SEMIANNUAL REPORT TO THE CONGRESS

October 1, 2019 – March 31, 2020

Architect of the Capitol Office of Inspector General





Inspector General Message



I am pleased to submit the Architect of the Capitol's (AOC) Office of Inspector General (OIG) Semiannual Report (SAR) to Congress for the first half of Fiscal Year (FY) 2020. Every six months, we provide Congress with a report detailing our independence and oversight of the AOC

during the reporting period. This report highlights our activities for the past six months ending March 31, 2020. This report is our 24th SAR and the sixth report of my tenure.

The work detailed here contains results from the efforts of an OIG staff dedicated to promoting economy and efficiency, and preventing and detecting fraud, waste and abuse in the AOC's programs and operations. In the years to come, we look forward to continuing our efforts to provide independent and effective oversight of the AOC and working with the Council of Inspectors General on Integrity and Efficiency (CIGIE) on important issues that span across our government.

During this SAR period, the 16 full-time employees of the OIG worked diligently to complete statutory requirements, audits, evaluations, inspections and congressional requests.

The OIG produced and issued one Management Advisory to the Architect of the Capitol and began providing weekly and monthly progress reports on the Cannon House Office Building Renewal (CHOBr) Project to the Committee on House Administration.

The OIG completed its year-long search for an Independent Public Accounting Firm (IPA) with a specialty in construction audits and has partnered with Cotton and Company, LLP. Cotton and Company has since begun two audits of the CHOBr Project, which has grown from \$752.7 million to \$890.1 million. Our efforts to contract out construction audit services will help us identify cost savings, fraud, product substitution and labor cost overpayment as well as reconcile modifications utilizing Government Auditing Standards. I believe this will result in faster, more focused construction audits generating meaningful findings and recommendations to aid the AOC in cost-cutting and quality construction efforts. Our intention is to complete two Construction Audits per year under this Blanket Purchase Agreement (BPA) for oversight of the CHOBr Project with possible expansion to other Capitol campus construction projects.

Investigation efforts for this reporting period yielded \$219,648 in avoided costs. We received 23 complaints, which, in part, led to opening six new investigations. We issued 11 investigative reports in which we substantiated cases involving viewing sexually explicit or obscene material on government resources, wasteful spending, supervisors soliciting gifts from subordinates as well as standards of conduct and ethical violations.

The AOC OIG's footprint on Twitter, which began six months ago @AOCOIG, now has more than 340 followers and is growing as the public, media and Congress continue to take interest in our oversight work. I want to thank the staff of the OIG for their tremendous work ethic and dedication to the mission over this period. The quality of your work and the importance it plays continues to shine as demand for our services has only increased.

I would also like to thank former Acting Architect of the Capitol Thomas Carroll; I appreciated his cooperation with the OIG during his tenure. Additionally, I would like to welcome Mr. J. Brett Blanton, the 12th Architect of the Capitol. I know Mr. Blanton's support will only further aid in making the AOC OIG a model for all Inspectors General, and I look forward to providing him with meaningful audits, evaluations and investigations that result in an improved AOC culture, a more efficient work force and an economically responsible organization.

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Our Mission

The OIG promotes efficiency and 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 and 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, 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, as amended, 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 J. Brett Blanton 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 to include the Committee on House Administration. The Architect of the Capitol 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 certain sections of the IG Act of 1978, as amended, that detail 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:

- 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

Completed Activity This Reporting Period

Audit of AOC FY 2019 Financial Statements (OIG-AUD-2020-01)

The OIG contracted with the IPA firm Kearney & Company (Kearney) to audit the AOC's financial statements for FY 2019, period ending September 30, 2019. Kearney was 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, issued by the Comptroller General of the United States; Office of Management and Budget (OMB) Bulletin No. 19-03, Audit Requirements for Federal Financial Statements; the U.S. Government Accountability Office's (GAO) Federal Information System Controls Audit Manual; and the GAO/Council of the Inspectors General on Integrity and Efficiency Financial Audit Manual. Those standards and OMB Bulletin No. 19-03 require that Kearney plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

The OIG served as the contracting officer's technical representative (COTR) on the contract providing oversight of contract requirements and transmitting the auditor's final report in November 2019. Kearney issued an unmodified opinion report for the FY 2019 financial statements. Kearney's reports for Internal Control over Financial Reporting and Compliance with Laws, Regulations, Contracts, and Grant Agreements did not identify any material weaknesses, significant deficiencies or noncompliance.

Kearney issued no recommendations for the audit.

Audit of FY 2019 Financial Statements Audit Management Letter

As a supplement to the Independent Auditor's Report on the AOC's financial statements for FY 2019, Kearney issued a management letter that identified three modified report deficiencies and one new deficiency in the AOC's internal control over financial reporting. These four deficiencies did not rise to the level of material weaknesses or significant deficiencies, but should be corrected. Kearney made 11 recommendations to correct these deficiencies and management concurred with the recommendations.

Audits in Progress

Audit of Cannon House Office Building Renewal (CHOBr) Project's Contract Modification (2019-AUD-004-A)

An IPA is conducting a performance audit of the CHOBr Contract Modifications. The CHOBr ensures that the Cannon House Office Building continues to provide space for members of Congress to perform their legislative business. The CHOBr budget is under review to incorporate anticipated cost requirements for completion of the project.

Our objective is to assess the effectiveness of contract modifications. Specifically, the audit will determine whether the change orders are reasonable, authorized, supported and comply with contract requirements. The scope of this audit includes contract modifications from the project's preconstruction services (Phase Zero) and Phase 1.

The OIG serves as the COTR on the contract with the IPA, which includes overseeing the requirements of the contract, and plans to transmit the auditor's final report in May 2020.

Audit of Cannon House Office Building Renewal (CHOBr) Project's Contract Invoices Information (2019-AUD-006-A)

An IPA is conducting a performance audit of the CHOBr Contract Invoices. The CHOBr ensures that the Cannon House Office Building continues to provide space for members of Congress to perform their legislative business. The CHOBr budget is under review to incorporate anticipated cost requirements for completion of the project.

Our objective is to assess the AOC's review and approval of the CHOBr invoices for Option Periods 1 and 2, to ensure the costs and payments were made in accordance with contract requirements, AOC policies and procedures, and industry standards. Additionally, the audit will determine whether the costs invoiced are allowable, supported and appear reasonable within the scope of contract requirements.

The OIG serves as the COTR on the contract with the IPA, which includes overseeing the requirements of the contract, and plans to transmit the auditor's final report in July 2020.



Audit of Senate Underground Garage Renovations and Landscape Restoration, Senate Office Buildings Contract Modifications (2020-AUD-001-A)

The OIG announced the audit of the Senate Underground Garage Renovations and Landscape Restoration on October 8, 2019. The objective of the audit is to assess the effectiveness of contract modifications. Specifically, the audit will determine whether the change orders are reasonable, authorized, supported and comply with contract requirements.

Audit of Russell Senate Office Building Exterior Repair and Restoration Sequence II (2020-AUD-003-A)

The OIG announced the audit of the Russell Senate Office Building Exterior Repair and Restoration Sequence II on October 30, 2019. The objective of the audit is to assess the effectiveness of contract modifications. Specifically, the audit will determine whether the change orders are reasonable, authorized, supported and comply with contract requirements.

Inspections and Evaluations

Completed Activity This Reporting Period

Evaluation of the AOC's Capitol Power Plant Cogeneration (Cogen) Facility Cybersecurity Posture (2019-0002-IE-P)

The OIG conducted an evaluation of the AOC Capitol Power Plant Cogen facility's cybersecurity posture, including appropriate resourcing of agency needs to meet this evolving challenge. This evaluation was in response to a request from the U.S. House of Representatives' Committee on House Administration and was the second in a series of cybersecurity evaluations. Our objective was to determine if cybersecurity vulnerabilities existed within the AOC's Capitol Power Plant Cogen facility and Capitol Power Plant interconnected control systems. We contracted with the John Hopkins University Applied Physics Laboratory to serve as subject matter experts during this evaluation. We made four findings and eight recommendations. The AOC concurred with each of the recommendations. Due to the sensitive nature of this evaluation, specific language pertaining to findings and recommendations is protected and not disclosed.

Evaluations-In-Progress

Evaluation of the AOC's Compliance with Its Discipline Processes (2019-0001-IE-P)

The OIG announced the evaluation of the AOC's compliance with its discipline program on August 14, 2019. Our objective was to determine if AOC disciplinary actions taken in response to employee misconduct were in compliance with established AOC policy and penalty guidance, and if disciplinary actions were applied consistently across the agency based on appropriate criteria and evidence. The covered period for this evaluation was from FYs 2015 to 2019.



The OIG issued the Discussion Draft Report to the AOC on March 3, 2020, with a requested agency response date by March 6, 2020, to identify potential report technical irregularities. Due to the COVID-19 response, the AOC requested an extension. The OIG received comments on March 16, 2020, and incorporated changes as appropriate to the Official Draft Report, which was issued to the AOC on March 23, 2020. The AOC has until April 21, 2020, to provide formal management comments to our Official Draft Report. We anticipate releasing the final report by the end of April 2020.

Investigations

During this reporting period, we received or initiated a total of 23 complaints. From those complaints, investigators opened six new investigations. We referred a total of five complaints to other government agencies, AOC program offices and/or AOC avenues of assistance.

During the last SAR period, the Department of Justice advised the United States Marshals Service would no longer authorize special deputations of legislative branch personnel for the purposes of performing their duties in support of the legislative branch. Further, they announced that all previously deputized legislative branch employees' authority would expire on December 31, 2019.

On December 20, 2019, Congress approved the AOC OIG's law enforcement authority in the Legislative Branch Inspector's General Independence Act of 2019, P.L. 116-94, 133 Stat. 3212 and confers upon special agents under the IG for the AOC and the Government Publishing Office the authority to execute warrants for search, seizure and arrest as well as to make warrantless arrests upon reasonable belief that a person is committing a felony. To comply with the separation of powers, these special agents, as employees within the legislative branch, must limit their use of these authorities to actions that aid in the exercise of the Congress's constitutional functions.

Table A: Investigative Data This Reporting Period

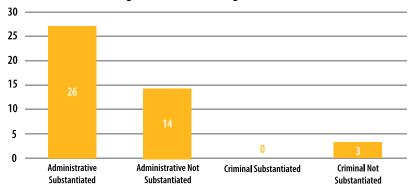
Investigative Activity	Count
Complaints	
Hotline Complaints Received (Phone and/or Email)	8
Complaints Received (Walk-ins)	1
Direct Phone or Email to AOC OIG	13
U.S. Mail or Facsimile Machine	0
AOC OIG Observed or Developed	1
Total Complaints	23
Investigations	
Investigations Opened	6
Investigations Closed ¹	11
Issuance of Subpoenas	
OIG Subpoenas Served	0
Grand Jury Subpoenas Served	0
Disciplinary Actions Resulting from Administrative Investigations	
Actions Pending	0
Allegations Not Substantiated or Disproven by OIG	2
Allegations Substantiated/Person(s) Unknown	0
Employee Removals/Resignations/Retirements (in lieu of)	3
Employee Reprimands/Warnings/Counseling	6
Employee Suspensions	2
Total Disciplinary Actions	13

Referrals

Criminal Investigation Referrals ²	
Accepted for Prosecution	0
Declined for Prosecution	1
Administrative Investigation Referrals	
Informal Referrals (to AOC Program Offices, no follow-up	3
or report required)	
Formal Referrals (Follow-up required within 60 - 90 days)	0
Employee Assistance Referral (to AOC Avenue of Assistance)	1
Total Referrals	5

¹Reflects investigations opened during the previous reporting period.

²Referred to a Law Enforcement Agency or the U.S. Attorney for Prosecution Consideration. Source: OIG Investigative files FIGURE 1: Investigations Division Charge Substantiation



Investigations Division Charge Substantiation

Figure 1 highlights the number of charges, both substantiated and unsubstantiated by type. During the period of review, there were 40 administrative charges. Of those, 26 (65 percent) were substantiated. In response to these charges AOC management carried out the following disciplinary actions: one termination, two resignations in lieu of termination, two suspensions, and six memorandums of counseling. There are two substantiated administrative charges that are awaiting a decision from AOC management.

FIGURE 2: Investigations Division Violations by Type

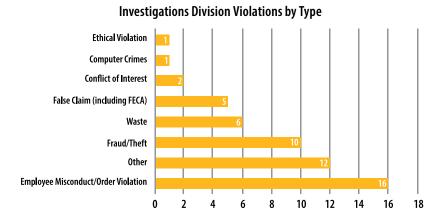


Figure 2 represents investigations for the time period under review broken out by violation type. Fraud/Theft, Employee Misconduct and Others (that did not meet a certain case criteria when initiated)¹ were the most frequent types of violations committed by AOC employees.

¹ Impersonation, Wasteful Spending, Inadequate Processes, Contract Irregularities at another agency, Retaliation and Harassment, and Suspected Drug Use.



Open Investigations

We currently have seven open investigations:

- 2018-0008-INVI-P
- 2019-0017-INVI-P
- 2020-0002-INVI-P
- 2020-0003-INVI-P
- 2020-0004-INVI-P
- 2020-0005-INVI-P
- 2020-0006-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.

Closed Investigations

Suspected Violations of Title 18 U.S. Code § 287 – False, Fictitious or Fraudulent Claims: Not Substantiated; and Title 18 U.S. Code § 1001 – False Statements, Concealment: Not Substantiated (2018-0002-INVI-P)

On October 17, 2017, the AOC OIG received a complaint from an AOC employee alleging that an AOC contractor may have submitted three claims for payment under an AOC contract that contained false information and inflated hourly labor rates.

The OIG investigation determined that the contract specifications did not spell out specific instructions regarding submission and substantiation of invoices, but that hourly labor rates under the contract were negotiated bilaterally and ratified by the AOC and the contractor. In January 2020, the OIG learned that the AOC and the contractor reached a tentative settlement on the claims that were the subject of the allegation.

Final Management Action: The investigation is closed.

Misuse of Government Networks to View Sexually Explicit or Obscene Material by an AOC Employee: Substantiated (2019-0006-INVI-P)

On September 25, 2018, the Library of Congress OIG initiated a proactive effort to identify web browsing activity potentially associated with sexually explicit or obscene material on both the Library of Congress government network and guest Wi-Fi networks.

On October 11, 2018, web traffic potentially associated with sexually explicit or obscene material was detected on the Library of Congress guest Wi-Fi network from an internet protocol address associated with a personal mobile phone. The personal mobile phone accessed the Library of Congress guest Wi-Fi network several times generating alerts associated with internet browsing of suspected sexually explicit or obscene material. The activity prompted a joint investigation with Library of Congress OIG, Architect of the Capitol OIG, U.S. Capitol Police (USCP) and the Metropolitan Police Department, Washington D.C.

The AOC employee agreed to a voluntary interview and admitted to the USCP that they had used their personal mobile phone to access the Library of Congress' guest Wi-Fi network to view sexually explicit material while on duty at the AOC. In addition, the AOC employee's personal conduct and use of the Library of Congress' government Wi-Fi networks to view sexually explicit or obscene material violated AOC orders and policy.

Final Management Action: On December 6, 2019, the AOC employee was terminated from employment. The investigation is closed.

Solicitation of a Gift by a Supervisor: Substantiated (2019-0016-INVI-P)

In August 2019, the AOC OIG received a telephonic complaint reporting that an AOC supervisor solicited a gift from their subordinate in exchange for time off from work.

The OIG interviewed the subordinate employee who reported that after they returned from leave in September 2017, their supervisor informed them that they owed a bottle of alcohol to the supervisor for approving the leave. The employee stated they feared retaliation if they did not comply with the request. In order to avoid retaliation, the employee provided the supervisor a bottle of alcohol, estimated value between \$55.00 and \$80.00. The employee disclosed the incident to a co-worker, who reported a similar conversation with the supervisor, but took it as sarcasm. The employee also reportedly confided in a higher level manager, who took no action against the supervisor. The supervisor was interviewed and admitted accepting a bottle of alcohol from their subordinate, but denied that it was conditional or in exchange for official action.

Final Management Action: The AOC supervisor was issued a 12-day disciplinary suspension. In addition, the AOC supervisor was reassigned to another position. The investigation is closed.

Suspected Violations of the AOC "Standards for Conduct," "Leave," and "Family and Medical Leave Act (FMLA)" Policies: Substantiated (2019-0018-INVI-P)

On August 23, 2019, the AOC OIG received a complaint from an anonymous source, citing an AOC employee was arrested for driving under the influence and subsequently incarcerated. The anonymous complainant alleged the AOC employee was using FMLA entitlements to cover their absences from work.

The investigation determined that on August 10, 2019, the AOC employee was involved in an automobile accident, arrested for driving under the influence of alcohol and incarcerated from August 10 to September 10, 2019. On August 30, 2019, the AOC employee submitted a doctor's note to AOC management citing they had been under doctor's care since August 12, 2019, incapacitated and unable to report for work. The AOC employee also submitted a Certification of Health Care Provider for Employee's Serious Health Condition (U.S. Department of Labor Form, WH-380-E) in support of their request for FMLA entitlements.

Final Management Action: The OIG substantiated the AOC employee violated AOC Order 752-2, Standards of

Conduct by not being truthful to management or truthful regarding the actual facts of their absence from work. The AOC employee also violated AOC Order 630-1, Absence and Leave Policy and AOC Order 630-2, FMLA Policy by requesting unscheduled sick leave or intermittent FMLA entitlements by submitting a doctor's note and a certification of a health care provider claiming FMLA to cover the time period when they were incarcerated for driving under the influence of alcohol. During an interview, the AOC employee admitted to their incarceration from August 10 to September 10, 2019, and submitting the doctor's note and a certification of a health care provider to cover their absences from work. The investigation is closed and management action is pending.

Suspected Violations of the AOC "Government Ethics," "Standards for Conduct," and "Personal Property" Policies: Substantiated (2020-0001-INVI-P)

On August 23, 2019, the AOC OIG received a complaint from an AOC manager concerning an AOC employee, who removed AOC property and used it for personal use. The investigation determined that the AOC employee removed a broken aluminum ladder from a trash collection container and took it home. After realizing the ladder was broken, the AOC employee returned the ladder to AOC and discarded it. Further, the AOC employee admitted taking home a bull float (concrete finishing tool), property of the AOC, valued at \$188.80, to use on a personal project and returned it to the AOC upon completion.

Final Management Action: The OIG substantiated that the AOC employee violated AOC policies when they used AOC property for personal use. The administrative violation was submitted to the jurisdiction for consideration. The case is closed and management action is pending.

Closed Investigations Involving Senior Government Employees

Preferential Treatment, Non-Compliance with Time and Attendance (T&A), and Standards of Conduct: Not Substantiated (2019-0012-INVI-P)

Between May 2018 and June 2019, the AOC OIG received three separate complaints alleging that an AOC executive leader provided their subordinate preferential treatment to include awards and performance appraisals. The allegations included complaints of non-compliance with T&A policy, interference with jurisdiction operations, and other misconduct by the employee allegedly not addressed by the executive leader. The confidential complainants also reported that the employee was not held accountable for job performance issues and that the employee interfered with jurisdictional supervisors in operations, hiring and various personnel management matters.

The OIG investigation found no evidence of T&A abuse, although we recorded at least one instance of not adhering to AOC policy standards and noted some anomalous entries in the employee's T&A file.

Further, when interviewed, the executive leader stated that they had previously taken corrective action against the employee for job performance issues and provided counseling for interference with jurisdictional supervisors.

Final Management Action: The investigation is closed.

Action Resulting from Investigations Reported in Previous SARs

Theft of Copper: Not Substantiated; Suspected Violations of the AOC Outside Employment Policy: Substantiated (2018-0009-INVI-P)

The AOC OIG received a confidential complaint about the suspected theft of copper. The confidential source alleged six electricians within the AOC, stole approximately \$22,000 worth of copper pipe and wiring while installing a large uninterrupted power supply for the Library of Congress in December 2017.

The OIG interviewed the electricians and none admitted to the theft and/or resale of copper pipe, wiring or other government property. Due to outdated information, surveillance limitations and lack of physical evidence, the theft could not be substantiated. However, based on testimony, one AOC employee violated AOC policy pertaining to outside employment or self-employment. During an interview, the AOC employee admitted to having outside employment providing electric repair services.

The AOC employee had not previously notified or requested authorization from AOC management to participate in outside employment as required by AOC policy.

Final Management Action: On September 13, 2019, after an interview regarding this investigation, the AOC employee informed AOC management of their outside employment. On March 6, 2020, management provided an update, citing that the AOC employee submitted a "Notice of Outside Employment," which management approved on September 13, 2019. In addition, employees are reminded of the outside employment reporting requirement through

annual ethics training and via email with the annual announcement for mandatory training. The investigation is closed.

Inappropriate Relationship between a Supervisor and Subordinate (Employees 1, 2 & 3); Deliberate Concealment of Material Fact (Employees 1 & 2); Failing to Cooperate with an OIG Investigation (Employees 1 & 2); Harassment (Employee 3); and Abuse of T&A policy (Employee 4): Substantiated (2019-0007-INVI-P)

The AOC OIG received a telephonic complaint that an AOC supervisor (Employee 1), was romantically involved with and showed favoritism to their subordinate (Employee 2). Both were interviewed by the OIG regarding the allegations and both denied having a romantic relationship. They both complained of harassment by the subordinate's estranged spouse, an AOC assistant supervisor (Employee 3). Photographic evidence contradicted initial statements by Employees 1 and 2, and they subsequently admitted to making false statements and concealing a romantic relationship in violation of policy.

Employee 3 was interviewed and admitted that they married Employee 2 in 2015, without the knowledge of AOC management. Employee 3 also admitted to confronting Employee 1, while on shift at the AOC and recording the conversations, thereby engaging in harassment. Further, Employee 3 made allegations that Employees 1 and 2 violated the AOC's T&A procedures. We could not substantiate T&A fraud by Employees 1 and 2; however, the Time and Leave Clerk (Employee 4) admitted to violating AOC policy by providing protected T&A records to Employee 3.

Final Management Action: Employee 1 resigned in lieu of termination on October 28, 2019. Employee 2 resigned in lieu of termination on October 23, 2019. Employee 3 received a 12-day suspension, effective January 8, 2020. Employee 4 received a counseling memorandum on October 4, 2019. The investigation is closed.

Suspected False Statements: Not Substantiated; Suspected Violations of the AOC Standards of Conduct and Use and Creation of Social Media Policies: Substantiated (2019-0009-INVI-P)

The AOC OIG received an anonymous Hotline complaint that an AOC employee provided fraudulent Leadership in Energy and Environmental Design (LEED) and Project Management Professional (PMP) certifications when they applied for a position at the AOC. The complainant cited the AOC employee listed questionable LEED and PMP certifications on their profile page on LinkedIn, a social media website. The complainant also suspected the AOC employee may have lied, exaggerated or falsified credentials on their resume and AOC job application for the position currently held.

The investigation did not substantiate, through testimony and documentary evidence, that the AOC employee violated Title 18, United States Code §1001 by submitting fraudulent LEED or PMP certifications when they applied for a position at the AOC. Testimony determined LEED and PMP certifications were not required and were not a determining factor in hiring the AOC employee. There were no indications on the AOC employee's resume that they claimed to possess either certification. However, the resume did cite LEED and PMP examination preparation training courses.

The investigation substantiated, through testimony and documentary evidence, that the AOC employee violated the AOC Standards of Conduct and Use and Creation of Social Media policies when they created a social medial account on LinkedIn using LEED and PMP certification titles, which they did not possess, along with their AOC position title. Use of the LEED and PMP certifications created an appearance that the AOC employee possessed the certifications while representing the AOC in an official capacity. The AOC employee explained that the use of the certification titles on LinkedIn, was hypothetical based on a class assignment in a Career Development course that they had taken at DeVry University. The assignment required students to create a LinkedIn account and build an internet profile with a branding message geared toward a target job. Following their testimony, the AOC employee voluntarily deleted their LinkedIn account.

Final Management Action: The AOC employee received a verbal counseling on July 25, 2019. The investigation is closed.

Wasteful Spending: Substantiated (2019-0013-INVI-P)

The AOC OIG received a Hotline complaint from an individual who requested confidentiality. The complainant stated that in September 2017, an AOC manager used AOC funds to purchase unnecessary collection/shred containers, which sat unused for over six months. According to the complainant, the AOC had a contract for shredding services which included contractor-provided collection/shred containers; the complainant felt the purchase of additional collection/shred containers was wasteful.

On February 17, 2016, the AOC awarded a contract for shredding services with an annual cost of \$4,858.94 for the base year with four option years. The scope in the contract's statement of work (SOW) stated the contractor would provide the necessary personnel, vehicles, (shred trucks), collection/shred containers, and other equipment needed to secure materials to be shredded for each collection point and securely transfer the material for on-site shredding on a biweekly basis. Further, it stated additional service and collection/shred containers were available for an additional fee of \$170 per service, plus a fee of \$0.0725 for up to 2,286 pounds of shredding. Between May 5, 2016 and November 13, 2017, the AOC requested additional contractor shredding services and collection/shred containers on seven occasions to support as-needed services at a cost of \$1,198.85.

In September 2017, an AOC manager purchased 12 fourwheeled collection/shred containers, totaling \$2,943.25 using FY 2016 end of year funds. In an interview, the AOC manager stated that frequent ad hoc customer requests for collection/shred containers created an operational need for additional wheeled collection/shred containers to augment those provided by the contractor and that four-wheeled containers were generally preferred over two-wheeled containers. After receiving the AOC-purchased fourwheeled collection/shred containers, the AOC manager returned six two-wheeled collection/shred containers to the contractor, which were part of the base contract.

The investigation substantiated that the purchase of the additional four-wheeled collection/shred containers was wasteful. The purchase was duplicative, as the contractor would provide a sufficient number of collection/shred containers as part of the base contract. The purchase of additional collection/shred containers incurred a cost of \$2,943.25, 61 percent above the annual amount of \$4,858.94 paid on the AOC contract. Despite citing an operational need for purchasing additional wheeled collection/shred containers to augment the nine contractor-provided two-wheeled containers, the AOC manager returned six two-wheeled collection/shred containers (part of the base contract) to the contractor. Thus, the purchase of 12 additional four-wheeled collection/shred containers was not a requirement to accomplish the mission and this purchase was wasteful spending. If more wheeled containers were needed, the AOC manager could have requested them from the contactor. Additionally, we found no justification that four-wheeled containers would more effectively accomplish the mission than the two-wheeled containers that the



contractor could supply. While we acknowledge that the purchase was within the AOC manager's purchase authority and the guidelines for purchasing as detailed in AOC orders, returning the contractor-provided collection/shred containers was wasteful.

The investigation did not substantiate that the purchase of additional collection/shred containers was prohibited by the AOC Government Purchase Card Orders and Policies.

Final Management Action: After reviewing the report and discussing the complaint with the AOC manager, senior management took no formal disciplinary action. They determined the AOC manager's intent was to improve customer service and increase work efficiency. However, discussions were held with the AOC manager to ensure future purchases were not duplicative of existing service contracts. The management action did not address the issue of waste by either issuing a contract modification or seeking credit for the six, two-wheeled collection/shred containers returned to the contractor. The investigation is closed.

Loss of AOC-Assigned Computer: Substantiated (2019-0015-INVI-P)

In July 2019, the AOC OIG received a telephonic complaint reporting a missing AOC-owned MacBook computer. The employee was interviewed and confirmed that they understood the Information Technology Division (ITD) policy requiring them to safeguard issued equipment. The employee reported that the laptop was last used in mid-June 2019, and they reported the loss in July 2019, believing that the device was located somewhere in their possessions. The employee searched but could not find the computer in their office, residences or vehicles. The employee agreed to continue to look for the MacBook and notify the OIG if it was located. The original item was valued between \$1,300 and \$1,500; with a current replacement value of approximately \$1,600.

Final Management Action: The OIG could not substantiate the computer was stolen, sold or other, however the OIG did substantiate that the AOC employee violated AOC policy by not safe guarding and losing their AOCissued ITD equipment. After consultation with the Human Capital Management Division, AOC management issued a Memorandum of Counseling to the employee on December 9, 2019. The OIG is forwarding this information to the AOC for recoupment of funds for the loss or action deemed appropriate. The investigation is closed.



OTHER WORK

OIG Response to Congressional Request on Oversight of the Renovations of the Cannon House Office Building (2020-AUD-002-O)

On September 25, 2019, the OIG received a congressional request to address the 14 Questions for the Record following the Committee on House Administration hearing titled "Oversight of the Renovations of the Cannon House Office Building" held on September 10, 2019. We responded to the congressional request in three separate letters dated October 16, 2019, November 1, 2019, and November 20, 2019.

Semiannual Status Update on Cannon House Office Building Renewal (CHOBr) Project (2020-AUD-004-0)

The Explanatory Statement accompanying the FY 2016 Legislative Branch Appropriations Act, P.L. 114-113, directed the AOC OIG to transmit quarterly status updates to the House Committee on Appropriations about the AOC's progress on the CHOBr Project (formerly addressed as Cannon Project). In spring 2018, the committee approved the AOC OIG's request to transmit these status updates semiannually.

On March 26, 2019, we transmitted our status update on the AOC's progress on the CHOBr Project for the sixmonth period of July 1, 2019 to December 31, 2019. Our key observations for the period included:

- (1) The CHOBr Project team completed an Integrated Cost Schedule Risk Analysis (ICSRA) for Phases 2, 3 and 4, dated December 20, 2019, in accordance with the GAO guidelines. Based on the ICSRA conclusions, the project budget was increased by \$137.4 million, from \$752.7 million to \$890.2 million. The original project budget was established in 2009. Per the GAO, the original budget established in the planning stage generally fluctuates by +/- 40 percent. The project's revised budget has a 90 percent confidence level completing the project at the projected cost level. The CHOBr Project team continues the process of closing out the last items associated with Phase 1 (the east wing), constructing Phase 2 renovations (the north wing), and coordinating the schedule to start construction of Phase 3 (the west wing).
- (2) The AOC reported the completion of certain Phase 1 ancillary spaces and punch list work will continue through the beginning of 2020. The House Office Buildings superintendent is aware of these remaining activities and every effort is being made to ensure the

work is completed without disrupting the building's occupants. The continued Phase 1 work has not had an impact on the performance of Phase 2 work. Phase 1 was funded at \$195.7 million; however, as of December 31, 2019, the Phase 1 budget was revised down to \$194.7 million, with \$190.9 million obligated and \$190.2 million expended. Leaving the remaining \$3.8 million available for final closeout costs of partnering fees, swing space Construction Division costs, and punch-list and warranty items. Any funding in excess of the final costs for Phase 1 will be returned to the House Historic Buildings Revitalization Trust Fund. As of February 26, 2020, the AOC reported that Clark Christman Joint Venture (CCJV) completed all punchlist items, with the exception of eight weather-related items, and is currently addressing the warranty items.

- (3) For Phase 2, the majority of areas are either slightly ahead of schedule or on schedule. The Phase 2 congressional move-ins are scheduled to start on December 1, 2020, and will be completed before the north wing opens to the public for the 117th Congress on January 3, 2021. Due to customer requested scope changes, the House Committee on Veterans' Affairs hearing room will not be available until late summer of 2021, and the exterior hardscapes and landscape are not scheduled to be completed until late spring of 2021 due to weather-related constraints. Phase 2 is budgeted to cost \$202.4 million. As of December 31, 2019, \$181.8 million was allocated to Phase 2, \$163.7 million was obligated, and \$59.7 million had been expended. The CHOBr Project team planned to reallocate funding to align the above costs with the revised budget in January 2020. We subsequently confirmed that this reallocation was completed as planned.
- (4) In addition to revising the budget, the ICSRA identified risks which may adversely affect timely completion of the project. The top five risks identified were:
 - a. Delays due to an iterative approval process for poor quality construction submittals from the contractor.
 - b. Delays pursuant to the volume of construction submittals requiring multiple stakeholder reviews under an accelerated construction schedule.
 - c. Maintaining high quality craftsmanship while accelerating the construction schedule.

- d. Added complexity for CCJV subcontractor and supplier coordination while accelerating the construction schedule.
- e. Cost and schedule impacts due to scope changes and unforeseen conditions.
- (5) The CHOBr Project team analyzes these risks during weekly and quarterly risk meetings. We also want to acknowledge the potential risk of the COVID-19 virus on the project. Although the project team did not include the occurrence of a pandemic as a risk at the time of the last ICSRA, there were no resulting project delays as a result of the virus at the time of this semiannual report on the CHOBr. CCJV has added additional hand washing stations to help minimize the risk of exposure. It is prudent for the AOC to continue to monitor the effects of COVID-19 on the project and ensure sufficient documentation is prepared and maintained for any potential impacts.
- (6) Based on our review of these risks, we requested and the CHOBr Project team has agreed to begin providing detailed information regawrding potential change orders (PCOs). This information will include, but is not limited to, the quantity and cost of PCOs issued each month and will assist us in analyzing the risks change work poses to the project's schedule and budget. As of January 31, 2020, the CHOBr Project team has identified outstanding cost exposure due to recently identified unforeseen site conditions amounting to approximately \$2 million, which are currently under review. PCOs for these conditions have not yet been submitted by the contractor; however, if approved, the costs for these conditions would be funded from the \$11.9 million Phase 2 contingency at zero increase to the overall projected budget.
- (7) CCJV developed an accelerated schedule that recovered 59 days of delay. As of December 31, 2019, the public bathrooms, which represent a small portion of Phase 2, were 25 days behind schedule due to unforeseen structural issues in the concrete floor slab. There was also a three day delay on the fifth floor due to an unforeseen condition with the structural support of the floor. The CHOBr Project team was able to recover these days during January 2020. The CHOBr Project team anticipates that the February schedule will include an 11 day slip in substantial completion and a three day slip in final Phase 2 completion. They do not

expect that either of these delays will delay the member move in, which is scheduled to begin on December 1, 2020 or the opening of the 117th Congress. The CHOBr Project team also expects to recover from this delay in the next 30-60 days. Throughout the project, the CHOBr Project team has consistently shown the ability to recover from delays and keep the project on schedule. Schedule recovery is typically accomplished through an accelerated schedule. As identified in the ICSRA, this has the potential to increase the risk to both the quality and the cost of the work performed. The CHOBr Project team appears to understand these risks based on the information that we have reviewed, and we expect that it will warrant review throughout the duration of the project.

FY 2020 Organizational Risk Assessment (2020-AUD-005-O)

The OIG announced the Organizational Risk Assessment on February 20, 2020. The risk assessment will identify and assess the nature of the AOC's programs and operations, performance measures, anticipated outcomes, scope and dollar magnitude, staffing and budgetary trends, perceived vulnerabilities, and inherent risks. The AOC OIG will use the information to assist with audit and evaluation planning.

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 which may or may not require AOC concurrence.

We issued one management advisory to the AOC during the reporting period.

NOTICE OF CONCERNS

A Notice of Concern reports on specific AOC safety or security issues observed during the course of OIG work and are provided to AOC management for 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 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 20 orders or other policy or guidance documents.

Document	Title	Description
Order 10-1	Asbestos Control Policy	 This chapter of the Safety and Health manual summarizes the requirements for the AOC for employee protection from asbestos-containing material and to ensure compliance with all regulatory standards. The chapter also describes duties and responsibilities of employees with respect to asbestos control regulations that apply to the AOC. The chapter has companion documents that are designed to aid in the compliance of this program. Revisions of the chapter included: Ambient Air Sampling Requirements Sampling Guidance Inventory Requirements for Quantities of Asbestos Permitting and Notification Requirements Reference to Fiber Release Standard Operating Procedure (SOP) Project and National Emission Standards for Hazardous Air Pollutants (NESHAP) NESHAP Numbers Asbestos Abatement Project Closeout
Order 24-2	Workplace Anti-Harassment Policy	 This policy addresses all harassment-related issues for the AOC. The policy incorporated the following major provisions and requirements: Expands the sexual harassment policy memorandum to include harassment of all protected classes. Provides greater clarity on the specific prohibited behaviors and the process for reporting and participating in the investigative process. Includes the applicable authorities and references. Updates organizational names.
Order 32-12	Recycling Program Revolving Fund	 This order establishes the policy governing the AOC Recycling Program Revolving Fund established by the U.S. Congress. The policy supersedes Order 32-12, Recycling Program Revolving Fund, dated May 3, 2011. The revised order also provides in part the following revisions: Updating the criteria and scoring used to determine how to use available funds, to include the standards established by the agency's Sustainability Community of Practice. Amending the policy to conform to statutory updates in Public Law 113-76.

Table B: Review of AOC Legislation and Policies

Document	Title	Description
Order 34-1	Contracting Manual (CM)	 This revised CM was issued to prescribe policy for the acquisition of supplies, services and construction, and provides guidance to staff applying those policies and procedures. Revisions included: §1.2 – Added a definition, with examples, on "Split Transactions" to the definitions section of the CM. §7.3.5(a) – Changed "jurisdiction head" to "supervisor" and added language on issuing purchase cards while an employee is on a detail. §8.2.5 – Changed title from "Performance Based Contracting" to "Performance Based Acquisition" and modified the language therein throughout. §13.1.2(c) – Changed language on frequency of Contracting Officer's Representative reviews.
Order 250-2	Assignment of Authorities and Responsibilities in the Architect of the Capitol	This order designates jurisdiction and senior staff authorities and responsibilities within the AOC.
Order 335	Career Staffing Plan	 This policy updates AOC Order 335, dated February 21, 2012, and revises policy and procedure with regard to recruitment and hiring for the Architect of the Capitol. Revisions were made to incorporate the following major provisions and requirements: Stipulate educational requirement for positions at the General Schedule (GS) - 14 grade level and above. Enhance interview requirements for internal candidates. Replace the term "Highly Qualified" to "Best Qualified" when referring to qualified job candidates who have achieved a rating of 85 or above. Reduce the life of the certificate of eligibles from 90 to 60 calendar days and retain the flexibility to request extension of the same. Edit organizational names. Change order of references and update the same.
Order 335-4	Architect's Mobility Program (AMP)	 This order establishes the AOC's policy provisions for the Architect's Mobility Program (AMP) for current AOC employees. The policy supersedes AOC Order 335-4, dated February 26, 1999. Revisions were made to incorporate the following major provisions and requirements such as the following: Enhances the application and referral processes by which applicants are rated and ranked; discontinues the use of ranking panel reviews for determining best qualified before issuing certificates to selecting official. Provides for the referral of all applicants that meet qualifications and eligibility requirements. Streamlines the interview and selection process. Updates the policy by deleting references to obsolete positions. Changes the position designations by modifying the use of bridge and target (end of AMP) positions. Establishes a specific career ladder with an entry level position up to a specific full performance level. Changes the duration of the certificate of eligibles to 60 days.

Table B: Review of AOC Legislation and Policies Continued

Table B: Review of AOC Legislation and Policies Continued

Document	Title	Description
Order 451-1	Awards Program	This order outlines the framework for creating and disseminating the AOC Awards Program. Jurisdiction heads or organization equivalents have authority to approve Special Contribution Awards up to \$2,500 per award, and Time Off Awards up to 60 hours per leave year; On-the-Spot Awards and Emergency Response Awards will be \$100, \$200 and \$300; the cap on the number of On-the-Spot Awards per year has been removed; employees may be awarded time off in lieu of cash awards or Quality Step Increases for receiving overall ratings of "Outstanding" on their Ratings of Record; Senior Rated executives are included in this policy; the award recommendation forms are consolidated into one form; employees with 25 years of federal service are included in the Service Recognition Ceremony; the Excellence in Equal Opportunity Honor Award has been renamed the Spirit of Inclusion Award; the Safety-no Recordable Injury Award category has been discontinued from the AOC Honor Awards Ceremony.
Order 532	Pay Under the Architect's Wage System	This order outlines the system under which AOC employees in recognized trade, craft, unskilled, semiskilled or skilled manual labor occupations or positions having trade, craft or labor experience and knowledge as the primary requirement, including work leaders, foremen or supervisors, shall be classified and compensated. It also describes the procedures for appealing the classification of Wage Grade, Wage Leader or Wage Supervisor positions.
Order 537-1	Student Loan Repayment Program	This order revises the policy for the AOC's Student Loan Repayment Program. The revised policy increases the maximum amount for Capitol Visitor Center employees who transitioned from the U.S. Senate to the Architect of the Capitol on November 23, 2008 from \$6,000 to \$10,000 per year with a lifetime maximum of \$40,000. In addition, employees who fulfill the minimum service agreement of three years and apply to the program years later, will be required to complete a new three-year service agreement beginning on the day the Architect of the Capitol or designee approves the application. This version supersedes Order 537-1, dated April 6, 2014.
Order 550-2	Supervisory Pay Differentials	This order establishes the AOC's policy and procedures to approve payment of supervisory differentials involving GS supervisory positions. This revised order provides clarification on entitlement of the Supervisory Differential and supersedes Order 550, Supervisory Pay Differentials Policy, dated July 23, 1991 and the memorandum titled Supervisory Pay Differential – Justification Letter, dated June 6, 2008.
Order 550-3	Time and Attendance Policy and Procedures	This order updates the AOC's policy on time and attendance and written guidance for time and attendance reporting.
Order 575	Relocation Incentives	This order outlines the procedural guidance for implementing and applying the provision of relocation incentives.
Order 590	Dress Code	This new order outlines guidelines for employees' appearance at work. The goal is to ensure that AOC employees maintain an appearance that positively represents the AOC.

Table B: Review of AOC Legislation and Policies Continued

Document	Title	Description
Order 600-1	Telework Program	 This revised order supersedes AOC Order 600-1, Telework Program, dated March 2015 and reflects the following changes within the Telework Program: Eliminates the annual recertification requirement. Removes the six-month service requirement, thereby allowing managerial discretion to approve/deny all applications upon entry on duty. Permits the jurisdiction head to waive the maximum two days of telework per week and authorize up to two additional days of telework per week. Replaces the Telework Guide for Supervisors and Employees with a Frequently Asked Questions Guide. Clarifies workers' compensation eligibility.
Order 610	Hours of Duty	This chapter outlines policy requirements for establishing hours of duty for AOC employees. This policy supersedes AOC Order 610 Hours of Duty, dated September 2, 2003. AOC Policy Memorandum 610-5, Breaks, dated August 6, 2012, provides authority for superintendents/division directors and equivalent management personnel to authorize early release of less than 1 hour. The requirement to charge 1 hour of annual leave when Daylight Savings Time goes into effect has been changed to reflect that 1 hour of administrative leave will be granted.
Order 610-3	Emergency Employees Policy	In order to ensure the AOC's continuity of operations for essential functions and provide essential services to Congress and the Supreme Court in the event of emergencies, this order outlines the policy regarding status categories, and requirements and responsibilities for jurisdiction heads, supervisors and AOC employees who have been designated as emergency employees. Emergency Response Awards are now subsumed in AOC Order 451-1, Awards, and includes three levels of cash awards and two levels of time off awards.
AOC Order 630-1	Absence and Leave Policy	This order outlines policy requirements for the administration of absence and leave for AOC employees. It incorporates the provision under Wounded Warriors Federal Leave Act of 2015. The policy also eliminates the requirement for employees to provide medical documentation that includes an employee's medical diagnosis and prognosis. There are three instances in which an employee's diagnosis and prognosis is a statutory requirement and must be provided: Family Medical Leave Act, Federal Employees Compensation Act Worker's Compensation claims, and reasonable accommodations under the Americans with Disabilities Act. Further, an employee's medical diagnosis and prognosis must be provided with advanced sick leave and voluntary leave transfer program requests.
Order 630-2	Family Medical Leave Act Policy (FMLA)	 This is the AOC's policy regarding the provision of family and medical leave in accordance with applicable law and regulations. The Genetic Information Nondiscrimination Act safe harbor language has been added to U.S. Department of Labor medical certification forms (WH-380-E, 380-F, 385 and 385-V). The policy: Clarifies that parental leave is subsumed under FMLA leave. Clarifies that a husband and wife who are both employed by the AOC may only take a combined total of 12 weeks of leave for bonding purposes. Clarifies that a husband and wife who are both employed by the AOC may only take a combined total of 26 weeks of leave to care for a covered injured or ill service member. This policy includes a definition for electronic signatures.
Order 900-2	Workplace Violence Prevention Policy	This new order outlines the AOC's workplace violence prevention system and replaces the AOC's Policy Memorandum 900-2, Violence in the Workplace, dated February 15, 2019.



Instances of the AOC 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

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

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 with which 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.

Peer Review Reporting

AUDIT

There was no peer review activity for audit operations this reporting period. The last peer review for the AOC OIG audit function was conducted in September 2018 by the Corporation for Public Broadcasting OIG. The AOC OIG received a rating of Pass, and there are no outstanding recommendations.

INSPECTIONS & EVALUATIONS

There was no peer review activity for inspections and evaluations operations this reporting period. The last peer review for the AOC OIG inspections and evaluations function was conducted in June 2018 by the Office of the Special Inspector General for Afghanistan Reconstruction and the Pension Benefit Guaranty Corporation OIG. The AOC OIG received a rating of Pass, and there are no outstanding recommendations.

INVESTIGATIONS

There was no peer review activity for investigation operations this reporting period. The last peer review for the AOC OIG investigations function was conducted in July 2017 by the Federal Housing Finance Administration OIG. The AOC OIG received a rating of Pass, and there are no outstanding recommendations.



Recommendations

Table C: Unimplemented Recommendations

Subject	Report No. Issue Date	Office	Rec No.	Summary of Recommendations and Action
Architect of the Capit	ol/Office of the Chief	Administrative Officer	r	
Audit of the AOC ITD Contracting Services BPA AOC16A3000	OIG Report OIG-AUD-2019-03 July 30, 2019	Information Technology Division and Acquisition and Material Management Division	A.1	 Report Summary: The OIG performed an audit of the AOC ITD Contracting Services BPA AOC16A3000. Overall, the BPA was awarded in accordance with laws and contracting requirements; however, the BPA file lacked information and contracting officials did not properly monitor the BPA. Recommendation: Contracting officials ensure the Independent Government Cost Estimate (IGCE) is adequately supported and documented in the contract file in accordance with AOC guidance. AOC Management Decision: Concur. The AOC concurs with the finding that the BPA file lacked the required detailed documentation to support how the IGCE was calculated.
Audit of the AOC ITD Contracting Services BPA AOC16A3000			B.3	 Recommendation: The Contracting Officer (CO) and COTR perform the duties as required in the Appointment of COTR Memorandum and Contracting Manual 34-1 – Section 13.1.2(c) COTR for the ITD BPA Task Order No.1. AOC Management Decision: Partially Concur. Although most of the post-award duties of the CO and COTR were performed in accordance with AOC Order 34-1 – Section 13.1.2(c) COTR for the ITD BPA Task Order No. 1 and the COTR Appointment Letter, better documentation could have been provided to support duties performed. The Acquisition and Material Management Division (AMMD) will review existing policies and procedures relative to documentation requirements to ensure they are up to date and the COTR's file for the task order to ensure that it contains all required documentation.
Audit of the AOC ITD Contracting Services BPA AOC16A3000			B.4	Recommendation: The CO and COTR document and maintain detailed records of the COTR's and contractor's performance. AOC Management Decision: Concur. The COs and COTRs must document and maintain detailed records of the COTR's and contractor's performance.
Audit of the AOC ITD Contracting Services BPA AOC16A3000			B.5	Recommendation: The AOC establish proper internal controls to ensure the performance of CO and COTR post-award administration duties. AOC Management Decision: Partially Concur. Although AMMD has established internal controls to ensure the performance of CO and COTR post-award administration duties, we agree with the concerns about the need for more COTR reviews and the eventual need for additional clarity relative to the word "regularly" that is currently in AOC Order 34-1 to set the number of COTR reviews.
Audit of the AOC ITD Contracting Services BPA AOC16A3000			B.6	Recommendation: The CO develop measurable performance standards and quality assurance plans for Task Order No. 1. AOC Management Decision: Partially Concur. Although AOC Order 34-1 does not require every task or subtask in the SOW to have a measurable performance standard, the CO will review tasks not covered by such standards to determine whether any other measurable performance standards would be appropriate and practicable.

Subject	Report No. Issue Date	Office	Rec No.	Summary of Recommendations and Action
Audit of the AOC ITD Contracting Services BPA AOC16A3000			B.7	Recommendation: The CO establish proper internal controls to ensure that contracting documents include measurable performance standards and quality assurance plans. AOC Management Decision: Concur. The COs must establish proper internal controls to ensure that contracting documents include measurable performance standards, if appropriate and practicable, and quality assurance plans.
Evaluation of the AOC's Inventory Accountability and Controls	OIG Report 2018- 0002-IE-P August 2019	Acquisition and Material Management Division	A	 Recommendation: The Chief Administrative Officer update and revise AOC Order 34-45 (Personal Property Manual) and all other associated policy directives to establish internal control requirements, including standard definitions and criteria for highly pilferable and mission critical non- consumable property valued less than \$1,500. AOC Management Decision: Concur. The AOC concurs with updating Property Manual 34-45 to identify pilferable and mission essential property under \$1,500. The Chief Administrative Officer has made updates to Property Manual 34-45 and the manual is with the AOC's policy office, pending agency review and implementation.
Evaluation of the AOC's Inventory Accountability and Controls			B.1	 Recommendation: The Chief Administrative Officer update and revise AOC Order 34-45 (Personal Property Manual) and all other associated policy directives to establish guidelines to document, report and track missing non- consumable property valued less than \$1,500. AOC Management Decision: Concur. The AOC concurs with updating Property Manual 34-45 to document, report and track missing non- consumable property valued at less than \$1,500. The Chief Administrative Officer has made updates to Property Manual 34-45, and the manual is with the AOC's policy office, pending agency review and implementation.
Evaluation of the AOC's Inventory Accountability and Controls			B.2	 Recommendation: The Chief Administrative Officer update and revise AOC Order 34-45 (Personal Property Manual) to enforce the requirement for mission critical non-consumable property valued less than \$1,500 to be recorded in the personal property management system. AOC Management Decision: Concur. The AOC concurs with updating Property Manual 34-45 to enforce the requirement for mission critical non-consumable property valued at less than \$1,500 be recorded in the property management system. The Chief Administrative Officer has made updates to Property Manual 34-45, and the manual is with the AOC's policy office, pending agency review and implementation.
Evaluation of the AOC's Inventory Accountability and Controls			С	Recommendation: The Architect of the Capitol direct an organizational assessment to determine the feasibility of creating full-time property management positions that strictly deal with property management. AOC Management Decision: Concur. The AOC concurs that having full-time, accountable property officers and property custodians is a good idea. However, this is a position/funding issue that has to be studied and possibly budgeted. Subject to the availability of funds, a review and/or study of this recommendation will be done by the end of the 3rd quarter, FY 2020.

Subject	Report No. Issue Date	Office	Rec No.	Summary of Recommendations and Action
Evaluation of the AOC's Inventory Accountability and Controls			D.1	 Recommendation: The Architect of the Capitol review all existing allocated and assigned storage space across each jurisdiction and reallocate and reassign facility space based on the needs of the jurisdictions. AOC Management Decision: Concur. The AOC concurs with reviewing existing storage spaces across jurisdictions and reallocating based on the needs of the jurisdictions. Jurisdictional input is required, and possibly a feasibility study. Subject to the availability of funds, a review and/or study will be done by the end of the 3rd quarter, FY 2020.
Evaluation of the AOC's Inventory Accountability and Controls			D.2	Recommendation: The Architect of the Capitol complete a cost estimate and assess the feasibility of building a consolidated and centralized AOC inventory control center. AOC Management Decision: Concur. The AOC concurs with assessing the feasibility of a centralized inventory center. Jurisdictional input and a feasibility study are required. Subject to the availability of funds, a review and/or study will be done by the end of the 3rd quarter, FY 2020.
Evaluation of the AOC's Compliance with the Government Purchase Card Program	OIG Report 2018- 0003-IE-P August 2019	Acquisition and Material Management Division	A.3	Recommendation: AMMD develop written procedures for the agency program coordinator for daily, monthly and annual purchase card reviews. AOC Management Decision: The AOC will develop a SOP on purchase card reviews by the end of the third quarter, FY 2020.
Evaluation of the AOC's Compliance with the Government Purchase Card Program		AOC	В	Recommendation: The AOC update purchase card use guidance and training to include examples of split purchases and how to avoid them. AOC Management Decision: The AOC concurs with clarifying guidance in the CM on split purchases and strategies on how to avoid them. The AOC Chief Financial Officer is currently developing additional reporting capabilities that will assist AMMD in monitoring the purchase card program.

Architect of the Capitol/Utilities and Power Plant Operations; Acquisition and Material Management Division; and Planning and Project Management

Audit of the AOC Capitol Power Plant Cogeneration Facility	OIG Report OIG-AUD-2019-05	Capitol Power Plant and Planning & Project Management	A.1	 Report Summary: The OIG performed an audit of the AOC Capitol Power Plant Cogen Facility. Recommendation: The AOC incorporate well-defined contract requirements for future Utility Energy Service Contracts, to include but not limited to: Commissioning requirements – General Description, Commissioning Roles and Responsibilities, Systems to be Commissioned, Commissioning Plan, Scheduling, Commissioning Report Reliability Run requirements – Duration, Classification of Interruptions and Scheduling
				AOC Management Decision: Concur. Many types of projects involve the need for commissioning. The AOC is updating its 2010 Commissioning Guidelines and will include provisions in the update to address the issues raised by the OIG. The AOC expects to complete this update by July 2020.

Subject	Report No. Issue Date	Office	Rec No.	Summary of Recommendations and Action
Architect of the Capito	ol/Office of Chief Fina	ncial Officer and Offic	e of the Ch	ief Administrative Officer
Audit of FY 2019 Financial Statements Audit Management Letter	OIG Report OIG-AUD-2020-02	Chief Financial Officer and Information Technology Division	1	Report Summary: The OIG performed an audit of the AOC FY 2019 Financial Statements Audit. Recommendation: Ensure that Momentum® user administration guidance and procedures are updated to reflect current processes and controls, including timelines for removing roles and deactivating access resulting from recertification responses and personnel separation actions AOC Management Decision: Concur.
Audit of FY 2019 Financial Statements Audit Management Letter			2	Recommendation: Require, document and maintain approvals for Momentum® access modifications in addition to original account provisioning actions. AOC Management Decision: Concur.
Audit of FY 2019 Financial Statements Audit Management Letter			3	Recommendation: Recertify all active Momentum [®] users annually and remove unnecessary accounts within reasonable timelines. AOC Management Decision: Concur.
Audit of FY 2019 Financial Statements Audit Management Letter			4	Recommendation: Disable accounts for separated, inactive and re- assigned personnel consistently and timely. AOC Management Decision: Concur.
Audit of FY 2019 Financial Statements Audit Management Letter			5	Recommendation: Enforce AOC Order 30-1 requiring a review of unliquidated obligations (ULOs). Consider drafting an SOP to simplify the periodic review process for the status of ULOs and to ensure appropriate contract personnel communicate when funds are no longer valid. The process should include the requirement to provide documentation of the review of the status of the ULO balances that lack expenditure activity for a prolonged period. AOC Management Decision: Concur.
Audit of FY 2019 Financial Statements Audit Management Letter			6	Recommendation: Conduct appropriate training and perform formal communication (e.g., correspondence, minutes) on a periodic basis to applicable AOC personnel (e.g., COs, COTRs) to ensure proper execution over the monitoring of ULO balances and timely de-obligations of invalid ULO balances. Training should include information on the AOC's ULO review process, specifically on how to execute review, in addition to understanding the importance of de-obligating unneeded funds in a timely manner. AOC Management Decision: Concur.
Audit of FY 2019 Financial Statements Audit Management Letter			7	Recommendation: Continue to have the AMMD associate chief and the Accounting and Finance officer work jointly to develop an automated solution. AOC Management Decision: Concur.
Audit of FY 2019 Financial Statements Audit Management Letter			8	Recommendation: The Human Capital Management Division should review the policies and procedures related to overtime and leave and make updates if considered appropriate. AOC Management Decision: Concur.

Subject	Report No. Issue Date	Office	Rec No.	Summary of Recommendations and Action
Audit of FY 2019 Financial Statements Audit Management Letter			9	Recommendation: AOC managers, supervisors and timekeepers must adhere to the policies and procedures put in place for supervisors and responsible parties in order to properly monitor the overtime and leave of absence use in their jurisdictions. AOC Management Decision: Concur.
Audit of FY 2019 Financial Statements Audit Management Letter			10	Recommendation : AOC jurisdictional leaders should reinforce to their managers, supervisors, timekeepers and employees the importance of following the leave and overtime approval process by frequently communicating and meeting with personnel with responsibility to monitor overtime and leave use. Jurisdictional leaders should have situational awareness of instances where overtime and leave requests are not being approved in accordance with AOC Orders 550-1 and 630-1, respectively. AOC Management Decision: Concur.
Audit of FY 2019 Financial Statements Audit Management Letter			11	Recommendation: If overtime or leave cannot be approved in advance, document and maintain an explanation for the delay. Hard copy requests and approvals should be retained in a location that is easily available upon request or annotated in the remarks section in WebTA if overtime or leave requests are requested and approved in the system. AOC Management Decision: Concur.

Office of the Chief Administrative Officer and Utilities and Power Plant Operations

Evaluation of the AOC's Capitol Power Plant Cogeneration Facility Cybersecurity Posture	OIG Report 2019- 0002-IE-P March 2020	Information Technology Division	A.1	Recommendation: Due to the sensitive nature of this evaluation, specific language pertaining to findings and recommendations is protected and not disclosed. AOC Management Decision: Concur. The AOC anticipates that corrective action to address the recommendation will be complete by December 31, 2020.
Evaluation of the AOC's Capitol Power Plant Cogeneration Facility Cybersecurity Posture		Information Technology Division and Capitol Power Plant	A.2	Recommendation: Due to the sensitive nature of this evaluation, specific language pertaining to findings and recommendations is protected and not disclosed. AOC Management Decision: Concur. The AOC anticipates that corrective action to address the recommendation will be complete by March 31, 2021.
Evaluation of the AOC's Capitol Power Plant Cogeneration Facility Cybersecurity Posture			A.3	Recommendation: Due to the sensitive nature of this evaluation, specific language pertaining to findings and recommendations is protected and not disclosed. AOC Management Decision: Concur. The AOC anticipates that corrective action to address the recommendation will be complete by December 31, 2020.
Evaluation of the AOC's Capitol Power Plant Cogeneration Facility Cybersecurity Posture			B.1	Recommendation: Due to the sensitive nature of this evaluation, specific language pertaining to findings and recommendations is protected and not disclosed. AOC Management Decision: Concur. The AOC anticipates that corrective action to address the recommendation will be complete by March 31, 2021.

Subject	Report No. Issue Date	Office	Rec No.	Summary of Recommendations and Action
Evaluation of the AOC's Capitol Power Plant Cogeneration Facility Cybersecurity Posture			B.2	Recommendation: Due to the sensitive nature of this evaluation, specific language pertaining to findings and recommendations is protected and not disclosed. AOC Management Decision: Concur. The AOC anticipates that corrective action to address the recommendation will be complete by September 30, 2021.
Evaluation of the AOC's Capitol Power Plant Cogeneration Facility Cybersecurity Posture		Capitol Power Plant	C.1	Recommendation: Due to the sensitive nature of this evaluation, specific language pertaining to findings and recommendations is protected and not disclosed. AOC Management Decision: Concur. The AOC anticipates that corrective action to address the recommendation will be complete by December 31, 2020.
Evaluation of the AOC's Capitol Power Plant Cogeneration Facility Cybersecurity Posture			C.2	Recommendation: Due to the sensitive nature of this evaluation, specific language pertaining to findings and recommendations is protected and not disclosed. AOC Management Decision: Concur. The AOC anticipates that corrective action to address the recommendation will be complete by December 31, 2020.
Evaluation of the AOC's Capitol Power Plant Cogeneration Facility Cybersecurity Posture		Information Technology Division and Capitol Power Plant	D	Recommendation: Due to the sensitive nature of this evaluation, specific language pertaining to findings and recommendations is protected and not disclosed. AOC Management Decision: Concur. The AOC anticipates that corrective action to address the recommendation will be complete by December 31, 2020.

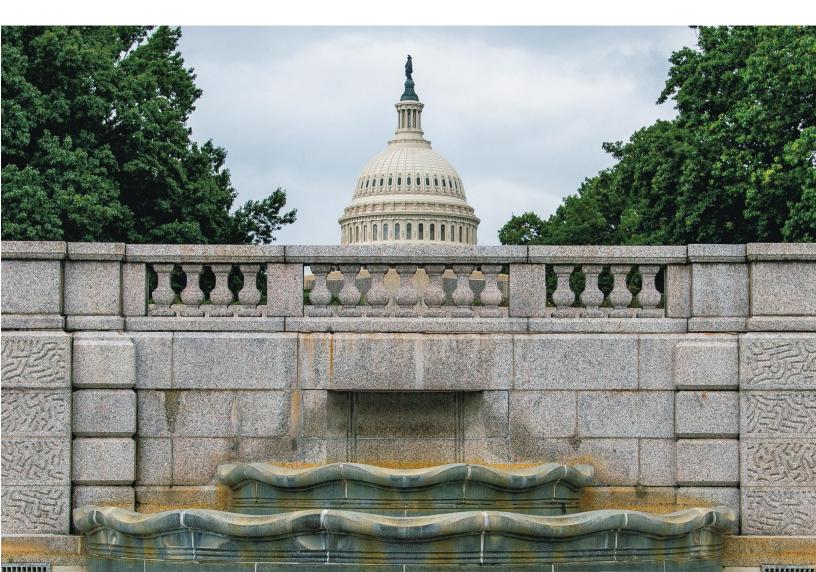


Table D: Implemented and Closed Recommendations

Subject	Report No. Issue Date	Office	Rec No.	Summary of Recommendations and Action			
Architect of the Capito Project Management	Architect of the Capitol/Utilities and Power Plant Operations; Acquisition and Material Management Division; and Planning and Project Management						
Audit of the AOC Capitol Power Plant Cogeneration Facility	OIG Report OIG-AUD-2019-05	Capitol Power Plant And Planning & Project Management	A.2	 Recommendation: The AOC enhance its contracting policies and procedures for origination and execution of utility energy service contracts (UESC) to include developing contract templates for future projects that reflect lessons learned and current industry practice. AOC Management Decision: Concur. The AOC will prepare a lessons learned document on January 29, 2020, covering the Cogeneration Project to address the issues identified by the OIG. This document will be used to enhance contracting policies and procedures should the AOC decide to pursue another UESC. 			
Audit of the AOC Capitol Power Plant Cogeneration Facility			A.3	 Recommendation: The AOC establish well-defined AOC policies and procedures for providing and documenting oversight of UESC to ensure contract compliance. AOC Management Decision: Concur. The AOC included oversight in the lessons learned document discussed in Recommendation A.2, dated January 29, 2020, and will establish the relevant policies and procedures should another UESC be pursued in the future. 			
Architect of the Capito	ol/Office of the Chief A	dministrative Officer					
Evaluation of the AOC's Cyber Security Program	OIG Report 2018- 0001-IE-P April 2019	Information Technology Division	1	Recommendation: Due to the sensitive nature of this evaluation, specific language pertaining to findings and recommendations is protected and not disclosed. AOC Management Decision: Concur. The AOC took corrective action to address the recommendation, and it was closed on March 30, 2020.			
Evaluation of the AOC's Cyber Security Program			2	Recommendation: Due to the sensitive nature of this evaluation, specific language pertaining to findings and recommendations is protected and not disclosed. AOC Management Decision: Concur. The AOC took corrective action to address the recommendation, and it was closed on March 16, 2020.			
Evaluation of the AOC's Cyber Security Program			3	Recommendation: Due to the sensitive nature of this evaluation, specific language pertaining to findings and recommendations is protected and not disclosed. AOC Management Decision: Concur. The AOC took corrective action to address the recommendation, and it was closed on February 5, 2020.			
Follow-up Evaluation of Audit of the AOC's Compliance with Federal Workers' Compensation Act Program	OIG Report 2018- 0006-IE-R June 2018	Human Capital Management Division	A.2	Recommendation: The Workers' Compensation Program Unit update its written procedures to reflect current practices. AOC Management Decision: Concur. Human Capital Management Division's Office of Workers' Compensation has updated and disseminated Workers' Compensation SOPs in November 2018 involving case management to assist staff in reviewing cases to determine if the Department of Labor should take action or correct a previous action. The Revision of AOC Order 810-1, Workers Compensation Policy has been finalized.			

Table D: Implemented and Closed Recommendations

Subject	Report No. Issue Date	Office	Rec No.	Summary of Recommendations and Action
Evaluation of the AOC's Compliance with the Government Purchase Card Program	OIG Report 2018- 0003-IE-P August 2019	Acquisition and Material Management Division	A.1	 Recommendation: AMMD identify and implement data analytics software that can automate continuous credit card transaction monitoring and reviews. This should include automation for detection of potential split-purchases as well as for use of potentially inappropriate merchant category codes or third-party vendors. AOC Management Decision: AMMD has implemented the use of the AOC's financial office software for data mining; this software enables the review of itemized lines of purchase card transactions, allowing for more targeted oversight.
Evaluation of the AOC's Compliance with the Government Purchase Card Program		AOC	A.2	Recommendation: The AOC increase staffing levels for purchase card oversight. AOC Management Decision: The AOC concurred that additional staffing is needed and advertised a job announcement for one additional AMMD staff member who will assist with purchase card oversight.



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	0	0	\$0
Subtotals (A+B)	0	0	\$0
 C. Reports for which a Management Decision was issued during the reporting period (i) Dollar value of disallowed costs (ii) Dollar value of costs not disallowed 	0 0 0	0 0 0	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	\$213,096
*Savings from Employee Salaries during Suspensions	\$6,552
Administrative Repayment Determinations	0
Court Ordered Fines/Forfeitures/Restitution	0
OIG Recovery of Stolen Government Property/Funds	0
Total	\$219,648

*Using the AOC average salary of \$71,032 per employee per year or \$273 per workday for suspensions for FY 2020. 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.

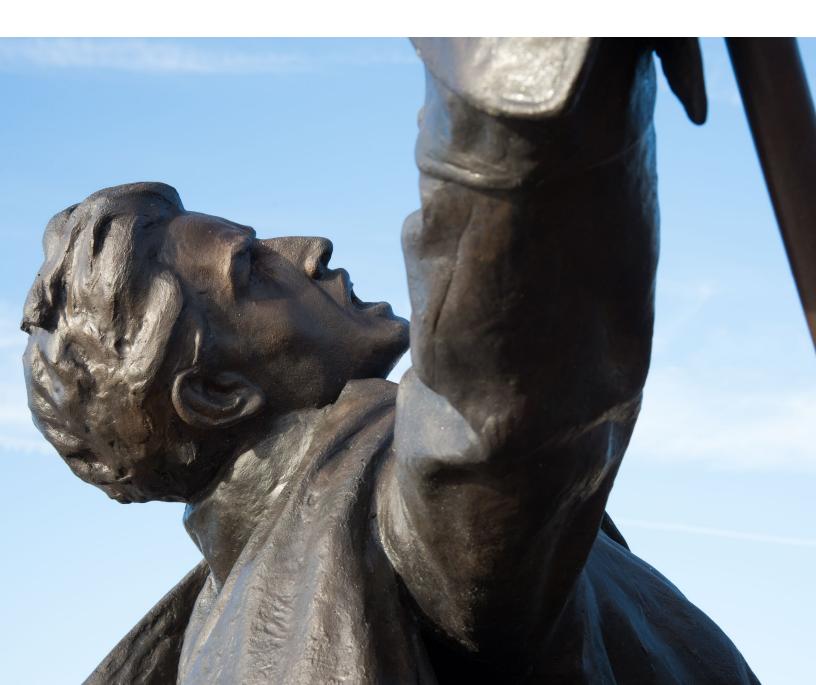
Appendices

Appendix A: Inspector General Reporting Requirements

IG Act Reporting Requirements	Description	Page No.
Section 4(a)(2)	Review of Legislation and Regulations	22-25
Section 5(a)(1)	Significant Problems, Abuses and Deficiencies	8-11
Section 5(a)(2)	Recommendations with Respect to Significant Problems, Abuses and Deficiencies	29-37
Section 5(a)(3)	Prior Significant Recommendations Not Yet Implemented	29-34
Section 5(a)(4)	Summary of Matters Referred for Prosecution and resulting convictions	11-12
Section 5(a)(5)	Summary of Instances Where Information Was Refused	27
Section 5(a)(6)	Listing of Audit, Inspection and Evaluation Reports, including total value of questioned costs and funds put to better use	38
Section 5(a)(7)	Summary of Significant Reports	8-20
Section 5(a)(8)	Statistical Tables on Management Decisions on Questioned Costs (See statute for specifics)	38
Section 5(a)(9)	Statistical Tables on Management Decisions on Recommendations That Funds Be Put To Better Use (See statute for specifics)	38
Section 5(a)(10)	Summary of Each Audit Report Over Six Months Old for Which No Management Decision Has Been Made (See statute for specifics)	27
Section 5(a)(11)	Significantly Revised Management Decisions	27
Section 5(a)(12)	Significant Management Decisions With Which the Inspector General Disagrees	27
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	27
Section 5(a)(18)	Description of the metrics used for developing the statistical tables under 5(a)(17)	12
Section 5(a)(19)	Report on each investigation conducted by the OIG involving senior government employee (See statute for specific info required)	14
Section 5(a)(21)	Detailed description of any attempt to interfere with OIG independence (See statute for specifics)	27
P.L. 114-113	Semi-annual status updates on Cannon House Office Building and the Capitol Power Plant projects	19

Appendix B: Definitions of Terms Used in this Semiannual Report

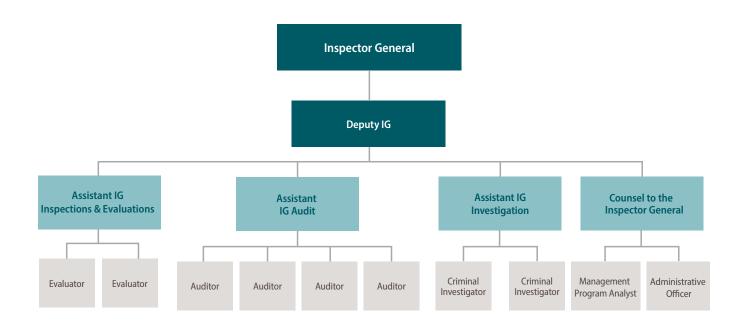
Terms	Definition
Questioned Cost	A cost that is questioned because (i) of an alleged violation of a provision of a law, regulation, contract or other agreement or document governing the expenditure of funds; (ii) the cost is not supported by adequate documentation; or (iii) the expenditure of funds for 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

AMMD	Acquisition and Material Management Division	IGCE	Independent Government Cost Estimate
AMP	Architect's Mobility Program	IPA	Independent Public Accounting Firm
AOC	Architect of the Capitol	ITD	Information Technology Division
BPA	Blanket Purchase Agreement	Kearney	Kearney & Company
VLJJ	Clark Christman Joint Venture	LEED	Leadership in Energy and Environmental Design
CHOBr	Cannon House Office Building Renewal	NESHAP	National Emission Standards for Hazardous Air Pollutants
CIGIE	Council of the Inspectors General on Integrity and Efficiency	OIG	Office of Inspector General
СМ	Contracting Manual	OMB	Office of Management and Budget
C0	Contracting Officer	PCO	Potential Change Orders
Cogen	Cogeneration	PMP	Project Management Professional
COTR	Contracting Officer's Technical Representative	SAR	Semiannual Report
FMLA	Family Medical Leave Act	SOP	Standard Operating Procedure
FY	Fiscal Year	SOW	Statement of Work
GA0	Government Accountability Office	T&A	Time and Attendance
GS	General Schedule	UESC	Utility Energy Service Contract
ICSRA	Integrated Cost Schedule Risk Analysis	ULO	Unliquidated Obligations
IG	Inspector General	USCP	U.S. Capitol Police

Office of Inspector General Organization Chart





To Report Fraud, Waste and Abuse



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Confidential OIG Website Hotline Report

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Visit Fairchild Building, Suite 518, 499 South Capitol Street, SW, Washington, DC 20515

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We welcome any feedback, comments, concerns or suggestions on this report. Please send any comments to Christopher Failla at Christopher.failla@aoc.gov.





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