

January 21, 2016

Lewis Larsen
President and Designated Agency
Ethics Official
James Madison Memorial Fellowship Foundation
1613 Duke Street
Alexandria, VA 22314

Dear Mr. Larsen:

As a result of the onsite inspection of the James Madison Memorial Fellowship Foundation (Foundation), the United States Office of Government Ethics (OGE) issued four recommendations in its April 2015 ethics program inspection report. OGE has conducted a follow-up review to assess whether the Foundation has taken action sufficient to resolve the deficiencies underlying the recommendations. As indicated below, three recommendations have been closed based on the actions the Foundation has taken.

Recommendation	Agency Action	Status
Develop written procedures for the administration of the public financial disclosure system which meet the requirements of 5 U.S.C. app. IV, § 402(d)(1).	The Foundation developed written procedures for the administration of the public financial disclosure system which met the requirements of 5 U.S.C. app. IV, § 402(d)(1).	Closed
Collect the DAEO's 2012, 2013 and 2014 annual public financial disclosure reports, as required by 5 C.F.R. § 2634.202(g), and submit copies of the reviewed reports to OGE, as required by 5 C.F.R. § 2634.602(c). Either collect or issue a waiver of the late filing fee for the DAEO's 2012, 2013 and 2014 annual reports.	The Foundation has submitted to OGE the DAEO's 2015 annual public financial disclosure report. The Foundation has not yet submitted the DAEO's 2012, 2013 or 2014 annual public financial disclosure reports. Therefore, this recommendation remains open.  The Foundation issued a waiver of the late filing fees for the DAEO's 2012	Open
	Develop written procedures for the administration of the public financial disclosure system which meet the requirements of 5 U.S.C. app. IV, § 402(d)(1).  Collect the DAEO's 2012, 2013 and 2014 annual public financial disclosure reports, as required by 5 C.F.R. § 2634.202(g), and submit copies of the reviewed reports to OGE, as required by 5 C.F.R. § 2634.602(c). Either collect or issue a waiver of the late filing fee for the DAEO's 2012, 2013	Develop written procedures for the administration of the public financial disclosure system which meet the requirements of 5 U.S.C. app. IV, § 402(d)(1).  Collect the DAEO's 2012, 2013 and 2014 annual public financial disclosure reports, as required by 5 C.F.R. § 2634.202(g), and submit copies of the reviewed reports to OGE, as required by 5 C.F.R. § 2634.602(c). Either collect or issue a waiver of the late filing fee for the DAEO's 2012, 2013 and 2014 annual reports.  The Foundation developed written procedures for the administration of the public financial disclosure system which met the requirements of 5 U.S.C. app. IV, § 402(d)(1).  The Foundation has submitted to OGE the DAEO's 2015 annual public financial disclosure report. The Foundation has not yet submitted the DAEO's 2012, 2013 or 2014 annual public financial disclosure reports. Therefore, this recommendation remains open.

3	Develop written procedures for the administration of the confidential financial disclosure system which meet the requirements of 5 U.S.C. app. IV, § 402(d)(1).	The Foundation developed written procedures for the administration of the confidential financial disclosure system which met the requirements of 5 U.S.C. app. IV, § 402(d)(1).	Closed
4	Ensure that materials for providing initial ethics orientation meet the requirements of 5 C.F.R. § 2638.703.	OGE verified the revised materials the Foundation developed for initial ethics orientation fully met the content requirements of 5 C.F.R. § 2638.703	Closed

Thank you for your assistance during the follow-up process. OGE will perform a second follow-up in 60 days to assess the status of recommendation 2. We encourage you to contact your OGE Desk Officer for any future ethics program support.

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Deputy Director for Compliance