



United States
Office of Government Ethics
1201 New York Avenue, NW., Suite 500
Washington, DC 20005-3917

September 30, 2014

Paige Cottingham-Streater
Executive Director
Japan-US Friendship Commission
1201 15th Street, NW., Suite 330
Washington, DC 20005

Dear Ms. Cottingham-Streater:

As a result of the onsite inspection of the Japan-United States Friendship Commission (JUSFC) the United States Office of Government Ethics (OGE) issued nine recommendations in its June 2014 ethics program inspection report. In August 2014, OGE conducted a follow-up to assess the implementation of the recommendations.

	Recommendation	Agency Action	Status
1	Ensure written procedures for public financial disclosure include all required elements, including public availability of the OGE Form 278 and collection, review, evaluation, and public availability of the OGE Form 278-T.	JUSFC provided written procedures for public financial disclosure covering all required elements.	Closed
2	Prior to Commission meetings, obtain and review for potential conflicts of interest the financial disclosure reports of all public sector Commission members.	JUSFC added this requirement to its written procedures for financial disclosure. JUSFC obtained and reviewed for potential conflicts of interest the financial disclosure reports for the public sector members attending the September 2014 Commission meeting.	Closed
3	Ensure future non-PAS public financial disclosure reports are filed by the May 15 annual filing deadline unless a filing extension is granted.	JUSFC established multiple filing reminders to its shared electronic calendar to help ensure timely filing of future non-PAS public reports. The non-PAS public report due in CY2014 was filed timely.	Closed

4	Destroy confidential financial disclosure reports in accordance with retention requirements. Establish a process to ensure review and destruction of reports that have reached the end of the retention period.	OGE verified that all confidential reports that exceeded the retention period have been destroyed in accordance with retention requirements. JUSFC added a destruction reminder to its shared electronic calendar and updated its written procedures to help ensure timely destruction of reports that have reached the end of the retention period.	Closed
5	Obtain all three outstanding annual confidential financial disclosure reports, review and certify the reports, and determine the applicability of any penalties under 5 C.F.R. § 2634 Subpart G.	OGE verified all three outstanding confidential reports were collected, reviewed, and certified. The DAEO determined no penalties were applicable under 5 C.F.R. § 2634 Subpart G.	Closed
6	Obtain an OGE Form 450 from the filer covering the CY2013 reporting period to satisfy the requirements for use of the OGE Form 450-A.	OGE verified the OGE Form 450 covering CY2013 was collected. OGE reviewed with JUSFC the requirements for use of the OGE Form 450-A.	Closed
7	Complete the certification process for all confidential financial disclosures submitted in 2013.	OGE verified all confidential reports submitted in 2013 had been certified by an ethics official.	Closed
8	Ensure initial ethics orientation includes all required elements, including the 14 Principles of Ethical Conduct.	JUSFC developed written material that included all the required elements for initial ethics orientation.	Closed
9	Ensure annual ethics training includes all the required elements, including the criminal conflict of interest statutes and the 14 Principles of Ethical Conduct.	JUSFC developed verbal annual ethics training that included all the required elements for annual ethics training.	Closed

Thank you for your assistance during the follow-up process. We encourage you to contact your Desk Officer for ethics program support.

Sincerely,



Doug Chapman
Acting Deputy Director for Compliance