

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: National Endowment for the Arts

Follow-up to OGE Report Number: 19-31I

Report No.: 20-19IF

Date: May 12, 2020

UNITED STATES OFFICE OF
GOVERNMENT ETHICS

Preventing Conflicts of Interest
in the Executive Branch

As a result of its review of the National Endowment for the Arts (NEA) ethics program, the United States Office of Government Ethics (OGE) issued two recommendations in its July 2019 review report. OGE conducted a follow-up review to assess whether the NEA 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 that new entrant confidential financial disclosure reports are filed, reviewed, and certified timely.	<p><u>Agency Action:</u> According to NEA ethics officials, new entrant information is entered into financial disclosure tracking spreadsheets. Tracked information includes the deadlines for submission, review, and certification of new entrant financial disclosure reports.</p> <p><u>OGE Finding:</u> OGE reviewed the two available new entrant confidential financial disclosure reports provided by NEA. Only one of the two reports was filed timely. Both of the reports were reviewed and certified timely by the Ethics Office. NEA stated they are still in the process of working on communication improvements between the Office of Human Resources (HR) and the Ethics Office in order to improve filing timeliness of new entrant reports. According to NEA ethics officials, HR will be required to notify the Ethics Office when new employees who are required to file are hired.</p> <p>OGE will follow-up with NEA in six months to again evaluate new entrant financial disclosure report timeliness.</p>	Open
2	Ensure that new employees receive initial ethics training within three months of appointment.	<p><u>Agency Action:</u> According to NEA ethics officials, new entrant information is entered into financial disclosure tracking spreadsheets. In addition to financial disclosure information, the tracking spreadsheets include the dates by which the new employees' ethics briefings should be completed.</p> <p><u>OGE Finding:</u> OGE determined that all four of NEA's new employees received initial ethics training within three months.</p>	Closed

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Based on the results of OGE's follow-up review, recommendation 2 is closed. OGE will conduct an additional follow-up review in six months to assess whether the NEA has taken sufficient action to resolve the deficiencies underlying recommendation 1.