

## ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: Harry S. Truman Scholarship Foundation

Follow-up to OGE Report Number: 18-45I

Report No.: 19-24IF

Date: May 10, 2019

UNITED STATES OFFICE OF  
**GOVERNMENT ETHICS**

  
Preventing Conflicts of Interest  
in the Executive Branch

As a result of its inspection of the Harry S. Truman Scholarship Foundation (Foundation) ethics program, the Office of Government Ethics (OGE) issued three recommendations in its September 2018 inspection report. OGE attempted to conduct a follow-up review to assess whether the Foundation had taken sufficient action to resolve the deficiencies underlying these recommendations. However, despite OGE's repeated inquiries and attempts to collect the documentation necessary to assess the Foundation's progress, the Foundation has failed to provide any evidence that it has addressed the deficiencies in its ethics program.

The failure to provide OGE with the documentation it has requested is a violation of 5 C.F.R. §2638.202.<sup>1</sup> If the Foundation has not provided the relevant notices or established the required written procedures, they remain out of compliance with these regulatory requirements as well. The status of OGE's recommendations is indicated below.

	<b>Recommendation</b>	<b>Agency Action and OGE Finding</b>	<b>Status</b>
1	Ensure that written offers of employment for positions covered by the Standards of Conduct provide the content requirements provided at 5 C.F.R. § 2638.303.	OGE will keep this recommendation open pending additional follow-up.	Open
2	Establish written procedures for issuing the notice to prospective employees as required by 5 C.F.R. § 2638.303(c).	OGE will keep this recommendation open pending additional follow-up.	Open
3	Establish written procedures for supervisory ethics notices as required by 5 C.F.R. § 2638.306(d).	OGE will keep this recommendation open pending additional follow-up.	Open

All three recommendations remain open and OGE will conduct additional follow-up in 2019 to determine whether these recommendations can be closed.

<sup>1</sup> 5 C.F.R. §2638.202 requires agencies to furnish to the Director of OGE all information and records in their possession which the Director deems necessary to the performance of the Director's duties, except to the extent prohibited by law. All such information and records must be provided to the OGE in a complete and timely manner.