

ETHICS PROGRAM INSPECTION REPORT

Agency: Millennium Challenge Corporation (MCC)

Report No.: 26-511

Date: August 8, 2026

Period Covered by Review: January 1, 2025 through December 31, 2026

UNITED STATES OFFICE OF GOVERNMENT ETHICS

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1.0	AGENCY DATA	
	EMPLOYEES	
1.1	Number of full-time agency employees.	232
1.2	Number of Presidentially appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed.	1
1.3	Number of non-PAS public financial disclosure reports required to be filed.	134
1.4	Number of confidential financial disclosure reports required to be filed.	225
	ETHICS PROGRAM	
1.5	Title of Designated Agency Ethics Official (DAEO).	Associate General Counsel
1.6	Grade level of DAEO.	Pay Band 3A
1.7	Title of Alternate DAEO (ADAEO).	Attorney Advisor
1.8	Grade level of ADAEO.	Pay Band 3B
1.9	Title of the primary, day-to-day ethics program administrator.	Attorney Advisor
1.10	Grade level of the primary, day-to-day ethics program administrator.	Pay Band 3B
1.11	Current number of full-time ethics officials.	2
1.12	Current number of part-time ethics officials.	0
1.13	Number of reporting levels between the DAEO and the agency head.	3
	COMMENTS	
	1.11, 1.12: During the last three inspections, MCC historically retained staff of three ethics officials (2016) to four ethics officials (2020 and 2023). Since early 2025, the ethics program has maintained only two full-time ethics officials, the DAEO and ADAEO. OGE notes that ethics programs are not bound by an established ethics officials to agency staff ratio; however an agency must establish staffing capacity to successfully administer an ethics program. 1.13: OGE’s Annual Questionnaire covered 138 agencies in 2026 (excluding MCC). Of these 127 agencies, 98% (124) maintain two reporting levels or less between the DAEO and the agency head (includes DAEOs who are also the agency head) OGE’s inspection found that the number of reporting levels between the DAEO and MCC’s agency head recently increased from two levels (2020 and 2023) to three levels. OGE encourages MCC to assess the impact of the reporting level to ensure the DAEO has direct and unhindered access to the agency head to discuss critical ethics issues and ethics program needs as required.	

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</i> 5 C.F.R. § 2638.107(a).	☒	☐	☐
2.2	OGE has received an up-to-date designation from the agency head naming the ADAEO. <i>See</i> 5 C.F.R. § 2638.107(a).	☒	☐	☐
	COMMENTS			
	None.			

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. § 13122(d)(1)			

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3.1	Collection of public financial disclosure reports.	☒	☐	☐
3.2	Review/evaluation of public financial disclosure reports.	☒	☐	☐
3.3	Public availability of public financial disclosure reports.	☒	☐	☐
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. <i>See</i> 5 C.F.R. § 2634.704	☒	☐	☐
3.5	Public financial disclosure reports are securely maintained. <i>See</i> OGE/GOVT-1.	☒	☐	☐
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).	☒	☐	☐
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).	☐	☒	☐
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).	☒	☐	☐
DATA ANALYSIS		%		
3.9	Percentage of sampled non-PAS new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(b).	50%		
3.10	Percentage of sampled non-PAS annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(a).	92%		
3.11	Percentage of sampled non-PAS termination reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(e).	80%		
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).	94%		
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).	85%		
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).	100%		
3.16	Percentage of sampled PAS annual and termination reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	0%		
3.17	Percentage of sampled PAS annual and termination reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	0%		
COMMENTS				
3.4: OGE’s financial disclosure examination found that four reports (3 termination and 1 annual) were collected more than thirty days past the filing deadline. MCC ethics official should have either assessed a late fee or, if circumstances reasonably permit, issued a waiver. During OGE’s inspection, MCC issued waivers in all four cases. 3.7: OGE notes that the majority of MCC’s reports that required a late fee involved either a new entrant report or a termination report. OGE recommends/suggests MCC ensure human resources officials provide a biweekly report of staff changes to ethics officials of newly hired staff, filer-related transfers and promotions, and departures from filing positions. 3.9: OGE’s financial disclosure examination found that 50% (1 out of 2) new entrant reports required in 2025 were collected timely. 3.11: In total, (5 out of the 20) reports examined in the sample were collected late. MCC had to navigate an uncharacteristically high level of departures in 2025. OGE is not issuing a formal recommendation at this time. 3.14: MCC’s only PAS official departed the agency in January 2025 and as a result did not require filing an annual report that year. 3.16, 3.17: The one report required from a PAS official in 2025 was certified four days late. MCC ethics officials explained that the retirement of an experienced ethics official created delays with completing the review and certification of this report. During OGE’s past				

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three inspections, (2016, 2020, and 2023) no issues involving the review and certification timeliness of financial disclosure reports (PAS and Non-PAS filers) have been identified. OGE is not issuing a formal recommendation.

4.0 CONFIDENTIAL FINANCIAL DISCLOSURE

COMPLIANCE REQUIREMENTS

Yes No N/A

The agency has written policies and procedures in place governing: *See* 5 U.S.C. § 13122(d)(1)

4.1	• Collection of confidential financial disclosure reports.	☒	☐	☐
4.2	• Review/evaluation of confidential financial disclosure reports.	☒	☐	☐
4.3	Confidential financial disclosure reports are securely maintained. <i>See</i> OGE/GOVT-2.	☒	☐	☐
4.4	Confidential financial disclosure reports are retained in accordance with the retention requirements. <i>See</i> 5 C.F.R. § 2634.604.	☒	☐	☐
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.	☐	☐	☒
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).	☐	☒	☐

DATA ANALYSIS

%

4.7	Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b).	0%
4.8	Percentage of sampled confidential annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(a).	96%
4.9	Percentage of sampled reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	96%
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).	96%

COMMENTS

4.5: MCC does not utilize an alternative financial disclosure system.

4.6: OGE's inspection found that ethics officials did not receive timely notice of the one new filer's hiring in 2025. As a result, this filer did not receive notice of their need to file until two months after their hiring date. (see Comments section entry 3.7)

4.7: The one new entrant report required in 2025 was filed late.

4.8 4.9, 4.10: OGE's examination of confidential financial disclosure reports included a sample of 31 reports (30 annual and 1 new entrant) required in 2025. The examination found that 28 out of 31 reports were not certified or the fully certified copies could not be provided because of technical issues. Based on OGE's examination protocols, these 28 reports (27 annual and 1 new entrant) were removed from the examination samples for this inspection because they are considered incomplete without certification. The original report copies submitted and signed by the filers were provided for OGE's inspection. The other three reports included in this sample were either not provided or were from previous years outside the scope of this inspection. During OGE's inspection, MCC retroactively certified (signed) 23 of the previously completed annual reports and certified the one new entrant report. MCC confirmed that the seven missing annual reports will be collected and certified. MCC certified all available reports resolving issues 4.9 and 4.10 during the OGE's inspection. However, OGE is issuing a formal recommendation for 4.8.

4.9, 4.10: The original review and certification date for the 24 reports included in the sample was obtained from MCC's master list of confidential financial disclosure filers.

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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.	☒	☐	☐
5.2	• Notice that the individual will be subject to the Standards of Conduct and the criminal conflict of interest statutes as an employee.	☒	☐	☐
5.3	• Contact information for an appropriate agency ethics office or an explanation of how to obtain additional information on applicable ethics requirements.	☒	☐	☐
5.4	• Where applicable, notice of the time frame for completing initial ethics training.	☒	☐	☐
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.	☒	☐	☐
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).	☒	☐	☐
5.7	The agency's written procedures are reviewed by the DAEO each year. <i>See</i> 5 C.F.R. § 2638.303(c).	☒	☐	☐
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.	☒	☐	☐
COMMENTS				
5.6 - 5.8: MCC did not have established written procedures at the beginning of OGE's inspection. During OGE's inspection, MCC developed and implemented written procedures that sufficiently cover the issuance of both ethics notices to prospective employees and new supervisors. This development process also satisfied the annual review requirement. OGE is not issuing a recommendation because this issue was resolved during the inspection.				

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.	☐	☐	☒
6.2	• The text of 5 C.F.R. § 2638.103.	☐	☐	☒
6.3	• A copy of, a hyperlink to, or the address of a Web site containing the Principles of Ethical Conduct.	☐	☐	☒
6.4	• Other information the DAEO deems necessary.	☐	☐	☒
6.5	The agency has established written procedures for supervisory ethics notices. <i>See</i> 5 C.F.R. § 2638.306(d).	☒	☐	☐
6.6	The agency's written procedures are reviewed by the DAEO each year. <i>See</i> 5 C.F.R. § 2638.306(d).	☒	☐	☐
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).	☒	☐	☐
COMMENTS				
6.1 - 6.4: No notices were required during the period covered by OGE's inspection.				
6.5 - 6.7: MCC did not have established written procedures. Based on OGE's inspection, MCC developed and implemented written procedures that sufficiently cover the issuance of notices to new supervisors. (see Comments section entry for 5.6 – 5.8 above)				

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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 5 C.F.R. § 2638.304.</i>			
7.1	The training presentation(s) addressed concepts related to conflicts of interest, impartiality, misuse of position and gifts. <i>See 5 C.F.R. § 2638.304(e)(1).</i>	☒	☐	☐
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 5 C.F.R. § 2638.304(e)(2).</i>	☒	☐	☐
7.3	The agency has established written procedures for initial ethics training. <i>See 5 C.F.R. § 2638.304(f).</i>	☒	☐	☐
7.4	The agency's written procedures are reviewed by the DAEO each year. <i>See 5 C.F.R. § 2638.304(f).</i>	☒	☐	☐
	DATA ANALYSIS	%		
7.5	Percentage of new employees who received initial ethics training. <i>See 5 C.F.R. § 2638.304.</i>	100%		
7.6	Percentage of new employees who received initial ethics training within three months of appointment. <i>See 5 C.F.R. § 2638.304(b).</i>	100%		
	COMMENTS			
	7.2: As part of initial ethics training and annual ethics training, employees are required to receive either a link to the Standards of Conduct or receive instructions for accessing them and/or receive a copy. Contact information for ethics officials could not be located within the training materials. During OGE's inspection, MCC updated their training materials to sufficiently include both the Standards of Conduct and ethics official contact information. OGE is not issuing a recommendation because this issue was resolved during the inspection. 7.5, 7.6: MCC's tracking lists did not include sufficient information to determine filer requirements. This issue was resolved during OGE's inspection.			

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. <i>See 5 C.F.R. §§ 2638.307 and 2638.308.</i>			
8.1	The training presentation(s) addressed concepts related to financial conflicts of interest, impartiality, misuse of position and gifts. <i>See 5 C.F.R. §§ 2638.307(e)(1) and 2638.308(f)(1).</i>	☒	☐	☐
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. <i>See 5 C.F.R. § 2638.308(f)(2) and 5 C.F.R. § 2638.307(e)(2).</i>	☒	☐	☐
8.3	The agency's annual ethics training complies with the formatting requirements for public filers, confidential filers, and certain other employees. <i>See 5 C.F.R. §§ 2638.307(d) and 2638.308(e).</i>	☒	☐	☐
8.4	The agency's program for annual ethics training complies with the tracking requirements for public filers, confidential filers, and certain other employees. <i>See 5 C.F.R. §§ 2638.307(f) and 2638.308(g).</i>	☒	☐	☐
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. <i>See 5 C.F.R. § 2638.308(e)(2).</i>	☐	☒	☐

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	DATA ANALYSIS	Training Format	
		Live	Interactive
	Percentage of public filers who completed annual ethics training before the end of the calendar year. <i>See</i> 5 C.F.R. § 2638.308(a).		
8.6	• Executive Schedule Level I and Level II. <i>See</i> 5 C.F.R. § 2638.308(e)(1).	N/A	N/A
8.7	• Other PAS and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(2).	N/A	N/A
8.8	• SES and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(3).	N/A	39%
	Percentage of confidential filers and certain other employees who completed annual ethics training before the end of the calendar year. <i>See</i> 5 C.F.R. § 2638.307(a).		
8.9	• Employees required to file an annual confidential financial disclosure report. <i>See</i> 5 C.F.R. § 2638.307(a)(1).	N/A	29%
8.10	• Employees appointed by the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).	*	*
8.11	• Employees of the Executive Office of the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).	*	*
8.12	• Contracting officers described in 41 U.S.C. § 2101. <i>See</i> 5 C.F.R. § 2638.307(a)(3).	*	*
8.13	• Other employees designated by the head of the agency. <i>See</i> 5 C.F.R. § 2638.307(a)(4).	*	*
	COMMENTS		
	8.2: During OGE's inspection, MCC updated their training materials to sufficiently include both the Standards of Conduct and ethics official contact information. (see the Comments section entry 7.2) 8.4: During OGE's inspection, MCC sufficiently updated the tracking lists covering public and confidential filers to include all required filers and to distinguish training completion dates. (see the Comments section entry 7.5, 7.6) 8.6, 8.7: MCC's only PAS official, who is not Level I nor II, departed the agency in 2025 before requiring additional ethics training. 8.8, 8.9: In OGE's 2025 Annual Questionnaire, it was reported that 66% (42 out of 62) of public filers and 74% (95 out of 129) of confidential filers received AET as required. *8.10-8.13: OGE could not determine how many employees from these groups required ethics training in 2025.		

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).	☒	☐	☐
	COMMENTS			
	None.			

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.	1
	DATA ANALYSIS	%
10.2	Percentage of sampled confidential new entrant reports filed timely. See 5 C.F.R. § 2634.903(b).	N/A

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10.3	Percentage of sampled reports reviewed within 60 days of receipt but not later than the SGE's first meeting. <i>See 5 C.F.R. § 2634.605(a).</i>	N/A
10.4	Percentage of sampled reports certified within 60 days of receipt. <i>See 5 C.F.R. § 2634.605(a).</i>	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).	☒	☐	☐
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).	☒	☐	☐
	DATA ANALYSIS	%		
10.7	Percentage of SGEs who received initial ethics training. See 5 C.F.R. § 2638.304.	0%		
10.8	Percentage of SGEs who received initial ethics training timely. See 5 C.F.R. § 2638.304(b)(2).	0%		
10.9	Percentage of SGEs who received annual ethics training. See 5 C.F.R. § 2638.307(d)(2).	N/A		
	COMMENTS			
	10.2-10.4: It is established agency policy that SGEs serving on the Board of Directors do not need to file financial disclosure reports based on 5 CFR § 2634.904 (b). 10.6: During OGE’s inspection, MCC updated their training materials to sufficiently include both the Standards of Conduct and ethics official contact information. (see the Comments section entry 7.2) 10.7 - 10.8: In 2025, the SGE was not provided ethics training as required.			

ISSUES IDENTIFIED AND RESOLVED DURING THE INSPECTION

Element	ISSUE
3.4	<u>ISSUE:</u> Four filers failed to pay the late fee as required. Based on OGE's inspection, MCC reviewed circumstances surrounding these four late filings and determined that waivers were warranted. <u>AGENCY RESPONSE:</u>
4.9, 4.10	<u>ISSUE:</u> MCC retroactively certified all available confidential reports from 2025 and left a brief note within each report describing the circumstances. <u>AGENCY RESPONSE:</u>

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5.6, 5.7, 5.8, 6.5, 6.6, 6.7	<u>ISSUE:</u> MCC did not have existing written procedures covering the issuance of notices to both prospective employees and to new supervisors. Based on OGE's inspection, MCC developed and implemented procedures that sufficiently cover these ethics programs. <u>AGENCY RESPONSE:</u>
7.2, 8.2, 10.6	<u>ISSUE:</u> MCC's training materials for initial ethics training, annual ethics training, and ethics trainings provided to SGEs did not include all required information and materials. Based on OGE's inspection, MCC sufficiently updated their training materials. <u>AGENCY RESPONSE:</u>
7.5, 7.6, 8.4	<u>ISSUE:</u> MCC's tracking lists did not include employees' hiring date, which hinders the ability to track employees' ethics-related deadlines. Based on OGE's inspection, MCC revised their tracking lists to sufficiently include all required information. <u>AGENCY RESPONSE:</u>

RECOMMENDATIONS

#	Element	RECOMMENDATION	Compliance Due
1	3.7, 4.6	<u>RECOMMENDATION:</u> Part A: Ensure MCC's human resources department provides the MCC ethics program timely notice of all newly hired employees, all transfers, and all departures. Part B: Develop and implement a memo of understanding (MOU) between MCC's ethics program and MCC's human resources department that outlines the human resources department's role in providing, at the least, a biweekly list of all newly hired employees, all employee transfers, and all employee departures. This MOU should specify that the biweekly list includes sufficient information, such as grade level and position, to help ethics officials identify filers. In addition, both parties' leadership (e.g. DAEO and human resources director) need to sign this MOU in collective agreement along with MCC's agency head. This MOU should also be signed annually by the human resources director to confirm ongoing implementation as required. <u>AGENCY RESPONSE:</u>	January 15, 2027
2	3.9	<u>RECOMMENDATION:</u> Part A: Ensure the timely collection of all public financial disclosure new entrant reports. Part B: Develop and implement an escalation plan to deal with delinquent public and confidential financial disclosure filers. In addition, this plan should address the need to collect late fees. <u>AGENCY RESPONSE:</u>	January 15, 2027

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in the Executive Branch

3	4.7, 4.8	<u>RECOMMENDATION:</u> Part A: Ensure the timely collection of all confidential financial disclosure new entrant reports. Part B: Collect the seven missing annual confidential financial disclosure annual reports required in 2025 and complete the certification process. If any of these reports require retroactive certification, also leave a brief note explaining the need for the new certification date. <u>AGENCY RESPONSE:</u>	January 15, 2027
4	8.8, 8.9, 8.10, 8.11, 8.12, 8.13, 10.7, 10.8	<u>RECOMMENDATION:</u> Ensure all covered employee groups at MCC receive annual ethics training as required. <u>AGENCY RESPONSE:</u>	January 15, 2027