## **GOVERNMENT ETHICS**

October 26, 2018

Nancy E. Weiss General Counsel and Designated Agency Ethics Official Institute of Museum and Library Services 955 L'Enfant Plaza North, SW, Suite 4000 Washington, DC 20024-2135

Dear Ms. Weiss:

As a result of its review of the Institute of Museum and Library Services (IMLS) ethics program, the Office of Government Ethics (OGE) issued two recommendations in its May 2017 review report. OGE recently conducted a follow-up review to assess whether IMLS 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 non-PAS new entrant public financial disclosure reports are filed timely.	IMLS created a risk management plan to reduce the likelihood that new entrant reports would be filed late. The plan includes advance coordination with their Office of Human Resources, more emphasis on filer notification, and timely reporting of approaching deadlines to filers' supervisors.  No non-PAS new entrant reports were required to be filed since OGE's initial inspection and IMLS does not anticipate receiving any new entrant reports for the foreseeable future. However, the measures outlined in IMLS' risk management plan provide reasonable assurance that subsequent reports will be filed timely.	Closed
2	Ensure that all non-PAS public financial disclosure reports are certified timely.	OGE examined six non-PAS annual public financial disclosure reports that were required to be filed in 2018. OGE determined that all six reports were certified timely.	Closed

I appreciate the courtesies extended to the OGE program review staff. If you would like to discuss the report, please contact me at 202-482-9224.

Dale Christopher
Deputy Director for Compliance