April 1, 2013

Thomas Luebke  
Secretary and Designated Agency Ethics Official  
U.S. Commission of Fine Arts  
401 F Street, N.W., Suite 312  
Washington, DC 20001-2728

Dear Mr. Luebke:

The United States Office of Government Ethics (OGE) has completed a second follow-up review of the ethics program at the U.S. Commission of Fine Arts (CFA) to determine how the outstanding recommendation in our December 2011 program review has been addressed. The original December 2011 review identified four recommendations requiring agency action and provided two suggestions to further improve ethics program operations. OGE conducted its first follow-up review in August 2012 and determined the steps taken by CFA were sufficient to close three of the four recommendations and both suggestions from the December 2011 review. In March 2012, OGE conducted its second follow-up review of the ethics program at CFA. The status of the one outstanding recommendation and results of the second follow-up review appear below.

OGE recommended that CFA certify all confidential financial disclosure reports within 60 days of their submission. During our second follow-up review, OGE verified that ethics officials had certified within 60 days all confidential financial disclosure reports submitted by the November 30, 2012 filing deadline.

Based on OGE’s follow-up, we have determined that CFA has adequately implemented the remaining recommendation from the December 2011 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,

Rashmi Bartlett  
Chief, Professional Staff Group 1  
Program Review Branch  
Compliance Division

CFA Report No. 13-17F