

SEMIANNUAL REPORT TO THE CONGRESS

October 1, 2017 — March 31, 2018

Architect of the Capitol
Office of Inspector General





Inspector General Message

It has been an extremely busy period for the personnel of the Architect of the Capitol (AOC) Office of Inspector General (OIG) as we strive to build an office that accomplishes the work that the AOC and Congress have entrusted us to do to combat fraud, waste and abuse and evaluate programs within the AOC for economies and efficiencies. I am very proud to submit our latest Semiannual Report (SAR) to the AOC and Congress. This second report of my tenure as Inspector General highlights our activities for the past six months ending March 31, 2018.

During this reporting period, with the approval of the Senate and House Appropriations Committees, we began adding four additional positions to the OIG. These employees will fill critical gaps to help our investigators complete our backlogged investigations triages and close out opened investigations while also enabling our auditors and evaluators to accomplish our aggressive and optimistic Fiscal Year (FY) 2018-2020 Audit and Evaluation Plan. This plan was developed with the consideration of an agency-wide risk assessment completed in November. Additionally, we issued the AOC FY 2017 Financial Statements Audit as well as a Performance Audit on the Capitol Building House cleaning and policing contract. Concurrently, we conducted fieldwork and began drafting our findings on a follow-up evaluation of the AOC's Federal Employee Compensation Act (FECA) due out in May as well as a Performance Audit on the Russell Building food service contract due out in June. In the mega project audit area, we completed field work and began the draft for a Performance Audit on the Cannon Renewal project contract modifications while providing a quarterly status report on seven critical areas of the Cannon Renewal project, as well as quarterly status reports on Capitol Power Plant projects – West Refrigeration Plant Revitalization (RPR) project and Cogeneration (COGEN) project. We did this while preparing for a Council of the Inspectors General on Integrity and Efficiency (CIGIE) Peer Review of our Audit program in May and a modified CIGIE Peer Review of our newly established Inspections and Evaluations program which began in March 2018. This required writing new inspection and evaluation policies and procedures in a very short time. We also developed a memorandum of understanding with the Army Corps of Engineers to provide subject matter expertise during technical construction audits.

Our investigators have been working diligently on investigating 36 new complaints which were added to the 41 complaints from the last reporting period. Although not all of these complaints will become investigations, the work to evaluate the allegations, determine if an investigation is warranted or refer them to the proper jurisdiction is laborious, but time well spent.

Personally, I could not be more excited about the work that lays ahead for this office. With the addition of experienced Deputy Inspector General Melinda Miguel in December 2017, we are a duo fully committed to represent the office and keep the Architect of the Capitol and Congress fully informed while providing the guidance, tools and resources to ensure we successfully meet the AOC OIG's mission. I also want to applaud the OIG staff for their tremendous work ethic and dedication to the mission of this office. Lastly, I want to thank the Architect of the Capitol and Congress for their support to ensure the independence of this office and to bolster existing staff with additional resources.

I am truly honored to serve in protecting the interests of citizens of this great nation and adding value to the AOC.



A handwritten signature in black ink, appearing to read "C. Lilla". The signature is fluid and cursive, written on a white background.

Our Mission

The OIG promotes efficiency and effectiveness to deter and prevent fraud, waste and mismanagement in AOC operations and programs. Through value-added, transparent and independent audits, 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 management 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, 2 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 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 United States Capitol by the AOC is based on Section 1811 of Title 2 of the United States Code. 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. This includes the U.S. Capitol, House and Senate office buildings, the U.S. Capitol Visitor Center, 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 also provides professional expertise with regard to the preservation of architectural and artistic elements entrusted to its care and provides recommendations concerning 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.

Architect of the Capitol Stephen T. Ayers performs his duties in connection with the U.S. Senate side of the Capitol, Senate office buildings and the administrative oversight of the Senate restaurants contract subject to the approval of the Senate Committee on Rules and Administration. In matters of general policy in connection with the House office buildings, the Architect of the Capitol's activities are subject to the approval and direction of the U.S. House of Representatives (House) Office Building Commission and various House committees, including the Committee on House Administration. He is responsible for the care and repair of works of art in the U.S. Capitol under the direction of the Joint Committee on the Library. In addition, the Architect of the Capitol 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 on the Library.

OFFICE OF INSPECTOR GENERAL

The AOC Inspector General (IG) Act of 2007, 2 U.S.C. § 1808, establishes the OIG as an independent objective office within the AOC and applies to the AOC certain sections of the IG Act of 1978, as amended, that details the IG's duties and authorities and establishes 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 comment in the Semiannual Report regarding the impact on the economy and efficiency or the prevention and detection of fraud and abuse of such legislation and regulations.
- (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. This is generally done by issuing a Semiannual Report to the Architect of the Capitol and Congress.

Audits

OIG Report 2018-0004-AUD-R, Audit of FY 2017 Financial Statements

We contracted with the independent certified public accounting firm Kearney & Company (Kearney) to audit the AOC's financial statements for the year ending September 30, 2017. The contract required the audit be conducted in accordance with Government Auditing Standards issued by the Comptroller General of the United States.

Kearney issued an unmodified opinion for the FY 2017 financial statements and identified a significant deficiency pertaining to internal controls. The report stated that the AOC did not complete reviews of Service Organization Controls Reports from the National Finance Center and the AOC did not follow their internal guidance and identify a responsible person to complete these reviews.

OIG Report 2018-0005-AUD-R, Audit of Capitol Building House Cleaning and Policing Contract, Project Number 2017-0001-AUD-P

We issued the final report for the audit of the Capitol Building House cleaning and policing contract in March 2018. The objectives of this audit were to determine if the AOC solicited, awarded, and is monitoring the Capitol Building House cleaning and policing contract in accordance with agency policies and procedures; evaluate if the Capitol Building House cleaning and policing contract provides value to the AOC and is warranted; and determine if the contractor was carrying out its duties in accordance with the specifications of the contract.

Our audit resulted in two findings; one pertaining to the AOC not always monitoring contractor performance in accordance with contractual requirements and another regarding the lack of a documented bona fide need to support that night cleaning services were warranted for the current contract. We also noted that the current contract may not be providing the best value to the AOC and suggested that they consider several factors prior to exercising an option to extend the contract for another year.

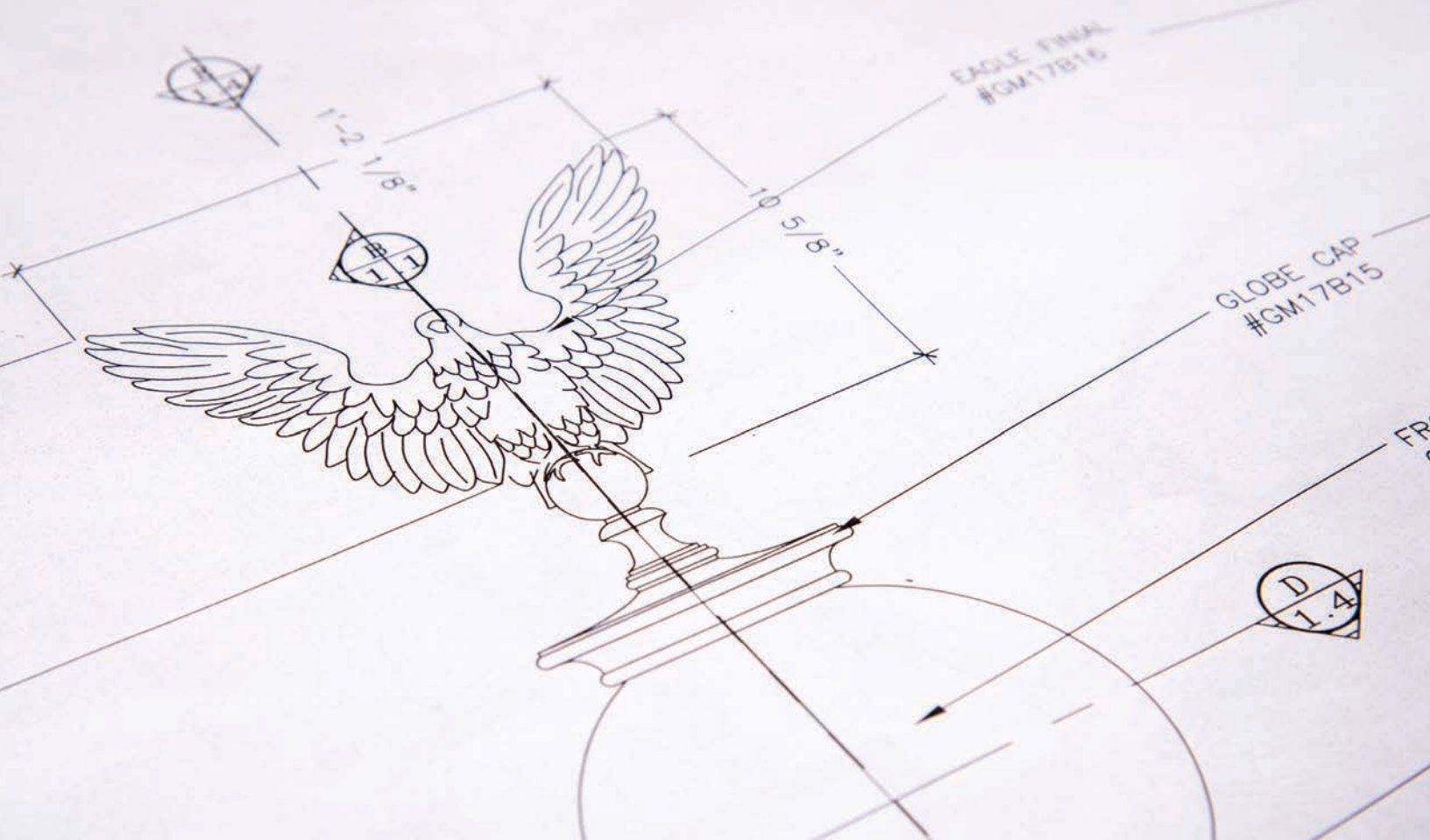
The AOC concurred with the audit report findings and recommendations. In addition, the AOC will not exercise the option to extend this contract, and they will utilize internal resources for these cleaning services going forward. This action serves as their management decision and notice of final action. As such, there will be no further follow-up actions regarding this audit.

Quarterly Status Reports

We issued four quarterly status reports as required by the Explanatory Statement accompanying the FY 2016 Legislative Branch Appropriations Act, P.L. 114-113, Division I. The Explanatory Statement requires the OIG to provide quarterly status reports on the Cannon Renewal project to the House Committee on Appropriations and on the Capitol Power Plant to the Committees on Appropriations. The status reports are not audits or evaluations, but are transmissions of information requested from AOC management. We do not issue findings or recommendations based on these reports, but use the reports as background in building future audits and evaluations related to the seven key areas outlined in the reports.

Third and Fourth Cannon Renewal Project Quarterly Status Reports

We issued our third and fourth Cannon Renewal project quarterly status reports on August 1, 2017, and March 1, 2018, respectively. These quarterly status reports covered activities from July through December 2017. The reports provided status updates on seven key factors relating to the projects: 1) safety, 2) security, 3) schedule, 4) budget, 5) risk management, 6) contract management and 7) client satisfaction. These seven key factors provide a repeatable process for obtaining current updated information from the AOC and providing it in a timely manner to Congress for its situational awareness.



Our key observations for the Cannon Renewal project quarterly status report included:

- (1) Phase I of the Cannon Renewal project has been experiencing potential scheduling problems over the past two quarterly reports. The OIG is considering hiring a subject matter expert to review the reasonableness of the contractor's recovery plan schedule.
- (2) Contracting badging for this project increased over the past two quarterly reports by approximately 700 badges. We will include a review of this project's badging in a future evaluation.

Quarterly Status Reports on Capitol Power Plant Projects – West Refrigeration (RPR) Project and Cogeneration (COGEN) Project

The report issued December 1, 2017, was the second quarterly status report on the RPR and covered activities from January through June 2017. The report issued March 1, 2018, was the first status report for COGEN and covered activities from commencement of fieldwork in summer 2016 through December 2017. These reports also followed the seven key factor model as follows: 1) safety, 2) security, 3) schedule, 4) budget, 5) risk management, 6) contract management and 7) client satisfaction.

Our key observation on the RPR project quarterly status report issued December 1, 2017, was: the AOC reported the RPR project has had no construction activity since June 2017. The OIG believes the AOC should re-evaluate the program risk as funds are appropriated for future phases to adequately capture changes in risk to schedule and budget. The OIG will note this for future audit processes.

Our key observations on the COGEN project quarterly status report issued March 1, 2018, were:

- (1) The AOC believes the substantial completion of the COGEN project will be closer to July 31, 2018, than to the initial June 2, 2018, estimate.
- (2) COGEN's dual financing arrangement (both appropriated funds and a financing vehicle) will be a challenging auditing environment.
- (3) The contractor conducting the work, Washington Gas and Light, has filed three claims against the AOC. The AOC denied the claims and Washington Gas and Light, as of this report, has appealed all three claims with the Government Accountability Office. The status of these claims is still pending.

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 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 an 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 two orders or other policy or guidance documents.

Table A: Review of AOC Legislation and Policies

Document	Title	Description
Environmental Manual 12-4, Chapter 6	Petroleum Storage Tank	The purpose of the Petroleum Storage Tank Chapter is to establish the requirements and assign responsibilities for employees of the AOC with respect to the management of petroleum products in tanks and bulk storage containers. This chapter defines the regulations governing the installation, operation and removal of both underground storage tanks and aboveground storage tanks.
Environmental Manual 12-4, Chapter 11	Integrated Pest Management	The purpose of the Integrated Pest Management Chapter is to establish pesticide management requirements for facilities managed by the AOC.
Human Resources Manual	Order 591-1 Uniform Policy	<p>This update to the AOC Uniform Policy includes the following revisions:</p> <ul style="list-style-type: none"> • Specifies and standardizes requirement for employee names on the uniforms • Prohibits current and former employees from selling uniform articles to other individuals or utilizing online sites such as E-Bay to buy, sell or trade uniform items • Requires all shirt styles to be tucked in at all times, with exceptions for gardeners • Authorizes new employees to receive an initial uniform allocation upon hire • Authorizes employees to make personal purchases of uniform items • Clarifies the requirement to wear a full uniform under outerwear components

Investigations

During this reporting period, we received or initiated a total of 36 complaints. From those complaints, investigators opened seven new investigations. We referred a total of nine complaints to other government agencies, AOC program offices and/or the AOC avenues of assistance.

Criminal investigator's status has been established however, law enforcement authority has not yet been reinstated. As of this SAR, this authority is currently under review by the U.S. Marshal Service.

Closed Investigation

I-2017-07 – Time and Attendance (T&A) Fraud; Government Ethics; Telework Program; Standards of Conduct: Substantiated

The OIG initiated an investigation based on information received from a confidential source concerning an AOC manager misrepresenting time worked and receiving payment for hours not worked. The OIG conducted a review of iPhone logs, T&A records, and emails for the period of March 2, 2017, through June 30, 2017, a three-month period selected surrounding the alleged dates of violation. The OIG also conducted relevant interviews of witnesses and subjects and confirmed that information provided by the manager as proof of attendance resulted in their senior manager making erroneous entries on their WebTA records for that period.

Testimony supported that the senior government manager (GS-15) relied upon the accuracy of information provided by the subordinate manager as a pattern of practice for the last 10 years and allowed the subordinate manager to work from home without an approved telework agreement. This lack of adequate oversight made it possible for the subordinate manager to violate the requirements of several AOC orders. This investigation is closed, management action is pending.

Table B: Investigative Data¹

Activity	Total
Complaints Received	
Hotline Complaints Received (Phone and/or Email)	11
Complaints Received (Walk-ins)	4
Direct Phone or Email to AOC OIG	14
U.S. Mail or Facsimile Machine	3
AOC OIG Observed or Developed	4
Total	36
Investigations Opened	7
Investigations Closed (2 pending AOC management actions)	4*
Criminal Investigations Referred to a Law Enforcement (L.E.) Agency or the United States Attorney for Prosecution Consideration:	
Referred to L.E. Agency or the U.S. Attorney	2
Declined	1
Accepted for Prosecution	0
Subpoenas Issued in Support of OIG Investigations:	
OIG Subpoenas Issued and Served	1
Grand Jury Subpoenas Served	0
Disciplinary Actions Resulting from OIG Administrative Investigations:	
Employee Removals/Resignations/Retirements (in lieu of)	3
Employee Suspensions	1
Employee Reprimands/Warnings/Counseling	2
Allegations Not Substantiated or Disproven by OIG	1
Allegations Substantiated/Person(s) Unknown	0
Actions Pending	1
Informal Referrals (to AOC Program Offices no follow-up or report required)	3
Formal Referrals (Follow-up required within 60 days)	4
Employee Assistance Referral (to AOC Avenue of Assistance)	0

*Includes two investigations opened in a previous reporting period.

Note: Data in this table was compiled from a review of the OIG investigation's databases and files.

¹ During this reporting period a management decision was made to change the case numbering system for the office which included the Audit, Investigations, and Inspections & Evaluations sections. The Investigations Sections case numbering was previously listed by Year-Case Number (18-0001) – then case type represented by a C (complaint), I (investigation) or R. The cases are now referred to as projects and listed by Year (2018) – Number (0001) – Type INVC [complaint], INVI [investigation], INVR [referrals] and ending with a P which represent a project. The first case number for the Investigations Section for SAR period 18-1 was 18-0001-I. The change to projects began with project number 2018-0002-INVC-P.

I-2017-08 – Violations of Standards of Conduct; Committing Theft of Government Property: Substantiated

The OIG initiated an investigation based on an anonymous complaint that three night-shift employees had been stealing supplies and food from a jurisdiction cafeteria. One of the night-shift employees was later identified to have a relative employed as a restaurant contractor located in an AOC jurisdiction. Based on the anonymous complainant's allegation, the contract employee provided the AOC relative a key to enter the cafeteria where the food and drinks were located. The AOC employee then placed the stolen food items in a personal vehicle during breaks.

This information was provided to the U.S. Capitol Police (USCP) who subsequently arrested an AOC employee. The AOC employee appeared before the Superior Court, District of Columbia and entered a diversion which is a form of sentence in which a criminal offender joins a rehabilitation program, in an effort to help remedy the behavior leading to the original arrest and avoid conviction and a criminal record through a deferred prosecution agreement with community service. The requirements of the deferred prosecution agreement were completed, and the case was disposed-nolle (will no longer prosecute). This AOC employee was terminated from the AOC, effective January 16, 2018.

The USCP later referred this investigation back to the AOC for resolution and possible administrative remedies. The U.S. Attorney's Office had declined to prosecute criminally on the basis that they could not accept an estimation on the amounts of food and supplies that were stolen. The follow-on administrative investigation substantiated that the AOC employees violated AOC policy when they removed AOC equipment, supplies, materials or other government property without first obtaining prior written permission from an appropriate releasing authority. The other AOC employee was terminated from the AOC effective February 12, 2018. The food service contractor received a letter of concern from the AOC regarding unethical employee conduct associated with her relative (AOC employee). The contractor terminated their employee effective November 10, 2017. This investigation is closed.

I-2018-01 – Program Fraud of Civil Remedies Act of 1986; Absence Without Leave; AOC Employee Responsibilities: Substantiated

The OIG initiated an investigation based on information received from the Human Capital Management Division, concerning an AOC employee who was suspected of faking an injury and fraudulently completing a Claim for Compensation (CA-7) certifying that the information they provided was true and accurate to the best of their knowledge and belief. This investigation substantiated that based on preponderance of the evidence, the employee committed FECA fraud when they fabricated an injury and made false statements by submitting a claim for compensation. The employee also violated AOC policies when they were absent from work without supervisory approval and did not cooperate with the AOC OIG during the investigation. This investigation is closed and pending management action.

2018-0005-INVI-P – Government Ethics: Appearance of Impropriety; Outside Interest, Activities and Employment; Personal Projects: Not Substantiated

The OIG initiated an investigation based on information received from an AOC manager alleging that a subordinate AOC supervisor misused their position and granted overtime to a subordinate employee as compensation for doing repairs on their personal residence.

The investigation did not substantiate the AOC supervisor used their position to coerce personal services, favors or solicit a subordinate to perform work at their personal residence. The investigation determined there was no evidence to corroborate the AOC supervisor provided preferential treatment or favoritism toward their subordinate employee. This investigation did not substantiate that the AOC supervisor or subordinate employee violated AOC policies. The investigation is closed.

Open Investigations

We currently have five open investigations, 2018-0002-INVI-P, 2018-0003-INVI-P, 2018-0004-INVI-P, 2018-0006-INVI-P, and 2018-0007-INVI-P. Per OIG policy, we are unable to comment about ongoing investigations. We anticipate reporting these as closed investigations in the next reporting period.

Action Resulting from Investigations Reported in Previous SARs

I-2017-03 – Time and Attendance (T&A) Fraud and Failing to Cooperate in an OIG Investigation: Substantiated

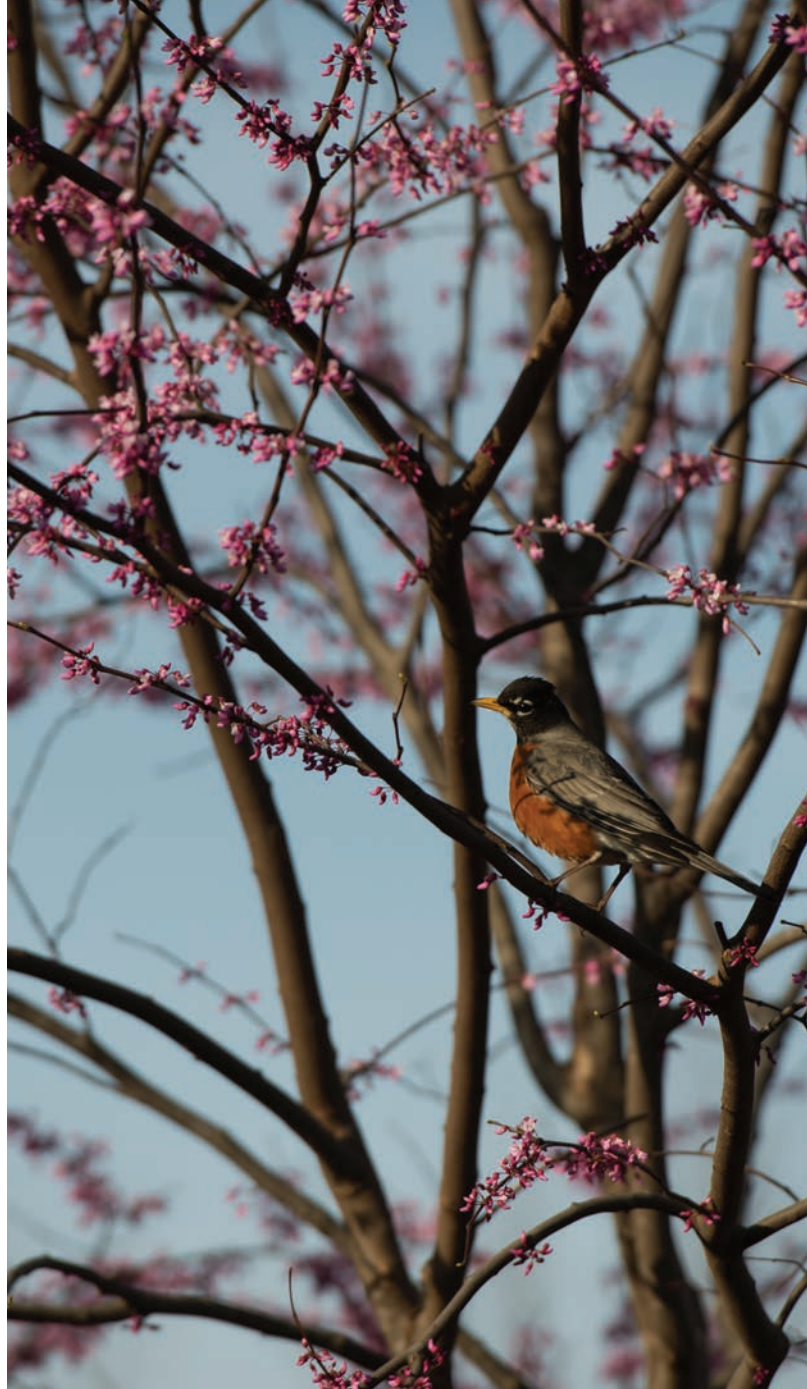
The OIG initiated an investigation based on information that an AOC employee allegedly submitted and certified false timesheets which resulted in T&A fraud.

This investigation substantiated that the AOC employee departed Capitol Hill during their tour of duty for hours at a time and in some instances did not return to finish their shift. The employee submitted, or caused submission of, erroneous time logs or other documentation when they certified and signed their timesheets, claiming their time was recorded accurately. It was determined that the employee committed T&A fraud by claiming up to 108 hours not worked. Based on the false information, the AOC employee certified timesheets as accurate, which caused the government to overpay for hours unworked at the rate of \$22.21 an hour, totaling up to \$2,398.68. The investigation is closed.

Updated Information: The AOC employee was terminated from the AOC effective November 9, 2017.

I-2017-06 – Violation of the De Minimis Use; Use of Electronic Mail and Internet to Participate in Chat Rooms during Duty: Substantiated

The OIG initiated an investigation based on information that an employee allegedly used an AOC computer during duty hours to host a Facebook radio show and participate in internet chat rooms.



This investigation substantiated that the AOC employee violated AOC policy when they used AOC IT assets (internet and cellular phone) numerous times during duty hours to participate in live chats with Facebook friends and on a live radio show. The investigation is closed.

Updated Information: The AOC employee was originally issued a suspension letter for five days, an appeal to the deciding official resulted in reduction of suspension from five days to three days. Additionally, the subject was ordered to make restitution in the amount of \$149 as this was identified as the loss to the AOC in the AOC IG report.



Instances of the AOC Refusing to Provide Information or Assistance or Interfering with the OIG's Independence

During the reporting period, there were no instances in which the AOC refused to provide information or assistance or interfered with the OIG's independence.

Status of Reports or Recommendations

- (1) **For Which No Management Decision was Made**
- (2) **For Which No Management Comment was Made Within 60 Days**

During the reporting period, there were no reports or recommendations more than six months old for which we had not received management decisions. Further, there were no reports or recommendations for which management did not provide comments within 60 days.

Significantly Revised Management Decisions

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

Significant Management Decisions With Which the OIG Disagrees

There were no significant management decisions with which we disagreed 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.

Peer Review Reporting

There was no peer review activity this reporting period.

Recommendations

Table C: Unimplemented Recommendations

Subject	Report No. Issue Date	Office	Rec No.	Summary of Recommendations and Action
Architect of the Capitol/Office of the Chief Administrative Officer				
Accountability of Information Technology Property	A-2017-02 May 2017	Information Technology Division	1	<p>Report Summary: The OIG evaluated the Information Technology Division's (ITD) controls over the accountability of Information Technology (IT) property.</p> <p>Recommendation: Strengthen the recording process to increase the accuracy and completeness of the Cireson inventory database.</p> <p>AOC Management Decision: Concur. The AOC will revise and document standard operating procedures for receiving, deploying and decommissioning inventory assets. Additionally, in accordance with AOC Order 8-4, Accountable IT Property, the AOC IT Property Manager will assist jurisdictions in performing their initial physical inventories and establishing and tracking annual inventory audit review dates for each AOC office. These actions will increase the accuracy and completeness of the Cireson inventory database. Estimated Completion Date: May 1, 2018.</p>
			2	<p>Recommendation: Fully implement AOC Order 8-4 to assign IT accountable property officers, responsible for overall accountability, to improve tracking, oversight and reconciliation processes for managing accountable IT property.</p> <p>AOC Management Decision: Concur. The AOC will collaborate with each office to identify and designate accountable property officers for all AOC offices. ITD will provide training to each accountable property officer as part of the inventory turnover process to improve tracking, oversight and reconciliation processes for managing accountable IT property. Estimated Completion Date: May 1, 2018.</p>

Table D: Implemented and Closed Recommendations

Subject	Report No. Issue Date	Office	Rec No.	Summary of Recommendations and Action
Capitol Building House Cleaning and Policing Contract	2018-0005-AUD-R March 2018	Capitol Building jurisdiction	A-1	<p>Report Summary: The OIG evaluated the Capitol Building House cleaning and policing contract to determine if it was properly procured and awarded, provides value to the AOC, was warranted and was properly monitored for contractor performance.</p> <p>Recommendation: Assign the appropriate Capitol Building contracting officer's technical representative (COTR) to monitor the contract from the inception of the contractual period in accordance with the contract terms.</p> <p>AOC Management Decision: Concur. The assigned COTR has completed the requisite training and is appropriately monitoring the contract. The contract terms have been reviewed and understood. In particular, inspections have been completed and documented since September 2017, and invoices have been approved based on an evaluation that the performed work is as described in the contract.</p>
			A-2	<p>Recommendation: The Capitol Building jurisdiction's responsible authorities ensure that COTRs and their designees obtain complete understanding of the contractual requirements for contracts under their authority to effectively evaluate contractor performance and compliance with contract terms. COTRs ensure that documented inspections are performed as required under the contract and maintain support for approving invoices and resolving possible disputes.</p> <p>AOC Management Decision: Concur. The Capitol Building jurisdiction has sent a memo to all COTRs reminding them of their contractual responsibility to perform inspections, evaluate contractor performance, approve invoices and abide by the duties applicable to COTRs related to contract management. The inspections have been completed and documented since September 2017, and invoices have been approved based on an evaluation that the performed work is as described in the contract.</p>
			B	<p>Recommendation: In the future, AOC determine and document bona fide need prior to decisions to adequately document the need for acquisition of additional resources such as contractual services.</p> <p>AOC Management Decision: Concur. The AOC generally concurs with the findings and recommendations. While we believe management validated the need for the service through the approval of the requisition before contracting for a service and through internal communications, enhanced documentation could have better supported the bona fide need to the auditor. Determination of a bona fide need will be formally documented in the future, prior to acquiring additional contracted cleaning services.</p>

Funds Questioned or Put to Better Use

Table E: Audit Recommendations and Management Decisions Put to Better Use of Funds

	Number of Reports	Category	Funds Put to Better Use
A. Audit reports for which no Management Decision was issued by the start of the reporting period	0	0	\$0
B. Reports requiring a Management Decision during the reporting period	1	0	\$0
Subtotals (A+B)	1	0	\$0
C. Reports for which a Management Decision was issued during the reporting period	2	0	~\$59,956
(i) Dollar value of disallowed costs	0	0	\$0
(ii) Dollar value of costs not disallowed	0	0	\$0
D. Reports for which no Management Decision was issued by the end of the reporting period	0	0	\$0
E. Reports for which no Management Decision was made within six months of issuance	0	0	\$0

Table F: Investigation Recommendations for Better Use of Funds

Item	Quantity
Cost Avoidance, Savings and Recoveries Resulting From OIG Investigations	
*Cost Avoidance from Employee Removals/Resignations	\$217,215
*Savings from Employee Salaries during Suspensions	\$835
Administrative Repayment Determinations	\$149
Court Ordered Fines/Forfeitures/Restitution	0
OIG Recovery of Stolen Government Property/Funds	0
Total	\$218,199

*Using the AOC average salary of \$72,405 per employee per year, or \$278 per workday for suspensions for 2018. The one-year cost avoidance method is used to conservatively estimate the positive impact and savings from investigations that result in the removal or resignation of employees engaged in misconduct in the workplace or who submit fraudulent Workers' Compensation claims.

Appendices

Appendix A: Inspector General Reporting Requirements

IG Act Reporting Requirements	Description	Page No.
Section 4(a)(2)	Review of Legislation and Regulations	10
Section 5(a)(1)	Significant Problems, Abuses and Deficiencies	None
Section 5(a)(2)	Recommendations with Respect to Significant Problems, Abuses and Deficiencies	None
Section 5(a)(3)	Prior Significant Recommendations Not Yet Implemented	16
Section 5(a)(4)	Summary of Matters Referred for Prosecution and resulting convictions	11
Section 5(a)(5)	Summary of Instances Where Information Was Refused	None
Section 5(a)(6)	Listing of Audit, Inspection and Evaluation Reports, including total value of questioned costs and funds put to better use	8 – 9, 18
Section 5(a)(7)	Summary of Significant Reports	8 – 9, 11 – 13
Section 5(a)(8)	Statistical Tables on Management Decisions on Questioned Costs (See statute for specifics)	18
Section 5(a)(9)	Statistical Tables on Management Decisions on Recommendations That Funds Be Put To Better Use (See statute for specifics)	18
Section 5(a)(10)	Summary of Each Audit Report Over 6 Months Old for Which No Management Decision Has Been Made (See statute for specifics)	None
Section 5(a)(11)	Significantly Revised Management Decisions	None
Section 5(a)(12)	Significant Management Decisions With Which the Inspector General Disagrees	None
Section 5(a)(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	11
Section 3(d), Section 5(a)(14)	Peer Review	None
Section 5(a)(18)	Description of the metrics used for developing the statistical tables under 5(a)(17)	11
Section 5(a)(19)	Report on each investigation conducted by the OIG involving Senior Government employee (See statute for specific info required)	11
Section 5(a)(21)	Detailed description of any attempt to interfere with OIG independence (See statute for specifics)	None
P.L. 114-113	Quarterly status updates on Cannon House Office Building and the Capitol Power Plant projects	8 – 9

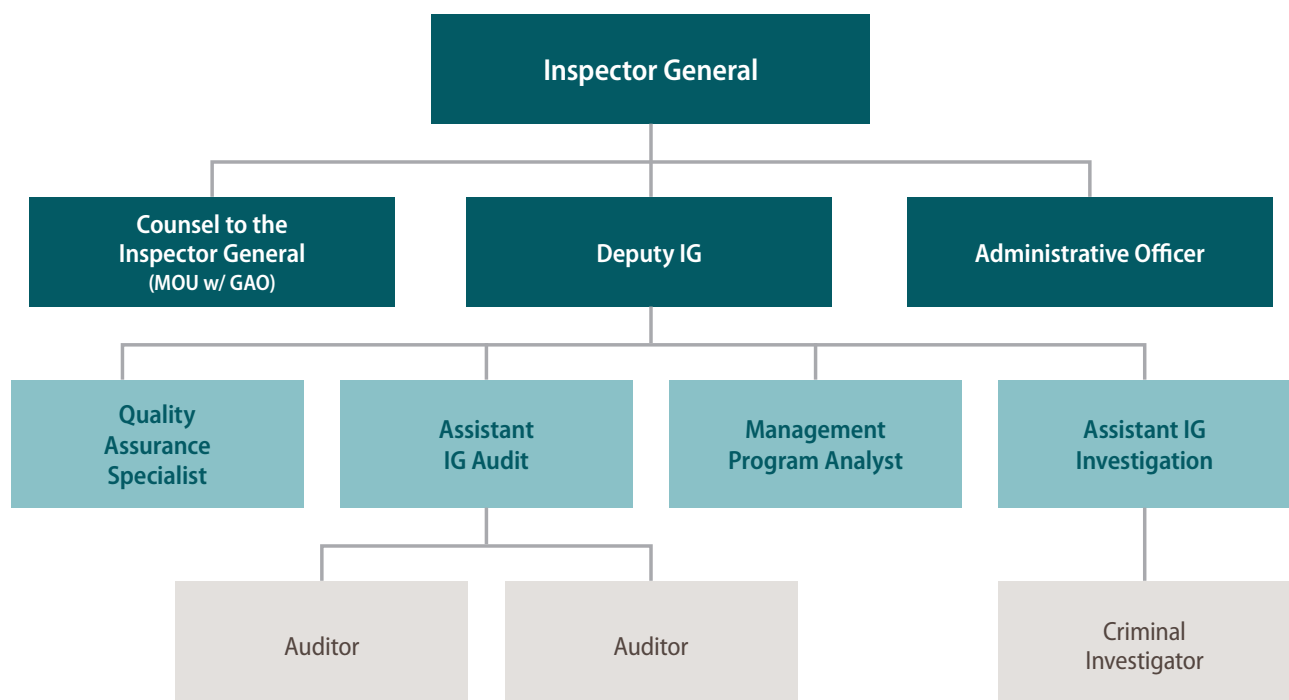
Appendix B: Definitions of Terms Used in this Semiannual Report

Terms	Definition
Questioned Cost	A cost that is questioned because (i) of an alleged violation of a provision of a law, regulation, contract or other agreement or document governing the expenditure of funds; (ii) the cost is not supported by adequate documentation; or (iii) the expenditure of funds for the intended purpose is unnecessary or unreasonable.
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 made that funds could be used more efficiently if management took actions to implement and complete the recommendation.
Management Decision	Management's evaluation of the findings and recommendations included in an audit or investigative report and the issuance of a decision by management, including actions the AOC plans to take in response to the recommendations.

List of Acronyms Used in this Report

AOC	Architect of the Capitol	ITD	Information Technology Division
CIGIE	Council of the Inspectors General on Integrity and Efficiency	Kearney	Kearney & Company
COGEN	Cogeneration	OIG	Office of Inspector General
COTR	Contracting Officer's Technical Representative	OWCP	Office of Workers' Compensation Program
DOL	Department of Labor	RPR	Refrigeration Plant Revitalization
FECA	Federal Employment Compensation Act	SAR	Semiannual Report
FY	Fiscal Year	T&A	Time and Attendance
IT	Information Technology	USCP	U.S. Capitol Police

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

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