

**ETHICS PROGRAM REVIEW FOLLOW-UP REPORT**

Agency: U.S. Commission of Fine Arts (CFA)

Follow-up to OGE Report Numbers: 19-38I, 20-23IF, 21-23IF

Report No.: 23-02IF

Date: November 14, 2022

**UNITED STATES OFFICE OF  
GOVERNMENT ETHICS**Preventing Conflicts of Interest  
in the Executive Branch

As a result of its review of the U.S. Commission of Fine Arts (CFA) ethics program, the Office of Government Ethics (OGE) issued one recommendation in its September 2019 review report. OGE conducted three follow-up reviews to assess whether CFA has taken sufficient action to resolve the deficiencies underlying this recommendation. The results of the third follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
1	Establish written procedures for providing required notices to prospective employees and supervisors.	<p>OGE's inspection of CFA's ethics program found that CFA had not established the required written procedures for providing notices to prospective employees and new supervisors explaining the ethical obligations associated with their respective positions. CFA uses contracted HR services provided by the Bureau of Safety and Environmental Enforcement at the Department of the Interior (BSEE/DOI).</p> <p>OGE conducted follow-up reviews in May 2020 and May 2021. Because of the COVID-19 pandemic, discussions with the HR services provider at the Department of the Interior ceased and CFA did not establish the required written procedures. Ethics officials acknowledged the need to establish procedures, but they could not predict when they would be able to comply with the recommendation.</p> <p>OGE Finding: CFA sent OGE a copy of the draft written procedures for notices to prospective employees and notices to new supervisors soon after followed by the final written procedures in October 2022.</p>	Closed

Based on the results of OGE's follow-up review, the recommendation is closed.