

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: James Madison Memorial Fellowship Foundation

Follow-up to OGE Report Number: 23-22I and 24-07IF

Report No.: 25-02IF

Date: October 21, 2024

UNITED STATES OFFICE OF
GOVERNMENT ETHICSPreventing 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 in October 2023 but was only able to close two of the five recommendations at that time. OGE conducted a second follow-up review in September 2024 to assess whether the Foundation had taken sufficient action to close the remaining three recommendations. The results of our second 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.	The Foundation worked with OGE to determine how to pay the \$200 late filing fee, and subsequently collected the fee from the late filer.	Closed
2	Purge all electronic and hardcopy public financial reports that exceed the six-year retention period.	In response to a request from OGE, the Foundation destroyed all financial disclosure reports that exceeded the six-year retention period.	Closed
3	Ensure that public financial disclosure reports are filed timely.	The Foundation worked to ensure that their one public filer was assigned their report via the <i>Integrity</i> online filing system much earlier compared to previous years. This enabled the filer to submit their 2024 report one month before the deadline.	Closed
Based on the results of OGE's follow-up review, all recommendations are closed.			