

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: James Madison Memorial Fellowship Foundation

Follow-up to OGE Report Number: 23-22I

Report No.: 24-07IF

Date: October 23, 2023

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

As a result of its review of the James Madison Memorial Fellowship Foundation (Foundation) ethics program, the Office of Government Ethics (OGE) issued five recommendations in its March 2023 review report. OGE conducted a follow-up review to assess whether the Foundation 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	The DAEO must pay the \$200 filing fee or receive a waiver of the late filing fee from the Board of Trustees as required by 5 C.F.R. § 2634.704.	<p>The DAEO provided OGE with documentation demonstrating that the late filing fee had been paid to the U.S. Treasury, as required.</p> <p>However, the DAEO also filed more than 30 days late in 2023, and must now pay another \$200 late filing fee or receive a waiver of the late filing fee. This recommendation remains open pending documentation that demonstrates that the fee was paid or that a waiver was granted.</p>	Open
2	Purge all electronic and hardcopy public financial reports that exceed the six-year retention period.	The Foundation did not provide confirmation that they destroyed electronic copies of reports that exceed the retention period. Furthermore, the Foundation is still in the process of locating paper copies of public reports that exceed the six-year retention period.	Open
3	Ensure that public financial disclosure reports are filed timely.	<p>Public reports are due on May 15th each year. The DAEO is the Foundation's only public filer and was granted a 90-day extension for filing an annual report. The report was still filed more than 30 days late.</p> <p>In September, the ADAEO explained that there were technical difficulties in accessing Integrity.gov. This prevented the ADAEO from assigning a report to the DAEO. OGE recommends that the ADAEO attempt to access Integrity as early in the year as possible and to promptly reach out to OGE's Integrity Helpdesk if there are any issues.</p>	Open

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4	Provide OGE with a copy of initial ethics training that meets applicable requirements.	The Foundation's initial ethics training consists of a video presentation that covers the required concepts, and a live discussion of the ethical issues raised in the video. The training meets content and format requirements.	Closed
5	Ensure that the employee required to receive initial ethics training in 2022 receives training that meets requirements set forth at 5 C.F.R. § 2638.304(e).	The Foundation provided the employee with the required initial ethics training	Closed

Based on the results of OGE's follow-up review, recommendations 4 and 5 are closed. OGE will conduct an additional follow-up review in approximately eight months to assess whether the Foundation has taken sufficient action to resolve the deficiencies underlying the recommendations which remain open.