

**ETHICS PROGRAM REVIEW FOLLOW-UP REPORT**

Agency: National Endowment for the Arts

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

Report No.: 21-22IF

Date: May 11, 2021

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 Office of Government Ethics (OGE) issued two recommendations in its July 2019 inspection report. OGE conducted a follow-up review in May 2020 and closed one of the recommendations. OGE recently conducted a second follow-up review in May 2021 to assess whether NEA has taken sufficient action to resolve the deficiencies underlying the remaining recommendation. The results of our second follow-up review are summarized below.

**Recommendation**

Ensure that new entrant confidential financial disclosure reports are filed, reviewed, and certified timely.

**Agency Action and OGE Finding**

OGE requested all new entrant confidential financial disclosure reports filed since May 2020. NEA was able to provide four reports. Of those four reports, two were filed timely, one report was filed 311 days after its due date, and the remaining report was filed 206 days after it was due. Of the same 4 reports, 2 were certified within 60 days of filing and 2 were certified more than 60 days after being filed. One report was reviewed and certified 248 days after it was filed.

An ethics official stated that the agency had experienced a number of conflicting priorities during the period during which the reports were filed. These included, the demands of incoming transition and election, the implementation of the CARES Act, and legal issues related to the pandemic.

NEA understands that further improvements are required to ensure that reviews of new entrant reports are completed timely. NEA ethics officials stated they planned to fill the ADAEO position to increase personnel resources devoted to the ethics program, improve the current tracking spreadsheet to ensure deadlines are met and tracked in an accountable manner, and establish regular monthly meetings between the DAEO and ADAEO to review and take action on outstanding ethics issues.

**Status of Recommendation: Open**

Based on the results of OGE's follow-up review, the recommendation remains open. OGE will conduct an additional follow-up review to assess whether NEA has taken sufficient action to resolve the deficiencies underlying the recommendation.