

ETHICS PROGRAM INSPECTION REPORT

Agency: Commission of Fine Arts

Report No.: 26-30I

Date: May 13, 2026

Period Covered by Review: January 1, 2025 through December 31, 2025

UNITED STATES OFFICE OF GOVERNMENT ETHICS

Preventing Conflicts of Interest
in the Executive Branch

1.0 AGENCY DATA		
EMPLOYEES		
1.1	Number of full-time agency employees.	8
1.2	Number of Presidentially appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed.	N/A
1.3	Number of non-PAS public financial disclosure reports required to be filed.	1
1.4	Number of confidential financial disclosure reports required to be filed.	N/A
ETHICS PROGRAM		
1.5	Title of Designated Agency Ethics Official (DAEO).	Secretary
1.6	Grade level of DAEO.	SES
1.7	Title of Alternate DAEO (ADAEO).	Administrative Officer
1.8	Grade level of ADAEO.	GS-13
1.9	Title of the primary, day-to-day ethics program administrator.	Administrative Officer
1.10	Grade level of the primary, day-to-day ethics program administrator.	GS-13
1.11	Current number of full-time ethics officials.	0
1.12	Current number of part-time ethics officials.	2
1.13	Number of reporting levels between the DAEO and the agency head.	0
COMMENTS		
1.2: There are no PAS positions at the agency. 1.4: There were no confidential financial disclosure reports required by fulltime CFA staff during the period covered by OGE's inspection. CFA does have seven commissioners, who are special government employees (SGE), that file confidential reports. See Section 10.		

2.0 LEADERSHIP						
COMPLIANCE REQUIREMENTS				Yes	No	N/A
2.1	OGE has received an up-to-date designation from the agency head naming the DAEO. <i>See 5 C.F.R. § 2638.107(a).</i>			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.2	OGE has received an up-to-date designation from the agency head naming the ADAEO. <i>See 5 C.F.R. § 2638.107(a).</i>			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
None.						

3.0 PUBLIC FINANCIAL DISCLOSURE (OGE Form 278e, OGE Form 278-T)						
COMPLIANCE REQUIREMENTS				Yes	No	N/A
The agency has written policies and procedures in place governing: <i>See 5 U.S.C. § 13122(d)(1)</i>						
3.1	• Collection of public financial disclosure reports.			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.2	• Review/evaluation of public financial disclosure reports.			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.3	• Public availability of public financial disclosure reports.			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.4	The agency can demonstrate that late filing fees are collected or, where appropriate, waivers are issued when public filers do not timely file financial disclosure reports. <i>See 5 C.F.R. § 2634.704</i>			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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3.5	Public financial disclosure reports are securely maintained. <i>See</i> OGE/GOVT-1.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.6	Public financial disclosure reports are retained in accordance with the retention requirements. <i>See</i> 5 C.F.R. § 2634.603(g)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.7	There is reasonable assurance that the lead human resources official or designee promptly (no later than 15 days after appointment) notifies the DAEO of all appointments to positions that require incumbents to file public financial disclosure reports. <i>See</i> 5 C.F.R. § 2638.105(a)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.8	There is reasonable assurance that the lead human resources official or designee promptly (no later than 15 days after termination) notified the DAEO of terminations of employees in positions that require incumbents to file public financial disclosure reports. <i>See</i> 5 C.F.R. § 2638.105(a)(2).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DATA ANALYSIS		%		
3.9	Percentage of sampled non-PAS new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(b).	N/A		
3.10	Percentage of sampled non-PAS annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(a).	0%		
3.11	Percentage of sampled non-PAS termination reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(e).	N/A		
3.12	Percentage of sampled non-PAS public financial disclosure reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	100%		
3.13	Percentage of sampled non-PAS public financial disclosure reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	100%		
3.14	Percentage of sampled PAS annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(a).	N/A		
3.15	Percentage of sampled PAS termination reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(e).	N/A		
3.16	Percentage of sampled PAS annual and termination reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	N/A		
3.17	Percentage of sampled PAS annual and termination reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	N/A		
COMMENTS				
<p>3.0: CFA receives ethics services, as part of an interagency agreement, from the Department of Interior's (DOI) Bureau of Safety and Environmental Enforcement (BSEE). BSEE administers components of CFA's public and confidential financial disclosure programs by conducting hiring and determining filing requirements for positions.</p> <p>3.1 – 3.3: The public financial disclosure program's procedures did not cover the following required information:</p> <ul style="list-style-type: none"> • 3.1: Report collection dates • 3.2: Review and certification process • 3.3: Public availability of reports <p>OGE points out that although CFA has only one public filer, who is also the DAEO, written procedures serve to ensure that both current and future ethics officials can reasonably administer an ethics program. Because CFA receives ethics services from BSEE, it is further necessary to ensure BSEE's role in administering components of CFA's public and confidential financial disclosure programs are sufficiently outlined in CFA's relevant procedures. Based on OGE's inspection, CFA updated their written procedures covering the public financial disclosure program to sufficiently cover all requirements.</p> <p>3.4, 3.10: The one financial disclosure report required in 2025, despite receiving a 30 day extension, was filed two weeks late. A report filed two weeks late does not meet the criteria for requiring a late fee and/or waiver.</p> <p>3.9, 3.11: No new entrant nor termination reports were required during the period covered by this inspection.</p> <p>3.10: Although the one report required in 2025 was filed late, the sample size is too small to ascertain whether there are any underlying issue(s) that warrant a recommendation. It is important to note that OGE's two prior inspections of CFA's ethics program found all reports were filed timely.</p> <p>3.14 – 3.17: There are no PAS positions at the agency.</p>				

4.0 CONFIDENTIAL FINANCIAL DISCLOSURE

COMPLIANCE REQUIREMENTS

Yes No N/A

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The agency has written policies and procedures in place governing: <i>See</i> 5 U.S.C. § 13122(d)(1)			
4.1	<ul style="list-style-type: none"> • Collection of confidential financial disclosure reports. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.2	<ul style="list-style-type: none"> • Review/evaluation of confidential financial disclosure reports. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.3	Confidential financial disclosure reports are securely maintained. <i>See</i> OGE/GOVT-2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.4	Confidential financial disclosure reports are retained in accordance with the retention requirements. <i>See</i> 5 C.F.R. § 2634.604.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.5	The agency's OGE-approved alternative confidential financial disclosure system complies with plans approved by OGE. <i>See</i> 5 C.F.R. § 2634.905.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.6	There is reasonable assurance that the lead human resources official or designee promptly (no later than 15 days after appointment) notifies the DAEO of all appointments to positions that require incumbents to file confidential financial disclosure reports. <i>See</i> 5 C.F.R. § 2638.105(a)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>
DATA ANALYSIS			%
4.7	Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b).	N/A	
4.8	Percentage of sampled confidential annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(a).	N/A	
4.9	Percentage of sampled reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	N/A	
4.10	Percentage of sampled confidential financial disclosure reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. §§ 2634.605(a) and 2634.909(a).	N/A	
COMMENTS			
<p>4.1 – 4.2: The confidential financial disclosure program procedures did not cover report collection dates nor the review and certification process, nor cover BSEE's role in administering components of CFA's confidential financial disclosure program. Also see the comments entry for 3.1 – 3.3. Based on OGE's inspection, CFA updated their written procedures covering the confidential financial disclosure program to sufficiently cover all requirements.</p> <p>4.3, 4.4: CFA did not have any fulltime staff that required filing a confidential financial disclosure report. However, the agency does have seven SGEs who file these reports. See section 10.</p> <p>4.5: CFA does not utilize an alternative confidential financial disclosure report form.</p> <p>4.7 – 4.10: There were no confidential financial disclosure reports required by fulltime CFA staff during the period covered by OGE's inspection.</p>			

5.0	NOTICES TO PROSPECTIVE EMPLOYEES			
	COMPLIANCE REQUIREMENTS	Yes	No	N/A
Written offers of employment for positions covered by the Standards of Conduct provide: <i>See</i> 5 C.F.R. § 2638.303.				
5.1	<ul style="list-style-type: none"> • A statement regarding the agency's commitment to government ethics. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.2	<ul style="list-style-type: none"> • Notice that the individual will be subject to the Standards of Conduct and the criminal conflict of interest statutes as an employee. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.3	<ul style="list-style-type: none"> • Contact information for an appropriate agency ethics office or an explanation of how to obtain additional information on applicable ethics requirements. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.4	<ul style="list-style-type: none"> • Where applicable, notice of the time frame for completing initial ethics training. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.5	<ul style="list-style-type: none"> • Where applicable, a statement regarding financial disclosure requirements and an explanation that new entrant reports must be filed within 30 days of appointment. 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5.6	The agency has established written procedures for issuing the notice to prospective employees. <i>See</i> 5 C.F.R. § 2638.303(c).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.7	The agency's written procedures are reviewed by the DAEO each year. <i>See</i> 5 C.F.R. § 2638.303(c).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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5.8	The agency can demonstrate that there is an effective process for ensuring all covered employees receive the required information with their written offer of employment. <i>See</i> 5 C.F.R. § 2638.303.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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COMMENTS				
<p>5.0: Based on an established agreement, DOI’s BSEE issues all notices to prospective employees and new supervisors on behalf of CFA. 5.1 – 5.5, 5.8: BSEE issued one notice in 2025 on behalf of CFA. OGE’s review found that this notice did not sufficiently cover the following required information:</p> <ul style="list-style-type: none"> 5.1: Agency statement on commitment to government ethics 5.2: Notice that individual will also be subject to the Standards of Conduct 5.3: Contact information for a CFA ethics official 5.4: Initial ethics training requirement and deadline <p>It is important to point out that both 5.3 and 5.4 were found to be insufficiently covered in OGE’s 2023 inspection also. However, the underlying issues behind these recommendations were addressed during OGE’s 2024 follow-up review.</p> <p>5.5: The prospective employee’s position in 2025 did not require filing a financial disclosure report. However, the contingency for including required information covering financial disclosure reporting is not outlined in CFA’s procedures - which BSEE adheres to in issuing notices. Based on OGE’s inspection, CFA updated the notice template to cover all missing information. In addition, CFA provided confirmation that BSEE received a copy of the updated template.</p> <p>5.6, 5.8: OGE’s review found that CFA’s written procedures did not sufficiently cover the following notice requirements:</p> <ul style="list-style-type: none"> 5.1: CFA’s statement on commitment to government ethics (notice instead specifies DOI’s commitment) 5.3: Contact information for a CFA ethics official 5.4: Initial ethics training requirement and deadline 5.5: Financial disclosure requirement and deadline (for applicable positions) <p>In addition, the procedures direct prospective employees to DOI’s supplemental Standards of Conduct, which do not apply to CFI staff. CFA received a recommendation in OGE’s 2023 inspection to remove this reference from the notice to new supervisors template. However, the underlying issue behind this recommendation was addressed during OGE’s 2024 follow-up review. Based on OGE’s inspection, CFA updated the written procedures covering the issuance of notices, which includes the notice template. In addition, CFA removed reference to DOI’s supplemental Standards of Conduct, ensured the notice template included all required information, and confirmed that BSEE received a copy of the updated notice. OGE’s inspection found that both the notice template and the written procedures sufficiently met all requirements.</p>				

6.0	NOTICES TO NEW SUPERVISORS			
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COMPLIANCE REQUIREMENTS				
		Yes	No	N/A
The agency must provide each employee upon initial appointment to a supervisory position with: <i>See</i> 5 C.F.R. § 2638.306.				
6.1	<ul style="list-style-type: none"> Contact information for the agency’s ethics office. 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.2	<ul style="list-style-type: none"> The text of 5 C.F.R. § 2638.103. 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.3	<ul style="list-style-type: none"> A copy of, a hyperlink to, or the address of a Web site containing the Principles of Ethical Conduct. 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.4	<ul style="list-style-type: none"> Other information the DAEO deems necessary. 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.5	The agency has established written procedures for supervisory ethics notices. <i>See</i> 5 C.F.R. § 2638.306(d).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.6	The agency’s written procedures are reviewed by the DAEO each year. <i>See</i> 5 C.F.R. § 2638.306(d).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.7	The agency can demonstrate that there is an effective process for ensuring that new supervisors receive the required information within one year of appointment. <i>See</i> 5 C.F.R. § 2638.306(b).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

COMMENTS				
<p>6.1 – 6.4: There were no notices required during the period covered by this inspection. Traditionally, CFA’s Secretary, who also serves as the DAEO, is the only supervisory position. To ensure new supervisors in the future will receive this notice as required, CFA’s notice template was reviewed. This review found that the notice template included all required information, except for contact information for a CFA ethics official. Instead, contact information for DOI’s ethics website is provided. OGE notes that CFA staff should reasonably be able to obtain contact information for a CFA ethics official based on the agency’s size.</p>				

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6.5, 6.7: CFA ethics officials could not locate the written procedures covering the issuance of notices to new supervisors. It is important to point out that CFA received a recommendation in OGE's 2019 inspection, in part, for not having these procedures in place. Based on OGE's inspection, CFA developed and implemented written procedures covering the issuance of notices to new supervisors. OGE's review found these procedures sufficiently met all requirements.

6.6, 6.7: An annual review was not conducted in 2025. CFA ethics officials explained that procedures would be reviewed when a new supervisor is hired and the issuance of this notice is required. OGE points out that established written procedures along with the annual review serve to ensure that both current ethics officials and future ethics officials will reasonably be able to issue notices as required. Based on CFA developing new written procedures covering the issuance of this notice, the annual review requirement was also covered.

7.0 INITIAL ETHICS TRAINING							
COMPLIANCE REQUIREMENTS				Yes	No	N/A	
	Each new employee of the agency subject to the Standards of Conduct must complete initial ethics training. <i>See</i> 5 C.F.R. § 2638.304.						
7.1	The training presentation(s) addressed concepts related to conflicts of interest, impartiality, misuse of position and gifts. <i>See</i> 5 C.F.R. § 2638.304(e)(1).				<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7.2	The agency provided new employees with either the following written materials or written instruction for accessing them: The summary of the Standards of Conduct distributed by the Office of Government Ethics or an equivalent summary prepared by the agency; provisions of any supplemental agency regulation that the DAEO determines to be relevant or a summary of those provisions; such other written materials as the DAEO determines should be included; instructions for contacting the agency's ethics officials. <i>See</i> 5 C.F.R. § 2638.304(e)(2).				<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7.3	The agency has established written procedures for initial ethics training. <i>See</i> 5 C.F.R. § 2638.304(f).				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.4	The agency's written procedures are reviewed by the DAEO each year. <i>See</i> 5 C.F.R. § 2638.304(f).				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DATA ANALYSIS				%			
7.5	Percentage of new employees who received initial ethics training. <i>See</i> 5 C.F.R. § 2638.304.				N/A		
7.6	Percentage of new employees who received initial ethics training within three months of appointment. <i>See</i> 5 C.F.R. § 2638.304(b).				N/A		
COMMENTS							
<p>7.0: BSEE provides initial ethics training for new CFA employees. However, CFA explained that the agency intends to develop and administer new training materials in house by CFA ethics officials.</p> <p>7.1 – 7.2, 7.5 – 7.6: There were no new employee appointments at the agency during the period covered by this inspection. To ensure future employees will receive this training as required, OGE reviewed CFA's initial ethics training program, which included written procedures and training materials. No issues were identified.</p> <p>7.3, 7.4: After the departure of CFA's former ADAEO, new ethics officials could not locate the written procedures covering the initial ethics training program. CFA developed and implemented new procedures during OGE's inspection, which also covered the annual review requirement. It is important to point out that CFA could not locate these procedures during OGE's 2023 inspection, but resolved this issue during the inspection.</p>							

8.0 ANNUAL ETHICS TRAINING							
COMPLIANCE REQUIREMENTS				Yes	No	N/A	
	Each calendar year, public filers, confidential filers, and certain other employees must complete ethics training which meets specified requirements. <i>See</i> 5 C.F.R. §§ 2638.307 and 2638.308.						
8.1	The training presentation(s) addressed concepts related to financial conflicts of interest, impartiality, misuse of position and gifts. <i>See</i> 5 C.F.R. §§ 2638.307(e)(1) and 2638.308(f)(1).				<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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8.2	The agency provided employees with either the following written materials or written instruction for accessing them: The summary of the Standards of Conduct distributed by the Office of Government Ethics or an equivalent summary prepared by the agency; provisions of any supplemental agency regulation that the DAEO determines to be relevant or a summary of those provisions; such other written materials as the DAEO determines should be included; instructions for contacting the agency's ethics officials. <i>See</i> 5 C.F.R. § 2638.308(f)(2) and 5 C.F.R. § 2638.307(e)(2).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8.3	The agency's annual ethics training complies with the formatting requirements for public filers, confidential filers, and certain other employees. <i>See</i> 5 C.F.R. §§ 2638.307(d) and 2638.308(e).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8.4	The agency's program for annual ethics training complies with the tracking requirements for public filers, confidential filers, and certain other employees. <i>See</i> 5 C.F.R. §§ 2638.307(f) and 2638.308(g).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8.5	The agency can demonstrate it has an effective process for ensuring covered public filers, other than those whose pay is set at Level I or Level II of the Executive Schedule, complete live annual ethics training at least once every two years. <i>See</i> 5 C.F.R. § 2638.308(e)(2).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
DATA ANALYSIS		Training Format		
		Live	Interactive	
Percentage of public filers who completed annual ethics training before the end of the calendar year. <i>See</i> 5 C.F.R. § 2638.308(a).				
8.6	<ul style="list-style-type: none"> • Executive Schedule Level I and Level II. <i>See</i> 5 C.F.R. § 2638.308(e)(1). 	N/A	N/A	
8.7	<ul style="list-style-type: none"> • Other PAS and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(2). 	N/A	N/A	
8.8	<ul style="list-style-type: none"> • SES and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(3). 	N/A	N/A	
Percentage of confidential filers and certain other employees who completed annual ethics training before the end of the calendar year. <i>See</i> 5 C.F.R. § 2638.307(a).				
8.9	<ul style="list-style-type: none"> • Employees required to file an annual confidential financial disclosure report. <i>See</i> 5 C.F.R. § 2638.307(a)(1). 	N/A	N/A	
8.10	<ul style="list-style-type: none"> • Employees appointed by the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2). 	N/A	N/A	
8.11	<ul style="list-style-type: none"> • Employees of the Executive Office of the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2). 	N/A	N/A	
8.12	<ul style="list-style-type: none"> • Contracting officers described in 41 U.S.C. § 2101. <i>See</i> 5 C.F.R. § 2638.307(a)(3). 	N/A	N/A	
8.13	<ul style="list-style-type: none"> • Other employees designated by the head of the agency. <i>See</i> 5 C.F.R. § 2638.307(a)(4). 	N/A	N/A	
COMMENTS				
8.1 – 8.13: Over OGE's past three inspections (2019, 2023, and 2026), the DAEO and ADAEO have been the only covered fulltime employees at CFA. OGE's 2019 inspection determined that, as the DAEO and ADAEO of an ethics program, they are already expected to possess the ethics-related knowledge meant to be conveyed via annual ethics training. 8.5 – 8.7: There are no PAS positions at the agency. 8.8: The DAEO was the only covered employee at CFA during the period covered by OGE's inspection. 8.10 – 8.13: There were no employees in these positions that required annual ethics training.				

9.0 ETHICS ADVICE AND COUNSELING

	COMPLIANCE REQUIREMENT	Yes	No	N/A
9.1	Based on a sample collected by OGE, guidance provided by agency ethics officials to employees appears to be consistent with applicable laws and regulations. <i>See</i> 5 C.F.R. § 2638.104(c)(4).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
COMMENTS				
9.1: CFA did not have any requests for advice and counsel in 2025 nor in 2026 thus far.				

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10.0 SPECIAL GOVERNMENT EMPLOYEES (SGE) SERVING ON ADVISORY COMMITTEES AND BOARDS

Confidential Financial Disclosure

10.1	Number of SGEs serving on Advisory Committees and Boards.	7
	DATA ANALYSIS	%
10.2	Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b).	100%
10.3	Percentage of sampled reports reviewed within 60 days of receipt but not later than the SGE's first meeting. <i>See</i> 5 C.F.R. § 2634.605(a).	100%
10.4	Percentage of sampled reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	100%

Ethics Training

COMPLIANCE REQUIREMENTS		Yes	No	N/A
	Required ethics training must be provided to each SGE. <i>See</i> 5 C.F.R. §§ 2638.304 and 2638.307.			
10.5	The training presentation(s) addressed concepts related to conflicts of interest, impartiality, misuse of position and gifts. <i>See</i> 5 C.F.R. § 2638.304(e)(1).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10.6	The agency provided employees with either the following written materials or written instruction for accessing them: The summary of the Standards of Conduct distributed by the Office of Government Ethics or an equivalent summary prepared by the agency; provisions of any supplemental agency regulation that the DAEO determines to be relevant or a summary of those provisions; such other written materials as the DAEO determines should be included; instructions for contacting the agency's ethics officials. <i>See</i> 5 C.F.R. § 2638.304(e)(2).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	DATA ANALYSIS	%		
10.7	Percentage of SGEs who received initial ethics training. <i>See</i> 5 C.F.R. § 2638.304.	N/A		
10.8	Percentage of SGEs who received initial ethics training timely. <i>See</i> 5 C.F.R. § 2638.304(b)(2).	N/A		
10.9	Percentage of SGEs who received annual ethics training. <i>See</i> 5 C.F.R. § 2638.307(d)(2).	100%		
	COMMENTS			
	10.5: OGE's review found that the ethics training materials did not address concepts related to misuse and gifts. In addition, the training provided was not sufficiently interactive. 10.6: CFA believes the Standards were provided as required, but cannot confirm. 10.7 – 10.9: All seven current SGEs are serving on terms and received annual ethics training in 2025. 10.9: CFA cannot confirm completion dates, but is confident the trainings were all provided as required.			

ISSUES IDENTIFIED AND RESOLVED DURING THE INSPECTION

Element	ISSUE
3.1, 3.2, 3.3, 4.1, 4.2	<p>ISSUE: CFA's public and confidential financial disclosure procedures did not cover all required information. Based on OGE's inspection, CFA revised both procedures to sufficiently meet all requirements, which included adding a description of BSEE's role in administering these two programs.</p> <p><u>AGENCY RESPONSE:</u></p>

ETHICS PROGRAM INSPECTION REPORT

Agency: Commission of Fine Arts

Report No.: 26-30I

Date: May 13, 2026

Period Covered by Review: January 1, 2025 through December 31, 2025

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5.1 – 5.5, 5.6, 5.8	<p><u>ISSUE:</u> CFA’s written procedures and notice template did not include all required information. Based on OGE’s inspection, CFA sufficiently updated their procedures and notice template to be compliant with all applicable requirements.</p> <p><u>AGENCY RESPONSE:</u></p>
6.5, 6.6, 6.7	<p><u>ISSUE:</u> CFA could not locate the written procedures covering the issuance of notices to new supervisors. Based on OGE’s inspection, CFA developed and implemented new procedures that sufficiently met all requirements. In addition, the development of these procedures covered the annual review requirement.</p> <p><u>AGENCY RESPONSE:</u></p>
7.3	<p><u>ISSUE:</u> CFA could not locate written procedures covering the initial ethics training program. During OGE’s inspection, CFA developed and implemented sufficient procedures. However, if CFA does not implement an initial ethics training program in house, then BSEE’s role in administering this training needs to be outlined in these procedures.</p> <p><u>AGENCY RESPONSE:</u></p>

RECOMMENDATIONS			
#	Element	RECOMMENDATION	Compliance Due
1	10.5	<p><u>RECOMMENDATION:</u> Ensure that SGEs receive ethics training that sufficiently covers all required concepts. In addition, if the training is not provided live, ensure the training is interactive.</p> <p><u>AGENCY RESPONSE:</u> CFA will contact its Ethics Liaison to ensure it provides the required concepts. CFA will work to provide one-on-one training to the Commissioners.</p>	December 2026
2	10.6, 10.9	<p><u>RECOMMENDATION:</u> Part A) Designate a sufficient system for maintaining all ethics program-related procedures (SGE and non-SGE) that ensure both current and future ethics officials can reasonably locate.</p> <p>Part B) Ensure all SGE and non-SGE ethics-related materials (e.g. written procedures and ethics trainings and ethics tracking materials and ethics notice templates, etc.) are securely maintained.</p> <p>Part C) Ensure a copy of the interagency agreement between CFA and BSEE is retained in this new maintenance system. In addition, ensure contact information for at least one BSEE POC is listed.</p> <p><u>AGENCY RESPONSE:</u> CFA will implement procedures to upload all materials pertaining to ethics program related procedures to its SharePoint site for easy access and retrieval.</p>	December 2026

GENERAL AGENCY COMMENTS	

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