1	Number of SGEs serving on Advisory Committees and Boards.			0		
	DATA ANALYSIS			%		
10.2	Percentage of sampled confidential new entrant reports filed timely. See 5 C.F.R. § 2634.903(b).			N/A		
10.3	Percentage of sampled reports reviewed within 60 days of receipt but not later than the SGE's first meeting. See 5 C.F.R. § 2634.605(a).			N/A		
10.4	Percentage of sampled reports certified within 60 days of receipt. See 5 C.F.R. § 2634.605(a).			N/A		
Ethics Training						
	COMPLIANCE REQUIREMENTS			Yes	No	N/A
	Required ethics training must be provided to each SGE. See 5 C.F.R. §§ 2638.304 and 2638.307.					
10.5	The training presentation(s) addressed concepts related to conflicts of interest, impartiality, misuse of position and gifts. See 5 C.F.R. § 2638.304(e)(1).			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10.6	The agency provided employees with either the following written materials or written instruction for accessing them: The summary of the Standards of Conduct distributed by the Office of Government Ethics or an equivalent summary prepared by the agency; provisions of any supplemental agency regulation that the DAEO determines to be relevant or a summary of those provisions; such other written materials as the DAEO determines should be included; instructions for contacting the agency's ethics officials. See 5 C.F.R. § 2638.304(e)(2).			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	DATA ANALYSIS			%		
10.7	Percentage of SGEs who received initial ethics training. See 5 C.F.R. § 2638.304.			N/A		
10.8	Percentage of SGEs who received initial ethics training timely. See 5 C.F.R. § 2638.304(b)(2).			N/A		

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10.9	Percentage of SGEs who received annual ethics training. See 5 C.F.R. § 2638.307(d)(2).	N/A
COMMENTS		
	None	

ISSUES IDENTIFIED AND RESOLVED DURING THE INSPECTION

Element	ISSUE
2.2	<p><u>ISSUE:</u> The Udall Foundation had not provided a current ADAEO Designation Letter to OGE.</p> <p><u>AGENCY RESPONSE:</u> The DAEO provided a current designation letter. The DAEO also advised OGE that the current ADAEO would be leaving the agency. A new designation letter was provided when the new ADAEO was appointed.</p>
5.4-5.5	<p><u>ISSUE:</u> The Udall Foundation provided sample notifications for new employees. None of the notices in the sample included the time-frame for completing IET. The notices also did not include a statement regarding financial disclosure requirements or an explanation that new entrant reports must be completed within 30 days of appointment.</p> <p><u>AGENCY RESPONSE:</u> DAEO provided a template for new employee notification that includes the required language.</p>
6.1-6.4	<p><u>ISSUE:</u> The Udall Foundation did not hire any new supervisory employees in 2020 and could not initially provide a sample notice or template for a notice to demonstrate compliance with applicable requirements.</p> <p><u>AGENCY RESPONSE:</u> DAEO provided a template for new supervisory notifications that included the required language.</p>

RECOMMENDATIONS

#	Element	RECOMMENDATION	Compliance Due
1	1.0	<p><u>RECOMMENDATION:</u> Ensure SGE Confidential Financial Disclosure Reports are reviewed and certified within 60 days of receipt.</p> <p><u>AGENCY RESPONSE:</u> All SGE confidential Financial Disclosure Reports were reviewed and certified before the end of February 2021. We will continue to ensure this is done in future years.</p>	
2	5.4-5.5	<p><u>RECOMMENDATION:</u> Ensure written offers of employment include a timeframe for completion of IET and any applicable financial disclosure requirements. 5 C.F.R. § 2638.303.</p> <p><u>AGENCY RESPONSE:</u> All written offers of employment will include the timeframe for completion of IET and any applicable financial disclosure requirements in the future.</p>	
3	5.6	<p><u>RECOMMENDATION:</u> Establish written procedures for issuing the required notice to prospective employees. 5 C.F.R. § 2638.303(c).</p> <p><u>AGENCY RESPONSE:</u> Written procedures for issuing the required notice to prospective employees are being prepared and will be implemented.</p>	

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in the Executive Branch

4	6.5	<p><u>RECOMMENDATION:</u> Establish written procedures for issuing the required notice to new supervisors. 5 C.F.R. § 2638.306(d).</p> <p><u>AGENCY RESPONSE:</u> These written procedures are being prepared and will be implemented.</p>	
5	7.3	<p><u>RECOMMENDATION:</u> Establish written procedures for initial ethics training.</p> <p><u>AGENCY RESPONSE:</u> Written procedures for initial ethics training are being prepared and will be implemented.</p>	
6	8.1-8.5	<p><u>RECOMMENDATION:</u> Provide required annual ethics training.</p> <p><u>AGENCY RESPONSE:</u> Annual ethics training has been provided for calendar year 2021 and will be provided in subsequent years.</p>	