

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



October 30, 2017

Stephanie Zimmt-Mack
General Counsel and
Designated Agency Ethics Official
Morris K. Udall and Stewart L. Udall Foundation
130 S. Scott Avenue
Tucson, AZ 85701

Dear Ms. Zimmt-Mack:

As a result of its review of the Morris K. Udall and Stewart L. Udall Foundation (Udall Foundation) ethics program, the Office of Government Ethics (OGE) issued two recommendations in its December 2016 review report. OGE recently conducted a follow-up review to assess whether the Udall Foundation has taken sufficient action to resolve the deficiencies underlying these recommendations. The results of the follow-up review are summarized below.

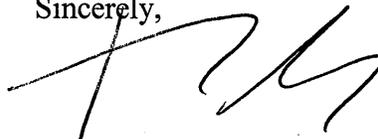
	Recommendation	Agency Action and OGE Finding	Status
1.	Ensure public financial disclosure reports are filed timely in accordance with 5 C.F.R. § 2634.605(a).	<p>The Udall Foundation's Designated Agency Ethics Official (DAEO) placed an increased emphasis on public financial disclosure filing timeliness, which included the issuance of more frequent reminders. The DAEO also cited the transition to OGE's <i>Integrity</i> online filing system as a reason for improved filing timeliness.</p> <p>Two public financial disclosure reports were filed at the Udall Foundation in 2017. OGE reviewed the reports and found that both reports were filed timely.</p>	Closed



2	Ensure annual confidential financial disclosure reports are filed timely in accordance with 5 C.F.R. § 2634.903(a).	All members of the Udall Foundation's Board of Trustees file confidential financial disclosure reports. Prior to the due date for annual reports, the Board's Chairman communicated the importance of filing timeliness to the other Board members. All nine of the annual confidential reports required to be filed at the Udall Foundation in 2017 were filed timely.	Closed
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I appreciate the courtesies extended to the OGE program review staff. If you would like to discuss the report, please contact me at 202-482-9224.

Sincerely,



Dale Christopher
Deputy Director for Compliance