



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

December 2, 2011

Karen L. Elias  
Designated Agency Ethics Official  
National Endowment for the Arts  
1100 Pennsylvania Avenue, NW., Room 518  
Washington, DC 20506

Dear Ms. Elias:

The United States Office of Government Ethics (OGE) recently conducted a follow-up review of the ethics program at the National Endowment for the Arts (NEA) to determine whether the improvements recommended in our May 2011 report have been achieved.

OGE's review of NEA's ethics program found that annual ethics training was primarily focused on provisions of the Hatch Act and therefore did not meet the regulatory requirements prescribing the subject matter which must be addressed during the training. OGE recommended that NEA "[P]rovide all public and confidential filers with annual ethics training containing the Standards, the Principles, the criminal conflict of interest statutes, and NEA's supplemental regulations in accordance with 5 CFR § 2638.704."

During the follow-up review, the Alternate DAEO provided information and documentation making it clear that NEA has provided annual training to all covered employees and that the training met all relevant requirements. Additionally, training was provided to employees who were not required to attend. OGE strongly encourages this practice as a way to strengthen ethical culture. It also raises the profile of the ethics program within the agency. The training appeared to be well-suited to addressing the needs of NEA's employees and employed an interactive component, which is also encouraged as a more effective method of training.

Based on our follow-up, we have determined that NEA has adequately implemented the recommendation in the February 2011 review report. As a result, OGE has closed the recommendation. Thank you for your assistance during the follow-up process. Please contact me at 202-482-9317 if you require any additional information.

Sincerely,

A handwritten signature in cursive script that reads "Rashmi Bartlett".

Rashmi Bartlett  
Associate Director