



ARCHITECT OF THE CAPITOL

SEMIANNUAL REPORT TO CONGRESS

Office of Inspector General
April 1, 2023 – September 30, 2023



INSPECTOR GENERAL MESSAGE



I am pleased to submit the Architect of the Capitol's (AOC's) Office of Inspector General (OIG) Semiannual Report (SAR) to Congress for the second half of Fiscal Year (FY) 2023. Every six months, the OIG provides Congress with a report detailing our independence and oversight of the AOC during the

reporting period. This report highlights our activities for the six-month period from April 1, 2023, to September 30, 2023. The work detailed herein contains results from the efforts of an OIG staff dedicated to promoting economy and efficiency and preventing and detecting fraud, waste and abuse within the AOC's programs and operations.

This report is the AOC's 31st SAR, and it is the 13th report of my tenure. In my role as the Inspector General, it is my responsibility to oversee and report on the efficiency, effectiveness and economy of AOC programs and operations and do so with independence and integrity. I manage the OIG and make decisions for its well-being independently and based on data-driven evidence, trend analyses and risk assessments. As the U.S. Capitol is a world-renowned symbol for democracy, we take pride in our work for Congress, the AOC, the Capitol campus community and the people of the United States.

During this reporting period, our office conducted numerous audits, evaluations and investigations across the AOC's programs and operations. Our work focused on identifying areas of risk and areas in need of improvement as well as assessing the agency's compliance with laws, regulations and policies. As such, this report contains findings and recommendations intended to assist the agency in improving its operations, reducing costs and enhancing program outcomes. The following pages detail oversight efforts that identified \$417,067.19 in questioned, unallowable or insufficiently supported funds as well as funds put to better use. This effort could not have been accomplished without the dedicated, diverse and talented OIG staff who go above and beyond and take their oversight role as seriously as I do, meeting all statutory and nonstatutory reporting requirements on time and with impactful results.

Impact cannot solely be measured monetarily or based on return on investment. Further, safety, security and integrity are hard to measure monetarily. Thus, I am honored to report that, for the second year in a row, the talented professionals of the AOC OIG will be recognized for their oversight work by the Council of the Inspectors General on Integrity and Efficiency (CIGIE). This year, members of the AOC OIG garnered two awards:

- Our Investigators, Legal Counsel, Management Program Analyst and Administrative Officer were awarded the Gaston L. Gianni Jr. Better Government Award. The award recognizes an individual or group whose efforts, accomplishments and actions enhance the public's confidence in government and exemplify the highest ideals of public service.
- Our second award, earned for excellence in evaluations, went to our Inspections and Evaluations Division Evaluator, Audrey Cree, in recognition of her evaluation of the AOC's security badging program, which resulted in the creation of standardized policies and procedures and interagency collaboration to enhance the safety and security of the Capitol campus, its workforce and its visitors.

These two awards show the effectiveness and quality of the AOC OIG's work. I am confident the work that this small but mighty office does has had a governmentwide impact and that our reports increase the public's confidence in government watchdogs.

To that end, over the next six months, the OIG will focus on increasing transparency and providing more outlets for our reports to be viewed, read and discussed. Following the success of our Twitter (X) feed ([@AOCOIG](#)), we implemented further transparency efforts like the launch of the AOC OIG's quarterly newsletter, the [OIG Quarterly](#), published this summer for AOC employees; we are going to expand our transparency with more frequent press releases and public announcements.

The OIG remains committed to providing independent, objective and transparent oversight to ensure the agency is fulfilling its mission and responsibilities effectively, efficiently and ethically. We will continue working diligently and without fear of reprisal to identify and address issues and vulnerabilities that may impact the agency's operations and performance and to investigate those that violate policies and laws and waste taxpayer funds at any level of the organization.

The OIG staff would like to express our gratitude to all AOC personnel for their assistance in providing documentation, their time and their expertise in support of OIG work.

Additionally, regarding OIG investigation [2021-0011-INVI-P](#), J. Brett Blanton, Architect of the Capitol, Abused His Authority, Misused Government Property and Wasted Taxpayer Money, Among Other Substantiated Violations, we would like to extend our thanks and appreciation to the Government Accountability Office (GAO) for its professionalism and coordination investigating our referral, which necessitated an appropriations law examination. The GAO concluded that, while the former Architect had statutory authorization to expend taxpayer dollars for official business, the AOC violated both the Antideficiency Act¹ and Purpose Statute² when it

authorized the use of government resources in excess of statutory limit and scope. The GAO's decision further supports the OIG's investigative findings on waste, abuse of authority and misuse of public funds by the former Architect and justifies the bipartisan and bicameral calls for his resignation as well as the president's decision to remove him from his post.

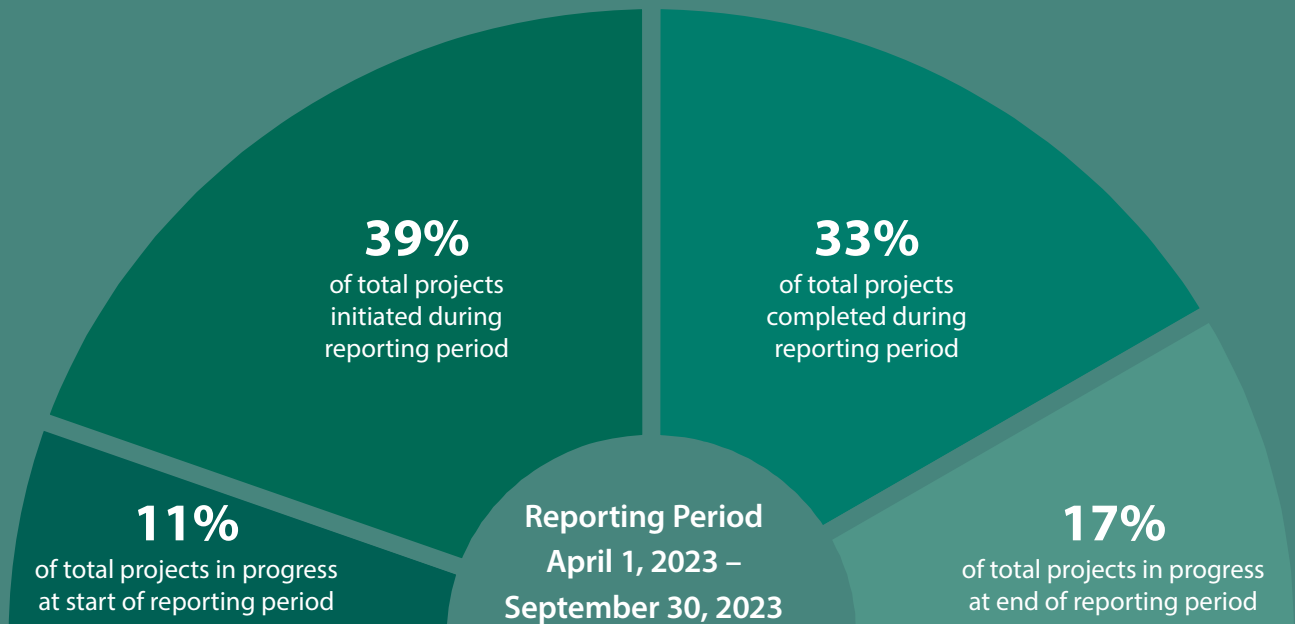
Last, we want to thank the Members of Congress and their staffs for their continued support in defense of the independence and transparency of inspectors general so that this OIG may provide the Acting Architect, Congress and the public with valuable oversight of the funds spent in support of our symbols of democracy and the jurisdictions that maintain them.




¹Title 31 U.S.C. § 1341, Limitations on Expending and Obligating Amounts, and § 1342, Limitation on Voluntary Services. <https://uscode.house.gov/view.xhtml?path=/prelim@title31/subtitle2/chapter13/subchapter3&edition=prelim>.

²Title 31 U.S.C. § 1301, Purpose Statute. <https://uscode.house.gov/view.xhtml?path=/prelim@title31/subtitle2/chapter13&edition=prelim>.

OIG PRODUCTIVITY



21 Projects in Progress at Start of Reporting Period

74 Projects Initiated During Reporting Period

63 Projects Completed During Reporting Period

32 Projects in Progress at End of Reporting Period



OUR MISSION

The OIG promotes efficiency, effectiveness and economy to deter and prevent fraud, waste, abuse and mismanagement in AOC programs and operations. We do this through value-added, transparent, impactful and independent audits, inspections, evaluations and investigations. We strive to positively affect the AOC and benefit the taxpayer while keeping the AOC and Congress fully informed.

OUR VISION

The OIG is a high-performing team, promoting positive change and striving for continuous improvement in AOC programs and operations. We foster an environment that inspires AOC workforce trust and confidence in our work.



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Inspector General Act

The Architect of the Capitol Inspector General Act of 2007, Title 2 United States Code (U.S.C.) § 1808, establishes the OIG as an independent, objective office within the AOC and applies certain sections of the Inspector General Act of 1978, that detail the Inspector General's (IG) duties and authorities and establish important protections for AOC employees and responsibilities for the AOC.



PROFILES

ARCHITECT OF THE CAPITOL

Permanent authority for the care and maintenance of the U.S. Capitol by the Architect of the Capitol (AOC) derives from § 1811 of the United States Code (U.S.C.). The AOC is responsible for the maintenance, operation, development and preservation of more than 18.4 million square feet of buildings and more than 570 acres of grounds. These buildings and grounds include the U.S. Capitol, House and Senate office buildings, the U.S. Capitol Visitor Center (CVC), the Library of Congress, the Supreme Court of the United States, the U.S. Botanic Garden, the Capitol Power Plant and other facilities. The AOC provides professional expertise regarding the preservation of architectural and artistic elements entrusted to its care and provides recommendations concerning the design, construction and maintenance of the facilities and grounds. The AOC is also responsible for the upkeep and improvement of the U.S. Capitol Grounds and the support of the quadrennial inaugural ceremonies and other ceremonies held on the Capitol campus.

The AOC performs its duties in connection with various House and Senate committees. The Committee on House Administration, as well as several other House committees, oversee AOC activities in the U.S. House of Representatives. The Senate Committee on Rules and Administration provides oversight for the AOC's duties associated with the Senate office buildings. The AOC is responsible for the care and repair of works of art in the U.S. Capitol under the direction of the Joint Committee of Congress on the Library. In addition, the AOC is responsible for the maintenance and restoration of murals and other architectural elements throughout the Capitol campus. Since 1934, the Architect of the Capitol has served as the Acting Director of the U.S. Botanic Garden under the Joint Committee of Congress on the Library.

OFFICE OF INSPECTOR GENERAL

The Architect of the Capitol Inspector General Act of 2007, Title 2 U.S.C. § 1808, established the Office of Inspector General (OIG) as an independent, objective office within the AOC and applies certain sections of the Inspector General Act of 1978, that detail the Inspector General's (IG) duties and authorities and established employee protections from retaliation for contacting the OIG or participating in OIG activities. The IG reports to and is under the general supervision of the Architect of the Capitol. The OIG's duties are to:

- (1) Conduct, supervise and coordinate audits and investigations relating to AOC programs and operations
- (2) Review existing and proposed legislation and regulations that impact AOC programs and operations and, in the semiannual reports (SAR), note their impact on the economy and efficiency or the prevention and detection of fraud and abuse
- (3) Recommend policies for AOC activities to promote economy and efficiency or prevent and detect fraud and abuse in its programs and operations
- (4) Provide a means of keeping the AOC and Congress fully and currently informed about problems and deficiencies relating to the administration of AOC programs and operations and the need for and progress of corrective action, which is an effort that is generally done by issuing a SAR to the Architect of the Capitol and Congress

AUDITS

COMPLETED ACTIVITY THIS REPORTING PERIOD

Architect of the Capitol Lacked Sufficient Oversight of the Cannon Caucus Room Renovations
[\(OIG-AUD-2023-06\)](#)

The OIG contracted with an independent public accounting firm (IPA) to conduct a performance audit of the Cannon House Office Building Renewal (CHOBr) Project's Caucus Room renovations. The objective of the audit was to determine if the Caucus Room was constructed and commissioned in accordance with the design, contract documents and contract terms and conditions within the approved budget.

Overall, the AOC did not provide sufficient oversight of the Caucus Room renovations. We determined that certain portions of the Caucus Room were not fully constructed and commissioned in accordance with the design, contract documents and contract terms and conditions within the approved budget. We identified areas where the AOC should consider updating its internal controls and commissioning requirements to ensure final deliverables provided by its contractors meet AOC expectations. In addition, we identified a potential cost recovery of \$29,324.00.

The OIG served as the Contracting Officer Representative (COR), overseeing contract requirements and transmitting the IPA's final report on September 6, 2023.

The IPA made 10 recommendations to correct the deficiencies, and the AOC concurred.

Review of the Architect of the Capitol's Multimillion-Dollar Construction Project Change Orders
[\(OIG-AUD-2023-07\)](#)

The OIG contracted with an IPA to perform semiannual reviews of AOC change orders for various multimillion-dollar construction projects. The objective of the review was to determine whether the change orders for multimillion-dollar construction projects are reasonable, authorized, supported and comply with contract requirements.

The semiannual review determined that the sampled change orders generally met the objective; however, we noted instances of (1) inconsistent guidance, (2) proposals containing duplicative costs, (3) incorrectly applied markups, (4) proposals lacking contractually required details and (5) supporting documentation that did not properly adhere to AOC policies and procedures. We identified a total of

\$105,224.00 in questioned costs (\$88,025.00) and funds put to better use [waste] (\$17,199.00) as a result of the findings.

The OIG served as the COR, overseeing contract requirements and transmitting the IPA's final report on September 21, 2023.

The IPA made five recommendations to correct the deficiencies, and the AOC concurred.

Cannon House Office Building Renewal Project's Punch List and Warranty Work Process Lacked Sufficient Oversight
[\(OIG-AUD-2023-08\)](#)

The OIG contracted with an IPA to conduct a performance audit of the punch list and warranty items for Phase 2 of the CHOBr Project. The objective of the audit was to evaluate and assess contract compliance and resources used to complete the punch list and warranty work for Phase 2 of the CHOBr Project.

Our audit found that the CHOBr Project team did not provide sufficient oversight of the Phase 2 punch list and warranty work. We determined that the CHOBr Project's Phase 2 punch list and warranty items were not always completed in compliance with the construction manager as constructor (CMc) contract and specifications or aligned with the processes described by the CHOBr Project team and CMc:

- For Phase 2 punch list items, we found that items were incorrectly marked as closed, contract completion timeframes were missed and inconsistent justifications to questioned punch list items were provided.
- For Phase 2 warranty items, we found items inappropriately identified as warranty work, closed without support indicating the issue had been fixed, marked closed for issues not fixed and identified as being inspected after the warranty period ended. As a result, we determined that the Phase 2 warranty data provided by the CHOBr Project team were inaccurate and unreliable.

The OIG served as the COR, overseeing contract requirements and transmitting the IPA's final report on September 25, 2023.

The IPA made nine recommendations to correct the deficiencies, and the AOC concurred.



AUDIT DIVISION PROJECTS IN PROGRESS

Fiscal Year 2023 Financial Statement Audit (2023-AUD-003-A)

The OIG is contracting with an IPA to perform an audit of AOC financial statements as of and for the fiscal year ending September 30, 2023. The IPA is responsible for conducting the audit in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in Government Auditing Standards,³ issued by the Comptroller General of the United States under the GAO; Office of Management and Budget (OMB) Bulletin No. 24-01, Audit Requirements for Federal Financial Statements;⁴ the GAO's Federal Information System Controls Audit Manual;⁵ and the GAO/Council of the Inspectors General on Integrity and Efficiency (CIGIE) Financial Audit Manual.⁶ Specifically, the IPA is responsible for providing an opinion on whether the financial statements that were prepared by AOC management, with the oversight of those charged with governance, were prepared, in all material respects, in accordance with the applicable financial reporting framework.

The OIG announced the audit on May 1, 2023. The OIG is serving as the COR, overseeing contract requirements. The OIG plans to transmit the IPA's final report in November 2023.

Audit of the Architect of the Capitol's Construction Division (2023-AUD-004-A)

The OIG is contracting with an IPA to perform an audit of the AOC's Construction Division. The objective of the audit is to determine whether Construction Division projects address stakeholder needs and are being completed in a timely and cost-effective manner.

The OIG announced the audit on July 26, 2023. The OIG is serving as the COR, overseeing contract requirements. The OIG plans to transmit the IPA's final report in April 2024.

Evaluation of the Cannon House Office Building Renewal Project's Construction Materials (2023-AUD-006-E)

The OIG is contracting with an IPA to perform an evaluation of the CHOBr Project's construction materials. The objective of the evaluation is to determine if the materials used for CHOBr Project Phase 4 comply with contract requirements and to assess the quality of the work performed.

The OIG announced the evaluation on September 7, 2023. The OIG is serving as the COR, overseeing contract requirements. The OIG plans to transmit the IPA's final report in June 2024.

INSPECTIONS AND EVALUATIONS

COMPLETED ACTIVITY THIS REPORTING PERIOD

Evaluation of the Architect of the Capitol's Safety Inspection Program (2022-0004-IE-P)

The OIG announced the evaluation of the AOC's Safety Inspection Program on September 6, 2022. The objective of this evaluation was to assess the compliance and internal controls of the AOC Safety Inspection Program in accordance with AOC policies, procedures and applicable federal laws and regulations. This review also included physical inspections of select in-scope buildings/offices or meeting spaces. The OIG contracted with an IPA to perform this evaluation.

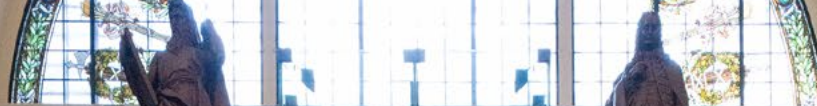
The evaluation determined that, overall, the AOC's Safety Self-Inspection Program complies with AOC policies and procedures and applicable federal laws and regulations. Further, internal controls over the program are generally sufficient. However, we concluded that (1) the safety self-inspection checklist completion and reporting process is inconsistent across AOC organizations, (2) improved guidance is needed about how to report other agencies' findings, (3) the self-inspection checklists may benefit from the inclusion of items related to hazardous materials, (4) AOC organizations' lists of physical areas to self-inspect may be incomplete and (5) while AOC organizations are required

³ GAO. 2018. Government Auditing Standards (Yellow Book). <https://www.gao.gov/yellowbook>.

⁴ OMB. 2023. Bulletin No. 24-01, Audit Requirements for Federal Financial Statements. <https://www.whitehouse.gov/wp-content/uploads/2023/10/Bulletin-24-01-Audit-Requirements-for-Federal-Financial-Statements.pdf>.

⁵ GAO. 2009. Federal Information System Controls Audit Manual. <https://www.gao.gov/assets/gao-09-232g.pdf>.

⁶ GAO. 2023. Financial Audit Manual. https://www.gao.gov/financial_audit_manual.



EXIT

EXIT

to complete self-inspections, not all parties receive training on how to conduct self-inspections.

The OIG served as the COR, overseeing contract requirements and transmitting the IPA's final report memorandum on July 14, 2023.

The IPA made eight recommendations for continued improvement to the AOC's Safety Inspection Program, and the AOC concurred. The AOC provided proposed corrective actions for each recommendation.

Evaluation of the Architect of the Capitol's Implementation of the Federal Information Security Modernization Act of 2014, Fiscal Year 2022 (2022-0005-IE-P)

The OIG announced the evaluation of the AOC's implementation of the Federal Information Security Modernization Act of 2014 (FISMA) on August 30, 2022. The objective of this evaluation was to determine whether the AOC developed and implemented effective information security programs and practices in accordance with the FISMA.⁷ The AOC is not required to follow FISMA, but it is a best practice and was used as criteria for the evaluation. The OIG contracted with an IPA to perform this evaluation. Due to the sensitive nature of this evaluation, specific language pertaining to findings and recommendations is protected and not disclosed.

The OIG served as the COR, providing oversight of contract requirements and transmitting the IPA's final report

memorandum on June 22, 2023. The IPA made 20 recommendations for continued improvement to the AOC's information security programs and the AOC concurred. The AOC provided proposed corrective actions for each of the recommendations.

Special Review (Flash Report Series) Architect of the Capitol's Records and Archives Management Flash Report (2023-0001-IE-P)

The OIG announced the special review of the AOC's Records Management and Archives Branch (RMAB) on February 16, 2023. The objective of this evaluation was to assess the efficiency, effectiveness and internal controls of the AOC RMAB Program in accordance with AOC policies, procedures and applicable federal laws and regulations. We also assessed whether document handling procedures complied with AOC security requirements. Additionally, this review included physical inspections of records, archives offices and storage spaces.

The OIG issued the final report on May 9, 2023. Our evaluation found a lack of timely policy development, inadequate resources and ineffective, inefficient management in this division. We made four recommendations for improvements to RMAB's record management program, and the AOC concurred or partially concurred with all recommendations. The AOC provided proposed corrective actions for three of the four recommendations and will provide a formal corrective action plan for all recommendations after the appointment of a permanent Chief Administrative Officer (CAO).

INSPECTIONS AND EVALUATIONS DIVISION PROJECTS IN PROGRESS

Evaluation of the AOC's Contracting Officer and Contracting Officer Representative Oversight (2023-0002-IE-P)

The OIG announced an evaluation of the AOC's Contracting Officer (CO) and COR oversight duties on June 29, 2023. The objective of this evaluation is to determine if COs and CORs are performing their duties in accordance with AOC policies, procedures, contractual requirements and applicable federal laws and regulations, while assessing any limitations that might hinder opportunities for efficiency in CO and COR work processes.

The OIG is contracting with an IPA to perform this evaluation. The OIG plans to transmit the IPA's final report in March 2024.

Evaluation of the Architect of the Capitol's Human Capital Management (2023-0003-IE-P)

The OIG announced the evaluation of the AOC's Human Capital Management Program on July 24, 2023. The objective of this evaluation is to assess the efficiency, effectiveness and internal controls of the AOC Human Capital Management Program activities and operations in accordance with AOC policies, procedures, organizational transformation milestones, human capital strategy and applicable federal laws and regulations.

The OIG is contracting with an IPA to perform this evaluation. The OIG plans to transmit the IPA's final report in May 2024.

⁷ Public Law No. 113-283. Federal Information Security Modernization Act of 2014. <https://www.congress.gov/bill/113th-congress/senate-bill/2521>.



FOLLOW-UP

COMPLETED ACTIVITY THIS REPORTING PERIOD

Follow-Up Evaluation of the Congressional Request for the Architect of the Capitol's Response to Sexual Harassment (OIG-FLD-2022-01)

The OIG announced a follow-up evaluation in response to a congressional request for the AOC's response to sexual harassment on May 24, 2022. The objective of this follow-up evaluation was to determine whether the AOC implemented corrective actions to address issues identified in the OIG's 2019 report, Congressional Request for Office of Inspector General Review of the Architect of the Capitol's Response to Sexual Harassment.⁸

The OIG issued the official report to the AOC on June 1, 2023. The OIG's follow-up evaluation found that the AOC expanded its antiharassment policy and that the Diversity, Inclusion and Dispute Resolution Office (DI/DR) developed new training for AOC employees and supervisors, increased training for its own staff, outsourced their 24/7 hotline, realigned its office for greater independence and implemented a new case management system. However, issues remain with the quality of the AOC's sexual harassment data, and the DI/DR lacks office-specific policies and procedures for training requirements and for complaint documentation, tracking and response. Our confidential, agencywide sexual harassment survey data yielded mostly positive results about the AOC's culture relevant to sexual harassment, but perceptions that the AOC does not always take concerns seriously, should do more to prevent harassment committed by nonemployees and provide more transparency about the outcomes of cases remain.

The OIG made 12 recommendations; the AOC concurred with eight recommendations, partially concurred with two recommendations and did not concur with two recommendations. The AOC provided proposed corrective actions for 10 recommendations.

Follow-Up Evaluation of the Architect of the Capitol's Inventory Accountability and Controls (OIG-FLD-2023-01)

The OIG announced a follow-up evaluation of the AOC's inventory accountability and controls on January 12, 2023. The objective of this follow-up evaluation was to determine whether the AOC implemented corrective actions to address recommendations in the OIG's 2019 report, Evaluation of the AOC's Inventory Accountability and Controls.⁹

The OIG issued the official report to the AOC on September 5, 2023. The OIG found opportunities for the AOC to strengthen internal controls over personal property, that there are still issues with inadequate storage space and that Accountable Property Officers did not have issues performing property management duties as a collateral duty.

We made three recommendations to improve the AOC's Personal Property Management Program, and the AOC concurred with all. The AOC provided proposed corrective actions for all three recommendations.

FOLLOW-UP DIVISION PROJECTS IN PROGRESS

Follow-Up Evaluation of the AOC's Data Center (2023-0002-FLD-P)

The OIG announced a follow-up evaluation of the AOC's Data Center on September 12, 2023. The OIG's objective is to determine whether the AOC effectively implemented corrective actions to address issues identified in the 2019 OIG report, Audit of the Architect of the Capitol Data Center.¹⁰

The OIG plans to transmit the final report in the second quarter of FY 2024.

⁸ AOC OIG. 2019. Congressional Request for Office of Inspector General Review of the Architect of the Capitol's Response to Sexual Harassment, Report No. 2019-0001-INVQ-P. <https://www.oversight.gov/sites/default/files/oig-reports/Combined%20AOC%20OIG%20Sexual%20Harassment%20Inquiry%20with%20AOC%20response.pdf>

⁹ AOC OIG. 2019. Evaluation of the AOC's Inventory Accountability and Controls, Report No. 2018-0002-IE-P. <https://www.oversight.gov/sites/default/files/oig-reports/AOC/Evaluation-AOCs-Inventory-Accountability-and-Controls-2018-0002-IE-P.pdf>

¹⁰ AOC OIG. 2019. Audit of the Architect of the Capitol (AOC) Data Center, Report No. OIG-AUD-2019-04. https://www.oversight.gov/sites/default/files/oig-reports/Final%20Audit%20of%20Architect%20of%20the%20Capitol%20Data%20Center%20OIG-AUD-2019-04_Redacted.pdf



INVESTIGATIONS

The OIG Investigations Division conducts criminal, civil and administrative investigations of fraud, waste, abuse and misconduct related to AOC programs and operations. Special agents investigate allegations involving both AOC employees and contractors that threaten the integrity of AOC initiatives. Criminal and civil matters are referred to the relevant U.S. Attorney's Office (USAO) or a local prosecutorial entity for criminal or civil prosecution or monetary recovery. Administrative violations or substantiated matters not accepted for prosecution are referred to AOC management for awareness and administrative action. OIG special agents continue to train and work with local and federal agencies to build relationships that further enhance our capabilities to identify and mitigate fraud within the AOC.

During this reporting period, the OIG received or initiated 40 complaints. From those complaints, investigators opened nine investigations. We referred 11 complaints to other government agencies, AOC program offices and/or AOC Avenues of Assistance. Two cases were referred for prosecutorial consideration.



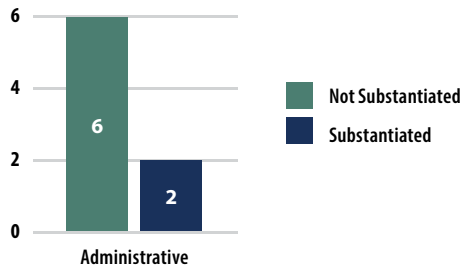
Table A: Investigative Data This Reporting Period

Investigative Activity	Count
Complaints	
Hotline complaints received (phone and/or email)	25
Complaints received (walk-ins)	0
Direct phone or email to the OIG	12
U.S. mail or facsimile machine	1
OIG-observed or -developed	2
Total Complaints	40
Investigations	
Investigations Opened	9
Investigations Closed ¹	4
<u>Issuance of Subpoenas</u>	
OIG Subpoenas Served	3
Grand Jury Subpoenas Served	0
<u>Disciplinary Actions Resulting from Administrative Investigations</u>	
Actions Pending	4
Allegations Not Substantiated or Disproven by the OIG	6
Allegations Substantiated	2
Employee Removals/Resignations/Retirements (in lieu of)	2
Employee Reprimands/Warnings/Counseling	1
Employee Suspensions	1
Total Disciplinary Actions	4
Referrals	
<u>Criminal Investigation Referrals²</u>	
Accepted for Prosecution	1
Declined for Prosecution	1
<u>Administrative Investigation Referrals</u>	
Informal Referrals (to AOC Program Offices, no follow-up or report required)	8
Formal Referrals (follow-up required within 60-90 days)	1
Law Enforcement Referrals	2
Employee Assistance Referral (to AOC Avenue of Assistance)	0
Total Referrals	13

¹ Reflects three investigations opened during previous periods

² Referred to USAO, states Attorney's Offices, state or local entity for prosecutorial decision
Source: OIG investigative files.

FIGURE 1: Investigations Division Charge Substantiation*



Note: This chart reflects the outcome of investigations only. An investigation may have more than one charge associated with each case.

Figure 1 highlights the number of charges, both substantiated and not substantiated, by type for the four¹¹ investigations closed during the reporting period. There were eight administrative charges. Of those, the OIG substantiated two. No civil/criminal charges were substantiated during this period. Management action is pending regarding the substantiated charges.

FIGURE 2: Investigations Division Violations by Category

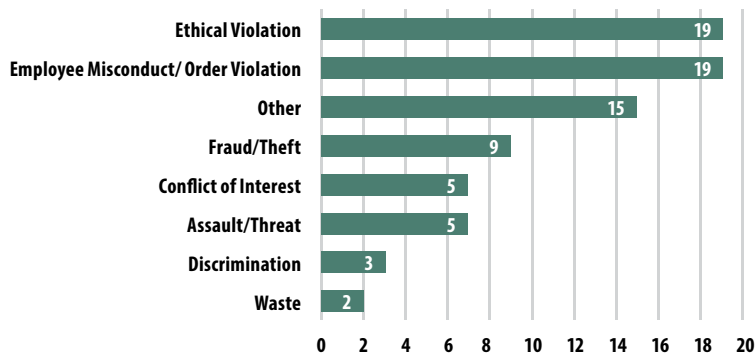
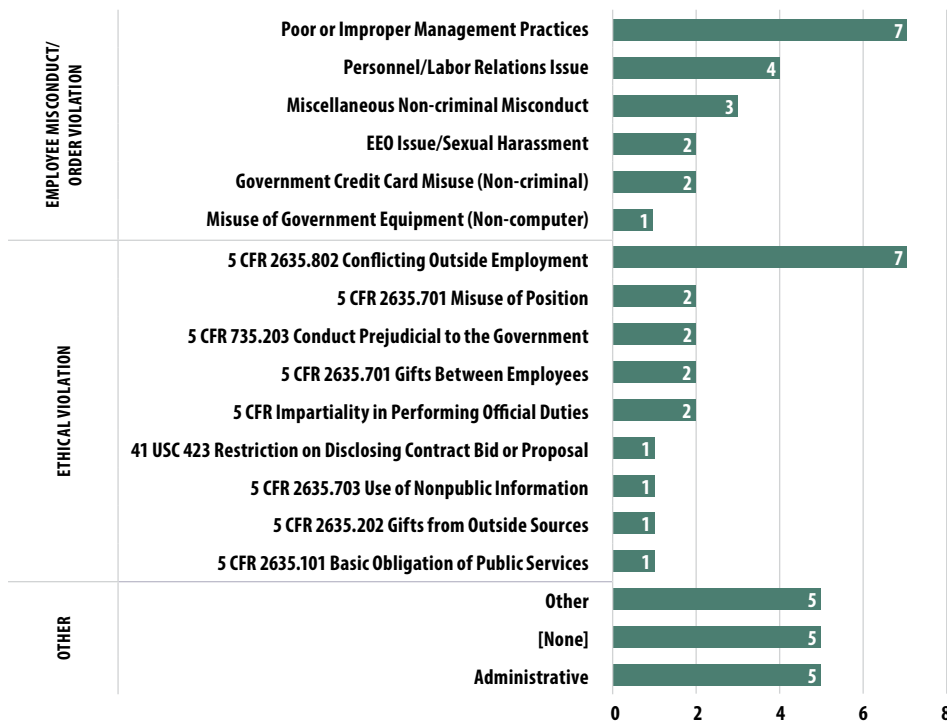


Figure 2 represents investigation activities that include complaints and referrals for the reporting period broken out by violation type. Ethical violation, employee misconduct/order violation and other (violations that did not meet certain case criteria when initiated) were the most frequent types of violations committed by AOC employees. A further breakout of the top three investigative violation types by subcategory are depicted in Figure 3.

FIGURE 3: Top Three Violations by Subcategory



¹¹ While there were four closed investigations, only one contained substantiated charges.

OPEN INVESTIGATIONS

The OIG currently has 10 open investigations:

- 2023-0002-INVI-P
- 2023-0007-INVI-P
- 2023-0008-INVI-P
- 2023-0009-INVI-P
- 2023-0010-INVI-P
- 2023-0011-INVI-P
- 2023-0012-INVI-P
- 2023-0014-INVI-P
- 2023-0015-INVI-P
- 2023-0016-INVI-P

Per OIG policy, we are unable to comment about ongoing investigations. We anticipate closing these investigations during the next reporting period.

CLOSED INVESTIGATIONS INVOLVING SENIOR GOVERNMENT EMPLOYEES

J. Brett Blanton, Architect of the Capitol, Abused His Authority, Misused Government Property and Wasted Taxpayer Money, Among Other Substantiated Violations (2021-0011-INVI-P)

Suspected Violations of the AOC Standards of Conduct Policy, Government Ethics Policy, Fleet Management Policy, Authority and Responsibilities of the OIG and Cooperation of AOC Employees Policy and Title 18 U.S.C. § 1001 Statements or Entries Generally.
Substantiated.

On March 7, 2021, the OIG received a complaint concerning an AOC vehicle being operated recklessly in the Tysons Corner, Virginia, area. The OIG determined the vehicle was assigned to the Office of the Chief Security Officer (OCSO) and used by then-Architect of the Capitol James Brett Blanton. It was also discovered that a previous complaint had been made with the General Services Administration referencing the same vehicle in December 2020. Subsequent investigation by the OIG revealed that AOC vehicles intended for home-to-work transportation and official government business by Blanton were consistently used as personal vehicles by Blanton and his family for weekend trips to a craft brewery and West Virginia, travel to Florida and South Carolina and general family use. The AOC vehicles were driven by Blanton's spouse and adult daughter on a regular basis without him in the vehicle. Blanton's daughter advised the OIG that her father had given her permission to drive the vehicles and that she had transported her friends and boyfriend in the vehicle. She referred to using the AOC's fuel as "free gas." On one occasion, an AOC vehicle under Blanton's control was involved in an accident at a brewery in Leesburg, Virginia. Blanton told the other party involved that it was a government vehicle, he was an "agent," and he did not have insurance information because the government would handle the insurance claim. A police

report was not obtained, witness statements were not taken, and other AOC accident procedures were not followed.

The investigation also revealed that Blanton used an AOC vehicle with emergency equipment to pursue a suspect involved in a hit-and-run that took place near his residence. The vehicle struck belonged to Blanton's daughter's boyfriend. The police report obtained from that incident identified Blanton as an "off-duty D.C. police officer." The suspect's legal counsel stated that, because of his belief that Blanton was law enforcement, he did not object to Blanton's presence at pretrial meetings. He also described Blanton as making an affirmative action when asked if he was law enforcement during the meetings. Witnesses reported that Blanton had "activated the emergency equipment" when pursuing the suspect.

The accident at the brewery caused \$1,409.80 in vehicle repairs, which were initially paid for by the AOC and U.S. taxpayers. In addition, the investigation determined that Blanton's personal use of AOC vehicles totaled more than 23,000 miles between 2020 and 2022. Using an Internal Revenue Service formula, the additional mileage, wear and tear and extra maintenance added to the AOC vehicles represented a fringe benefit to Blanton of approximately \$13,900.00, not including any fuel that may have been used by the family.

On February 13, 2023, the President of the United States terminated Blanton's appointment as Architect of the Capitol. The Department of Justice and the Office of the Fairfax County Commonwealth's Attorney declined to pursue criminal prosecution. As of May 1, 2023, the AOC had recovered funds in the amount of \$1,409.80 for the accident that took place at the brewery involving the AOC vehicle and withheld \$12,516.76 from Blanton's final annual leave payment.

On September 7, 2023, the GAO issued a legal decision¹² stating that the AOC violated the Antideficiency Act when it obligated appropriations for the purchase of a passenger motor vehicle in excess of the FY 2021 statutory price limitation and that the AOC violated the Purpose Statute when it obligated appropriations for expenses incurred in relation to the use of AOC vehicles by the then-Architect’s family members.

The 2021 fiscal year price limitation (set by the Financial Services and General Government Appropriations Act) to purchase a passenger motor vehicle was not to exceed \$19,947.00. Because the AOC obligated \$49,033.64 against its Capital Construction and Operations appropriation for the purchase of a passenger motor vehicle for use by Blanton, the OIG has identified \$29,086.64 as funds for better use.

Inappropriate Romantic Relationship Involving a Senior Rated Employee and a Subordinate Supervisor (2023-0005-INVI-P)

Senior Rated (SR) Employee: Suspected Violations of the AOC Standards of Conduct Policy and Relationships Between Supervisors and Subordinates Policy Memorandum. **Substantiated.**

Subordinate Supervisor: Suspected Violations of the AOC Standards of Conduct Policy, IT Resources and De Minimis Use Policy and Relationships Between Supervisors and Subordinates Policy Memorandum. **Substantiated.**

The OIG received a complaint that Ms. Angela “Beth” Compton Plemmons (SR-00, Chief Executive Officer, CVC) had an inappropriate romantic relationship with a subordinate supervisor in her chain of command. Following a review of digital forensic evidence and interviews of both parties, the OIG substantiated that both employees violated multiple AOC policies. The administrative violations were submitted to the Acting Architect for action deemed appropriate.

Plemmons resigned from the AOC effective April 6, 2023, following the OIG investigation. The OIG is still awaiting management action regarding violations sustained against the subordinate supervisor.

¹² GAO. 2023. Architect of the Capitol—Purchase and Use of Motor Vehicles, File B-333508. <https://www.gao.gov/products/b-333508>.

CLOSED INVESTIGATIONS AWAITING MANAGEMENT ACTION

Outside Employment While on COVID-19 Administrative Leave (2023-0004-INVI-P)

Suspected Violations of AOC Standards of Conduct Policy and Government Ethics Policy. **Substantiated.**

The OIG received an allegation that an AOC employee maintained unreported outside employment after seeking a reasonable accommodation of paid administrative leave from the AOC during the COVID-19 pandemic. The investigation confirmed that the employee had been employed at five different companies during the time period reviewed (2020 to 2023), none of which were approved by

the AOC. Only employment with one of the companies came during the employee's period of administrative leave between November 15, 2020, and December 31, 2020. Employment with the other companies came while the employee worked their regular AOC schedule.

The OIG substantiated that the employee violated multiple AOC policies, which were submitted to the agency for action deemed appropriate. The case was presented to the USAO, which declined to prosecute due to the availability of administrative remedies. The case is closed pending management action.

CLOSED INVESTIGATIONS WITH NO RESPONSE PENDING

Allegations of Wasteful and Unnecessary Spending (2023-0003-INVI-P)

Suspected Violations of AOC Standards of Conduct Policy and Contracting Manual. **Not Substantiated.**

The OIG received an allegation that an AOC supervisor at the Library Buildings and Grounds jurisdiction purchased unnecessary supplies for use by maintenance employees. The OIG investigation revealed that the required documentation and approvals had been submitted with all requests for purchase. The OIG conducted an inventory inspection and observed the equipment and control mechanisms in place. In addition, the OIG received explanations for questioned purchases. The OIG did not substantiate the allegations.

Allegation of False Family and Medical Leave Documentation (2023-0006-INVI-P)

Suspected Violation of AOC Standards of Conduct Policy and Absence and Leave Policy. **Not Substantiated.**

The OIG received a complaint alleging that an AOC employee submitted fraudulent medical documentation in support of sick leave. The OIG served a subpoena on the employee's medical provider to obtain confirmation

of medical appointments and documents provided to the AOC. The medical provider confirmed that the employee had visited the office on all dates in question and confirmed signing the employee's paperwork. The OIG did not substantiate the allegations.

Allegation of Nepotism in the Hiring of the Spouse of an AOC Employee (2023-0013-INVI-P)

Suspected Violation of AOC Policy on Employment of Relatives. **Not Substantiated.**

The OIG received an allegation of improper hiring practices associated with the vacancy announcement for a director-level position as the candidate selected is the spouse of a current AOC employee. The investigation found that the AOC had hired a candidate whose spouse was employed in the same jurisdiction, an apparent violation of AOC Order 310-1 Employment of Relatives. Further investigation determined that the Office of General Counsel, the Human Capital Management Division and the Acting Architect of the Capitol were aware of and approved the hiring, citing other AOC policies and orders. 2023-0013-INVI-P was closed administratively and the OIG issued a Management Advisory based on its findings (refer to [2023-0006-INVM-P](#)).



MANAGEMENT ACTION RESULTING FROM INVESTIGATIONS REPORTED IN PREVIOUS SEMIANNUAL REPORTS

Architect of the Capitol Employee Requests AOC Supervisors to Falsify Time and Attendance Records While Submitting False Medical Records (2022-0006-INVI-P)

Employee: Suspected Violations of the AOC Standards of Conduct Policy, Time and Attendance Policy and Procedures, Absence and Leave Policy, Time Clocks Standard Operating Procedures (SOP), Authority and Responsibilities of the OIG and Cooperation of AOC Employees and Title 18 U.S.C. § 1001 Statements or Entries Generally. **Substantiated.**

Supervisor 1: Suspected Violations of the AOC Standards of Conduct Policy, Time and Attendance Policy and Procedures and Time Clocks SOPs. **Substantiated.**

Supervisor 2: Suspected Violations of the AOC Standards of Conduct Policy, Time and Attendance Policy and Procedures and Time Clocks SOPs. **Substantiated.**

Supervisor 3: Suspected Violations of the AOC Standards of Conduct Policy, Government Ethics Policy, Time and Attendance Policy and Procedures and Time Clocks SOPs. **Not Substantiated.**

The OIG received a referral alleging that an employee requested their immediate supervisor clock them in and out of work without being physically present. The investigation substantiated the allegations against the employee and two supervisors and revealed that the employee provided supervisors with false medical documentation to support unscheduled leave requests. The administrative violations were submitted to the jurisdiction for action deemed appropriate.

On July 21, 2023, the OIG was notified that the employee had been terminated effective June 30, 2023. The notification failed to provide a disposition for Supervisors 1 and 2. Management action remains pending as of the conclusion of this reporting period.

Allegation of Architect of the Capitol Employee Conducting Outside Employment Without Prior Approval and Submitting a False Leave Request (2022-0007-INVI-P)

Suspected Violations of the AOC Standards of Conduct Policy, Government Ethics Policy, IT Resources and De Minimis Use Policy, IT System Rules of Behavior Policy, Authority and Responsibilities of the OIG and Cooperation of AOC Employees and Title 18 U.S.C. § 1001 Statements or Entries Generally. **Substantiated.**

Suspected Violations of the AOC Absence and Leave Policy. **Not Substantiated.**

The OIG received a referral alleging that an AOC employee had engaged in outside employment without following proper protocol, falsified a leave request to engage in this business and misused AOC resources. The OIG investigation determined that the employee operated an art business through which they sold their artwork for monetary profit. The OIG referred the investigation to the Department of Justice for criminal prosecution under Title 18 U.S.C. § 1001; the referral was declined due to limited resources.

The OIG substantiated that the employee violated AOC policies and referred the matter to the jurisdiction for action deemed appropriate. On April 17, 2023, the OIG was notified that the employee received a one-day suspension.

AOC Employee Allegedly Used Forged Medical Doctors Notes To Justify Sick Leave (2022-0017-INVI-P)

Suspected Violations of the AOC Family and Medical Leave Act Policy. **Substantiated.**

Suspected Violations of the AOC Government Ethics Policy, Absence and Leave Policy, Standards of Conduct Policy and D.C. Code § 22-3241 Forgery. **Not Substantiated.**

The OIG received a complaint that an AOC employee provided fraudulent medical documentation to gain leave under the Family and Medical Leave Act (FMLA).¹³ The investigation determined that the employee was authorized to use FMLA leave that provided temporary self-removal from the work environment if job stresses triggered their medical condition. The investigation determined that the document

¹³ Title 29 U.S.C. Ch. 28, Family and Medical Leave Act. <https://www.dol.gov/agencies/whd/fmla/laws-and-regulations>.





was authentic. The investigation revealed violations of the AOC's FMLA policy but did not substantiate allegations related to fraudulent documents. The matter was referred to the jurisdiction for action deemed appropriate.

On April 11, 2023, the AOC provided a management response advising that the employee retired from the AOC on January 31, 2023, before any administrative action being taken.

Alleged Theft of Government Property by Architect of the Capitol Employee (2022-0018-INVI-P)

Suspected Violations of D.C. Code § 22-3211 Theft and Title 18 U.S.C. § 641 Public Money, Property or Records. **Not Substantiated.**

Suspected Violations of the AOC Standards of Conduct Policy and Ethics Policy. **Substantiated.**

The OIG received a complaint alleging that an employee was ordering and taking home materials from the upholstery shop. The employee was also believed to be taking scraps of material and other supplies from their workspace in violation of AOC policy. The investigation determined that the employee operated an upholstery business from their home for several years without agency approval of outside employment. The employee also lied to investigators about receiving supervisory approval to take the scraps of material home for personal use. The OIG could not substantiate criminal allegations against the employee for theft. The matter was referred to the jurisdiction for action deemed appropriate.

On June 30, 2023, the OIG was notified that the employee received a letter of reprimand on March 17, 2023.

OTHER WORK

Proactive Review of the Architect of the Capitol Status of the Student Loan Repayment Program (2023-0001-INVPRO-P)

The OIG conducted a proactive review of the AOC's Student Loan Repayment Program. The goal of the proactive investigation was to ensure that individuals receiving AOC funds were compliant with AOC policy and service agreements and that the program was being administered

in compliance with agency policy. In addition, OIG analysts and investigative staff reviewed data received for potential indications of fraud.

Per the OIG's review, the program appears to be meeting the stated intention of retaining AOC employees, appears to be appropriately administered under AOC policy and no fraud was detected.



MANAGEMENT ADVISORIES

A Management Advisory reports on specific gaps or weaknesses in AOC internal controls observed during OIG work. These reports are a communication tool that may or may not contain recommendations that may or may not require AOC concurrence.

We issued one Management Advisory with recommendations to the AOC during the reporting period.

Clear, Consistent and Uniform Application of Architect of the Capitol Policy ([2023-0006-INVM-P](#))

On August 31, 2023, the OIG issued a Management Advisory to notify AOC management of discrepancies between various AOC policies that govern the hiring of relatives of AOC employees and differing definitions of the term “Management Official” across AOC policies. This Management Advisory was the result of an investigation into the hiring of a manager within the same jurisdiction as their spouse (refer to 2023-0013-INVI-P). The OIG issued the Management Advisory, which included three recommendations to the agency, in lieu of an official report of investigation.

NOTICES OF CONCERN

A Notice of Concern reports on specific AOC safety or security issues observed during the OIG’s work and is provided to AOC management for any immediate action they deem appropriate. These reports do not provide recommendations.

We did not issue any Notices of Concern during the reporting period.

REVIEW OF LEGISLATION AND POLICIES

The OIG provides resources in reviewing and providing comments on AOC draft guidance documents as part of our requirement to comment on proposed legislation and policy. This requirement ensures the AOC’s orders and/or policy revisions are consistent and promote economy and efficiency. Some of these orders result directly from OIG recommendations to improve internal controls and maintain orderly operation. Our review is an integral part of our effort to identify and prevent fraud, waste and abuse. During this reporting period, we reviewed eight orders or other policy or guidance documents (Table B).





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JAMES A. GARFIELD

1831-1881

TABLE B: Review of AOC Legislation and Policies

Document No.	Title	Description
Order 28-4	Design/Build Policy	This new policy provides guidelines and procedures for implementation of the delivery of a Design/Build (D/B) project. Guidelines and processes include roles and responsibilities, selection criteria, procurement processes, acquisition strategy, technical requirements and standards to plan and award a D/B project.
Order 28-9	Project Management Policy	This policy defines the required processes, constraints and tools for making decisions based on project requirements and goals throughout all project stages. The project delivery process involves the control of scope, quality, schedule, budget and risk from project initiation to project completion. The policy has been rewritten to align with current practices and tools used across the AOC. It includes requirements for using a project management information system to track, document and report project data.
Order 28-15	Enterprise Asset Management Steering Committee Charter	This new policy establishes the authority, scope, composition, function and responsibilities of the AOC Enterprise Asset Management Steering Committee and Enterprise Asset Management Working Group to formalize a governance structure related to the Enterprise Asset Management program.
Order 42-1	AOC Classified Information Security Program	This revised policy formalizes the AOC's Classified Information Security Program and establishes requirements for the protection of and access to classified information. Revisions also include updates to the security clearance process and efforts to formalize AOC's Classified Information Security Program.
Order 42-6	Operations Security Program	This revised policy formalizes the AOC's Operations Security (OPSEC) Program. The OPSEC Program will protect the AOC mission and operations by identifying critical information, identifying threats, analyzing vulnerabilities, assessing risk and implementing OPSEC countermeasures.
Order 42-7	Foreign Travel Policy	This new policy formalizes the AOC Foreign Travel Security Program and identifies the roles and responsibilities of all covered staff, supervisors and managers. The policy applies to AOC employees who are traveling internationally on official government business and/or have been approved to travel with IT government-furnished equipment.
Policy Memorandum 13-1	Building Official Program Policy	This policy memorandum provides updates to AOC Order 13-1 Building Official Program Policy. The document has been modified to further clarify the framework on obtaining Building Official approval for design work, repairs, alterations, modernizations, renewals and construction work executed at the AOC.
Policy Memorandum 600-1	Remote Work	This policy memorandum supplements AOC Order 600-1 Telework Program and provides additional guidance involving remote work. It is the policy of the AOC to administer remote work consistent with its operational needs and the underlying mission. Remote work requests will be evaluated against AOC operational requirements and criteria established in accordance with AOC Order 600-1 Telework Program.



INSTANCES OF THE ARCHITECT OF THE CAPITOL REFUSING TO PROVIDE INFORMATION OR ASSISTANCE OR INTERFERING WITH THE OIG'S INDEPENDENCE

There were no instances of the AOC refusing to provide information or assistance or interfering with the OIG's independence during the reporting period.

STATUS OF REPORTS OR RECOMMENDATIONS

(1) For which no management decision was made

(2) For which no management comment was made within 60 days

Report of Investigation 2022-0006-INVI-P was provided to the AOC on February 2, 2023, with a management response due by August 2, 2023. Though management identified discipline awarded and notified the OIG for one of three subjects, as of the cutoff date for this SAR on September 30, 2023, AOC notification to the OIG regarding management action taken for substantiated allegations for two of three subjects had not been provided. Refer to 2022-0006-INVI-P for more information.

SIGNIFICANTLY REVISED MANAGEMENT DECISIONS

There were no significantly revised management decisions during the reporting period.

SIGNIFICANT MANAGEMENT DECISIONS WITH WHICH THE OIG DISAGREES

There were no significant management decisions the OIG disagreed with during the reporting period.

INSTANCES IN WHICH AN INSPECTION, EVALUATION OR AUDIT WAS COMPLETED AND NOT DISCLOSED TO THE PUBLIC

There were no instances during the reporting period in which we completed an inspection, evaluation or audit without disclosing it to the public. All such products are listed at www.oversight.gov and aocoig.oversight.gov.



PEER REVIEW REPORTING

AUDIT

There was no peer review activity for the Audit Division during the reporting period. The Federal Maritime Commission OIG conducted an external peer review for the AOC OIG audit function and issued a final report on September 1, 2021. The AOC OIG received a peer review rating of Pass, and there were no outstanding recommendations.

INSPECTIONS AND EVALUATIONS

There was no peer review activity for the Inspections and Evaluations Division during the reporting period. The Equal Employment Opportunity (EEO) Commission OIG conducted an external peer review of AOC OIG inspection and evaluations operations and issued a final report on September 23, 2021. The AOC OIG received a peer review rating of Pass, the highest rating possible, confirming that inspection and evaluation operations are performed in accordance with CIGIE Blue Book¹⁴ standards. There were no outstanding recommendations in the final report.

FOLLOW-UP

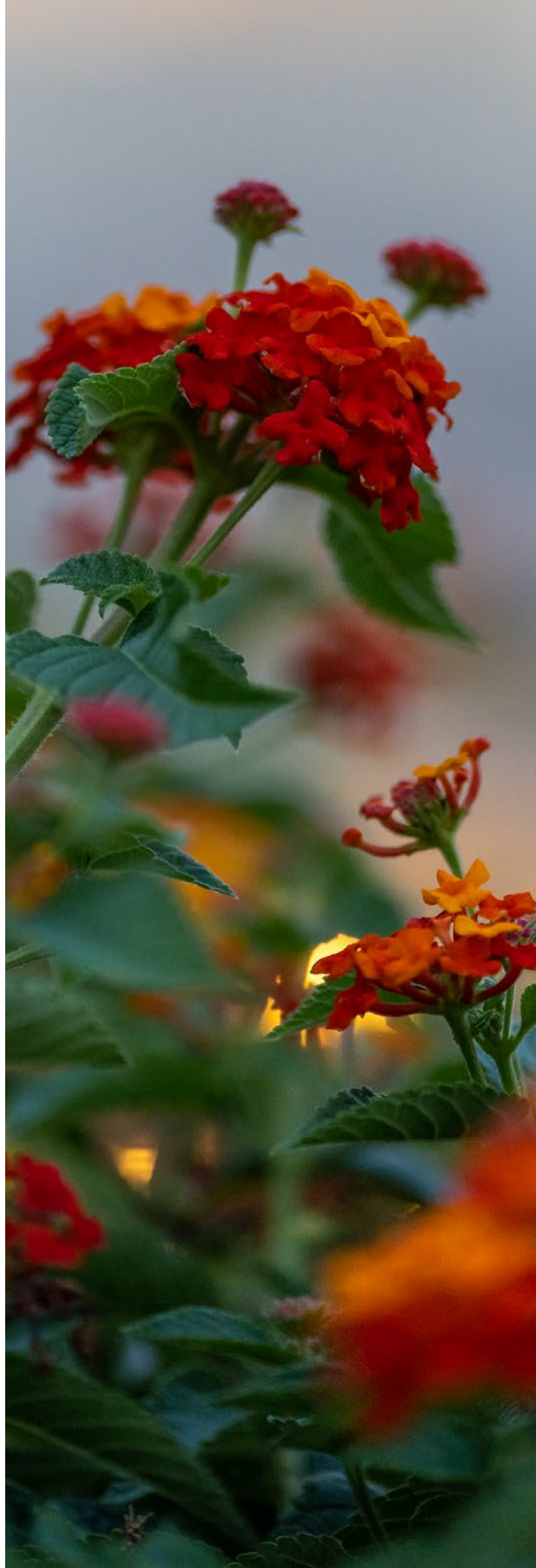
There was no peer review activity for the Follow-Up Division during the reporting period.

INVESTIGATIONS

The Federal Election Commission OIG conducted an external peer review of the AOC OIG Investigations Division and issued a final report on June 8, 2023.¹⁵ The review found the system of internal safeguards and management procedures for the investigative function of the AOC OIG complied with the quality standards established by the CIGIE and other applicable guidelines. The review team made no formal recommendations for improvement.

¹⁴ CIGIE. 2020. Quality Standards for Inspection and Evaluation (Blue Book). <https://www.ignet.gov/sites/default/files/files/QualityStandardsforInspectionandEvaluation-2020.pdf>.

¹⁵ Federal Election Commission Office of Inspector General. 2023. Report on the Qualitative Assessment Review of the Investigative Operations of the Office of Inspector General for the Architect of the Capitol, Report No. FEC OIG 2023-06-002. https://aocoig.oversight.gov/sites/default/files/document/2023-06/aoc_oig_opinion_letter_6.8.23.pdf.



RECOMMENDATIONS

115

RECOMMENDATIONS

\$134,548.00

QUESTIONED & DISALLOWED

\$0.00

RECOVERED

Tables C through Table F reflect 115 recommendations associated with 21 reports. Of those, one recommendation was implemented and closed and 114 remain open/unresolved.



TABLE C: Audits Unimplemented Recommendations

Subject	Report No. and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
ARCHITECT OF THE CAPITOL OFFICE OF THE CHIEF FINANCIAL OFFICER			
FY 2020 Financial Statements Audit Management Letter	OIG-AUD-2021-02 December 14, 2020	2	<p>Report Summary: The OIG oversaw an IPA audit of the AOC FY 2020 financial statements.</p> <p>Recommendation: We recommend determining whether the National Finance Center (NFC), Invoice Processing Platform (IPP) and subservice provider System and Organization Controls (SOC 1^o) reports will be delivered in a timely manner and contain the following information required for an effective review and analysis:</p> <ul style="list-style-type: none"> • Complete system description • Description of controls tested and the results of those tests • Applicable management responses • Any applicable changes incorporated to IPP and Treasury Web Application Infrastructure (TWA) subservice providers to the AOC IPP risk assessment that impact the accounts payable financial statement assertion for transactions through IPP <p>AOC Management Decision: Concur.</p>
		3	<p>Recommendation: We recommend completing an IPP/TWAI-specific risk assessment to ensure implementation of key controls relevant to the accounts payable financial statement assertion (e.g., through complete and timely SOC 1^o reports and/or internal AOC Complementary User Entity Control [CUEC]). If the AOC becomes aware that the content of IPP/TWAI-related SOC 1^o reports will continue to be provided in an untimely manner or presented in redacted format, through its risk assessment, AOC management should implement a process to separately identify and assess mitigating and compensating controls to its environment. Additionally, for known control deficiencies at the service and key subservice providers, the AOC should identify a compensating control(s) to mitigate risks within the AOC control environment.</p> <p>AOC Management Decision: Concur.</p>
		4	<p>Recommendation: We recommend completing an NFC-specific risk assessment to ensure implementation of key controls relevant to the payroll financial statement assertion (e.g., through complete and timely SOC 1^o reports and/or internal AOC CUECs). If the AOC becomes aware that the content of NFC-related SOC 1^o reports will be provided in an untimely manner, through its risk assessment, AOC management should implement a process to separately identify and assess mitigating and compensating controls to its environment. Additionally, for known control deficiencies at the service and key subservice providers, the AOC should identify a compensating control(s) to mitigate risks within the AOC control environment.</p> <p>AOC Management Decision: Concur.</p>

TABLE C: Audits Unimplemented Recommendations (continued)

Subject	Report No. and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
Audit of the Architect of the Capitol's Unliquidated Obligations (ULO)	OIG-AUD-2021-06 September 29, 2021	1	<p>Report Summary: The OIG performed an audit of the AOC's ULOs.</p> <p>Recommendation: We recommend the AOC review and properly close out the following dormant ULOs:</p> <ul style="list-style-type: none"> • 68 invalid ULOs valued at \$479,907.61 • Nine unsupported, questioned ULOs valued at \$90,109.58 • Nine valid ULOs valued at \$8,230.00 that have not received a final invoice • 231 ULOs with balances less than \$50.00 <p>Funds put to better use: \$479,907.61; questioned costs: \$90,109.58.</p> <p>AOC Management Decision: Concur.</p>
		2	<p>Recommendation: We recommend the AOC ensure supporting documentation for ULOs is maintained and readily available.</p> <p>AOC Management Decision: Concur.</p>
		3	<p>Recommendation: We recommend the AOC finalize the new Quarterly Financial Review SharePoint application and ensure it addresses the current and prior year audit findings as well as revise the AOC's policies and procedures to align with the new application.</p> <p>AOC Management Decision: Concur.</p>
FY 2021 Financial Statements Audit Management Letter	OIG-AUD-2022-05 June 16, 2022	2	<p>Report Summary: The OIG oversaw an IPA audit of AOC FY 2021 financial statements.</p> <p>Recommendation: We recommend AOC management implement the existing documented procedures over the review of SOC 1[®] reports, establish procedures to transfer responsibilities for control operations to other team members upon an employee's separation and monitor internal controls to assess their effectiveness.</p> <p>AOC Management Decision: Concur.</p>
		1	<p>Report Summary: The OIG oversaw an IPA audit of AOC FY 2022 financial statements.</p> <p>Recommendation: We recommend AOC management design control activities, including policies and procedures, that require the use of quality information in the preparation of the footnote.</p> <p>AOC Management Decision: Concur.</p>
FY 2022 Financial Statements Audit Management Letter	OIG-AUD-2023-03 December 8, 2022	2	<p>Recommendation: We recommend AOC management (1) enforce adherence to existing documented procedures to require appropriate review of SOC 1[®] reports and (2) monitor the status of internal controls performed by third parties to assess their effectiveness.</p> <p>AOC Management Decision: Concur.</p>

TABLE C: Audits Unimplemented Recommendations (*continued*)

Subject	Report No. and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
Architect of the Capitol's Internal Control Plan Lacked Procedures to Assess and Monitor Payment Accuracy	OIG-AUD-2023-05 Official draft: March 09, 2023 Final: April 2023	1	<p>Report Summary: The OIG performed an audit of AOC's internal control plan used to monitor payment accuracy.</p> <p>Recommendation: We recommend AOC management develop a process that will assess and monitor payment accuracy in its program and activities:</p> <ul style="list-style-type: none"> • The process should include procedures to identify and assess all programs and activities that are susceptible to significant improper payments annually (max triennially). • For programs and activities identified as susceptible to significant improper payments, the AOC should consider the following procedures using OMB guidance: <ul style="list-style-type: none"> • Perform testing to estimate the cost of improper payments in the program • Implement a plan to reduce erroneous payments • Report estimates of the annual amount of improper payments in programs and activities and progress toward reducing them within the Performance and Accountability Report <p>AOC Management Decision: Concur. The Office of the Chief Financial Officer (OCFO) will update its enterprise risk assessment process performed in accordance with our Enterprise Risk Management program to assess and monitor payment accuracy in its program and activities. We expect to implement the updates to our enterprise risk assessment process by the end of the second quarter of FY 2024.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		2	<p>Recommendation: We recommend AOC management execute the process that assesses and monitors payment accuracy in its program and activities every one to three years.</p> <p>AOC Management Decision: Concur. The OCFO will execute their updated enterprise risk assessment process to assess and monitor payment accuracy in its program and activities every one to three years.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		3	<p>Recommendation: We recommend AOC management design a recovery plan that is consistent with federal guidance for implementation when improper payments are identified.</p> <p>AOC Management Decision: Concur. The OCFO will design a recovery plan that is consistent with federal guidance and that aligns with the AOC's priorities when improper payments are identified. We expect to implement the design of our recovery plan by the end of the second quarter of FY 2024.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>

TABLE C: Audits Unimplemented Recommendations *(continued)*

Subject	Report No. and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
ARCHITECT OF THE CAPITOL OFFICE OF THE CHIEF SECURITY OFFICER			
Flash Report Series – Independent Assessment of the Architect of the Capitol’s Role in Securing the Capitol Campus for Large Public Gatherings	OIG-AUD-2021-03 May 5, 2021	2	<p>Report Summary: The OIG performed an independent assessment of the AOC’s role in securing the Capitol campus during large public gatherings.</p> <p>Recommendation: We recommend the AOC OCSO coordinate with the U.S. Capitol Police (USCP) to draft a memorandum of agreement to support the roles, responsibilities and services required for preparation and execution of the perimeter security plans for large public events.</p> <p>AOC Management Decision: Concur.</p>
		3	<p>Recommendation: We recommend the AOC OCSO establish well-defined policies and procedures with a preparation checklist for jurisdictions based on the severity of threat that provides clear guidance on execution of support activities related to coordination, mobilization, demobilization, asset protection and reporting of activities associated with special events across the Capitol campus.</p> <p>AOC Management Decision: Concur.</p>
		4	<p>Recommendation: We recommend the AOC coordinate with the Capitol Police Board and legislative stakeholders to evaluate the overall focus on Capitol campus security and reevaluate the responsibilities for design, installation and maintenance of the Capitol campus security systems as well as determine who should execute those responsibilities.</p> <p>AOC Management Decision: Concur</p>
		5	<p>Recommendation: We recommend the AOC OCSO hold a security briefing with AOC senior leadership for each event to highlight the security threats and risks identified during their monitoring and received from coordinating agencies and to present the AOC’s approach to manage such risks and instructions for jurisdictions to execute the developed preparation checklist.</p> <p>AOC Management Decision: Concur.</p>
		6	<p>Recommendation: We recommend the AOC inform the USCP of the deferred security maintenance work elements before large public gatherings and events on the Capitol campus.</p> <p>AOC Management Decision: Concur.</p>

TABLE C: Audits Unimplemented Recommendations (*continued*)

Subject	Report No. and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
ARCHITECT OF THE CAPITOL OFFICE OF THE CHIEF ENGINEER			
Multimillion-Dollar Construction Projects' Contract Provisions Comply With Federal Guidance, Architect of the Capitol Policies and Industry Standards Although Improvements Can Be Added	OIG-AUD-2022-07 July 29, 2022	1	<p>Report Summary: The OIG performed an audit of AOC's multimillion-dollar construction projects' contract provisions.</p> <p>Recommendation: We recommend the AOC consider structuring future guaranteed maximum price contracts as (1) fixed-price amounts for general conditions and general requirements, and (2) cost reimbursement for subcontracts that are fixed-price amounts between the general contractor and subcontractors to assist in alleviating the AOC's administrative burden in properly administering the contract.</p> <p>AOC Management Decision: Concur. Before using the guaranteed maximum price contract type on future procurements, the AOC will evaluate best practices and lessons learned and update CO guidance for the proper use of this contract type.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		2	<p>Recommendation: We recommend the AOC issue contract modifications for the sampled contracts to include any applicable clauses that the AOC did not include in the contract at the time of award or in any modifications already issued if the AOC determines that it is feasible to do so.</p> <p>AOC Management Decision: Concur. The AOC will perform an analysis [to determine] if it is feasible and/or appropriate to perform contract modifications for the clauses in question.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		5	<p>Recommendation: We recommend the AOC issue contract modifications to remove inapplicable clauses included in the contract if the AOC determines that it is beneficial and feasible to do so.</p> <p>AOC Management Decision: Concur. The AOC will perform an analysis to determine if it is feasible and beneficial to perform contract modifications to remove inapplicable clauses.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		6	<p>Recommendation: As a part of the AOC annual review of active contracts to determine whether any contract modifications are necessary, we recommend the AOC incorporate a review to identify (1) applicable clauses erroneously omitted during the formulation of the contract, (2) applicable contract clauses issued after contract award and (3) inapplicable contract clauses.</p> <p>AOC Management Decision: Concur. The AOC will assess its resources and consider including this recommendation as part of its existing Contract Management Annual Review.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>

TABLE C: Audits Unimplemented Recommendations (continued)

Subject	Report No. and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		7	<p>Recommendation: We recommend the AOC consider requiring its contractors to carry builder's risk policies on a project-by-project basis based on an evaluation of the risks that each project poses to the AOC.</p> <p>AOC Management Decision: Concur. The AOC will consider requiring contractors to carry builder's risk policies on a project-by-project basis based on an evaluation of the risks that each project poses to the AOC.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
Review of the Architect of the Capitol's Multimillion-Dollar Construction Project Change Orders	OIG-AUD-2023-04 March 30, 2023	1	<p>Report Summary: The OIG performed a review of the AOC's change orders for multimillion-dollar construction projects.</p> <p>Recommendation: We recommend the AOC perform the following:</p> <ol style="list-style-type: none"> a. Recover the questioned costs of \$6,464.00 identified within the R-Tunnel Project to the extent legally and administratively possible b. Review the questioned costs of \$68,940.00 (\$75,404.00 – \$6,464.00) identified within the CHOB Project (\$53,663.00) and R-Tunnel Project (\$15,277.00) to determine if the costs are allowable in accordance with contract requirements and, as applicable, recover any additional amounts resulting from the application of items like overhead and profits to the unallowable costs c. Ensure future change orders adhere to the contractual language regarding overhead costs not being allowed as direct costs and, when the AOC determines that overhead costs are allowable as direct costs, document how and why that determination was made <p>AOC Management Decision: Partially Concur. We concur with [recommendation] 1a. The AOC will work to recover the questioned costs if it is legally and administratively possible.</p> <p>We partially concur with [recommendation] 1b. The AOC does not concur with [recommendation] 1b as it relates to the CHOB Project but concurs with 1b for the R-Tunnel Project. As stated during the OIG's review of change order documentation and cited on page 3 of their report, we disagree with the OIG's finding on the CHOB Project.</p> <p>We concur with [recommendation] 1c. We will review existing processes for the AOC's review of contractor-submitted potential changes and their respective supporting documentation to ensure compliance with existing AOC policies and procedures and executed contracts.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>

TABLE C: Audits Unimplemented Recommendations (*continued*)

Subject	Report No. and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		2	<p>Recommendation: We recommend the AOC perform the following:</p> <ul style="list-style-type: none"> a. Review the questioned costs of \$167,628.00 once the AOC determines whether Clark/Christman, A Joint Venture, (CCJV) met the incentive fee requirements; if CCJV has not met the incentive fee requirements and the 100 percent unspent project contingency funds are not awarded, recover to the extent legally and administratively possible the AOC's proportional share of the of the questioned costs b. Ensure project funds are not used to pay for damages caused by the contractor, even if those funds may be earned by the contractor at a later date <p>AOC Management Decision: Partially Concur. We do not concur with [recommendation] 2a. The AOC provided the OIG detailed support and documentation of the history of discussions related to the cornice scope on March 27, 2023.</p> <p>We concur with [recommendation] 2b. We will review existing processes for the AOC's review of contractor-submitted potential changes and their respective supporting documentation to ensure compliance with existing AOC policies and procedures and contractual requirements as they relate to the use of contingency.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		3	<p>Recommendation: We recommend the AOC perform the following:</p> <ul style="list-style-type: none"> a. Review the questioned costs of \$6,958.00 identified within the CHOBr Project for potential improper overhead and profit markups by the first-tier subcontractor for a second-tier subcontractor's work b. Review and modify the contract language to specify that the allowable markups on change orders align with the memorandum dated June 26, 2017 <p>AOC Management Decision: Nonconcur.</p>
		4	<p>Recommendation: We recommend the AOC perform the following:</p> <ul style="list-style-type: none"> a. Recover the questioned costs of \$2,716.00 identified within the R-Tunnel Project to the extent legally and administratively possible b. Review the insufficiently supported questioned costs of \$478,557.00 (\$481,273.00 – \$2,716.00) identified within the CHOBr Project (\$367,315.00) and R Tunnel Project (\$111,242.00) to determine if the costs are supported and allowable; for any of the costs deemed unsupported and/or unallowable, recover the costs to the extent legally and administratively possible; as applicable, recover any additional amounts resulting from the application of items, such as overhead and profits to the unallowable costs <p>AOC Management Decision: Partially Concur. We concur with [recommendations] 4a and 4b related to the R-Tunnel Project. We do not concur with [recommendation] 4b related to the CHOBr Project. These are not insufficiently supported costs.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>

TABLE C: Audits Unimplemented Recommendations *(continued)*

Subject	Report No. and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		5	<p>Recommendation: We recommend the AOC recover the unsupported questioned costs of \$6,944.00 identified within the CHOBBr Project (\$226.00) and R Tunnel Project (\$6,718.00) to the extent legally and administratively possible.</p> <p>AOC Management Decision: Concur. The AOC will work to recover the questioned costs if it is legally and administratively possible.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		6	<p>Recommendation: We recommend the AOC work with the contractor to ensure proposals submitted for change orders are factually sound, contain the required cost detail and exclude unallowable costs.</p> <p>AOC Management Decision: Concur. We will review existing processes for the AOC's review of contractor-submitted potential changes and their respective supporting documentation to ensure compliance with the contract.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		7	<p>Recommendation: We recommend the AOC comply with the sequence of review and approval for its change orders as prescribed by its policies and procedures and ensure sufficient documentation is maintained. If the AOC deviates from its policies and procedures, the AOC should fully document the reason for the deviation.</p> <p>AOC Management Decision: Concur. We will review existing processes for the AOC's review of contractor-submitted potential changes and their respective supporting documentation to ensure compliance with existing AOC policies and procedures.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		8	<p>Recommendation: We recommend the AOC recover or not award the questioned costs of \$3,551.00 identified within Phase 3 of the U.S. Capitol Exterior Stone and Metal Preservation project to the extent legally and administratively possible and ensure the contractor excludes subcontractor profit before applying contractual markups.</p> <p>AOC Management Decision: Concur. To the extent legally and administratively possible, the AOC will recover the questioned costs.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
<p>The Architect of the Capitol Lacked Sufficient Oversight of the Cannon Caucus Room Renovations</p>	<p>OIG-AUD-2023-06 September 6, 2023</p>	1	<p>Report Summary: The OIG performed an audit of AOC's CHOBBr Project Caucus Room.</p> <p>Recommendation: We recommend the AOC ensure the CMC complies with the contractual requirements outlined in the CHOBBr Project's Building Information Modeling (BIM) Project Execution Plan.</p> <p>AOC Management Decision: Concur. The AOC will work with the [CMC] to ensure compliance with the BIM Project Execution Plan.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>

TABLE C: Audits Unimplemented Recommendations (*continued*)

Subject	Report No. and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		2	<p>Recommendation: We recommend the AOC ensure the final as-built model of the Caucus Room includes all work performed in the room, regardless of which organization performed the work.</p> <p>AOC Management Decision: Concur. The AOC will ensure the Caucus Room has a complete set of as-built documents.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		3	<p>Recommendation: We recommend the AOC develop and adopt agencywide requirements for its BIM Project Execution Plan to ensure contractors are informed and capable of meeting the required contractual deliverables.</p> <p>AOC Management Decision: Concur. The AOC is in the process of updating the Architectural/ Engineering (A/E) Design Manual and computer-aided drafting standards, which will reference this report and recommendation. The agencywide BIM Execution Plan will need to be developed and will be a separate document that can be included in future projects requiring BIM execution.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		4	<p>Recommendation: We recommend the AOC require the CMc to submit a final testing, adjusting and balancing report. If the CMc is unable to do so, the AOC should assess a credit against the CMc for failing to properly complete its contractual obligations.</p> <p>AOC Management Decision: Concur. As the Caucus Room is occupied, the AOC will work with House Office Buildings and all stakeholders to determine the best available dates to complete the necessary testing.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		5	<p>Recommendation: We recommend the AOC identify any other incomplete or incorrect work pertaining to the heating, ventilation and air conditioning (HVAC) system in the Caucus Room. The AOC should require the CMc to complete the work in accordance with the contractual specifications or assess credits against the CMc for failing to properly complete its contractual obligations.</p> <p>AOC Management Decision: Concur. As the Caucus Room is occupied, the AOC will work with House Office Buildings and all stakeholders to determine the best available dates to complete the necessary HVAC [system] scope.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		6	<p>Recommendation: We recommend the AOC review its commissioning process and implement internal controls to ensure the commissioning agent properly completes all required steps before commissioning work.</p> <p>AOC Management Decision: Concur. We will review existing processes and contract requirements related to commissioning and implement any necessary improvements to related controls for CHOBr [Project] Phase 4.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>

TABLE C: Audits Unimplemented Recommendations *(continued)*

Subject	Report No. and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		7	<p>Recommendation: We recommend the AOC add steps to the commissioning process that require the commissioning agent to test HVAC systems for acceptable sound levels in all rooms deemed to be sensitive to elevated noise.</p> <p>AOC Management Decision: Concur. For rooms where the design and/or specification dictates the need for sensitivity to elevated noise [or] that require a sound level for a specific room configuration, the AOC will add steps to the commissioning process to test for the sound requirement.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		8	<p>Recommendation: We recommend the AOC ensure design specifications clearly identify sound design A-weighted decibels goals for all rooms deemed to be sensitive to elevated noise.</p> <p>AOC Management Decision: Concur. [The AOC] will review specifications and other contract requirements related to sound and implement any necessary improvements to meet industry standards where applicable.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		9	<p>Recommendation: We recommend the AOC ensure the supply diffusers near the Caucus Room ceiling are adjusted or replaced so they do not interfere with the use of the projector screen.</p> <p>AOC Management Decision: Concur. As the Caucus Room is occupied, the AOC will work with House Office Buildings and all stakeholders to determine the best available dates to complete the necessary scope.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		10	<p>Recommendation: We recommend the AOC require the CMC to either address the damages resulting from the incorrect or improper work that the CMC performed during Phase 1 or recover the costs that the AOC incurs to remediate the damages. If feasible, the AOC should recover the costs it has already incurred for the repairs to date (\$29,324.00).</p> <p>AOC Management Decision: Concur. The AOC will work with the CMC to either remediate the damages themselves or to recover the costs incurred by the AOC. The AOC will also work to recover the identified costs already incurred if legally and administratively possible.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
Review of the Architect of the Capitol's Multimillion-Dollar Construction Project Change Orders	OIG-AUD-2023-07 September 21, 2023	1	<p>Report Summary: The OIG performed a review of the AOC's change orders for multimillion-dollar construction projects.</p> <p>Recommendation: We recommend the AOC review its potential change order (PCO) notification criteria and implement the following:</p> <ol style="list-style-type: none"> <li data-bbox="889 1707 1425 1791">a. Ensure that any diagrams or flowcharts referencing the criteria for PCO notification forms are consistent with the criteria outlined in the Planning and Project Management Memorandum (PPM Memo) <li data-bbox="889 1801 1446 1854">b. Ensure the criteria in any PCO notification form templates are consistent with the criteria outlined in the PPM Memo <p>AOC Management Decision: Concur.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>

TABLE C: Audits Unimplemented Recommendations (*continued*)

Subject	Report No. and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		2	<p>Recommendation: We recommend the AOC evaluate the \$2,320.00 in questioned costs related to improper application of markups for the following projects:</p> <ul style="list-style-type: none"> a. Russell Exterior Envelope Project for the contractor's improper application of overhead and profit markups to first-tier subcontractor work in a total of \$2,105.00 b. Thurgood Marshall Federal Judiciary Building Administrative Office Space Realignments for their first-tier subcontractor's improper application of markups on a second-tier subcontractor in the total of \$215.00 <p>The AOC should recover any erroneously awarded costs to the extent legally and administratively possible.</p> <p>AOC Management Decision: Concur.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		3	<p>Recommendation: We recommend the AOC evaluate the \$288.00 in questioned costs for duplicative overhead costs awarded as direct costs for the Russell Exterior Envelope Project. The AOC should recover any erroneously awarded costs to the extent legally and administratively possible.</p> <p>AOC Management Decision: Concur.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		4	<p>Recommendation: We recommend the AOC review the insufficiently supported questioned costs identified within the Russell Exterior Envelope Project (\$66,449.00) and the Thurgood Marshall Federal Judiciary Building Administrative Office Space Realignments project (\$18,968.00) to determine if the costs are supported and allowable. For any of the costs deemed unsupported and/or unallowable, recover the costs to the extent legally and administratively possible. As applicable, recover any additional amounts resulting from the application of items, such as overhead and profits to the unallowable costs.</p> <p>AOC Management Decision: Concur.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		5	<p>Recommendation: We recommend the AOC ensure it uses the contractual markups when preparing independent government estimates to make sure the resulting price is consistent with the costs allowed under the contract and to avoid overpayment (e.g., \$17,199.00 in funds put to better use).</p> <p>AOC Management Decision: Concur.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>

TABLE C: Audits Unimplemented Recommendations (*continued*)

Subject	Report No. and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
Cannon House Office Building Renewal Project's Punch List and Warranty Work Process Lacked Sufficient Oversight	OIG-AUD-2023-08 September 25, 2023	1	<p>Report Summary: The OIG performed an audit of the AOC's CHOBBr Project punch list and warranty work.</p> <p>Recommendation: We recommend the CHOBBr Project team align the punch list requirements with the CMc contract and specifications and resolve any discrepancies.</p> <p>AOC Management Decision: Concur. The AOC will perform the recommended reconciliation and will resolve any discrepancies if necessary.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		2	<p>Recommendation: We recommend that, for the remaining contract phases (Phases 3 and 4), the CHOBBr Project team update its written quality control procedures to ensure compliance with all requirements for punch list items prescribed in the CMc contract and specifications.</p> <p>AOC Management Decision: Concur. The AOC will review its existing process related to quality control (i.e., punch list-related procedures) and reconcile with the CMc contract and specifications to update where necessary.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		3	<p>Recommendation: We recommend the CHOBBr Project team conduct a review of all punch list items for Phase 2 to ensure it has properly identified each item and listed the correct status for each item (i.e., open or closed).</p> <p>AOC Management Decision: Concur. The AOC, to the extent administratively possible, will develop a methodology to review the Phase 2 punch list and perform the requested scope by the OIG. Additional resources may be required.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		4	<p>Recommendation: We recommend the AOC consider tying the start of contractual warranty periods to final completion rather than substantial completion to ensure that the AOC does not lose warranty coverage on work completed after substantial completion and to incentivize the timely completion of all work needed to meet final completion, including punch list items.</p> <p>AOC Management Decision: Concur. The AOC will consider pursuing this recommendation to the extent legally and administratively possible.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		5	<p>Recommendation: We recommend the CHOBBr Project team ensure it maintains sufficient documentation for all punch list items to accurately identify (1) the work completed to close out punch list items and (2) the individual who approved the completed work.</p> <p>AOC Management Decision: Concur. To the extent administratively possible, the AOC will determine and issue guidance on the appropriate level of documentation that should be retained to do the following: accurately identify (1) the work completed to close out punch list items and (2) the individual who approved the completed work. Additional resources may be required.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>

TABLE C: Audits Unimplemented Recommendations (*continued*)

Subject	Report No. and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		6	<p>Recommendation: We recommend the CHOBBr Project team review all items listed as warranty items for Phase 2 and ensure they are (1) properly categorized as punch list (this includes in-scope work), warranty or latent defect; (2) correctly recorded as open or closed; and (3) sufficiently documented to support closed items, including the work completed and the individual who approved.</p> <p>AOC Management Decision: Concur. The AOC, to the extent administratively possible, will develop a methodology to review the Phase 2 warranty items and perform the requested scope by the OIG. Additional resources may be required.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		7	<p>Recommendation: We recommend, for those items categorized as punch list (in-scope work) and completed during and/or after the warranty period, the CHOBBr Project team negotiate an extended warranty period with the CMC to the extent legally and administratively feasible.</p> <p>AOC Management Decision: Concur. The AOC will determine if the OIG's recommended approach is feasible. We anticipate this may be an additional cost to the CHOBBr Project.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		8	<p>Recommendation: We recommend the CHOBBr Project team improve its process for managing warranty items to ensure the only items included on its warranty list are those that meet the definition and description of a warranty item provided in the contract and specification requirements.</p> <p>AOC Management Decision: Concur. The AOC will review its existing process for managing warranty items and update it, where necessary, to ensure the list includes only warranty items, as defined by contract and specification requirements.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		9	<p>Recommendation: We recommend the CHOBBr Project team review all punch list items discovered during the one-year warranty inspection to determine how the quality control (QC) reviewers overlooked those items during prior inspections and whether the CHOBBr Project team should make any improvements to the QC process to avoid future oversights.</p> <p>AOC Management Decision: Concur. The AOC, to the extent administratively possible, will develop a methodology to review punch list items and perform the requested scope by the OIG. Additional resources may be required.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>

TABLE D: Inspections & Evaluations Unimplemented Recommendations

Subject	Report No. Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
ARCHITECT OF THE CAPITOL OFFICE OF THE CHIEF ADMINISTRATIVE OFFICER			
Evaluation of the Architect of the Capitol's Compliance With Its Discipline Order	2019-0001-IE-P June 5, 2020	C	<p>Report Summary: The OIG performed an evaluation to determine if AOC disciplinary actions taken from FY 2015 to FY 2019 in response to employee misconduct complied with established policy and penalty guidance. The OIG also reviewed disciplinary actions to determine if punitive actions were applied consistently based on appropriate criteria and evidence.</p> <p>Recommendation: We recommend the AOC develop and publish a discipline policy for exempt personnel for transparency and consistency with other employee groups.</p> <p>AOC Management Decision: Concur. The AOC concurs with the recommendation. The AOC has drafted AOC Order 213-1 Senior Rated Executive System, which addresses the OIG recommendation. Section 42 of the order addresses discipline involving AOC's SR staff. The policy order will be reviewed, revised as directed, signed and implemented upon the appointment of a permanent Architect.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
Evaluation of the Architect of the Capitol's Fleet Management Program	2021-0001-IE-P November 29, 2021	1	<p>Report Summary: The OIG performed an evaluation to determine if adequate mechanisms and controls were in place to account for the AOC's vehicle fleet, including agency cost and usage rate of vehicles.</p> <p>Recommendation: We recommend the CAO develop and implement additional policies and procedures that:</p> <ul style="list-style-type: none"> • Ensure adherence to vehicle utilization reporting • Include a more formal scheduled vehicle maintenance program • Collect, track, monitor and analyze fleet costs throughout the vehicle life cycle, at the vehicle level <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. Updates to AOC Order 34-2 Fleet Management are contingent upon completing a feasibility study of the entire Fleet Management Program. The Supplies, Services and Material Management Division awarded a contract to an external vendor to conduct a comprehensive review and feasibility study of the AOC's Fleet Management Program. The study [commenced] in April 2023, and the results will inform future policy updates pertinent to vehicle reporting, vehicle maintenance schedules and vehicle life-cycle costs.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>

TABLE D: Inspections & Evaluations Unimplemented Recommendations (*continued*)

Subject	Report No. Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		2	<p>Recommendation: We recommend the CAO review jurisdiction-level fleet policies and standardize jurisdictional best practices across the AOC where appropriate.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. A cross-functional working group reviewed existing policies and made recommendations for standardized best practices in the third quarter of FY 2022. Recommendations from the working group included implementing an agencywide fleet management system with the ability to accurately track fleet vehicle use and standardizing AOC Order 34-2 Fleet Management. The AOC is currently purchasing an agencywide fleet management system and anticipates full implementation by the end of the fourth quarter of FY 2023. Accordingly, AOC Order 34-2 will be updated to standardize jurisdictional best practices across the AOC where appropriate.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		3	<p>Recommendation: We recommend the CAO procure an agencywide fleet management information system with best-in-class fleet management capabilities, to include vehicle inventory, acquisition, disposal, utilization, cost, mileage and fuel-use information for each vehicle and automatic notification to fleet managers of maintenance due.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. The AOC is currently purchasing an agencywide fleet management information system and anticipates full implementation by the end of the fourth quarter of FY 2023.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		4	<p>Recommendation: We recommend the CAO conduct a feasibility study to develop and implement centralized vehicle maintenance contract(s) for routine and nonroutine maintenance to standardize the AOC's maintenance processes and realize efficiencies resulting from centralized contract(s).</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. The AOC has awarded a contract to an external vendor to conduct a comprehensive review and feasibility study of the AOC's Fleet Management Program. The study [commenced] in April 2023, and the results of the study will inform future policy updates pertinent to vehicle reporting, vehicle maintenance schedules and vehicle life-cycle costs.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		5	<p>Recommendation: We recommend the CAO, in coordination with AOC organization leaders, review and revise agencywide and jurisdictional policies, including standards for vehicle utilization and guidance for implementing these standards while maintaining jurisdiction-level operational flexibility.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. The AOC has awarded a contract to an external vendor to conduct a comprehensive review and feasibility study of the AOC's Fleet Management Program. The study [commenced] in April 2023 and the results of the study will inform future policy updates pertinent to standardization of vehicle use. [AOC management is] awaiting end of fourth quarter FY 2023 updates.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>

TABLE D: Inspections & Evaluations Unimplemented Recommendations (*continued*)

Subject	Report No. Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
Evaluation of the Architect of the Capitol's Information Technology Division (ITD) Inventory Accountability and Controls	2022-0002-IE-P July 28, 2022	6	<p>Recommendation: We recommend the CAO procure a fleet management information system with fleet management capabilities, to include vehicle utilization information for each vehicle.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. The AOC is currently purchasing an agencywide fleet management information system and anticipates full implementation by the end of the fourth quarter of FY 2023.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		1	<p>Report Summary: The OIG performed an evaluation to determine if adequate mechanisms and controls are in place to account for issued IT equipment, such as laptops and cell phones, and to what extent procedures are in place to report, track and replace missing property.</p> <p>Recommendation: The Chief Information Officer update the ITD's current policy for accountable IT property, to include the incorporation of defined program personnel roles, requirements aligned with the property management life cycle and all current program procedures.</p> <p>AOC Management Decision: Concur. The AOC concurs with the recommendation. The ITD is currently updating AOC Order 8-4 Accountable IT Property, to include personnel roles, information on the property management life cycle and all current program procedures and requirements. ITD will coordinate with the Policy and Special Programs Division for review and publication. The AOC anticipates publishing the policy in early 2024. Please note that the anticipated date may shift if there are any delays in the appointment of a permanent CAO.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		2	<p>Recommendation: We recommend the Chief Information Officer continue the pursuit of transitioning to a single asset management system that addresses its program needs to track accountable and consumable IT property and establish a detailed implementation plan with target dates to transition to a single asset management system for accountable and consumable IT property as currently captured in Cireson and JumpStock.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. ITD has requested funding to support the acquisition of and transition to a more robust IT service management and asset management system. ITD has initiated an internal assessment project to validate the feasibility of, and develop an implementation plan for, consolidating the agency's nonaccountable or consumable IT inventory currently in JumpStock into the existing accountable IT property asset management system (Cireson). The feasibility assessment and implementation plan development are expected to be completed in quarter four of FY 2023; it will include a target date for inventory consolidation within a single asset management system with a more narrowly focused asset management solution that may be a lower cost and more effective for the agency.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>

TABLE D: Inspections & Evaluations Unimplemented Recommendations (*continued*)

Subject	Report No. Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		3	<p>Recommendation: We recommend the AOC revise the Board of Survey process with codified punitive actions to act as a deterrent against future instances of egregious employee negligence and misconduct regarding the loss of AOC property, including both IT mobile devices and personal property.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. As referenced in the AOC's management response to this recommendation in the evaluation report, ITD will be incorporating a process to address the auditor's recommendation within the [update to AOC] Order 8-4. The updated order is expected to be completed in early 2024, but timing depends on the appointment of a permanent CAO.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
<p>Evaluation of the Architect of the Capitol's Implementation of the Federal Information Security Modernization Act of 2014, Fiscal Year 2022</p>	<p>2022-0005-IE-P June 22, 2023</p>	1-20	<p>Report Summary: The OIG performed an evaluation to determine whether the AOC developed and implemented effective information security programs and practices in accordance with FISMA.</p> <p>Recommendation: Due to the sensitive nature of this evaluation, specific language pertaining to findings and recommendations is protected and not disclosed.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendations.</p> <p>OIG Response: These recommendations will remain open until confirmed.</p>
<p>Flash Report Series – Architect of the Capitol Records and Archives Management Flash Report</p>	<p>2023-0001-IE-P May 9, 2023</p>	1	<p>Report Summary: The OIG performed an evaluation to assess the efficiency, effectiveness and internal controls of the AOC Records and Archives Management Program in accordance with AOC policies and procedures and applicable federal laws and regulations. We also determined if document handling procedures complied with AOC security requirements.</p> <p>Recommendation: We recommend the CAO prioritize the revision of the records and archives policies and procedures and all other associated policy directives to establish effective and efficient operational guidance and internal controls. Additionally, we recommend the CAO develop and implement a standardized timeline for policy revision and update within the current fiscal year. Though the AOC is not required to follow the National Archives and Records Administration guidelines and policies, they are noted as best practices.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. An initial draft of AOC Order 36-1 [Records Management Program] has been formally submitted to the Policy and Special Programs Division and is currently under review. Once finalized, RMAB will prioritize the processing and implementation of AOC Order 36-1. In addition, RMAB will continue to develop and document its own internal procedures and controls. RMAB is actively developing [more than] 40 internal procedures, including procedures defining RMAB archival methodologies and standardizing RMAB services.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>

TABLE D: Inspections & Evaluations Unimplemented Recommendations (*continued*)

Subject	Report No. Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		2	<p>Recommendation: We recommend the CAO, within 90 days, conduct an organizational assessment of the RMAB structure and responsibilities to determine if the branch is appropriately staffed and assigned.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. In 2018, the Office of the CAO conducted a workload assessment of each CAO division, including RMAB. The organizational assessment included workload inputs and outputs, organizational structure and the staffing needed to meet RMAB's workload demands. No organizational or operational changes have since occurred within RMAB. The AOC feels that the 2018 assessment is still valid; however, upon the appointment of a permanent CAO, a future workload study may be deemed appropriate.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		3	<p>Recommendation: To address the immediate need of archival backlog items and digitization processes, we recommend the CAO (a) source a temporary contracting staffing option to assist RMAB staff with processing and clearing backlog items and (b) procure the services of an archival digitalization specialist to assist records retention, processing, research and preservation.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. The position will be filled with a permanent government employee as RMAB views the work process as inherently governmental and not the type of work that should be performed by a contractor. In addition, a full-time government employee is a best value to the government while RMAB actively establishes procedures, controls and metrics for its internal work processes. The position was posted, and the job advertisement closed on June 9, 2023. Employee onboarding is in process.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		4	<p>Recommendation: We recommend the CAO, within 90 days, develop a corrective action plan for the RMAB and Curator Division leaders to address the leadership and management deficiencies within the division. At a minimum, the corrective action plan should address communication skills, change management, how to lead and empower high-performing teams and effective federal leadership.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. Corrective actions are currently being explored to potentially include leadership training and facilitated team building. A formal corrective action plan will be communicated after the appointment of a permanent CAO.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>

TABLE D: Inspections & Evaluations Unimplemented Recommendations (*continued*)

Subject	Report No. Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
ARCHITECT OF THE CAPITOL OFFICE OF THE CHIEF SECURITY OFFICER			
Evaluation of the Architect of the Capitol's Security Badging Program	2022-0001-IE-P July 25, 2022	1	<p>Report Summary: The OIG performed an evaluation to assess the badging process for AOC employees and contractors and determine if vulnerabilities exist within the program.</p> <p>Recommendation: We recommend the Chief Security Officer (CSO) develop and implement a suitability policy for AOC employees and consolidate and implement revisions, as appropriate, to the current contractor suitability policy. Additionally, we recommend developing and implementing a standardized timeline for policy revisions and updates within the current fiscal year.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. OCSO staff have completed coordination of the draft AOC Order 42-6 Staff Personnel Suitability Program Policy with the Human Capital Management Division and are finalizing the associated forms. The need for additional leadership reviews and changes in AOC senior leadership have delayed the draft's entry into the AOC's publication process; draft submission was initially scheduled for July 15, 2022. The OCSO has also drafted AOC Order 42-7 Contractor Suitability Policy, which will replace Order 731-1 Contractor Suitability Policy with Supplements. The resolution of outstanding comments was delayed due to changes in AOC senior leadership and a need for additional leadership reviews. The OCSO will conduct annual reviews of both orders no later than March 31 of each year.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		2	<p>Recommendation: We recommend the CSO, in coordination with the USCP and the House Sergeant at Arms (HSAA), perform a joint feasibility study to consider:</p> <ul style="list-style-type: none"> • Reassigning signature authority for CP-491 forms for HSAA-issued contractor badges from the OCSO to CORs, eliminating the hand carry of the CP-491 forms to the USCP (Fairchild Building) for fingerprinting, and implementing the use of approval buttons or PDF secure signatures in place of manual signatures • Identifying, developing or acquiring a badge management software solution that uses notification-based processes and ensures secure and efficient execution, monitoring and tracking of badging actions <p>AOC Management Decision: Partially Concur. The AOC concurs with elements of the OIG's recommendation. While the AOC agrees it is important to improve the overall process and timelines related to completing CP-491 forms for HSAA-issued contractor badges, the AOC notes that the ability to fully implement this recommendation is outside of the AOC's authority. The responses to specific components of the recommendation follow:</p> <ul style="list-style-type: none"> • <i>Joint feasibility study:</i> The AOC will continue to partner with the Sergeants at Arms and the USCP about potential changes to existing badging systems. However, as noted during the exit conference on June 17, 2022, the AOC does not have the authority to modify existing processes or systems we do not own.

(Continued on page 54)

TABLE D: Inspections & Evaluations Unimplemented Recommendations (continued)

Subject	Report No. Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		2	<p data-bbox="862 285 1045 306"><i>(Continued from page 53)</i></p> <ul style="list-style-type: none"> <li data-bbox="886 327 1451 758">• <i>Reassigning signature authority for CP-491 forms for HSAA-issued contractor badges from the OCSO to CORs:</i> The AOC does not concur with this recommendation due to the increased administrative burden to the existing process. Within the AOC, COR assignments change more frequently than OCSO security specialist assignments. COR changes require approval by the Architect and an updated memo from the Architect to the HSAA and the Chief of the USCP listing the authorized requestors. In addition, ensuring CORs are current on procedures and the nearly constant authorization updates filed with the USCP/HSAA creates a training and administrative burden that would increase processing time and cause further delays. The OCSO will continue to explore alternatives to the current process and will remain engaged in discussions with the HSAA and USCP points of contact (POC) on options to enhance the existing process. <li data-bbox="886 779 1451 989">• <i>Eliminating the hand carry of CP-491 forms to the USCP (Fairchild Building) for fingerprinting:</i> Although there were discussions regarding automation of key components of the process at the beginning of the pandemic in 2020, the requirement to hand carry CP-491 forms was kept. The AOC will re-engage the USCP and HSAA about eliminating the hand-carry requirement but cannot compel the change; the AOC does not own the forms or this stage of the process. <li data-bbox="886 1010 1451 1283">• <i>Implementing the use of approval buttons or PDF secure signatures in place of manual signatures:</i> The USCP is the CP-491 form and process owner; the HSAA is the form and process owner for the ID badge form. The OCSO has recommended automation of the forms to these process owners based on AOC user suggestions; however, the OCSO has no authority to compel the USCP or HSAA to review or change any internal processes to add approval buttons or secure signature methods on their forms. The OCSO will remain engaged in discussions with the HSAA and USCP POCs on options to enhance the existing process. <li data-bbox="886 1304 1451 1934">• <i>Identification, development or acquisition of a badge management software solution that uses notification-based processes that ensures secure and efficient execution, monitoring and tracking of badging actions:</i> The AOC's current SharePoint site sends automated notifications at each step of the badging process. Identification, development or acquisition of a badge management software solution that uses notification-based processes and ensures secure, efficient execution, monitoring and tracking of badging actions would need to be developed in house or through a contract. No commercial, off-the-shelf products exist that meet the complexity of the badging process. Even if the AOC builds badge management software, it would not improve many of the identified issues the USCP and HSAA own the key processes and forms associated with badging. The AOC has no authority to compel the USCP or HSAA to develop or acquire a badge management software system that is compatible for all three agencies. The OCSO will coordinate with the AOC's ITD to submit a funding request to assess the current SharePoint site and develop recommendations for a new software solution. The OCSO will further request funding to develop a software solution that addresses security lapses inherent in the current use of SharePoint to process AOC security badging. <p data-bbox="862 1944 1029 1965"><i>(Continued on page 55)</i></p>

TABLE D: Inspections & Evaluations Unimplemented Recommendations (*continued*)

Subject	Report No. Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		2	<p data-bbox="862 289 1045 310"><i>(Continued from page 54)</i></p> <p data-bbox="862 323 1419 506">OIG Response: The OIG considers the recommendation unresolved. The OIG continues to recommend that the AOC work with other Capitol campus badging entities to develop an efficient and secure badging program and engage in the proposed joint feasibility study. The OIG will monitor the program's progress and follow up on the development of any action items and implementation of program improvements.</p>
		3	<p data-bbox="862 575 1451 659">Recommendation: We recommend the OCSO develop and implement suitability policy language, including clear lines of responsibility and processes. Improvements should include:</p> <ul data-bbox="886 674 1419 827" style="list-style-type: none"> <li data-bbox="886 674 1419 758">• In the Contractor Suitability Policy, assign the responsibility for the centralized recordkeeping of intra-agency badging agreement memoranda of understanding or agreements to the OCSO <li data-bbox="886 772 1419 827">• In both policies, guidance and requirements for secure badge return and protection and oversight of personally identifiable information <p data-bbox="862 842 1451 1121">AOC Management Decision: Concur. The AOC concurs and will include responsibilities in the draft AOC Order 42-7 Contractor Suitability Policy. This order applies to all persons who have access to AOC controlled grounds, facilities and information systems, [including] AOC contractors, subcontractors and the employees of such contractors and subcontractors. The order will assign the responsibility for the centralized recordkeeping of intra-agency badging agreement [memorandum of understanding] or [memorandum of agreement] to the OCSO and requirements for secure badge return as well as protection and oversight of personally identifiable information.</p> <p data-bbox="862 1136 1403 1157">OIG Response: This recommendation will remain open until confirmed.</p>
		4	<p data-bbox="862 1226 1451 1409">Recommendation: We recommend the CSO, in coordination with the USCP and HSAA, perform a joint feasibility study to develop and implement a centralized security badge management process using shared software that allows for secure and efficient issuance, monitoring and tracking of badging actions, including tracking and reporting lost/stolen badges and follow-up actions.</p> <p data-bbox="862 1423 1451 1703">AOC Management Decision: Partially Concur. The AOC partially concurs with the OIG's recommendation. The AOC will continue discussions with legislative branch partners but cannot commit to implementing this recommendation. The AOC has no authority to compel the USCP or HSAA to develop or acquire a badge management software system that is compatible for all three agencies. Although a centralized system has been previously discussed, the identification, development or acquisition of a centralized security badge management software solution would require significant investments in personnel and IT resources.</p> <p data-bbox="862 1717 1451 1927">OIG Response: The OIG considers the recommendation unresolved. Although the AOC notes it does not have authority over legislative branch partners, the OIG continues to recommend the AOC work with other Capitol campus badging entities to develop an efficient and secure badging program and that the AOC engage in the proposed joint feasibility study. The OIG will monitor the program's progress and follow up on the development of any action items and implementation of program improvements.</p>

TABLE D: Inspections & Evaluations Unimplemented Recommendations (*continued*)

Subject	Report No. Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
ARCHITECT OF THE CAPITOL OFFICE OF SAFETY AND CODE COMPLIANCE			
Evaluation of the Architect of the Capitol's Safety Inspection Program	2022-0004-IE-P July 14, 2023	1	<p>Report Summary: The OIG performed an evaluation to assess the compliance and internal controls of the AOC's Safety Self-Inspection Program in accordance with AOC policies and procedures and with applicable federal laws and regulations.</p> <p>Recommendation: We recommend the Office of Safety and Code Compliance (SCC) issue guidance to the AOC's organizations to complete all elements of the self-inspection checklists (e.g., no blank responses or unchecked boxes).</p> <p>AOC Management Decision: Concur. The AOC concurs with the recommendation. The AOC is developing a policy memorandum to replace the inspection guidance in Chapter E of the safety manual [AOC Order 10-1 Chapter E- Risk Management]. The update directs jurisdictions to complete all elements of the self-inspection checklists in the WebTMA General Inspection Module and check all boxes on the inspection checklist. This policy memorandum is expected to be issued by February 2, 2024.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		2	<p>Recommendation: We recommend the SCC issue guidance instructing the AOC's organizations to report all self-inspection findings, including those resolved during the self-inspection process, in a centralized and consistent manner, and for SCC to analyze the data for proactive safety and compliance issue identification and management.</p> <p>AOC Management Decision: Concur. The policy memorandum in progress, referenced under the response to Recommendation 1, includes instructions for inspectors to report hazard(s) identified and remediated during the self-inspection in the WebTMA General Inspection Module, to create a work order, and to close the work order to indicate that the hazard was fixed during the inspection. This [approach] will capture data regarding hazards fixed immediately and will support analysis and proactive prevention.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		3	<p>Recommendation: We recommend the SCC update its WebTMA Inspection Findings Module Quick Guide to (1) document how to categorize non-AOC findings that are the responsibility of other agencies (e.g., USCP), (2) reiterate that SCC is responsible for both coordinating findings remediation with other agencies and defining the processes it will use to remediate findings and (3) provide the SCC's contact information. The SCC should ensure each AOC organization acknowledges receipt and understanding of the process for documenting and reporting other agencies' findings.</p> <p>AOC Management Decision: Concur. The suggested updates to WebTMA's Inspection Findings Module Quick Guide are in progress and expected to be complete by October 20, 2023.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>

TABLE D: Inspections & Evaluations Unimplemented Recommendations (*continued*)

Subject	Report No. Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		4	<p>Recommendation: We recommend the SCC obtain an understanding of escape hood respirators to ensure the Senate and HSAA regularly inspect respirators and ready them for use by AOC employees and others in emergency situations.</p> <p>AOC Management Decision: Concur. The SCC will reach out to the Sergeants at Arms to obtain this information by August 2023.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		5	<p>Recommendation: We recommend the SCC, in its next update to the self-inspection checklists, consider adding steps to address applicable items related to hazardous materials, including hazard communication.</p> <p>AOC Management Decision: Concur. An update to the self-inspection checklist is not planned at this time. However, this recommendation is noted and is under consideration.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		6	<p>Recommendation: We recommend the SCC develop guidance for how AOC organizations should develop a complete list of self-inspection areas, including guidance for shared spaces.</p> <p>AOC Management Decision: Concur. The policy memorandum in progress, referenced under the response to Recommendation 1, also includes instructions for jurisdictions to identify self-inspection areas.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		7	<p>Recommendation: We recommend AOC organizations review their lists of physical areas to self-inspect to validate that they are complete and in line with updated guidance from the SCC. In addition, AOC organizations should report validation review results to the SCC during ongoing and regular intervals.</p> <p>AOC Management Decision: Concur. AOC jurisdictions are updating their inventories. This [effort] is expected to be complete by February 2, 2024.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		8	<p>Recommendation: We recommend the SCC require all AOC employees performing self-inspections to complete standardized self-inspection training. The SCC should also consider requiring periodic refresher training to maintain readiness and awareness.</p> <p>AOC Management Decision: Concur. The policy memorandum in progress, referenced under the response to Recommendation 1, contains language indicating that self-inspection training is required for all employees who perform inspections. The memorandum will also include conditions for periodic refresher training.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>

TABLE E: Follow-Up Unimplemented Recommendations

Subject	Report No. Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
ARCHITECT OF THE CAPITOL DIVERSITY, INCLUSION AND DISPUTE RESOLUTION OFFICE			
Follow-Up Evaluation of the Congressional Request for the Architect of the Capitol's Response to Sexual Harassment	2022-0001-FLD-P June 1, 2023	1	<p>Report Summary: The OIG performed a follow-up evaluation of the 2019 report, Congressional Request for Office of Inspector General Review of the Architect of the Capitol's Response to Sexual Harassment (2019-0001-INVQ-P).</p> <p>Recommendation: We recommend the DI/DR develop and implement office-specific policies and procedures for documenting, monitoring and reporting cases in Entellitrak to ensure quality non-EEO and EEO data.</p> <p>AOC Management Decision: Concur. The DI/DR will establish written policies for documenting, monitoring and reporting cases in Entellitrak.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		2	<p>Recommendation: We recommend the DI/DR perform a climate assessment for jurisdictions that frequently work with the public to identify and address concerns regarding nonemployee harassment and hostile work environments.</p> <p>AOC Management Decision: Concur. The AOC will implement this recommendation, limiting the scope to nonemployee harassment concerns.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		3	<p>Recommendation: We recommend AOC jurisdictions that frequently work with the public review and update (as needed) all visitor guidelines and communications to include language that promotes an antiharassment workplace.</p> <p>AOC Management Decision: Concur. The DI/DR will meet with each jurisdiction and office to remind AOC leadership and managers of the need to reinforce our policies throughout the workforce. The AOC will review the public-facing visitor guidelines for appropriate behavior.</p> <p>OIG Response: The OIG considers the recommendation unresolved. The AOC's actions appear to be partially responsive to the recommendation. While continuous dialogue with a workforce and its leadership is a good practice, documentation (written guidelines and communication) is a necessary part of an effective internal control system. AOC employees have a greater risk for nonemployee harassment because of their interaction with the public. The agency could greatly benefit from updating guidelines or developing a visitor code of conduct that promotes an antiharassment workplace and a safe environment for all. The recommendation will be closed upon completion and verification that visitor guidelines and communications include language that promotes an antiharassment workplace.</p>

TABLE E: Follow-Up Unimplemented Recommendations *(continued)*

Subject	Report No. Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		4	<p>Recommendation: We recommend the AOC develop or update policies and procedures to address how the agency will document and investigate nonemployee harassment.</p> <p>AOC Management Decision: Partially Concur. The AOC's claims process covers all allegations of discrimination, including sexual harassment by employees and nonemployees. The AOC will continue to apply standard investigative procedures to document, track, monitor trends of and investigate nonemployee harassment allegations. The AOC policies on workplace antiharassment and sexual harassment are reviewed periodically.</p> <p>OIG Response: The OIG considers the recommendation unresolved. The DI/DR does not have written internal standard operating procedures that address nonemployee harassment. Additionally, AOC Order 24-2 Workplace Anti-Harassment Policy does not address harassment by the public or visitors. The recommendation will remain open until completion and verification of a new or updated policy to address how the agency will document and investigate nonemployee harassment.</p>
		5	<p>Recommendation: We recommend the DI/DR establish and document minimum training requirements for its staff related to the staff's field and area of expertise.</p> <p>AOC Management Decision: Partially Concur. As the legislative branch does not have a formal process, there is no formal external training for claims the agency can use to establish a minimum training requirement. However, [the] DI/DR will establish minimum training requirements in writing that articulate the need for initial and refresher training in this area.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		6	<p>Recommendation: We recommend the AOC document and implement a process to conduct follow-up inquiries after resolution to identify employee concerns, verify safety, address fears of retaliation and ensure effective reintegration (as appropriate) to minimize negative impacts on its workforce.</p> <p>AOC Management Decision: Nonconcur. It is inappropriate to implement victim advocacy in the DI/DR because the neutrality of an EEO office is paramount to its effective operations and mission. For this reason, "victim support and advocacy" is not an appropriate charge for [the] DI/DR. Rather, the AOC provides other more appropriate avenues for employee support. Accordingly, the guidelines outlined in AOC Order 24-2 Workplace Anti-Harassment Policy are the appropriate source for addressing concerns about retaliation and providing a communications strategy. Appropriate mechanisms are already in place to identify employee concerns (DI/DR investigations, climate assessments, the 24 hour hotline, Employee Labor Relations Branch, the Employee Assistance Program, the Ombuds), to verify safety concerns (Office of Safety, Workplace Violence Program) and to address fears of retaliation (DI/DR investigations).</p> <p><i>(Continued on page 60)</i></p>

TABLE E: Follow-Up Unimplemented Recommendations *(continued)*

Subject	Report No. Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		6	<p><i>(Continued from page 59)</i></p> <p>OIG Response: The OIG considers the recommendation unresolved. Our evaluation found that the DI/DR does not always proactively follow up with accusers to ensure safe re-entry into the workplace. The 2019 report referenced the phrase “victim support and advocacy.” In this follow-up evaluation, the OIG refrained from using this phrase based on feedback received from the DI/DR. The focus and intent of the recommendation is to ensure the safety of all employees after resolution and reintegration. The DI/DR is not governed by the EEO Commission (EEOC) and therefore has the flexibility to incorporate a neutral follow-up process or procedure without putting the agency at risk. Further, the recommendation was addressed to the AOC, not solely the DI/DR, to provide corrective action that considers the agency policies and operations as a whole. The OIG will monitor the program’s progress and follow up on the development of any action items and implementation of program improvements.</p>
		7	<p>Recommendation: We recommend the AOC update AOC Order 24-1 Conciliation Program Guide to ensure it provides consistent and current information about the conciliation process and resources available.</p> <p>AOC Management Decision: Concur. While AOC Order 24-1 Conciliation Program Guide is still accurate, the AOC is currently updating several orders, including AOC Order 24-1.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		8	<p>Recommendation: We recommend the DI/DR develop office-specific internal policies and procedures that require regular communication and updates to individuals on the status of their complaints and cases.</p> <p>AOC Management Decision: Concur. The AOC will provide more frequent case updates to the complainant in the investigative process.</p> <p>OIG Response: The OIG considers the recommendation unresolved. The proposed corrective action does not fully address the recommendation. The OIG recommended the DI/DR develop internal written policies and procedures that include standards or requirements for communicating with employees on the status of their complaints and cases. This internal control was recommended to help ensure consistent and regular communication among all employees. The recommendation will be closed upon completion and verification of specific internal policies and procedures that require regular communication and updates to individuals on the status of their complaints and cases.</p>

TABLE E: Follow-Up Unimplemented Recommendations (*continued*)

Subject	Report No. Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		9	<p>Recommendation: We recommend the AOC develop and implement a process to report EEO-related information (as appropriate) to increase transparency and employee trust.</p> <p>AOC Management Decision: Nonconcur. The AOC believes the potential negative effects of publicizing statistical case data outweigh the perceived benefits. This is supported by the fact that no federal agency requirement to report this type of information exists. Federal notification of case information is covered by sections 1133 and 1134 of the Elijah E. Cummings Federal Employee Antidiscrimination Act of 2020 [Cummings Act],¹⁶ which amends the No FEAR Act. The Cummings Act only requires agencies to post findings of intentional discrimination (including retaliation), not statistical aggregate data, and while the act does not apply to the legislative branch, the AOC briefs information monthly to the House and Senate Committees of Oversight and Administration. Additionally, data reporting does not effectively message the AOC's response to sexual harassment allegations. The AOC communicates its response to sexual harassment more effectively through training, targeted messaging [at] all levels of leadership and continued enforcement of the AOC's antidiscrimination policies.</p> <p>OIG Response: The OIG considers the recommendation unresolved. The OIG did not recommend that the AOC publicize statistical case data in accordance with any laws or regulations. Contrary to the agency's response, the Cummings Act requires executive federal agencies to post on their public websites summary statistical data relating to equal opportunity complaints filed against the agency. In addition, the No FEAR Act requires EEOC to post governmentwide summary statistical data pertaining to hearings and appeals filed with EEOC. The posting of EEO data on agency public websites is intended to assist Congress, federal agencies and the public with determining whether agencies are following through with their EEO responsibilities. The OIG believes that the perceived benefits of reporting such data, as with the Cummings Act, outweigh potential negative effects. The OIG will monitor the program progress and follow up on the development of any action items and implementation of program improvements.</p>
		10	<p>Recommendation: We recommend the DI/DR develop and implement a process to receive and document recommendations and actions taken by AOC jurisdiction deciding officials involving sexual harassment allegations.</p> <p>AOC Management Decision: Concur. However, [the] DI/DR will request this information from the Employee and Labor Relations Branch (ELRB), the advisor to and repository of this information, not the jurisdictions.</p> <p>OIG Response: The OIG considers the recommendation unresolved. The proposed corrective action does not fully address the recommendation. The OIG's intent was for the DI/DR to develop and implement a process for receiving and documenting actions taken from ELRB on a continuous basis to retain complete case records and auditable documentation. The recommendation will be closed upon completion and verification of a process to receive and document recommendations and actions taken by AOC jurisdictions and deciding officials involving sexual harassment allegations.</p>

¹⁶ Elijah E. Cummings Federal Employee Antidiscrimination Act of 2020.

<https://home.treasury.gov/system/files/306/Elijah-E-Cummings-Federal-Employee-Antidiscrimination-of-2020.pdf>

TABLE E: Follow-Up Unimplemented Recommendations (continued)

Subject	Report No. Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		11	<p>Recommendation: We recommend the DI/DR update its antiharassment training to include language options that employees commonly use; examples specific to the AOC workplace and workforce; consequences for supervisors if they fail to fulfill their responsibilities related to reporting and preventing harassment, retaliation and other prohibited conduct; consequences for misconduct; and explanations of the complaint process.</p> <p>AOC Management Decision: Concur. Outside of accessibility for those with disabilities, the AOC is not legally required to provide language options. However, as a best practice, the AOC is currently working on a Language Access Plan for various aspects of employment at the AOC.</p> <p>OIG Response: The OIG considers the recommendation unresolved. The proposed corrective action only partially addresses the recommendation. The response does not address whether the AOC will update the sexual harassment training to include examples specific to the AOC workplace and workforce; consequences for supervisors if they fail to fulfill their responsibilities related to reporting and preventing harassment, retaliation and other prohibited conduct; consequences for misconduct; and explanations of the complaint process. The OIG will monitor the program progress and follow up on the development of any action items and implementation of program improvements.</p>
ARCHITECT OF THE CAPITOL			
Follow-Up Evaluation of the Architect of the Capitol's Inventory Accountability and Controls	OIG-FLD-2023-01 September 5, 2023	1	<p>Report Summary: The OIG performed a follow-up evaluation of the 2019 report, Evaluation of the AOC's Inventory Accountability and Controls (2018-0002-IE-P).</p> <p>Recommendation: We recommend the AOC update and revise AOC Order 34-45 Personal Property Manual to (1) establish a dollar threshold for accountable property; (2) ensure mission-critical nonconsumable property is consistently defined, to the greatest extent possible, across AOC jurisdictions; (3) provide guidance on how to identify, document and track mission-critical nonconsumable and nonaccountable property; (4) provide clear directions on administrative controls; and (5) develop and enforce additional inventory and accountability procedures for accountable and nonaccountable property to reduce the risk of mismanagement and lost property in accordance with federal best practices.</p> <p>AOC Management Decision: Concur. The AOC will review, edit and update [AOC] Order 34-45. The updates will clarify dollar thresholds for accountable property; ensure mission-critical nonconsumable property is consistently defined; provide guidance on how to identify and track mission-critical property; provide clear direction; and develop additional inventory and accountability procedures for accountable and nonaccountable property to reduce the risk of mismanagement and lost property. [AOC management anticipates] completion by the third quarter FY 2024.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>

TABLE E: Follow-Up Unimplemented Recommendations (*continued*)

Subject	Report No. Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		2	<p>Recommendation: We recommend the AOC research and implement federal government best practices for acquiring and maintaining adequate storage space to reduce the risk of theft.</p> <p>AOC Management Decision: Concur. The AOC will research best practices for acquiring and maintaining adequate storage to reduce the risk of theft. Additionally, the AOC will review [AOC] Order 34-45 and make edits and updates as necessary to clarify the disposition of property, which in turn could increase storage space and reduce the risk of theft. [AOC management anticipates] completion by the third quarter FY 2024.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>
		3	<p>Recommendation: We recommend the AOC conduct an agencywide assessment to identify disposable property and discard the property per AOC Order 34-45 Personal Property Manual to ensure adequate storage space.</p> <p>AOC Management Decision: Concur. The AOC will assess, identify and discard disposable property agencywide in accordance with [AOC] Order 34-45. This effort could provide additional storage space. [AOC management anticipates] completion by the third quarter FY 2024.</p> <p>OIG Response: This recommendation will remain open until confirmed.</p>

TABLE F: Follow-Up Implemented and Closed Recommendations

Subject	Report No. Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
ARCHITECT OF THE CAPITOL DIVERSITY, INCLUSION AND DISPUTE RESOLUTION OFFICE			
Follow-Up Evaluation of the Congressional Request for the Architect of the Capitol's Response to Sexual Harassment	2022-0001-FLD-P June 1, 2023	12	<p>Recommendation: We recommend the DI/DR update and make its antiharassment training a mandatory annual training requirement for the AOC's workforce.</p> <p>AOC Management Decision: Concur. The AOC requires Prevention of Discrimination and Harassment training for all employees annually. However, during 2022, the training was being revised, so it was not implemented in 2022. Prevention of Discrimination and Harassment training [was made a requirement for] all AOC employees and supervisors in April and May 2023 and will be required annually thereafter.</p> <p>OIG Response: As of May 2023, the DI/DR requires that all AOC employees and supervisors take the Prevention of Discrimination and Harassment training. The AOC's actions appear to be responsive to the recommendation. Therefore, the recommendation is considered closed.</p>

FUNDS QUESTIONED OR PUT TO BETTER USE

TABLE G: Audit Recommendations and Management Decisions Put to Better Use of Funds

	Statutory Language	Number of Reports	Questioned Costs ³	Funds Put to/ For Better Use ⁴
A	Reports for which no management decision was issued by the start of the reporting period	0	—	—
B	Reports requiring a management decision during the reporting period	8	—	—
C	Prior Year Adjustments	0	—	—
	Subtotals (A+B+C)	8	—	—
D	Reports for which a management decision was issued during the reporting period:	8	—	—
	(i) Dollar value of disallowed costs¹	0	—	—
	(ii) Dollar value of costs not disallowed²	2	\$88,025.00	\$46,523.00
	(iii) Dollar value of recommendations that were agreed to by management	2	\$88,025.00	\$46,523.00
	(iv) Dollar value of recommendations that were not agreed to by management	0	—	—
E	Reports for which no management decision was issued by the end of the reporting period	0	—	—
F	Reports for which no management decision was made within six months of issuance	0	—	—

Definitions

¹Costs determined to be unallowable by Federal guidance (Funds For Better Use)

²Allowability of costs undetermined (Questioned) or costs considered to be waste (Funds Put to Better Use)

³Costs questioned due to:

- A. an alleged violation of a provision of a law, regulation, contract, grant, cooperative agreement, or other agreement or document governing the expenditure of funds;
- B. a finding that, at the time of the audit, such cost is not supported by adequate documentation; or
- C. a finding that the expenditure of funds for the intended purpose is unnecessary or unreasonable.

⁴Recommendation that funds could (“should” for disallowed costs) be used more efficiently if management of an establishment took actions to implement and complete the recommendation.

Example:

- A. Reductions in outlays
- B. Deobligation of funds from programs or operations

TABLE H: Status of Questioned and Disallowed Costs

Report Name	Report ID	Date Issued	Status of Reported Costs							Status to Date
			Reported Costs		Status of Questioned Costs		Status of Disallowed Costs			
			Questioned Costs	Disallowed Costs	Allowed Costs	Disallowed Costs	Recovered Costs	Not Recovered Costs		
Audit of the Architect of the Capitol's Unliquidated Obligations	OIG-AUD-2021-06	9/29/21	\$90,110.00	—	—	—	—	—	—	Open
Review of the Architect of the Capitol's Multimillion-Dollar Construction Project Change Orders	OIG-AUD-2023-04	3/30/23	\$722,083.00	\$19,675.00	—	—	—	—	—	Open
Review of the Architect of the Capitol's Multimillion-Dollar Construction Project Change Orders	OIG-AUD-2023-07	9/21/23	\$88,025.00	—	—	—	—	—	—	Open

TABLE I: Investigation Recommendations for Better Use of Funds

Cost Avoidance, Savings and Recoveries Resulting From OIG Investigations

Item	Quantity
Cost avoidance from employee removals/resignations*	\$229,419.20
Savings from employee salaries during suspensions*	\$1,182.45
Administrative repayment determinations	\$0.00
Court ordered fines/forfeitures/restitution	\$0.00
OIG recovery of stolen government property/funds	\$13,926.56
Funds put to better use:	
Salary and Benefits (subtotal)	\$230,601.65
Net Questioned Costs	\$8,904.34
Waste	\$29,086.64
Total	\$282,519.19

*Salary and wage data obtained from the OCFD is used to calculate positive impact and savings from investigations that result in the suspension, removal or resignation of employees engaged in misconduct in the workplace or who submit fraudulent workers' compensation claims.



APPENDICES

APPENDIX A: Inspector General Reporting Requirements¹⁷

IG Act Reporting Requirements	NEW IG Act Reporting Requirements	Description	Page No.
Section 4(a)(2)	Section 404(a)(2)	Review of Legislation and Regulations	28
Section 5(a)(1)	Section 405(b)(1)	Significant Problems, Abuses and Deficiencies	None
Section 5(a)(2)	Section 405(b)(2)	Recommendations with Respect to Significant Problems, Abuses and Deficiencies	None
Section 5(a)(3)	Section 405(b)(3)	Prior Significant Recommendations Not Yet Implemented	None
Section 5(a)(4)	Section 405(b)(4)	Summary of Matters Referred for Prosecution and Resulting Convictions	18
Section 5(a)(5)	Section 405(b)(5)	Summary of Instances Where Information Was Refused	None
Section 5(a)(6)	Section 405(b)(6)	Listing of Audit, Inspection and Evaluation Reports, Including Total Value of Questioned Costs and Funds Put to Better Use	64–65
Section 5(a)(7)	Section 405(b)(7)	Summary of Significant Reports	10–26
Section 5(a)(8)	Section 405(b)(8)	Statistical Tables on Management Decisions on Questioned Costs (see statute for specifics)	64
Section 5(a)(9)	Section 405(b)(9)	Statistical Tables on Management Decisions on Recommendations That Funds Be Put to Better Use (see statute for specifics)	65
Section 5(a)(10)	Section 405(b)(10)	Summary of Each Audit Report Over Six Months Old for Which No Management Decision Has Been Made (see statute for specifics)	None
Section 5(a)(11)	Section 405(b)(11)	Significantly Revised Management Decisions	None
Section 5(a)(12)	Section 405(b)(12)	Significant Management Decisions with Which the Inspector General Disagrees	None
Section 5(a)(17)	Section 405(b)(17)	Statistical Tables on Investigative Reports Issued; Person Referred to Department of Justice, State and Local Prosecuting Authorities for Criminal Prosecution; and Indictments and Criminal Information	18
Section 5(a)(14)	Section 405(b)(14)	Peer Review	33
Section 5(a)(18)	Section 405(b)(18)	Description of the Metrics Used for Developing the Statistical Tables Under Section 405(b)(17)	18–19
Section 5(a)(19)	Section 405(b)(19)	Report on Each Investigation Conducted by the OIG Involving Senior Government Employee (see statute for specific info required)	20–21

¹⁷ This section was derived from Section 5 of the Inspector General Act of 1978 (IG Act), Pub. L. 95–452, which was set out in a former Appendix to Title 5. On December 23, 2022, the IG Act was amended by Pub. L. 117–263, div. E, title LII, which recodified the IG Act at 5 U.S.C. §§ 401–424 (including the semiannual reporting requirements), before being repealed and reenacted on December 27, 2023 by Pub. L. 117–286. For applicability of those amendments to this section, see Section 5(b) of Pub. L. 117–286, Transitional and Savings Provisions. The semiannual reporting requirements of former Section 5 and the recodified 5 U.S.C. § 405(b) apply to the AOC’s OIG through the Architect of the Capitol Inspector General Act of 2007, as amended, 2 U.S.C. § 1808(d)(1) states, “Each Inspector General shall, not later than April 30 and October 31 of each year, prepare semiannual reports summarizing the activities of the Office during the immediately preceding six-month periods ending March 31 and September 30.”

APPENDIX A: Inspector General Reporting Requirements¹⁷ (continued)

Subject		Report No.	Issue Date
Section 5(a)(21)	Section 405(b)(21)	Detailed Description of Any Attempt to Interfere with OIG Independence (see statute for specifics)	None
Public Law 114-113	No Change	Quarterly Status Updates on Cannon House Office Building and the Capitol Power Plant Projects	None

APPENDIX B: Definitions of Terms Used in This Semiannual Report

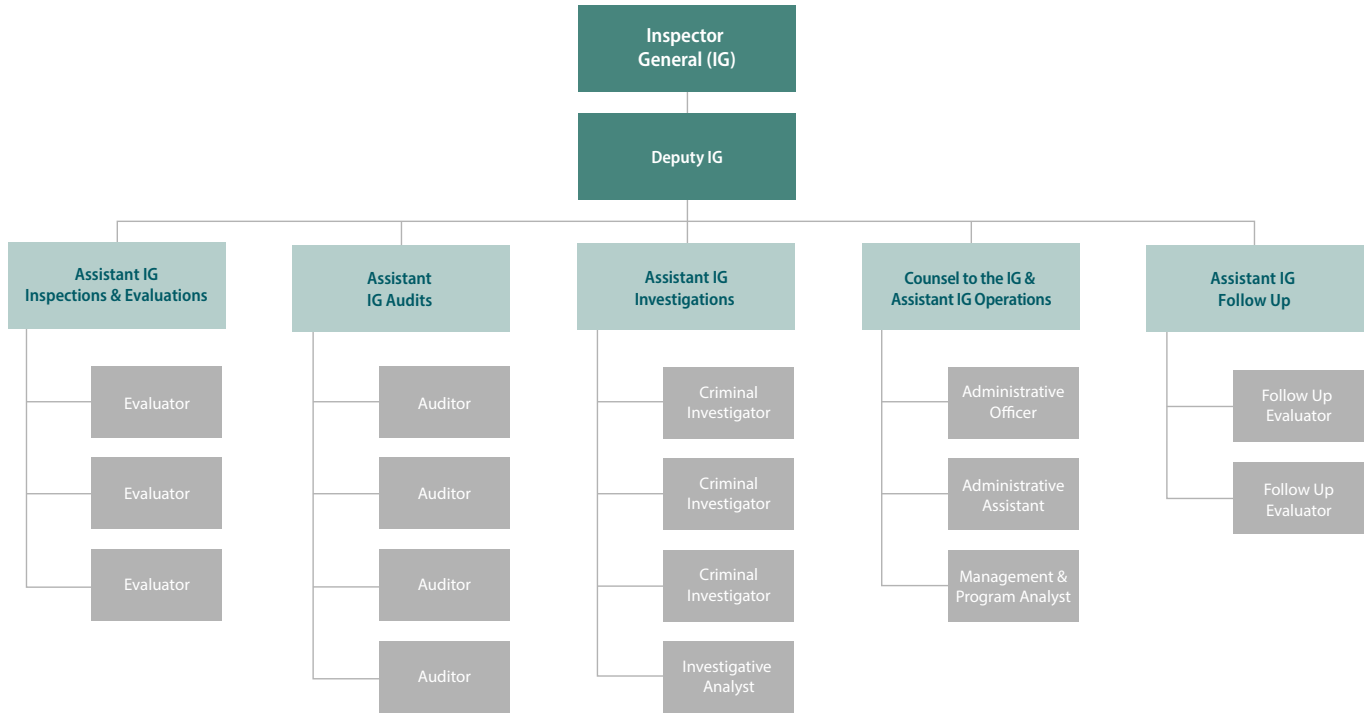
Term	Definition
Disallowed Cost	A questioned cost that management, in a management decision, has sustained or agreed should not be charged to the government.
Funds Put to Better Use	A recommendation that funds could be used more efficiently if management took action(s) to implement and complete the recommendation.
Management Decision	Management's evaluation of the findings and recommendations included in an audit, evaluation or investigative report and the issuance of a decision by management, including action(s) the AOC plans to take in response to the recommendations.
Questioned Cost	A cost that is questioned because (1) of an alleged violation of a provision of a law, regulation, contract or other agreement or document governing the expenditure of funds; (2) the cost is not supported by adequate documentation; or (3) the expenditure of funds for the intended purpose is unnecessary or unreasonable.



LIST OF ACRONYMS USED IN THIS REPORT

AOC	Architect of the Capitol	IPP	Invoice Processing Platform
BIM	Building Information Modeling	IT	Information Technology
CCJV	Clark/Christman, A Joint Venture	ITD	Information Technology Division
CHOBr	Cannon House Office Building Renewal	NFC	National Finance Center
CIGIE	Council of the Inspectors General on Integrity and Efficiency	OCFO	Office of the Chief Financial Officer
CMc	Construction manager as Constructor	OCSO	Office of the Chief Security Officer
CO	Contracting Officer	OIG	Office of Inspector General
COR	Contracting Officer's Representative	OMB	Office of Management and Budget
CSO	Chief Security Officer	OPSEC	Operations Security
CUEC	Complementary User Entity Control	PCO	Potential change order
CVC	U.S. Capitol Visitor Center	POC	Point of Contact
DI/DR	Diversity, Inclusion and Dispute Resolution Office	PPM Memo	Planning and Project Management Memorandum
EEO	Equal Employment Opportunity	QC	Quality Control
EEOC	Equal Employment Opportunity Commission	RMAB	Records Management and Archives Branch
ELRB	Employee and Labor Relations Branch	SAR	Semiannual Report
FISMA	Federal Information Security Modernization Act of 2014	SCC	Office of Safety and Code Compliance
FMLA	Family and Medical Leave Act	SOC 1^o	System and Organization Controls
FY	Fiscal Year	SR	Senior Rated
GAO	Government Accountability Office	TBD	To Be Determined
HSAA	House Sergeant at Arms	TWAI	Treasury Web Application Infrastructure
HVAC	Heating, Ventilation and Air Conditioning	ULO	Unliquidated Obligation
ID	Identification	USAO	U.S. Attorney's Office
IG	Inspector General	U.S.C.	United States Code
IPA	Independent Public Accounting Firm	USCP	U.S. Capitol Police

OFFICE OF INSPECTOR GENERAL ORGANIZATION CHART



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We welcome any feedback, comments, concerns or suggestions on this report.

Please send any comments to Christopher Failla, CIG at Christopher.failla@aoc.gov.





SAR 23-2