

# **NATIONAL ENDOWMENT FOR THE ARTS**

## **OFFICE OF INSPECTOR GENERAL**



### **SEMIANNUAL REPORT TO THE CONGRESS**

**APRIL 1, 2011 – SEPTEMBER 30, 2011**

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**OFFICE OF INSPECTOR GENERAL**

**NATIONAL ENDOWMENT FOR THE ARTS**

October 31, 2011

## MEMORANDUM

TO: Rocco Landesman  
Chairman

FROM: Tonie Jones  
Inspector General

SUBJECT: **Semiannual Report to the Congress: April 1, 2011 – September 30, 2011**

The Inspector General Act of 1978 (IG Act), as amended (5 U.S.C. App.), calls for the preparation of semiannual reports to the Congress summarizing the activities of the Office of Inspector General (OIG) for the six-month periods ending each March 31 and September 30. I am pleased to enclose the report for the period from April 1, 2011 to September 30, 2011.

The Inspector General's report is intended to cover audits, inspections, evaluations, investigations and other reviews conducted by the OIG as well as our review of the OMB Circular A-133 audits conducted by independent auditors. The report also indicates the status of management decisions whether to implement or not to implement recommendations made by the OIG. The former President's Council on Integrity and Efficiency developed the reporting formats for Tables I and II to ensure consistent presentation by the Federal agencies. The tables provide only summary totals and do not include a breakdown by auditee.

The Act requires that you transmit this report to the appropriate committees of the Congress within 30 days of receipt, together with any comments you may wish to make. Comments that you might offer should be included in your "Report on Final Action," a management report that is required to be submitted along with the Inspector General's report. We will work closely with your staff to assist in the preparation of the management report. The due date for submission of both reports to Congress is November 30, 2011.

I appreciate the continuing support we have received from the Chairman's Office and your managers throughout the Agency. Working together, I believe we have taken positive steps to improve Agency programs and operations. We look forward to continuing these efforts.

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## **NATIONAL ENDOWMENT FOR THE ARTS**

Founded in 1965, the National Endowment for the Arts (NEA) offers assistance to a wide range of non-profit organizations and individuals that carry out arts programming, as well as to state arts agencies. The NEA supports exemplary projects of excellence in the artistic disciplines of artist communities, dance, design, folk and traditional arts, literature, media arts, museums, music, musical theater, opera, presenting, theater, and visual arts, as well as for arts education projects and local arts agencies. Grants are awarded for specific projects rather than for general operating or seasonal support. Most NEA grants are matched dollar for dollar with non-federal funds. In addition, the NEA received \$50 million in 2009 under the American Recovery and Reinvestment Act of 2009 (Recovery Act); these additional funds do not require matching. For FY 2010, the NEA received \$167.5 million through the Department of the Interior, Environment, and Related Agencies Appropriation Act, 2010. The NEA received \$154.69 million, net a government-wide rescission of .2%, through the Department of Defense and Full-Year Continuing Appropriations Act, 2011.

## **OFFICE OF INSPECTOR GENERAL**

The Inspector General Act of 1978 (IG Act), as amended (5 U.S.C. App.), established independent, objective units within Federal agencies for oversight purposes. In 1988, the Congress amended the IG Act (P.L. No. 100-504) to establish statutory Inspectors General at additional departments and agencies, as well as designated Federal entities and establishments, including the National Endowment for the Arts. The mission of the Office of Inspector General (OIG) is to:

- Conduct and supervise independent and objective audits, inspections and evaluations relating to NEA programs and operations;
- Promote economy, effectiveness, and efficiency within the NEA;
- Prevent and detect fraud, waste, and abuse in NEA programs and operations;
- Review and make recommendations regarding existing and proposed legislation and regulations relating to NEA programs and operations; and
- Keep the NEA Chairman and the Congress fully and currently informed of problems in Agency programs and operations.

On October 14, 2008, the President signed the Inspector General Reform Act of 2008, Public Law 110-409. The 2008 Act amends the previous IG Act of 1978 by enhancing the independence of the Inspectors General and creating a Council of the Inspectors General on Integrity and Efficiency.

This semiannual report summarizes the OIG's major activities, initiatives, and results for the six-month period ending September 30, 2011. The OIG consists of four full-time positions, the Inspector General and three auditors. Currently, there are three staff members on board. The OIG is actively recruiting to fill an auditor's position. There is no investigator or general counsel on the

staff. To provide a reactive investigative capability, we have a Memorandum of Understanding with the Inspector General of the General Services Administration (GSA) whereby the GSA's OIG agrees to provide investigative coverage for us on a reimbursable basis as needed. (No investigative coverage from GSA was needed during the recent six-month period.) We also have a Memorandum of Understanding with the National Credit Union Administration's (NCUA) Office of Inspector General that details procedures to be used for providing the OIG with legal services pursuant to the new requirements reflected in the 2008 Act. An NCUA OIG staff member has been assigned to provide such services on an as-needed basis.

## **SUMMARY OF WORK COMPLETED BY THE OIG**

During the six-month period ending September 30, 2011, the OIG conducted the following audits, inspections, evaluations, reviews, investigations, and other activities.

### **Audits/Inspections/Evaluations/Reviews**

During the recent semiannual period, the OIG issued three reports and two memoranda which contained 23 recommendations based on evaluations performed by OIG personnel. One recommendation was related to systems deficiencies at the NEA, which was cleared during this reporting period. Four recommendations related to NEA grantees were also cleared during this reporting period. Corrective actions for the 18 recommendations in the remaining two reports to NEA grantees are in process.

### **Audit Resolution**

At the beginning of the six-month period, there were four reports awaiting management decisions to allow or disallow questioned costs of \$1,654,470 with potential refunds of \$467,115. All of the organizations submitted documentation to support the questioned costs. A management decision was made to allow all of the questioned costs for two of the reports. A management decision was also made to allow some of the questioned costs on one report. As a result, questioned costs were allowed in the amount of \$1,481,539, which eliminated potential refunds of \$373,630. The OIG has requested additional documentation from the two organizations with remaining questioned costs. A management decision cannot be made until the reviews have been completed. (See Table I)

During the period, none of the newly issued reports or memoranda identified any questioned costs or potential refunds. Therefore, at the end of the period, two reports remained outstanding with questioned costs of \$172,931 and potential refunds of \$93,485. (See Table I)

### **Inspections**

The OIG did not conduct any inspections during the recent six-month period.

### **Investigations**

The OIG did not open any new allegation cases during the recent six-month period. The one case opened prior to the start of the period remained open at the end of the period.

### **Audit of the NEA Fiscal Year 2011 Financial Statements**

The *Accountability of Tax Dollars Act of 2002* requires the NEA Office of Inspector General or an independent external auditor, as determined by the Inspector General, to audit the agency financial



statements. Under a competitively awarded contract monitored by the OIG, Leon Snead & Company, an independent certified public accounting and management consulting firm, received a one year contract, with a four year option, in January 2011 to audit the NEA's financial statements and will be performing the 2011 audit. The audit will be conducted following Generally Accepted Government Auditing Standards (GAGAS) and OMB Bulletin No. 07-04, *Audit Requirements for Federal Financial Statements*, as revised. In addition, the firm will provide reports on internal controls and compliance with laws and regulations for matters relevant to the financial statement audit. The report is scheduled to be issued by the November 15, 2011 deadline.

### **NEA's Compliance with the Federal Information Security Management Act of 2002 (FISMA)**

FISMA requires that each federal agency develop, document, and implement an agency-wide program for providing security for the information and information systems that support the operations and assets of the agency, including those provided or managed by another agency, contractor, or other source.

The OIG completed a full FISMA evaluation in FY 2010 using the most recent applicable FISMA requirements and guidelines published by the OMB and the National Institute of Standards and Technology. The assessment found that although NEA made progress in complying with FISMA, some additional improvements were needed. The OIG made seven recommendations, all of which the NEA has completed corrective actions. The FY 2011 FISMA evaluation is in process.

### **Review of Legislation, Rules, Regulations and Other Issuances**

The OIG is required to review and comment on proposed legislation and regulations for their potential impact on the Agency and its operations. During this reporting period, the OIG provided analyses and written commentaries on Agency and other government publications/reports and regulations.

### **Technical Assistance**

The OIG provided technical assistance to NEA grantees and their independent auditors. Our efforts included, for example, clarifying and interpreting the audit requirements of OMB Circular A-133, *"Audits of States, Local Governments, and Non-Profit Organizations,"* and advising some of the first-time and smaller organizations on implementing practical accounting systems and internal controls sufficient to assure compliance with their grant agreements.

The OIG also assisted Agency staff with technical issues related to auditing, accounting, and audit followup.

### **Web Site**

The OIG maintains an ongoing Internet presence ([www.arts.gov/about/OIG/Contents.html](http://www.arts.gov/about/OIG/Contents.html)) to assist and inform NEA grantees and Agency employees. The site includes pages for *Reports; Recovery Act* including a section for *Training and Resources; Reporting Fraud, Waste and Abuse; Career Opportunities; External Peer Reviews* of the OIG and *Other Resources*.



## **Other Activities**

During this period, the OIG took part in the activities of the Council on Inspectors General for Integrity and Efficiency (Council), and allocated resources for responding to information requests from and for the Congress and other agencies. We have also participated in various efforts by the Council and other federal agencies to develop effective oversight strategies for Recovery Act activities. We continued our proactive oversight of NEA's management of its Recovery Act funds with an emphasis on the accuracy of data and outreach to both the staff and grant recipients.

The Government Accountability Office's *Government Accounting Standards* requires audit organizations that perform audits or attestation engagements to have an appropriate system of quality control and to undergo external peer reviews at least once every 3 years. Federal audit organizations can receive a rating of *Pass*, *Pass with deficiencies*, or *fail*. A peer review of the OIG was conducted August 2010 by the Federal Trade Commission Office of Inspector General. The OIG received a rating of *Pass*.

## **Strategic Plan & Five-Year Audit Plan**

We have issued our Strategic Plan & Five-Year Audit Plan for the Years 2012 – 2016. Our planning methodology is built around the concept of issue areas and issues. The issue areas are broad categories of prime importance: they highlight the priorities of our customers - Agency management, the Congress and the American people. The individual issues, expressed as questions, represent an assessment of the most significant concerns facing the NEA. The methodology also includes the formulation of annual audit work plans.

## SECTIONS OF REPORT

The following sections of this report discuss the 12 areas specifically required to be included according to Section 5(a) of the IG Act of 1978, as amended. Table I shows Inspector General issued reports with questioned costs and Table II shows that there were no Inspector General issued reports with recommendations that funds be put to better use.

### **SECTION 1 – Significant Problems, Abuses and Deficiencies**

Audits, evaluations and other reviews conducted by OIG personnel during the current and prior periods have disclosed a few instances of deficient financial management practices in some organizations that received NEA grants. Among these were:

- Reported grant project costs did not agree with the accounting records, e.g., financial status reports were not always prepared directly from the general ledger or subsidiary ledgers or from worksheets reconciled to the accounts;
- Personnel costs charged to grant projects were not supported by adequate documentation, e.g., personnel activity reports were not maintained to support allocations of personnel costs to NEA projects when required;
- The amount allocated to grant projects for common (indirect) costs which benefited all projects and activities of the organization was not supported by adequate documentation; and
- Grantees needed to improve internal controls, such as ensuring proper separation of duties to safeguard resources and including procedures for comparing actual costs with the budget.

### **SECTION 2 – Recommendations for Corrective Action**

To assist grantees in correcting or avoiding the deficiencies identified in Section 1, the OIG utilizes two “*Financial Management Guides*,” one for non-profit organizations and the other for state and local governments. The guides are not offered as complete manuals of procedures; rather, they are intended to provide practical information on what is expected from grantees in terms of fiscal accountability. The guides are available at [www.arts.gov/about/OIG/Guidance.html](http://www.arts.gov/about/OIG/Guidance.html).

The guides discuss accountability standards in the areas of financial management, internal controls, audit, and reporting. The guides also contain sections on unallowable costs and shortcomings to avoid. In addition, the guides include short lists of useful references and some sample documentation forms.

### **SECTION 3 – Recommendations in Previous Reports on Which Corrective Action Has Not Been Implemented**

There were no significant recommendations in previous reports on which corrective action has not been implemented.

### **SECTION 4 – Matters Referred to Prosecuting Authorities**

No matters were referred to prosecuting authorities during this reporting period.

### **SECTION 5 – Denials of Access to Records**

No denials of access to records occurred during this reporting period.

**SECTION 6 – Listing of Reports Issued and OIG Hotline Contacts**

<b><u>REPORT NUMBER</u></b>	<b><u>TITLE</u></b>	<b><u>DATE OF REPORT</u></b>
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***Limited Scope Audits***

LS-11-01	American Samoa Council on Arts, Culture & Humanities (AS) .....	7/15/11
LS-11-02	Maryland State Arts Council (MD) .....	7/25/11

***Financial Management System & Compliance Evaluations***

SCE-11-02	Baltimore Symphony Orchestra (MD) .....	9/07/11
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***Memoranda***

M-11-01	Waiver of Matching Requirements for Insular Territories .....	6/16/11
M-11-02	Litchfield Performing Arts Method of Funding (CT) .....	9/07/11

***Contacts***

Telephone Calls .....	1
Email .....	1
Standard Mail .....	0
Referred by Other Sources .....	1
Fax .....	0

**Total Contacts – 3**

**SECTION 7 – Listing of Particularly Significant Reports**

There were no particularly significant reports during the reporting period.

**SECTION 8 – Statistical Tables Showing Total Number of Audit Reports, Inspection Reports, and Evaluation Reports and the Dollar Value of Questioned Costs**

Table I of this report presents the statistical information showing the total number of audit reports, inspection reports, and evaluation reports and the total dollar value of questioned costs.

**SECTION 9 – Statistical Tables Showing Total Number of Audit Reports, Inspection Reports, and Evaluation Reports and the Dollar Value of Recommendations that Funds be Put to Better Use by Management**

As shown on Table II, there were no audit reports, inspection reports and evaluation reports with recommendations that funds be put to better use by management.

**SECTION 10 – Audit Reports, Inspection Reports, and Evaluation Reports Issued Before the Commencement of the Reporting Period for Which No Management Decision Has Been Made by the End of the Reporting Period**

As shown on Table I, there were two audit reports issued before the commencement of the reporting period for which no management decision has been made by the end of the reporting period.

**SECTION 11 – Significant Revised Management Decisions Made During the Period**

No significant revised management decisions were made during the reporting period.

**SECTION 12 – Significant Management Decisions With Which the Inspector General Disagrees**

There were no significant management decisions that the Inspector General disagreed with during the reporting period.

**TABLE I**

**INSPECTOR GENERAL ISSUED REPORTS  
WITH QUESTIONED COSTS**

	<u>NUMBER</u>	<u>QUESTIONED COSTS</u>	<u>UNSUPPORTED COSTS</u>	<u>POTENTIAL REFUNDS<sup>1</sup></u>
A. For which no management decision has been made by the commencement of the reporting period	<u>2</u>	<u>172,931</u>	<u>(172,931)</u>	<u>93,485</u>
B. Which were issued during the reporting period	<u>0</u>	<u>0</u>	<u>(0)</u>	<u>0</u>
Subtotals (A + B)	<u>2</u>	<u>172,931</u>	<u>(172,931)</u>	<u>93,485</u>
C. For which a management decision was made during the reporting period	<u>0</u>	<u>0</u>	<u>(0)</u>	<u>0</u>
(i) Dollar value of disallowed costs	<u>0</u>	<u>0</u>	<u>(0)</u>	<u>0</u>
(ii) Dollar value of costs not disallowed	<u>1</u>	<u>1,481,539</u>	<u>(1,481,539)</u>	<u>373,630</u>
D. For which no management decision has been made by the end of the reporting period	<u>2</u>	<u>172,931</u>	<u>(172,931)</u>	<u>93,485</u>
Reports for which no management decision was made within six months of issuance	<u>2</u>	<u>172,931</u>	<u>(172,931)</u>	<u>93,485</u>

<sup>1/</sup> The potential refund amount usually will not equal the questioned cost amount because matching requirements must be considered and the grantee may be either under or over matched. In addition, historically, the potential refund generally is reduced significantly as a result of the audit followup process, which includes examination of documentation submitted by the grantee.

**TABLE II**

**INSPECTOR GENERAL ISSUED REPORTS  
WITH RECOMMENDATIONS THAT FUNDS BE PUT TO BETTER USE**

	<b><u>NUMBER</u></b>	<b><u>DOLLAR VALUE</u></b>
A. For which no management decision has been made by the commencement of the reporting period	0	0
B. Which were issued during the reporting period	0	0
Subtotals (A + B)	0	0
C. For which a management decision was made during the reporting period	0	0
(i) dollar value of recommendations that were agreed to by management	0	0
- based on proposed management action	0	0
- based on proposed legislative action	0	0
(ii) dollar value of recommendations that were not agreed to by management	0	0
D. For which no management decision has been made by the end of the reporting period	0	0
Reports for which no management decision was made within six months of issuance	0	0

## DEFINITIONS OF TERMS USED

The following definitions apply to terms used in reporting audit statistics:

<b>Questioned Cost</b>	A cost that the Office of Inspector General (OIG) questioned because of alleged violation with a provision of a law, regulation, contract, or other agreement or document governing the expenditure of funds; such cost is not supported by adequate documentation; or the expenditure of funds for the intended purpose is unnecessary or unreasonable.
<b>Unsupported Cost</b>	A cost which the OIG questioned because the cost was not supported by adequate documentation at the time of the audit.
<b>Disallowed Cost</b>	A questioned cost that management has sustained or agreed should not be charged to the NEA grant or cooperative agreement.
<b>Funds Be Put To Better Use</b>	A recommendation made by the OIG that funds could be used more efficiently if management took actions to implement and complete the recommendation.
<b>Management Decision</b>	Management's evaluation of the findings and recommendations contained in the audit report and the issuance of management's final decision, including actions to be taken. Interim decisions and actions are not considered final management decisions for the purpose of the tables in this report.
<b>Final Action</b>	The completion of all actions that management has concluded in its management decision with respect to audit findings and recommendations. If management concluded that no actions were necessary, final action occurs when a management decision was made.



**STRATEGIC PLAN  
&  
FIVE-YEAR AUDIT PLAN  
2012 - 2016**

National Endowment for the Arts  
Office of Inspector General

October 2011

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## **INTRODUCTION**

### **Foreword**

The Office of Inspector General (OIG) of the National Endowment for the Arts (NEA) was established in 1989 pursuant to Public Law 100-504, "The Inspector General Act Amendments of 1988" (IG Act). On October 14, 2008, the President signed the Inspector General Reform Act of 2008, Public Law 110-409, which amends the previous IG Act to enhance the independence of the Inspectors General, to create a Council of the Inspectors General on Integrity and Efficiency, and other purposes. This document describes the plan of the OIG for discharging its ongoing responsibilities under the Act, and for meeting its operational objectives for the period from fiscal year 2012 through fiscal year 2016.

This strategic plan is also a response to the General Accounting Office Report No. B-244053, "Inspectors General: Action Needed to Strengthen OIGs at Designated Federal Entities." That report recommended that the OIGs develop strategic plans, prepare annual work plans for each year of a five-year period, and report the plans to their entity heads and, in their semiannual reports, to the Office of Management and Budget and the Congress.

### **OIG Mission Statement**

The Office of Inspector General, National Endowment for the Arts, is a team of skilled personnel dedicated to helping the Agency reach its essential goals and objectives. To this end, the Office of Inspector General independently conducts activities such as audits, evaluations, investigations and special reviews with accuracy, balance and objectivity. Working with management to help avoid problems before they occur, our mission is to: promote economy, efficiency and effectiveness in NEA activities; prevent and detect fraud, waste and abuse; advocate ethics in government; and keep the Chairman and the Congress fully and currently informed about problems and deficiencies relating to the administration of NEA programs and operations.

In achieving our mission, the staff of the Office of Inspector General will be fair and equitable, performing our duties with honesty and integrity. We will strive to be leaders and innovators in our field of expertise, and will be accountable for meeting our responsibilities. We will cooperate with all components of the NEA, giving proper recognition to the rights, authorities and duties of its employees and the public it serves.

## **Duties and Responsibilities of the Inspector General**

The Inspector General shall:

- Provide policy direction for, and conduct, supervise, and coordinate audits (including evaluations and other reviews that are conducted in accordance with applicable government standards) and investigations relating to the programs and operations of the NEA;
- Review existing and proposed legislation and regulations to determine their impact on economy and efficiency in the administration of, and the prevention and detection of fraud, waste and abuse in, the NEA programs and operations;
- Recommend policies and conduct, supervise, or coordinate activities both internal and external to the NEA, for the promotion of economy and efficiency, and the prevention and detection of fraud, waste and abuse in NEA programs and operations.
- Keep the NEA Chairman and the Congress fully and currently informed concerning fraud and other serious problems, abuses, and deficiencies relating to the administration of programs and operations financed by the NEA, or the identification and prosecution of participants committing such fraud or abuse;
- Comply with standards established by the Comptroller General of the United States for audits of Federal establishments, organizations, programs, activities and functions (the Government Auditing Standards);
- Give particular regard to the activities of the Comptroller General of the United States with a view toward avoiding duplication and ensuring effective coordination and cooperation;
- Establish guidelines for determining when it shall be appropriate to use non-Federal auditors, and give due regard to assuring that any work performed by non-Federal auditors complies with the Comptroller General's standards; and
- Report expeditiously to the Attorney General whenever the Inspector General has reasonable grounds to believe there has been a violation of Federal criminal law.

## **Authority of the Inspector General**

To carry out these responsibilities, the Congress has given the Inspector General:

- Access to all records, reports, audits, reviews, documents, papers, recommendations, or other material available to the NEA which relate to its programs and operations;
- Authority to conduct such investigations and reviews that are, in the judgment of the Inspector General, necessary or desirable;
- Authority to request information or assistance from any Federal, state or local government agency or unit thereof, as may be necessary for carrying out the duties and responsibilities of the Inspector General Act;
- Authority to issue subpoenas;
- Authority to administer and take an oath, affirmation or affidavit from any person when necessary;
- Direct and prompt access to the Chairman;
- Authority to select, appoint and employ such officers and employees as may be necessary for carrying out the functions, powers and duties of the OIG; and
- Within the limits of the established budget, authority to contract for audits, studies, analyses and other services.

## **Jurisdiction of the Inspector General**

The OIG consolidates audit and investigative capabilities under the direction of a single official, the Inspector General, who in turn reports directly to the Chairman and the Congress. Three important features characterize the OIG: independence, objectivity and integrity.

Although under the Chairman's general supervision, the Chairman may not prevent or prohibit the IG from initiating, performing, or completing any audit or investigation. The IG is also vested with special authorities that facilitate the performance of his or her mandate, and it is from these provisions that the element of independence derives.

The IG legislation states that there should be no conflicting policy responsibilities between the IG and the agency, thereby ensuring objectivity and independence. The IG's sole responsibility is auditing, investigating, and initiating other activities designed to promote economy and efficiency, and detect and prevent fraud, waste and abuse.

The investigative jurisdiction of the OIG includes all allegations of fraud, abuse and mismanagement, and any apparent or suspected violations of statute, order, regulation or directive in connection with any program or operation of the NEA.

The audit jurisdiction of the OIG encompasses a wide range of audit services, including audits, special reviews, and oversight audit agency (OAA) reviews. Audits are characterized as: financial or performance; full-scope or limited-scope; and external (focusing on the records of recipients of NEA funding) or internal (focusing on operations and activities carried on within the NEA). Special reviews are used to appraise and provide information about particular programs or projects. They include inspections (typically focused on compliance issues), evaluations (commonly focused on assessments of grantees' financial management systems and grantee compliance), and electronic data processing reviews (focused on data centers, application systems or telecommunication systems). OAA reviews are examinations of audit reports issued by other Federal agencies, state auditors, and independent public accountants to determine whether the results of audits have either a past, current or potential effect on NEA awards and what action, if any, is required by the NEA. In addition, reviews may be conducted of individual awards to ensure proper reporting of expenditures.

The Inspector General's jurisdiction also includes the review of existing and proposed legislation and regulations relating to NEA programs and activities. This is essentially a reactive activity, limited to commenting on and making recommendations about the impact of the legislation or regulation on economy and efficiency or the prevention of fraud, waste and abuse. As an adjunct to the legal requirement, the Inspector General is consulted as a matter of agency policy prior to issuance of internal directives and other significant pronouncements.

The Inspector General's jurisdiction is not always limited to the areas listed above. The IG may, as circumstances dictate, be given special assignments by the Chairman.

## **Planning Methodology**

The planning methodology that we have adopted is built around the concepts of issue areas and issues. Issue areas are broad categories of prime importance: they highlight the priorities of our customers -- Agency management, the Congress, and the American people -- and contain a number of narrower topics or individual issues. The individual issues, expressed as questions, represent an assessment of the most significant concerns facing the NEA.

The methodology also includes the formulation of annual audit work plans. The annual plan defines the work to be done by: identifying individual jobs; assigning priorities; linking jobs to the strategic issue areas; allocating staff among issue areas and issues; and serving as a device for communicating with NEA officials. The work plans will, of course, require periodic updates to reflect shifts in issue emphasis as well as changes in audit resources.

It is expected that issue area planning will:

- Establish multi-year audit objectives consistent with Agency and congressional needs;
- Focus OIG resources on issues that represent the greatest risk to the NEA and those that offer the most opportunity for adding value;
- Reflect the OIG's budget requests and resource allocation decisions; and
- Provide a basis for measuring results and ensuring accountability.

## **OIG Resource Requirements**

The OIG staff consists of four full-time positions, namely, the IG and three other auditors. Currently, there are three staff members on board, the IG and two auditors. The OIG is actively recruiting to fill an auditor's position. There is no investigator or general counsel on the staff. To provide a reactive investigative capability, we have a Memorandum of Understanding with the Inspector General of the General Services Administration (GSA) whereby the GSA's OIG agrees to provide investigative coverage for us on a reimbursable basis as needed. We also have a Memorandum of Understanding with the National Credit Union Administration's (NCUA) Office of Inspector General that details procedures to be used for providing the OIG with legal services pursuant to the new requirements reflected in the 2008 Act.

It is possible that the resources provided for the OIG may, at some time, need to be changed. Any such adjustment should be based on periodic evaluations of the OIG as gauged by the performance measures identified in this strategic plan and available resources.

## **STRATEGIC ISSUE AREAS**

### **Issue Area 1: NEA Program Activities**

Major functions include:

- Project monitoring; allowable costs; and compliance with reporting requirements, and general terms and conditions
- Audit followup
- Grant award process

**Issue 1.1:** Does the Agency evaluate completed projects to assess the benefits and accomplishments attributable to NEA funding?

**Strategy:** The OIG will work with management to assess the effectiveness of Agency practices for reviewing the results obtained by recipients' projects as well as NEA's program initiatives.

**Issue 1.2:** Does the Agency ensure that the recipients of NEA funding are held accountable for meeting their particular reporting requirements and for complying with the terms and conditions applicable to their awards?



**Strategy:** The OIG will conduct audits, special reviews (such as evaluations) and OAA reviews to verify accountability, allowability, and compliance with terms and conditions. In addition, the OIG will continue to review the implementation of corrective actions and advise management as to the effectiveness of the actions and whether the desired results were achieved. Furthermore, the OIG will provide technical assistance to grantees on how to maintain a financial management system and on how to comply with the financial aspects of the terms and conditions.

**Issue 1.3:** Are NEA's standards for determining grantee eligibility consistent with the Agency's mission and legislated objectives?

**Strategy:** The OIG will survey these measures to assess Agency compliance and evaluate the extent to which stated purposes are being achieved.

**Issue 1.4:** Does NEA provide potential applicants with information that is both appropriate and adequate regarding its funding initiatives?

**Strategy:** The OIG will survey this function to assess timeliness, adequacy of content, and effectiveness in reaching potential applicants.

**Issue 1.5:** Does the NEA ensure that applications are processed and evaluated in accordance with legislative requirements and Agency policies?

**Strategy:** The OIG will survey and document the existing policies and procedures at the Agency program level, Panel level and the Council level. Subsequent efforts will focus on areas in which compliance may be improved.

**Issue 1.6:** Do NEA's policies and procedures for its AccessAbility program adequately provide a framework consistent with legislative requirements?

**Strategy:** The OIG will conduct surveys and analyses as warranted to assess policies and initiatives for promoting AccessAbility's goals and objectives.

## **Issue Area 2: NEA Administrative Operations**

Major functions include:

- Information systems
- Financial management
- Budget administration
- Procurement and facilities
- Human resources
- Internal controls
- Freedom of Information and Privacy Acts

**Issue 2.1:** Is the Agency efficiently and effectively addressing the need to modernize its information management systems, and in a manner that allows it to continue meeting current operational needs while maintaining consistency with provisions of the Computer Security Act, OMB Circular No. A-130 and the Federal Information Security Management Act of 2002?

**Strategy:** The OIG will continue to assist management by: participating in task groups; periodically reviewing and commenting on implementation issues; and performing internal control reviews on new systems with a focus on security and problem prevention.

**Issue 2.2:** Does the Agency's financial management system provide the management information needed for: (1) budget planning and formulation, budget allocation, and budget review and follow up; and (2) monitoring costs and expenditures in accordance with the requirements and initiatives of Congress, OMB, the Department of the Treasury, and the Accountability of Tax Dollars Act of 2002?

**Strategy:** The OIG will conduct, through an independent auditor, financial related audits to verify the integrity of budget execution, the propriety of transactions, the validity of account balances, and the accuracy of financial reports.

**Issue 2.3:** Does the Agency effectively assure that procurement actions comply with Federal and Agency requirements?

**Strategy:** The OIG will periodically review NEA's procurement activities in accordance with Federal and Agency requirements.

**Issue 2.4:** Do NEA's policies and procedures provide a framework for the efficient and effective use of human resources that are consistent with EEO goals and objectives?

**Strategy:** The OIG will conduct surveys and analyses as warranted to: (1) identify patterns and trends; (2) evaluate Agency responsiveness to employee complaints or grievances; and (3) assess management initiatives for promoting EEO goals and objectives.

**Issue 2.5:** Are the Agency's internal controls adequate to deter and detect fraud, waste, abuse, and mismanagement?

**Strategy:** The OIG will conduct audits and other reviews to uncover any weaknesses in internal controls and will prepare management reports with recommendations for corrective action, if applicable.

**Issue 2.6:** Do the Agency's policies and procedures on FOIA and the Privacy Act adhere to Federal laws and regulations?

**Strategy:** The OIG will periodically review the Agency's policies and procedures for adherence to the Federal laws and regulations.

### **Issue Area 3: OIG Administration and Investigations**

Major Functions Include:

- Audit universe
- Lines of communication
- Allegations' review
- Staff professionalism
- Regulatory review

**Issue 3.1:** Does the OIG maintain an up-to-date audit universe, complete with weighted criteria for assessing audit priorities?

**Strategy:** The OIG will update its universe of discrete auditable areas, revising and prioritizing the criteria as appropriate.

**Issue 3.2:** Does the OIG promote open relations and positive interaction with Agency officials and others?

**Strategy:** The OIG will: seek frequent feedback from the Chairman, senior staff and Agency managers as appropriate; actively participate on NEA committees or task forces when opportunities exist to add value. In addition, the OIG, when appropriate, will establish relations with Congressional committees, GAO, the Department of Justice and other law enforcement agencies, and the OIG community.

**Issue 3.3:** Does the OIG maintain an investigative capability that is appropriate for the NEA?

**Strategy:** The OIG will continue to maintain a formal memorandum of understanding with the General Services Administration's (GSA) OIG to provide for the temporary assignment of professional criminal investigators as needed. OIG auditors will screen allegations and other indications of possible misconduct to determine whether there is a sufficient basis for investigation. If so, the OIG will, as appropriate, either refer the case to another investigative authority, request the temporary assignment of a criminal investigator from GSA's OIG, or investigate the case as a civil matter with the expectation that, after the necessary evidence is gathered and evaluated, the matter will be referred to NEA management for administrative action.

**Issue 3.4:** Does the OIG foster the professional growth of the OIG staff?

**Strategy:** The OIG will establish a staff feedback process to encourage the open exchange of information and ideas, and will continue to budget training funds adequate to satisfy the continuing education standards established by the Comptroller General.

**Issue 3.5:** Does the OIG review existing and proposed legislation and regulations to determine their effect on the programs and operations of the NEA?

**Strategy:** The OIG will continue to work with management, devising a process for ensuring that legislative and regulatory proposals are evaluated for their impact on the Agency.

# PERFORMANCE MEASURES

These measures are expected to help the OIG recognize successes, document achievements, evaluate progress toward goals, and identify needs for improvement. The measures are structured along the requirements of the IG Act and are intended to allow comparisons to previous periods.

- Feedback from customers on the value added by audit reports and other reviews of programs and operations;
- Assessment of the significance of recommendations implemented to correct deficiencies, which should lead to improved operations;
- The number of technical and advisory activities that benefited from OIG participation;
- The number of laws and regulations reviewed.

# FIVE-YEAR AUDIT PLAN

## 2012 - 2016

The following list of audits and audit-related efforts show how the OIG plans to use its available audit resources to implement the strategies previously discussed. The objectives of each project have been identified along with a short description of the work to be performed. While the plan is flexible and subject to revision based on management's input and changing conditions, it reflects our current assessment of relative risks and the most effective use of limited audit resources.

Criteria for selection include:

- Statutory requirements and recommendations from other sources of Federal authority such as OMB or GAO;
- Requests from the Chairman or other high authority;
- Importance of the activity to the NEA's mission;
- Extent of NEA resources committed to the activity;
- Potential for fraud and other unlawful or improper acts;
- Agency needs as identified through consultation with representatives of management;
- Extent of audit coverage provided by GAO, consultants or other outside sources;
- Newness, changed conditions, or sensitivity of the activity;
- Adequacy of the existing internal control systems for the activity;
- Availability of audit staff with needed expertise; and
- Extent and results of prior reviews by the OIG.

Note: The following pages reflect each year's audit plan. In addition, on the very last page there is a list of audits, evaluations or reviews that may be added at any time to one of the upcoming years. For purposes of our audit plans, "grantee" refers to NEA grantees, cooperators or contractors.

## AUDIT PLAN - FY 2012

**Grantee Audits.** Conduct audits and other reviews to: 1) determine the adequacy of grantees' financial systems for managing and accounting for Federal funds, 2) evaluate the current financial condition of grantee organizations, and 3) verify compliance with the terms and conditions of NEA awards. The number of on-site audits to be conducted will depend on the availability of auditors and travel funds. Grantee audits will also be impacted the review and reporting requirements of the American Recovery and Reinvestment Act of 2009 (ARRA), under which NEA received an additional \$50 million. However, we anticipate the number is expected to increase over the number in FY 2010. (Issue 1.2)

**Evaluations.** Conduct evaluations of grantees to determine the adequacy of financial management systems and ensure that recordkeeping complies with the requirements established by OMB and NEA's General Terms and Conditions. Evaluations will be limited to reviewing records of one to two awards. The availability of auditors, travel funds and the review and reporting requirements for ARRA, will dictate the number of evaluations. Anticipate more than 15 evaluations this year. (Issue 1.2)

**ARRA Reviews.** Conduct evaluations and audits to determine whether (1) the Agency's use of ARRA funds and program activities are in compliance with ARRA guidelines; and (2) recipients are in compliance with NEA and ARRA guidelines. The availability of auditors, travel funds and ARRA review and reporting requirements will dictate the number of evaluations and audits.

**OAA Reviews.** Conduct desk reviews of audit reports and other materials related to grantees that have had A-133 audits performed by independent outside auditors to: 1) determine compliance with relevant OMB circulars, 2) evaluate the audit findings for past, current or potential effect on NEA grants, and 3) recommend what action, if any, is required by NEA. An indeterminate number of non-OIG audit reports (probably five or more) will be examined throughout the year. (Issue 1.2)

**Audit Followup.** Track the status of recommendations for corrective action and provide the Audit Followup Official and other NEA managers with technical assistance in resolving audit findings. This activity will be ongoing throughout the year. (Issue 1.2)

**Information & Technology Management (ITM) and Privacy Management Review.** Determine whether the Agency's ITM policies, procedures, and practices are adequate for meeting its operational and security needs, and whether they conform to accepted standards and requirements. Review of security matters will be undertaken in accordance with the Federal Information Security Management Act of 2002. Privacy review will be done in accordance with OMB Memorandum M-06-20 (Issue 2.1) (Issue 2.6)

**Financial Statement Audit.** Provide oversight of the independent CPA firm conducting the financial statement audit of the Agency. (Issue 2.2)

**Investigations.** Investigate all allegations of fraud, waste, abuse, mismanagement, employee misconduct or any apparent or suspected violation of law or official regulations. Although the number of investigative reviews to be conducted cannot be predicted with confidence, in recent years the annual rate of new cases opened is two to three. (Issue 3.3)

**Regulatory Review.** Review existing and proposed legislation and regulations for effect on Agency programs and operations. This activity will be ongoing throughout the year. (Issue 3.5)



## AUDIT PLAN - FY 2013

**Grantee Audits.** Conduct audits and other reviews to: 1) determine the adequacy of grantees' financial systems for managing and accounting for Federal funds, 2) evaluate the current financial condition of grantee organizations, and 3) verify compliance with the terms and conditions of NEA grants. Grantee audits will also be impacted the review and reporting requirements of the American Recovery and Reinvestment Act of 2009 (ARRA). However, we anticipate the number is expected to decrease over the number in FY 2012. The number of on-site audits to be conducted will depend on the availability of auditors and travel funds. (Issue 1.2)

**Evaluations.** Conduct evaluations of grantees to determine the adequacy of financial management systems and ensure that recordkeeping complies with the requirements established by OMB and NEA's General Terms and Conditions. Evaluations will be limited to reviewing the records of one to two grants. The availability of auditors, travel funds and the work requirements for ARRA will dictate the number of evaluations. Anticipate more than 13 evaluations this year. (Issue 1.2)

**ARRA Reviews.** Conduct evaluations and audits to (1) determine whether ARRA recipients are in compliance with NEA and ARRA guidelines, and (2) compare grantees' reported versus projected data concerning numbers, types, and locations of jobs preserved with NEA's ARRA grants. The availability of auditors, travel funds and ARRA review and reporting requirements will dictate the number of evaluations and audits.

**OAA Reviews.** Conduct desk reviews of audit reports and other materials related to grantees that have had A-133 audits performed by independent outside auditors to: 1) determine compliance with relevant OMB circulars, 2) evaluate the audit findings for past, current or potential effect on NEA grants, and 3) recommend what action, if any, is required by NEA. An indeterminate number of non-OIG audit reports (probably five or more) will be examined throughout the year. (Issue 1.2)

**Audit Followup.** Track the status of recommendations for corrective action, and provide the Audit Followup Official and other NEA managers with technical assistance in resolving audit findings. This activity will be ongoing throughout the year. (Issue 1.2)

**Information & Technology Management (ITM) and Privacy Management Review.** Determine whether Agency's ITM policies, procedures, and practices are adequate for meeting its operational and security needs, and whether they conform to accepted standards and requirements. Review of security matters will be undertaken in accordance with the Federal Information Security Management Act of 2002. Privacy review will be done in accordance with OMB Memorandum M-06-20 (Issue 2.1) (Issue 2.6)

**Financial Statement Audit.** Provide oversight of the independent CPA firm conducting the financial statement audit of the Agency. (Issue 2.2)

**Investigations.** Investigate all allegations of fraud, waste, abuse, mismanagement, employee misconduct or any apparent or suspected violation of law or official regulations. Although the number of investigative reviews to be conducted cannot be predicted with confidence, in recent years the annual rate of new cases opened is two or three. (Issue 3.3)

**Regulatory Review.** Review existing and proposed legislation and regulations for effect on Agency programs and operations. This activity will be ongoing throughout the year. (Issue 3.5)

## AUDIT PLAN - FY 2014

**Grantee Audits.** Conduct audits and other reviews to: 1) determine the adequacy of grantees' financial systems for managing and accounting for Federal funds, 2) evaluate the current financial condition of grantee organizations, and 3) verify compliance with the terms and conditions of NEA grants. The number of on-site audits to be conducted will depend on the availability of auditors and travel funds. (Issue 1.2)

**Evaluations.** Conduct evaluations of grantees to determine the adequacy of financial management systems and ensure that recordkeeping complies with the requirements established by OMB and NEA's General Terms and Conditions. Evaluations will be limited to reviewing the records of one to two grants. The availability of auditors and travel funds will dictate the number of evaluations. Anticipate more than 13 evaluations this year. (Issue 1.2)

**ARRA Reviews.** Conduct evaluations and audits to (1) determine whether ARRA recipients are in compliance with NEA and ARRA guidelines, and (2) compare grantees' reported versus projected data concerning numbers, types, and locations of jobs preserved with NEA's ARRA grants. ARRA evaluations and audits will be incorporated into review process with other NEA grants awarded to the recipient. The availability of auditors, travel funds and ARRA review and reporting requirements will dictate the number of evaluations and audits.

**OAA Reviews.** Conduct desk reviews of audit reports and other materials related to grantees that have had A-133 audits performed by independent outside auditors to: 1) determine compliance with relevant OMB circulars, 2) evaluate the audit findings for past, current or potential effect on NEA grants, and 3) recommend what action, if any, is required by NEA. An indeterminate number of non-OIG audit reports (probably five or more) will be examined throughout the year. (Issue 1.2)

**Audit Followup.** Track the status of recommendations for corrective action, and provide the Audit Followup Official and other NEA managers with technical assistance in resolving audit findings. This activity will be ongoing throughout the year. (Issue 1.2)

**Information & Technology Management (ITM) and Privacy Management Review.** Determine whether Agency's ITM policies, procedures, and practices are adequate for meeting its operational and security needs, and whether they conform to accepted standards and requirements. Review of security matters will be undertaken in accordance with the Federal Information Security Management Act of 2002. Privacy review will be done in accordance with OMB Memorandum M-06-20 (Issue 2.1) (Issue 2.6)

**Financial Statement Audit.** Provide oversight of the independent CPA firm conducting the financial statement audit of the Agency. (Issue 2.2)

**Investigations.** Investigate all allegations of fraud, waste, abuse, mismanagement, employee misconduct or any apparent or suspected violation of law or official regulations. Although the number of investigative reviews to be conducted cannot be predicted with confidence, in recent years the annual rate of new cases opened is two or three. (Issue 3.3)

**Regulatory Review.** Review existing and proposed legislation and regulations for effect on Agency programs and operations. This activity will be ongoing throughout the year. (Issue 3.5)

## AUDIT PLAN - FY 2015

**Grantee Audits.** Conduct audits and other reviews to: 1) determine the adequacy of grantees' financial systems for managing and accounting for Federal funds, 2) evaluate the current financial condition of grantee organizations, and 3) verify compliance with the terms and conditions of NEA grants. The number of on-site audits to be conducted will depend on the availability of auditors and travel funds. (Issue 1.2)

**Evaluations.** Conduct evaluations of grantees to determine the adequacy of financial management systems and ensure that recordkeeping complies with the requirements established by OMB and NEA's General Terms and Conditions. Evaluations will be limited to reviewing the records of one to two grants. The availability of auditors and travel funds will dictate the number of evaluations. Anticipate more than 20 evaluations this year. (Issue 1.2)

**OAA Reviews.** Conduct desk reviews of audit reports and other materials related to grantees that have had A-133 audits performed by independent outside auditors to: 1) determine compliance with relevant OMB circulars, 2) evaluate the audit findings for past, current or potential effect on NEA grants, and 3) recommend what action, if any, is required by NEA. An indeterminate number of non-OIG audit reports (probably five or more) will be examined throughout the year. (Issue 1.2)

**Audit Followup.** Track the status of recommendations for corrective action, and provide the Audit Followup Official and other NEA managers with technical assistance in resolving audit findings. This activity will be ongoing throughout the year. (Issue 1.2)

**Information & Technology Management (ITM) and Privacy Management Review.** Determine whether Agency's ITM policies, procedures, and practices are adequate for meeting its operational and security needs, and whether they conform to accepted standards and requirements. Review of security matters will be undertaken in accordance with the Federal Information Security Management Act of 2002. Privacy review will be done in accordance with OMB Memorandum M-06-20 (Issue 2.1) (Issue 2.6)

**Financial Statement Audit.** Provide oversight of the independent CPA firm conducting the financial statement audit of the Agency. (Issue 2.2)

**Investigations.** Investigate all allegations of fraud, waste, abuse, mismanagement, employee misconduct or any apparent or suspected violation of law or official regulations. Although the number of investigative reviews to be conducted cannot be predicted with confidence, in recent years the annual rate of new cases opened is two or three. (Issue 3.3)

**Regulatory Review.** Review existing and proposed legislation and regulations for effect on Agency programs and operations. This activity will be ongoing throughout the year. (Issue 3.5)

## AUDIT PLAN - FY 2016

**Grantee Audits.** Conduct audits and other reviews to: 1) determine the adequacy of grantees' financial systems for managing and accounting for Federal funds, 2) evaluate the current financial condition of grantee organizations, and 3) verify compliance with the terms and conditions of NEA grants. The number of on-site audits to be conducted will depend on the availability of auditors and travel funds. (Issue 1.2)

**Evaluations.** Conduct evaluations of grantees to determine the adequacy of financial management systems and ensure that recordkeeping complies with the requirements established by OMB and NEA's General Terms and Conditions. Evaluations will be limited to reviewing the records of one to two grants. The availability of auditors and travel funds will dictate the number of evaluations. Anticipate 20 or more evaluations this year. (Issue 1.2)

**OAA Reviews.** Conduct desk reviews of audit reports and other materials related to grantees that have had A-133 audits performed by independent outside auditors to: 1) determine compliance with relevant OMB circulars, 2) evaluate the audit findings for past, current or potential effect on NEA grants, and 3) recommend what action, if any, is required by NEA. An indeterminate number of non-OIG audit reports (probably eight or more) will be examined throughout the year. (Issue 1.2)

**Audit Followup.** Track the status of recommendations for corrective action, and provide the Audit Followup Official and other NEA managers with technical assistance in resolving audit findings. This activity will be ongoing throughout the year. (Issue 1.2)

**Information & Technology Management (ITM) and Privacy Management Review.** Determine whether Agency's ITM policies, procedures, and practices are adequate for meeting its operational and security needs, and whether they conform to accepted standards and requirements. Review of security matters will be undertaken in accordance with the Federal Information Security Management Act of 2002. Privacy review will be done in accordance with OMB Memorandum M-06-20 (Issue 2.1) (Issue 2.6)

**Financial Statement Audit.** Provide oversight of the independent CPA firm conducting the financial statement audit of the Agency. (Issue 2.2)

**Investigations.** Investigate all allegations of fraud, waste, abuse, mismanagement, employee misconduct or any apparent or suspected violation of law or official regulations. Although the number of investigative reviews to be conducted cannot be predicted with confidence, in recent years the annual rate of new cases opened is two or three. (Issue 3.3)

**Regulatory Review.** Review existing and proposed legislation and regulations for effect on Agency programs and operations. This activity will be ongoing throughout the year. (Issue 3.5)

## OTHER ACTIVITIES \*

**Accessibility.** Review the Agency's policies and procedures for compliance with laws and regulations governing accessibility. (Issue 1.6)

**EEO.** Review the Agency's policies and procedures for compliance with laws and regulations governing equal employment opportunities and the civil rights of NEA employees. (Issue 2.4)

**FOIA.** Review the Agency's policies and procedures for adherence to Federal laws and regulations. (Issue 2.6)

**Grant Award Process.** Review the Agency's policies and procedures for providing potential applicants with information that is appropriate and accurate. The review also will assess timeliness, adequacy of content, and effectiveness in reaching potential applicants. (Issue 1.4) Review the Agency's policies and procedures employed by NEA staff, advisory panelists and Council Operations in the screening of grant applications and the awarding of grants to ensure there is fair and equitable treatment along with proper enforcement of the eligibility rules. (Issues 1.3 and 1.5)

**Procurement.** Review the Agency's procurement activities for compliance with Federal regulations and Agency policies. (Issue 2.3)

**Supply Management.** Review policies and procedures to uncover any weaknesses in administrative controls. (Issue 2.5)

**Transit Benefits.** Review and test for adequacy of controls over Agency's transit benefits program. (Issue 2.5)

**Travel.** Review NEA's controls related to approving and monitoring the travel of Agency employees. In addition, ensure that travel's purpose is both reasonable and appropriate to Agency's mission. (Issue 2.5)

\* The above areas may be considered at any time for an audit, evaluation or review based on the discretion of the OIG.

## REPORTING WRONGFUL ACTS

Anyone, including Agency employees, who learns about or has reason to suspect the occurrence of any unlawful or improper activity related to NEA operations or programs, should contact the OIG immediately. A complaint/referral may be reported using any of the following methods:

Toll-free OIG Hotline: 1-877-535-7448

Local Calls: 202-682-5479

Fax: 202-682-5649

Email: [oig@arts.gov](mailto:oig@arts.gov)

Website: [www.arts.gov/about/oig/fraud.html](http://www.arts.gov/about/oig/fraud.html)

You may also visit or write us at the National Endowment for the Arts, Office of Inspector General, Room 601, 1100 Pennsylvania Avenue, NW, Washington, DC 20506.

When contacting the OIG, it will help if you have answers to the following questions:

- Who are the parties involved (names, addresses and phone numbers if possible);
- What is the suspected activity (specific facts of the wrongdoing);
- When and where did the wrongdoing occur;
- How did you learn about the activity (from a third party, actual observation, conclusion drawn from observing or performing different activities, etc.); and
- Where can you be contacted or when will you contact us again.

The OIG will not disclose the identity of a complainant or informant without consent, unless the Inspector General determines that such disclosure is unavoidable during the course of the investigation. You may remain anonymous, if you choose. Federal employees are protected against reprisal for disclosing information to the Inspector General unless such disclosure was knowingly false.

