

ARCHITECT OF THE CAPITOL **SEMIANNUAL REPORT TO CONGRESS**

Office of Inspector General
October 1, 2023–March 31, 2024



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) 2024. Every six months, the OIG provides Congress with a report detailing our independence and oversight of the AOC during the report-

ing period. This report highlights our activities for the six-month period from October 1, 2023, to March 31, 2024. The work detailed herein contains results from the efforts of an OIG staff dedicated to promoting economy and efficiency and preventing and detecting fraud, waste and abuse within the AOC's programs and operations.

Before describing the work we have accomplished this reporting period, I would like to welcome two new members to the Investigations Division of the OIG, Special Agent Thomas Gallagher and Investigative Analyst Anna Beganowska. Both are force multipliers who bring great experience and knowledge and will enhance our investigative capacity, allowing the OIG to accomplish even more important oversight activities of AOC programs and operations.

This report is the AOC's 32nd SAR, and it is the 14th report of my seven-year tenure. During this tenure, the AOC OIG has now surpassed \$10 million in potential cost savings (questioned + funds better use) and issued more than 300 recommendations. In my role as the Inspector General, it is my responsibility to oversee and report on the efficiency, effectiveness and economy of AOC programs and operations and to do so with independence and integrity. OIGs operate independently within an organization, conducting audits, investigations and reviews to ensure the accountability, efficiency and integrity of the organization. The Inspector General Act of 1978 empowers OIGs with significant operational and administrative independence: "[The] Office of Inspector General shall be considered to be a separate agency; and the Inspector General... shall, with

respect to that office have the functions, powers, and duties of an agency head or appointing authority."¹ As established in the Inspector General Act, an OIG's independence is the very foundation of their purpose. I manage the OIG and make decisions for its well-being independently and based on data-driven evidence, trend analyses and risk assessments. As the U.S. Capitol is a world-renowned symbol for democracy, we take pride in our work for Congress, the AOC, the Capitol campus community and the people of the United States.

During this reporting period, our office conducted numerous audits, evaluations and investigations across the AOC's programs and operations. Our work focused on identifying areas of risk and areas in need of improvement as well as assessing the agency's compliance with laws, regulations and policies. As such, this report contains findings and recommendations intended to assist the agency in improving its operations, reducing costs and enhancing program outcomes. The following pages detail oversight efforts that identified \$1,616,658.00 in questioned costs. This effort could not have been accomplished without the dedicated, diverse and talented OIG staff who go above and beyond and take their oversight roles as seriously as I do, meeting all statutory and nonstatutory reporting requirements on time and with impactful results.

Impact cannot be measured solely monetarily or based on return on investment. Further, safety, security and integrity are hard to measure monetarily. As such, the OIG focuses on transparency, which is paramount to prevention and deterrence. For transparency to have a positive effect, we work to educate the AOC workforce on fraud, waste and abuse prevention and detection as well as on the use of the methods for reporting such instances.

To that end, the OIG continues its focus on increasing transparency and providing more outlets for our reports to be viewed, read and discussed. Following the success of our X (formerly Twitter) feed (@AOCOIG), we implemented further transparency efforts to include the launch of the AOC OIG's newsletter, the OIG Quarterly, published for AOC employees. We are actively working to expand our transparency with more frequent press releases and public announcements as well as by using informational white papers and anti-fraud advisories based on trends we have seen across all jurisdictions.

¹Title 5 U.S. Code § 406 Authority of Inspector General (e)(1)(A).

<https://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title5-section406&num=0&edition=prelim>.

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

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

The OIG staff would also like to welcome Acting Architect of the Capitol Joseph R. DiPietro to his new role.

Mr. DiPietro is the sixth Architect or Acting Architect during my tenure, and we look forward to working with him to improve the economies and efficiencies of the AOC while conducting work that fights against fraud, waste, abuse and mismanagement in AOC programs until a permanent Architect is appointed.

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





OIG PRODUCTIVITY

Reporting Period
October 1, 2023–March 31, 2024

34 Projects in
Progress at Start of
Reporting Period

64 Projects
Initiated During
Reporting Period

58 Projects
Completed During
Reporting Period

40 Projects in
Progress at End of
Reporting Period





OUR MISSION

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

OUR VISION

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



TABLE OF CONTENTS

INSPECTOR GENERAL MESSAGE	2
OIG PRODUCTIVITY	4
OUR MISSION	5
OUR VISION	5
INSPECTOR GENERAL ACT	7
TABLE OF CONTENTS	7
PROFILES	9
AUDITS	10
INSPECTIONS AND EVALUATIONS	11
FOLLOW-UP	12
INVESTIGATIONS	14
OTHER WORK	23
MANAGEMENT ADVISORIES	24
NOTICES OF CONCERN	24
REVIEW OF LEGISLATION AND POLICIES	24
INSTANCES OF THE ARCHITECT OF THE CAPITOL REFUSING TO PROVIDE INFORMATION OR ASSISTANCE OR INTERFERING WITH THE OIG'S INDEPENDENCE	26
SIGNIFICANT MANAGEMENT DECISIONS WITH WHICH THE OIG DISAGREES	26
INSTANCES IN WHICH AN INSPECTION, EVALUATION OR AUDIT WAS COMPLETED AND NOT DISCLOSED TO THE PUBLIC	26
PEER REVIEW REPORTING	28
RECOMMENDATIONS	29
FUNDS QUESTIONED OR PUT TO BETTER USE	62
APPENDICES	65
LIST OF ACRONYMS USED IN THIS REPORT	68



Inspector General Act

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



PROFILES

ARCHITECT OF THE CAPITOL

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

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

OFFICE OF INSPECTOR GENERAL

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

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



AUDITS

COMPLETED ACTIVITY THIS REPORTING PERIOD

Audit of Fiscal Year 2023 Financial Statements **([OIG-AUD-2024-01](#))**

The OIG contracted with an independent public accounting firm (IPA) to audit the financial statements of the AOC as of and for the FY that ended September 30, 2023, and to report on internal control over financial reporting and on compliance and other matters. The contract required the audit be performed in accordance with auditing standards generally accepted in the United States; the standards applicable to financial audits contained in *Government Auditing Standards*,² issued by the Comptroller General of the United States under the U.S. Government Accountability Office (GAO); the Office of Management and Budget (OMB) Bulletin No. 24-01, *Audit Requirements for Federal Financial Statements*;³ the GAO's *Federal Information System Controls Audit Manual*;⁴ and the GAO/Council of the Inspectors General on Integrity and Efficiency (CIGIE) *Financial Audit Manual*.⁵ Specifically, the IPA was responsible for forming and expressing an opinion on whether the financial statements prepared by AOC management, with the oversight of those charged with governance, are prepared in all material respects in accordance with the applicable financial reporting framework.

The IPA issued an unmodified opinion for FY 2023 financial statements. The combined report did not identify a material weakness, significant deficiency or noncompliance with the AOC's financial management systems, provisions of laws tested or other matters.

The OIG served as the Contracting Officer's Representative (COR), providing oversight of contract requirement. The OIG transmitted the IPA's final report on November 21, 2023.

The IPA issued no recommendations in their audit report.

FY 2023 Financial Statements Audit Management Letter **([OIG-AUD-2024-02](#))**

As a supplement to the IPA's report on the AOC's financial statements for FY 2023, the IPA issued a management letter that identified two deficiencies in the AOC's internal controls over financial reporting. These two deficiencies did not rise to the level of material weaknesses or significant deficiencies but should be corrected.

The audit identified an insufficient review of litigation cases and potential contingent liabilities and a control gap in succession and contingency plans for key roles in the organization.

The OIG served as the COR, providing oversight of contract requirements. The OIG transmitted the IPA's final report on December 4, 2023.

The IPA made two recommendations to correct these deficiencies, and AOC management concurred.

²GAO. 2018. Government Auditing Standards (Yellow Book). <https://www.gao.gov/yellowbook>.

³OMB. 2023. Bulletin No. 24-01, Audit Requirements for Federal Financial Statements. <https://www.whitehouse.gov/wp-content/uploads/2023/10/Bulletin-24-01-Audit-Requirements-for-Federal-Financial-Statements.pdf>.

⁴GAO. 2009. Federal Information System Controls Audit Manual. <https://www.gao.gov/assets/gao-09-232g.pdf>.

⁵GAO. 2022. Financial Audit Manual. https://www.gao.gov/financial_audit_manual.

AUDIT DIVISION PROJECTS IN PROGRESS

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

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

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

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

The OIG has contracted with an IPA to perform an evaluation of the Cannon House Office Building Renewal (CHOB) Project's construction materials. The objective of the evaluation is to determine if the materials used for CHOB Project Phase 4 comply with contract requirements and to assess the quality of the work performed.

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

INSPECTIONS AND EVALUATIONS

COMPLETED ACTIVITY THIS REPORTING PERIOD

No inspection or evaluation reports were completed during this reporting period.

INSPECTIONS AND EVALUATIONS DIVISION PROJECTS IN PROGRESS

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

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

The OIG announced this evaluation on June 29, 2023. The OIG is serving as the COR, overseeing contract requirements. The OIG plans to transmit the IPA's final report in July 2024.

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

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

The OIG announced this evaluation on July 24, 2023. The OIG is serving as the COR, overseeing contract requirements. The OIG plans to transmit the IPA's final report in July 2024.

FOLLOW-UP

COMPLETED ACTIVITY THIS REPORTING PERIOD

No follow-up reports were completed during this reporting period.

FOLLOW-UP DIVISION PROJECTS IN PROGRESS

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

The OIG is conducting a follow-up evaluation of the AOC's Data Center. The objective of this evaluation is to determine whether the AOC effectively implemented corrective actions to address issues identified in the 2019 OIG report, *Audit of the Architect of the Capitol Data Center*.⁶

The OIG announced this follow-up evaluation on September 12, 2023 and plans to transmit the final report in the second quarter of FY 2024.

Follow-Up Evaluation of the AOC's Compliance with the Government Purchase Card Program (2024-0001-FLD-P)

The OIG is conducting a follow-up evaluation of the AOC's Compliance with the Government Purchase Card Program. The objective of this evaluation is to determine whether the AOC has effectively implemented corrective actions to address the findings and recommendations in the 2019 OIG report, *Evaluation of the Architect of the Capitol's Compliance with the Government Purchase Card Program*.⁷

The OIG announced this follow-up evaluation on March 14, 2024 and plans to transmit the final report in December 2024.



⁶AOC OIG. 2019. Audit of the Architect of the Capitol (AOC) Data Center, Report No. OIG-AUD-2019-04.

https://www.oversight.gov/sites/default/files/oig-reports/Final%20Audit%20of%20Architect%20of%20the%20Capitol%20Data%20Center%20OIG-AUD-2019-04_Redacted.pdf.

⁷AOC OIG. 2019. Evaluation of the Architect of the Capitol (AOC) Compliance with the Government Purchase Card Program, Report No. 2018-0003-IE-P. <https://www.oversight.gov/sites/default/files/oig-reports/Evaluation%20Report%202018-0003-IE-P.pdf>



INVESTIGATIONS

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

During this reporting period, the OIG received or initiated 27 complaints. From those complaints, investigators opened 10 investigations. We referred six complaints to other government agencies, AOC program offices and/or AOC Avenues of Assistance. Six cases were referred for prosecutorial consideration.



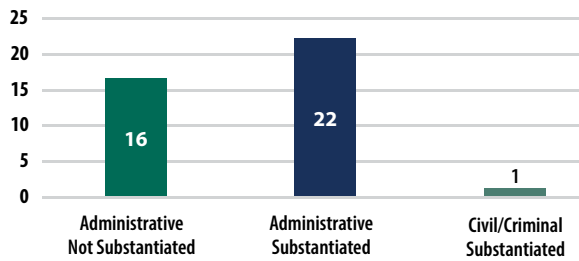
Table A: Investigative Data This Reporting Period

Investigative Activity	Count
Complaints	
Hotline complaints received (phone and/or email)	11
Complaints received (other)	2
Direct phone or email to the OIG	9
U.S. mail or facsimile machine	2
OIG-observed or -developed	3
Total Complaints	27
Investigations	
Investigations Opened	15
Investigations Closed ¹	10
Issuance of Subpoenas	
OIG Subpoenas Served	10
Grand Jury Subpoenas Served	25
Disciplinary Actions Resulting from Administrative Investigations	
Actions Pending	4
Allegations Not Substantiated or Disproven by the OIG	16
Allegations Substantiated	23
Employee Removals/Resignations/Retirements (in lieu of)	0
Employee Reprimands/Warnings/Counseling	6
Employee Suspensions/Reduction in Grade	1
Total Disciplinary Actions	7
Referrals	
Criminal Investigation Referrals²	
Accepted for Prosecution	4
Declined for Prosecution	2
Administrative Investigation Referrals	
Informal Referrals (to AOC Program Offices, no follow-up or report required)	1
Formal Referrals (follow-up required within 60-90 days)	1
Law Enforcement Referrals	4
Employee Assistance Referral (to AOC Avenue of Assistance)	0
Total Referrals	12

¹Reflects six investigations opened during previous periods.

²Referred to the USAO, state Attorney's Offices or state or local entities for prosecutorial decision.

Source: OIG investigative files.

FIGURE 1: Investigations Division Charge Substantiation

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

Figure 1 highlights the number of charges, both substantiated and not substantiated, by type for the 10⁸ investigations closed during the reporting period. There were 38 identified administrative charges. Of those, the OIG substantiated 22. One criminal charge was identified and substantiated during this period; however, prosecution was declined by the USAO. Eight of the substantiated charges have been adjudicated by the agency during this reporting period. Management action is pending regarding the remaining substantiated charges.

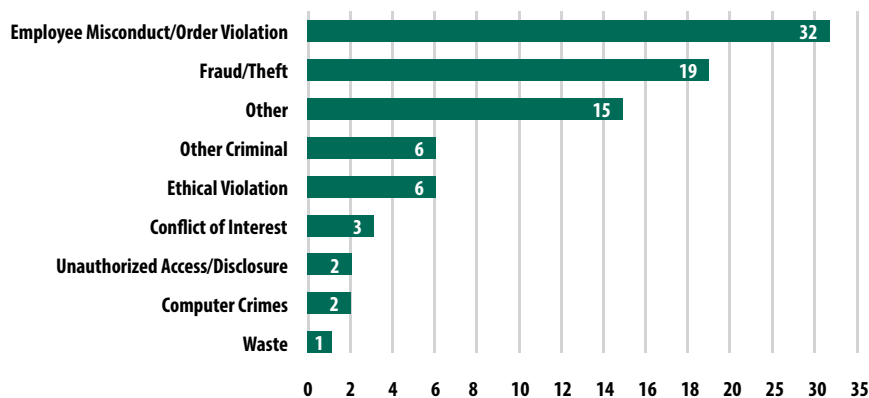
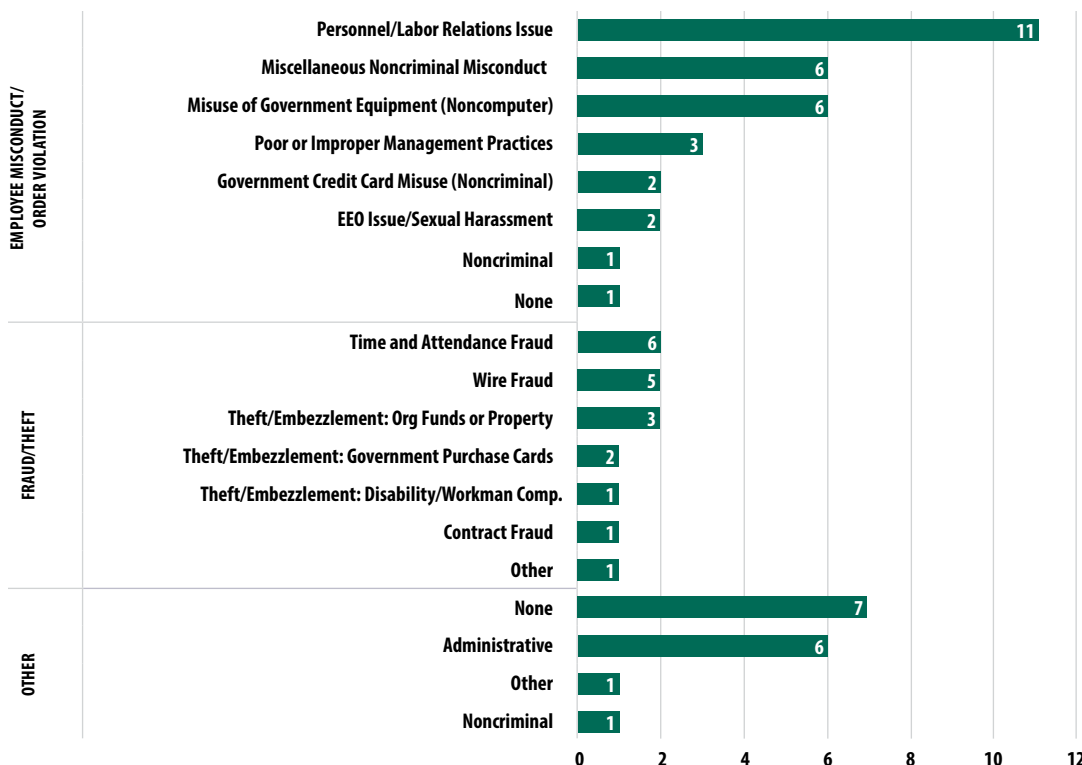
FIGURE 2: Investigations Division Violations by Category

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

FIGURE 3: Top Three Violations by Subcategory

Note: The None subcategory within the Other category refers to instances where a complaint was received or a contact was logged in the OIG case management system that contained no violations within OIG's purview. This subcategory also includes several proactive investigations in which the Investigations Division conducted a review of a program area without initial allegations of wrongdoing.

⁸While we reported closing 10 investigations, one was conducted on behalf of another agency (refer to 2024-0003-INVI-P in the section Other Work). The results of that investigation will be reported by that agency. Of the remaining nine closed investigations, five contained substantiated charges.



OPEN INVESTIGATIONS

The OIG currently has 15 open investigations:

- 2023-0002-INVI-P
- 2023-0007-INVI-P
- 2023-0010-INVI-P
- 2023-0016-INVI-P
- 2024-0002-INVI-P
- 2024-0004-INVI-P
- 2024-0005-INVI-P
- 2024-0007-INVI-P
- 2024-0009-INVI-P
- 2024-0010-INVI-P
- 2024-0011-INVI-P
- 2024-0012-INVI-P
- 2024-0013-INVI-P
- 2024-0014-INVI-P
- 2024-0015-INVI-P

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

CLOSED INVESTIGATIONS INVOLVING SENIOR GOVERNMENT EMPLOYEES

Allegations of Misuse of Information Technology (IT) Equipment and Standards of Conduct by a Senior Rated (SR) Employee and a Subordinate Employee ([2024-0008-INVI-P](#))

SR Employee: Suspected Violations of the AOC Standards of Conduct Policy, AOC IT Resources and De Minimis Use Policy and the Information Technology Division (ITD) Rules of Behavior. **Not Substantiated.**

Subordinate Employee: Suspected Violations of the AOC Standards of Conduct Policy, IT Resources and De Minimis Use Policy and the ITD Rules of Behavior. **Not Substantiated.**

On December 15, 2023, the OIG received a complaint alleging that two AOC employees, including an SR employee, disseminated a sexually explicit video involving two males who had been recorded on an AOC mobile device. The OIG investigation revealed that the recording did not contain graphic or sexually explicit material and that the recording and dissemination of the recording were done in the course of official business. No violations of AOC policies were substantiated. The case is closed.

CLOSED INVESTIGATIONS AWAITING MANAGEMENT ACTION

Allegations of Violations of Outside Employment and Suspected Favoritism During a Hiring Process ([2023-0011-INVI-P](#))

Supervisor: Suspected Violations of the AOC Standards of Conduct Policy, Government Ethics Policy and the AOC IT Resources and De Minimis Use Policy. **Substantiated.**

Subordinate Employee: Suspected Violations of the AOC Standards of Conduct Policy and Government Ethics Policy. **Substantiated.**

The OIG received an allegation that an AOC supervisor owned a heating, ventilation and air conditioning (HVAC) business and employed a subordinate employee. The allegation stated that the supervisor and subordinate employee used AOC office phones to conduct their outside employment business and that the subordinate employee was

alleged to be a leading candidate for a promotion and the supervisor was the selecting official.

The OIG substantiated that the supervisor and employee violated multiple AOC policies and submitted the administrative violations to the Acting Architect of the Capitol for action deemed appropriate, if any. The case is closed, and management action is pending.

False Medical Documentation ([2023-0015-INVI-P](#))

Suspected Violations of the AOC Standards of Conduct Policy, Government Ethics Policy, Absence and Leave Policy and Title 18 U.S.C. § 1001 Statements or Entries Generally. **Substantiated.**

The OIG received an allegation that an AOC employee provided a fraudulent, unsigned medical excuse following their return from sick leave. The employee's supervisor requested



the medical excuse when they suspected the employee was abusing sick leave. The employee provided an unsigned note alleging they were seen at a dental practice on a Sunday at 5:00 p.m., a day and time that the dental practice was closed. The investigation confirmed that the employee had not been seen at the dental practice on the date and time provided on the medical excuse.

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

Misuse of Government-Issued iPhone (2024-0001-INVI-P)

Suspected Violations of the AOC Standards of Conduct Policy, Information Technology Resources and De Minimis Use Policy, Workplace Anti-Harassment Policy and the ITD Rules of Behavior. **Substantiated.**

The OIG received an allegation that an AOC employee had misused their AOC-issued iPhone by sending sexually explicit images in violation of ITD policy. The investigation confirmed the existence of multiple sexually explicit photos stored on the AOC iPhone issued to the employee and identified another AOC employee to whom the employee had sent explicit images. In addition, the subject employee told the OIG that they had sent additional nude images of

themselves using applications downloaded and installed on their AOC-issued iPhone.

The OIG substantiated that the employee violated multiple AOC policies and submitted these violations to the agency for action deemed appropriate. The case is closed, and management action is pending.

Allegations of Forgery and Security Violations Related to the Security of Personally Identifiable Information (PII) (2024-0006-INVI-P)

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

The OIG received an allegation that an AOC employee forged the signatures of potential future volunteers on official government forms used to obtain congressional identification badges for the potential volunteers. In addition, the employee was alleged to have used their AOC mobile device to take photos of government documents containing the potential volunteers' PII, which the employee emailed to their AOC email account and then uploaded to the AOC badging portal.

The case was presented to the USAO, which declined to prosecute the employee based on the availability of administrative remedies to the AOC. The OIG substantiated that the employee violated multiple AOC policies and the administrative violations were submitted to the Acting Architect of the Capitol for action deemed appropriate. The case is closed, and management action is pending.

CLOSED INVESTIGATIONS WITH NO RESPONSE PENDING

Allegations of Unauthorized Expenditures and Improper Requests by Supervisors (2023-0008-INVI-P)

Supervisor 1: Suspected Violations of the AOC Standards of Conduct Policy, Training and Employee Development Policy and the AOC Contracting Manual. **Not Substantiated.**

Supervisor 2: Suspected Violations of the AOC Standards of Conduct Policy. **Not Substantiated.**

The OIG received an allegation that a jurisdiction procured training in violation of AOC policy. During the course of the investigation, the OIG uncovered further allegations that Supervisor 1 had not provided sufficient time,

notification or documentation to justify the training and that it had been acquired without following appropriate contract protocol. It was further alleged that Supervisor 2 had directed AOC staff to falsify dates on AOC forms to rectify the unauthorized training courses.

The investigation determined that, while certain processes and procedures were not strictly adhered to within the jurisdiction, no violations of AOC policy were identified, and the processes and procedures have since been updated. The OIG found no evidence that Supervisor 2 falsified or directed any AOC employees to falsify documents. The OIG did not substantiate the allegations; however, the OIG did identify a \$15,000 debt owed to a vendor that was not paid for training rendered. The case is closed.



Unreported Outside Employment and Employment of Subordinate Employees (2023-0009-INVI-P)

Suspected Violations of the AOC Standards of Conduct Policy and Government Ethics Policy by a Senior Supervisor, Subordinate Supervisor and Employee. **Substantiated.**

The OIG received an allegation that an AOC senior supervisor owned an unreported HVAC business and employed a subordinate supervisor. The OIG investigation revealed that, in addition to the subordinate supervisor, the senior supervisor also employed another AOC employee. Evidence obtained by the OIG revealed that the subordinate supervisor also owned an unreported and unlicensed HVAC business in the same state.

The OIG substantiated that all three employees violated multiple AOC policies and submitted the violations to the agency for action deemed appropriate. Issues regarding potential violations of state law and licensing concerns were referred to the appropriate regulatory agencies. On March 13, 2024, the OIG was notified that the AOC issued reprimands to the senior supervisor and subordinate supervisor. The employee received a counseling memorandum. The case is closed.

Alleged Violations of Contract Protocol in Hiring of Yoga Instructor (2023-0012-INVI-P)

Suspected Violations of the AOC Standards of Conduct Policy, Government Ethics Policy and the AOC Contracting Manual. **Not Substantiated.**

The OIG received a complaint alleging that the Senate Office Buildings jurisdiction was funding yoga classes at the Senate Health and Fitness Facility at no cost to congressional staff and that contracting protocol had not been followed when hiring the instructor. The OIG investigation did not substantiate administrative violations of AOC policy; however, the OIG did identify \$15,171.63 in questioned costs. The investigation also revealed that a yoga instructor employed by the jurisdiction was employed full-time at another government agency, a potential violation of federal law. This information was referred to that agency's OIG for review. The case is closed.

Unqualified Candidates hired by the Human Capital Management Division (HCMD) (2023-0014-INVI-P)

Suspected Violations of the AOC Standards of Conduct Policy, Government Ethics Policy and Career Staffing Plan Policy. **Not Substantiated.**

The OIG received an allegation that an AOC supervisor hired unqualified candidates with whom they were friends for multiple vacancies within the HCMD and that the candidates lacked proper federal government experience. The complaint further alleged that a subordinate employee was awarded a \$1,500.00 bonus as "hush money" for turning a blind eye to the hiring practices. The OIG found no evidence to corroborate any of the allegations. The case is closed.





MANAGEMENT ACTION RESULTING FROM INVESTIGATIONS REPORTED IN PREVIOUS SEMIANNUAL REPORTS

AOC Employee Requests AOC Supervisors to Falsify Time and Attendance Records While Submitting False Medical Records ([2022-0006-INVI-P](#))

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

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

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

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

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

On July 21, 2023, the OIG was notified that the employee had been terminated effective June 30, 2023. On October 12, 2023, the OIG was notified that supervisor 1 and supervisor 2 received counseling memorandums. The case is closed.

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

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

The OIG received an allegation that an AOC employee maintained unreported outside employment after seeking reasonable accommodation of paid administrative leave from the AOC during the COVID-19 pandemic. The investigation confirmed that the employee had been employed at five different companies during the period reviewed (2020–2023), none of which were approved by the AOC. Employment with only one of the companies occurred during the employee's period of administrative leave between November 15, 2020, and December 31, 2020. Employment with the other companies occurred while the employee worked their regular AOC schedule.

The OIG substantiated that the employee violated multiple AOC policies and submitted these violations to the agency for action deemed appropriate. The case was presented to the USAO, which declined to prosecute due to the availability of administrative remedies. The AOC issued a letter of reprimand to the employee. The OIG disagreed with AOC management's decision based on observed inconsistencies when compared to similar matters. The case is closed.

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

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

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

The OIG received a complaint that an SR employee had an inappropriate romantic relationship with a subordinate supervisor in their chain of command. Following a review of digital forensic evidence and interviews of both parties, the OIG substantiated that both employees violated multiple AOC policies. The administrative violations were submitted to the Acting Architect for action deemed appropriate.

The results of the investigation as they pertain to the SR employee were reported in the previous SAR.⁹ On November 6, 2023, the subordinate supervisor received a reduction in grade. The case is closed.

OTHER WORK

Request for Investigative Assistance from Other Legislative Branch OIG (2024-0003-INVI-P)

The AOC OIG was requested by another legislative branch OIG to conduct an investigation on their behalf in which their personnel had a potential conflict of interest. The AOC OIG concluded the investigation within this SAR reporting period and issued a final report to the partner agency. Our results will be reported by the partner agency as the work was conducted under their authority.

AOC Locality Pay for Remote Employees (White Paper)

After receiving a number of complaints from AOC employees regarding incorrect locality pay for remote workers, the OIG conducted a review to assess whether the AOC paid employees correct locality pay in accordance with applicable statutes, regulations and policies and to identify potential indications of waste. The OIG reported the results in a white paper. The study revealed that telework and remote work agreements were applied inconsistently across and within AOC jurisdictions. The OIG also found that several AOC employees continued to receive Washington, D.C.-area locality pay while working in regions with lower rates of locality pay following the conclusion of the COVID-19 pandemic. Our review identified more than \$115,000 in questioned costs for the overpayment of locality pay to AOC remote workers during the period reviewed.

⁹AOC OIG. 2024. Semiannual Report to Congress: October 1, 2023–March 31, 2024. <https://www.oversight.gov/sites/default/files/oig-sa-reports/SAR%2023-2.pdf>.

MANAGEMENT ADVISORIES

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

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

Implementation of the Pregnant Workers Fairness Act (PWFA) ([2024-0001-INVM-P](#))

On December 18, 2023, the OIG issued a Management Advisory to notify AOC management that the lack of an

AOC policy implementing the provisions of the PWFA created a misunderstanding of the law by an employee, leading to a delay in granting reasonable accommodation and causing the employee undue stress. The OIG acknowledged that the PWFA was new legislation and that, although final guidelines had not yet been issued, the law was nevertheless in effect. The OIG recommended that the AOC review and update AOC policy to align with the PWFA or issue preliminary guidance to AOC employees. On February 7, 2024, the AOC issued preliminary guidance to agency employees in the form of a flyer that was distributed via email to all AOC employees. The OIG considers the recommendation in this advisory closed.

NOTICES OF CONCERN

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

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

REVIEW OF LEGISLATION AND POLICIES

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





TABLE B: Review of AOC Legislation and Policies

Document No.	Title	Description
AOC Policy Memorandum 10-2	AOC Self-Inspection Program Implementation	This policy memorandum replaces section E.2.1.1. Procedures for Performing an Inspection/Audit/Evaluation and Table E-1 in the 2011 AOC Safety Manual.
Order 34-2	Fleet Management Policy	This revised policy includes information about AOC's vehicle telematics system and associated requirements, updates to office/jurisdiction and driver responsibilities, maintenance requirements and general updates across all topics related to fleet management at the agency. It also incorporates AOC Policy Memorandum 34-2 Fleet Manual Update, which reassigns the responsibilities for installation, maintenance and associated mandatory training for the application of law enforcement light and siren packages on agency vehicles to the Office of the Chief Security Officer (OCSO).
Order 36-1	AOC Records Management and Archives Program	This order prescribes the policies, responsibilities and procedures for the management of records and archival Heritage Assets within the AOC. It establishes the basic requirements related to the creation, maintenance, use and disposition of records at the AOC.
Order 42-1	AOC Classified Information Security Program	This revised policy formalizes the AOC's Classified Information Security Program and establishes requirements for the protection of and access to classified information. Revisions also include updates to the security clearance process and efforts to formalize the Classified Information Security Program.

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

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

SIGNIFICANT MANAGEMENT DECISIONS WITH WHICH THE OIG DISAGREES

The OIG disagreed with the disciplinary action taken by agency management following OIG investigation 2023-0004-INVI-P. The OIG has noted in prior Management Opportunities and Performance Challenges provided to the AOC that numerous inconsistencies exist within and across offices and jurisdictions, including the application of administrative action following findings of employee misconduct. The OIG pointed out that "Increased employee misconduct and noncompliance may be an indication that employees are confused or unaware of their responsibility and obligation to adhere to AOC policies and orders." The OIG believes the disciplinary action was one such instance of the inconsistencies in applying AOC Order 752-1 Discipline.

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 the OIG completed an inspection, evaluation or audit without disclosing it to the public. All such products are listed at www.oversight.gov and aocoig.oversight.gov.



PEER REVIEW REPORTING

AUDIT

There was no peer review activity for the Audit Division during the reporting period. The Federal Maritime Commission OIG conducted an external peer review of the AOC OIG audit function and issued a final report on September 1, 2021. The AOC OIG received a peer review rating of Pass, the highest rating possible, confirming that audit operations are performed in accordance with GAO Yellow Book² standards. There were no outstanding recommendations in the final report.

INSPECTIONS AND EVALUATIONS

There was no peer review activity for the Inspections and Evaluations Division during the reporting period. The Equal Employment Opportunity Commission OIG conducted an external peer review of the AOC OIG inspection and evaluation function and issued a final report on September 23, 2021. The AOC OIG received a peer review rating of Pass, the highest rating possible, confirming that inspection and evaluation operations are performed in accordance with CIGIE Blue Book¹⁰ standards. There were no outstanding recommendations in the final report.

FOLLOW-UP

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

INVESTIGATIONS

There was no peer review activity for the Investigations Division during the reporting period. The Federal Election Commission OIG conducted an external peer review of the AOC OIG investigative function and issued a final report on June 8, 2023.¹¹ The AOC OIG received a peer review rating of In Compliance, the highest rating possible, confirming that investigation operations are performed in accordance with the CIGIE *Quality Standards for Investigations*.¹² There were no outstanding recommendations in the final report.

¹⁰CIGIE. 2020. Quality Standards for Inspection and Evaluation (Blue Book). <https://www.ignet.gov/sites/default/files/files/QualityStandardsforInspectionandEvaluation-2020.pdf>.

¹¹Federal Election Commission Office of Inspector General. 2023. Report on the Qualitative Assessment Review of the Investigative Operations of the Office of Inspector General for the Architect of the Capitol, Report No. FEC OIG 2023-06-002. https://aocoig.oversight.gov/sites/default/files/document/2023-06/aoc_oig_opinion_letter_6.8.23.pdf.

¹²CIGIE. 2011. Quality Standards for Investigations. <https://www.ignet.gov/sites/default/files/files/invprg1211appi.pdf>.



RECOMMENDATIONS

Table C through Table I reflect 115 recommendations associated with 21 reports. Of those, 22 recommendations were implemented and closed-resolved, three were closed-unresolved, and 90 remain open-resolved.¹³ Resolution occurs when the auditing/evaluating organization and agency management agree on action to be taken on reported findings and recommendations or, in the event of disagreement, the point at which the OIG official determines the matter to be resolved.^{14,15}

TABLE C: Summary of Potential Cost Savings¹⁶ for Open-Resolved Recommendations

Report No.	No. of Unimplemented Recommendations	Funds Put to Better Use	Questioned Costs	Potential Cost Savings
OIG-AUD-2021-03	5	\$0	\$0	\$0
OIG-AUD-2021-06	3	\$479,908	\$90,110	\$570,018
OIG-AUD-2022-07	5	\$0	\$0	\$0
OIG-AUD-2023-04	6	\$0	\$741,758	\$741,758
OIG-AUD-2023-05	3	\$0	\$0	\$0
OIG-AUD-2023-06	10	\$29,324	\$0	\$29,324
OIG-AUD-2023-07	5	\$17,199	\$88,025	\$105,224
OIG-AUD-2023-08	9	\$0	\$0	\$0
OIG-AUD-2024-02	2	\$0	\$0	\$0
2019-0001-IE-P	1	\$0	\$0	\$0
2021-0001-IE-P	5	\$0	\$0	\$0
2022-0001-IE-P	2	\$0	\$0	\$0
2022-0002-IE-P	3	\$15,385	\$0	\$15,385
2022-0005-IE-P	20	\$0	\$0	\$0
2022-0001-FLD-P	8	\$0	\$0	\$0
2023-0001-FLD-P	3	\$0	\$0	\$0
Grand Total	90	\$541,816	\$919,893	\$1,461,709

¹³“Open-resolved” means that AOC management has agreed (concurred) to implement the recommendation or has proposed corrective actions that will address the recommendation.

¹⁴OMB. 1982. OMB Circular No. A-50, Audit Followup. <https://www.whitehouse.gov/wp-content/uploads/2017/11/Circular-050.pdf>.

¹⁵While OMB Circular A-50 is applicable only to executive agencies, the AOC OIG considers the guidance cited to be a best practice for resolving recommendations.

¹⁶“Cost savings” here is defined as the sum of questioned costs and recommendations of funds that could be put to better use.

TABLE D: Audits Unimplemented Recommendations

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
Architect of the Capitol Office of the Chief Financial Officer	OIG-AUD-2021-06 September 29, 2021 Audit of the Architect of the Capitol's Unliquidated Obligations (ULO)	1	<p>Report Summary: The OIG performed an audit of the AOC's ULOs.</p> <p>Recommendation: We recommend the AOC review and properly close out the following dormant ULOs:</p> <ul style="list-style-type: none"> • 68 invalid ULOs valued at \$479,907.61 • Nine unsupported, questioned ULOs valued at \$90,109.58 • Nine valid ULOs valued at \$8,230.00 that have not received a final invoice • 231 ULOs with balances less than \$50.00 <p>Funds put to better use: \$479,907.61; questioned costs: \$90,109.58.</p> <p>AOC Management Decision: Concur.</p> <p>OIG Response: Open-resolved.</p>
		2	<p>Recommendation: We recommend the AOC ensure supporting documentation for ULOs is maintained and readily available.</p> <p>AOC Management Decision: Concur.</p> <p>OIG Response: Open-resolved.</p>
		3	<p>Recommendation: We recommend the AOC finalize the new Quarterly Financial Review SharePoint application and ensure it addresses the current and prior year audit findings as well as revise the AOC's policies and procedures to align with the new application.</p> <p>AOC Management Decision: Concur.</p> <p>OIG Response: Open-resolved.</p>
	OIG-AUD-2023-05 April 14, 2023 Architect of the Capitol's Internal Control Plan Lacked Procedures to Assess and Monitor Payment Accuracy	1	<p>Report Summary: The OIG performed an audit of the AOC's internal control plan used to monitor payment accuracy.</p> <p>Recommendation: We recommend AOC management develop a process that will assess and monitor payment accuracy in its program and activities:</p> <ul style="list-style-type: none"> • The process should include procedures to identify and assess all programs and activities that are susceptible to significant improper payments annually (max triennially). • For programs and activities identified as susceptible to significant improper payments, the AOC should consider the following procedures using OMB guidance: <ul style="list-style-type: none"> • Perform testing to estimate the cost of improper payments in the program • Implement a plan to reduce erroneous payments • Report estimates of the annual amount of improper payments in programs and activities and progress toward reducing them within the Performance and Accountability Report <p>AOC Management Decision: Concur. The Office of the Chief Financial Officer (OCFO) will update its enterprise risk assessment process performed in accordance with our Enterprise Risk Management program to assess and monitor payment accuracy in its program and activities. We expect to implement the updates to our enterprise risk assessment process by the end of the second quarter of FY 2024.</p> <p>OIG Response: Open-resolved.</p>

TABLE D: Audits Unimplemented Recommendations (*continued*)

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		2	<p>Recommendation: We recommend AOC management execute the process that assesses and monitors payment accuracy in its program and activities every one to three years.</p> <p>AOC Management Decision: Concur. The OCF0 will execute their updated enterprise risk assessment process to assess and monitor payment accuracy in its program and activities every one to three years.</p> <p>OIG Response: Open-resolved.</p>
		3	<p>Recommendation: We recommend AOC management design a recovery plan that is consistent with federal guidance for implementation when improper payments are identified.</p> <p>AOC Management Decision: Concur. The OCF0 will design a recovery plan that is consistent with federal guidance and that aligns with the AOC's priorities when improper payments are identified. We expect to implement the design of our recovery plan by the end of the second quarter of FY 2024.</p> <p>OIG Response: Open-resolved.</p>
	OIG-AUD-2024-02 December 4, 2023 Fiscal Year 2023 Financial Statements Audit Management Letter	1	<p>Report Summary: The OIG oversaw an IPA audit of AOC FY 2023 financial statements.</p> <p>Recommendation: We recommend the AOC OCF0 properly monitors an adequate review of all litigation cases, as assessed by the Office of General Counsel, to determine that all necessary contingent liabilities are assessed properly, and the appropriate financial reporting requirements are followed.</p> <p>AOC Management Decision: Concur.</p> <p>OIG Response: Open-resolved.</p>
		2	<p>Recommendation: We recommend the AOC develop and implement an adequate succession and contingency plan as part of its organizational strategy to ensure that the agency is equipped to respond to unexpected departures from key positions within the agency.</p> <p>AOC Management Decision: Concur.</p> <p>OIG Response: Open-resolved.</p>
Architect of the Capitol Office of the Chief Security Officer	OIG-AUD-2021-03 May 5, 2021 Flash Report Series – Independent Assessment of the Architect of the Capitol's Role in Securing the Capitol Campus for Large Public Gatherings	2	<p>Report Summary: The OIG performed an independent assessment of the AOC's role in securing the Capitol campus during large public gatherings.</p> <p>Recommendation: We recommend the AOC OCSO coordinate with the U.S. Capitol Police (USCP) to draft a memorandum of agreement to support the roles, responsibilities and services required for preparation and execution of the perimeter security plans for large public events.</p> <p>AOC Management Decision: Concur.</p> <p>OIG Response: Open-resolved.</p>

TABLE D: Audits Unimplemented Recommendations (*continued*)

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		3	<p>Recommendation: We recommend the AOC OCSO establish well-defined policies and procedures with a preparation checklist for jurisdictions based on the severity of threat that provides clear guidance on execution of support activities related to coordination, mobilization, demobilization, asset protection and reporting of activities associated with special events across the Capitol campus.</p> <p>AOC Management Decision: Concur.</p> <p>OIG Response: Open-resolved.</p>
		4	<p>Recommendation: We recommend the AOC coordinate with the U.S. Capitol Police Board and legislative stakeholders to evaluate the overall focus on Capitol campus security and reevaluate the responsibilities for design, installation and maintenance of the Capitol campus security systems as well as determine who should execute those responsibilities.</p> <p>AOC Management Decision: Concur.</p> <p>OIG Response: Open-resolved.</p>
		5	<p>Recommendation: We recommend the AOC OCSO hold a security briefing with AOC senior leadership for each event to highlight the security threats and risks identified during their monitoring and received from coordinating agencies and to present the AOC's approach to manage such risks and instructions for jurisdictions to execute the developed preparation checklist.</p> <p>AOC Management Decision: Concur.</p> <p>OIG Response: Open-resolved.</p>
		6	<p>Recommendation: We recommend the AOC inform the USCP of the deferred security maintenance work elements before large public gatherings and events on the Capitol campus.</p> <p>AOC Management Decision: Concur.</p> <p>OIG Response: Open-resolved.</p>
Architect of the Capitol Office of the Chief Engineer	OIG-AUD-2022-07 July 29, 2022 Multimillion-Dollar Construction Projects' Contract Provisions Comply with Federal Guidance, Architect of the Capitol Policies and Industry Standards Although Improvements Can Be Added	1	<p>Report Summary: The OIG performed an audit of AOC's multimillion-dollar construction projects' contract provisions.</p> <p>Recommendation: We recommend the AOC consider structuring future guaranteed maximum price contracts as (1) fixed-price amounts for general conditions and general requirements and (2) cost reimbursement for subcontracts that are fixed-price amounts between the general contractor and subcontractors to assist in alleviating the AOC's administrative burden in properly administering the contract.</p> <p>AOC Management Decision: Concur. Before using the guaranteed maximum price contract type on future procurements, the AOC will evaluate best practices and lessons learned and update CO guidance for the proper use of this contract type.</p> <p>OIG Response: Open-resolved.</p>

TABLE D: Audits Unimplemented Recommendations (*continued*)

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		2	<p>Recommendation: We recommend the AOC issue contract modifications for the sampled contracts to include any applicable clauses that the AOC did not include in the contract at the time of award or in any modifications already issued, if the AOC determines that it is feasible to do so.</p> <p>AOC Management Decision: Concur. The AOC will perform an analysis [to determine] if it is feasible and/or appropriate to perform contract modifications for the clauses in question.</p> <p>OIG Response: Open-resolved.</p>
		5	<p>Recommendation: We recommend the AOC issue contract modifications to remove inapplicable clauses included in the contract, if the AOC determines that it is beneficial and feasible to do so.</p> <p>AOC Management Decision: Concur. The AOC will perform an analysis to determine if it is feasible and beneficial to perform contract modifications to remove inapplicable clauses.</p> <p>OIG Response: Open-resolved.</p>
		6	<p>Recommendation: As a part of the AOC annual review of active contracts to determine whether any contract modifications are necessary, we recommend the AOC incorporate a review to identify (1) applicable clauses erroneously omitted during the formulation of the contract, (2) applicable contract clauses issued after contract award and (3) inapplicable contract clauses.</p> <p>AOC Management Decision: Concur. The AOC will assess its resources and consider including this recommendation as part of its existing Contract Management Annual Review.</p> <p>OIG Response: Open-resolved.</p>
		7	<p>Recommendation: We recommend the AOC consider requiring its contractors to carry builder's risk policies on a project-by-project basis based on an evaluation of the risks that each project poses to the AOC.</p> <p>AOC Management Decision: Concur. The AOC will consider requiring contractors to carry builder's risk policies on a project-by-project basis based on an evaluation of the risks that each project poses to the AOC.</p> <p>OIG Response: Open-resolved.</p>



TABLE D: Audits Unimplemented Recommendations *(continued)*

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
	OIG-AUD-2023-04 March 30, 2023 Review of the Architect of the Capitol's Multimillion-Dollar Construction Project Change Orders	1	<p>Report Summary: The OIG performed a review of the AOC's change orders for multimillion-dollar construction projects.</p> <p>Recommendation: We recommend the AOC perform the following:</p> <ol style="list-style-type: none"> Recover the questioned costs of \$6,464.00 identified within the R-Tunnel Project to the extent legally and administratively possible Review the questioned costs of \$68,940.00 (\$75,404.00 – \$6,464.00) identified within the CHOB Project (\$53,663.00) and R-Tunnel Project (\$15,277.00) to determine if the costs are allowable in accordance with contract requirements and, as applicable, recover any additional amounts resulting from the application of items like overhead and profits to the unallowable costs Ensure future change orders adhere to the contractual language regarding overhead costs not being allowed as direct costs and, when the AOC determines that overhead costs are allowable as direct costs, document how and why that determination was made <p>AOC Management Decision: Partially Concur. We concur with [recommendation] 1a. The AOC will work to recover the questioned costs if it is legally and administratively possible.</p> <p>We partially concur with [recommendation] 1b. The AOC does not concur with [recommendation] 1b as it relates to the CHOB Project but concurs with 1b for the R-Tunnel Project. As stated during the OIG's review of change order documentation and cited on page 3 of their report, we disagree with the OIG's finding on the CHOB Project.</p> <p>We concur with [recommendation] 1c. We will review existing processes for the AOC's review of contractor-submitted potential changes and their respective supporting documentation to ensure compliance with existing AOC policies and procedures and executed contracts.</p> <p>OIG Response: Open-resolved.</p>
		2	<p>Recommendation: We recommend the AOC perform the following:</p> <ol style="list-style-type: none"> Review the questioned costs of \$167,628.00 once the AOC determines whether Clark/Christman, A Joint Venture, (CCJV) met the incentive fee requirements; if CCJV has not met the incentive fee requirements and the 100 percent unspent project contingency funds are not awarded, recover to the extent legally and administratively possible the AOC's proportional share of the questioned costs Ensure project funds are not used to pay for damages caused by the contractor, even if those funds may be earned by the contractor at a later date <p>AOC Management Decision: Partially Concur. We do not concur with [recommendation] 2a. The AOC provided the OIG detailed support and documentation of the history of discussions related to the cornice scope on March 27, 2023.</p> <p>We concur with [recommendation] 2b. We will review existing processes for the AOC's review of contractor-submitted potential changes and their respective supporting documentation to ensure compliance with existing AOC policies and procedures and contractual requirements as they relate to the use of contingency.</p> <p>OIG Response: Open-resolved.</p>

TABLE D: Audits Unimplemented Recommendations *(continued)*

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		4	<p>Recommendation: We recommend the AOC perform the following:</p> <ul style="list-style-type: none"> a. Recover the questioned costs of \$2,716.00 identified within the R-Tunnel Project to the extent legally and administratively possible b. Review the insufficiently supported questioned costs of \$478,557.00 (\$481,273.00 – \$2,716.00) identified within the CHOBr Project (\$367,315.00) and R Tunnel Project (\$111,242.00) to determine if the costs are supported and allowable; for any of the costs deemed unsupported and/or unallowable, recover the costs to the extent legally and administratively possible; as applicable, recover any additional amounts resulting from the application of items, such as overhead and profits to the unallowable costs <p>AOC Management Decision: Partially Concur. We concur with [recommendations] 4a and 4b related to the R-Tunnel Project. We do not concur with [recommendation] 4b related to the CHOBr Project. These are not insufficiently supported costs.</p> <p>OIG Response: Open-resolved.</p>
		5	<p>Recommendation: We recommend the AOC recover the unsupported questioned costs of \$6,944.00 identified within the CHOBr Project (\$226.00) and R Tunnel Project (\$6,718.00) to the extent legally and administratively possible.</p> <p>AOC Management Decision: Concur. The AOC will work to recover the questioned costs if it is legally and administratively possible.</p> <p>OIG Response: Open-resolved.</p>
		7	<p>Recommendation: We recommend the AOC comply with the sequence of review and approval for its change orders as prescribed by its policies and procedures and ensure sufficient documentation is maintained. If the AOC deviates from its policies and procedures, the AOC should fully document the reason for the deviation.</p> <p>AOC Management Decision: Concur. We will review existing processes for the AOC's review of contractor-submitted potential changes and their respective supporting documentation to ensure compliance with existing AOC policies and procedures.</p> <p>OIG Response: Open-resolved.</p>
		8	<p>Recommendation: We recommend the AOC recover or not award the questioned costs of \$3,551.00 identified within Phase 3 of the U.S. Capitol Exterior Stone and Metal Preservation project to the extent legally and administratively possible and ensure the contractor excludes subcontractor profit before applying contractual markups.</p> <p>AOC Management Decision: Concur. To the extent legally and administratively possible, the AOC will recover the questioned costs.</p> <p>OIG Response: Open-resolved.</p>

TABLE D: Audits Unimplemented Recommendations *(continued)*

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
The Architect of the Capitol Lacked Sufficient Oversight of the Cannon Caucus Room Renovations	OIG-AUD-2023-06 September 6, 2023	1	<p>Report Summary: The OIG performed an audit of AOC's CHOB Project Caucus Room.</p> <p>Recommendation: We recommend the AOC ensure the CMc complies with the contractual requirements outlined in the CHOB Project's Building Information Modeling (BIM) Project Execution Plan.</p> <p>AOC Management Decision: Concur. The AOC will work with the CMc to ensure compliance with the BIM Project Execution Plan.</p> <p>OIG Response: Open-resolved.</p>
		2	<p>Recommendation: We recommend the AOC ensure the final as-built model of the Caucus Room includes all work performed in the room, regardless of which organization performed the work.</p> <p>AOC Management Decision: Concur. The AOC will ensure the Caucus Room has a complete set of as-built documents.</p> <p>OIG Response: Open-resolved.</p>
		3	<p>Recommendation: We recommend the AOC develop and adopt agencywide requirements for its BIM Project Execution Plan to ensure contractors are informed and capable of meeting the required contractual deliverables.</p> <p>AOC Management Decision: Concur. The AOC is in the process of updating the Architectural/ Engineering Design Manual and computer-aided drafting standards, which will reference this report and recommendation. The agencywide BIM Execution Plan will need to be developed and will be a separate document that can be included in future projects requiring BIM execution.</p> <p>OIG Response: Open-resolved.</p>
		4	<p>Recommendation: We recommend the AOC require the CMc to submit a final testing, adjusting and balancing report. If the CMc is unable to do so, the AOC should assess a credit against the CMc for failing to properly complete its contractual obligations.</p> <p>AOC Management Decision: Concur. As the Caucus Room is occupied, the AOC will work with House Office Buildings and all stakeholders to determine the best available dates to complete the necessary testing.</p> <p>OIG Response: Open-resolved.</p>
		5	<p>Recommendation: We recommend the AOC identify any other incomplete or incorrect work pertaining to the HVAC system in the Caucus Room. The AOC should require the CMc to complete the work in accordance with the contractual specifications or assess credits against the CMc for failing to properly complete its contractual obligations.</p> <p>AOC Management Decision: Concur. As the Caucus Room is occupied, the AOC will work with House Office Buildings and all stakeholders to determine the best available dates to complete the necessary HVAC [system] scope.</p> <p>OIG Response: Open-resolved.</p>

TABLE D: Audits Unimplemented Recommendations *(continued)*

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		6	<p>Recommendation: We recommend the AOC review its commissioning process and implement internal controls to ensure the commissioning agent properly completes all required steps before commissioning work.</p> <p>AOC Management Decision: Concur. We will review existing processes and contract requirements related to commissioning and implement any necessary improvements to related controls for CHOB [Project] Phase 4.</p> <p>OIG Response: Open-resolved.</p>
		7	<p>Recommendation: We recommend the AOC add steps to the commissioning process that require the commissioning agent to test HVAC systems for acceptable sound levels in all rooms deemed to be sensitive to elevated noise.</p> <p>AOC Management Decision: Concur. For rooms where the design and/or specification dictates the need for sensitivity to elevated noise [or] that require a sound level for a specific room configuration, the AOC will add steps to the commissioning process to test for the sound requirement.</p> <p>OIG Response: Open-resolved.</p>
		8	<p>Recommendation: We recommend the AOC ensure design specifications clearly identify sound design A-weighted decibels goals for all rooms deemed to be sensitive to elevated noise.</p> <p>AOC Management Decision: Concur. [The AOC] will review specifications and other contract requirements related to sound and implement any necessary improvements to meet industry standards where applicable.</p> <p>OIG Response: Open-resolved.</p>
		9	<p>Recommendation: We recommend the AOC ensure the supply diffusers near the Caucus Room ceiling are adjusted or replaced so they do not interfere with the use of the projector screen.</p> <p>AOC Management Decision: Concur. As the Caucus Room is occupied, the AOC will work with House Office Buildings and all stakeholders to determine the best available dates to complete the necessary scope.</p> <p>OIG Response: Open-resolved.</p>
		10	<p>Recommendation: We recommend the AOC require the construction manager as constructor CMc to either address the damages resulting from the incorrect or improper work that the CMc performed during Phase 1 or recover the costs that the AOC incurs to remediate the damages. If feasible, the AOC should recover the costs it has already incurred for the repairs to date (\$29,324.00).</p> <p>AOC Management Decision: Concur. The AOC will work with the CMc to either remediate the damages themselves or recover the costs incurred by the AOC. The AOC will also work to recover the identified costs already incurred, if legally and administratively possible.</p> <p>OIG Response: Open-resolved.</p>

TABLE D: Audits Unimplemented Recommendations *(continued)*

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
	OIG-AUD-2023-07 September 21, 2023 Review of the Architect of the Capitol's Multimillion-Dollar Construction Project Change Orders	1	<p>Report Summary: The OIG performed a review of the AOC's change orders for multimillion-dollar construction projects.</p> <p>Recommendation: We recommend the AOC review its potential change order (PCO) notification criteria and implement the following:</p> <ol style="list-style-type: none"> Ensure that any diagrams or flowcharts referencing the criteria for PCO notification forms are consistent with the criteria outlined in the Planning and Project Management Memorandum (PPM Memo) Ensure the criteria in any PCO notification form templates are consistent with the criteria outlined in the PPM Memo <p>AOC Management Decision: Concur. The AOC will reconcile criteria with all respective charts, diagrams, forms, templates, etc. to ensure consistency with our PPM [Memo].</p> <p>OIG Response: Open-resolved.</p>
		2	<p>Recommendation: We recommend the AOC evaluate the \$2,320.00 in questioned costs related to improper application of markups for the following projects:</p> <ol style="list-style-type: none"> Russell Exterior Envelope Project for the contractor's improper application of overhead and profit markups to first-tier subcontractor work in a total of \$2,105.00 Thurgood Marshall Federal Judiciary Building Administrative Office Space Realignment for their first-tier subcontractor's improper application of markups on a second-tier subcontractor in the total of \$215.00 <p>The AOC should recover any erroneously awarded costs to the extent legally and administratively possible.</p> <p>AOC Management Decision: Concur. The AOC will evaluate this questioned cost, and, if deemed unallowable, the AOC will recover it to the extent legally and administratively possible.</p> <p>OIG Response: Open-resolved.</p>
		3	<p>Recommendation: We recommend the AOC evaluate the \$288.00 in questioned costs for duplicative overhead costs awarded as direct costs for the Russell Exterior Envelope Project. The AOC should recover any erroneously awarded costs to the extent legally and administratively possible.</p> <p>AOC Management Decision: Concur. The AOC CO determined in their contemporaneous memorandum for record that the cost was not duplicative. The AOC will reevaluate this questioned cost, and if deemed duplicative, the AOC will recover it to the extent legally and administratively possible.</p> <p>OIG Response: Open-resolved.</p>

TABLE D: Audits Unimplemented Recommendations (*continued*)

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		4	<p>Recommendation: We recommend the AOC review the insufficiently supported questioned costs identified within the Russell Exterior Envelope Project (\$66,449.00) and the Thurgood Marshall Federal Judiciary Building Administrative Office Space Realignment project (\$18,968.00) to determine if the costs are supported and allowable. For any of the costs deemed unsupported and/or unallowable, recover the costs to the extent legally and administratively possible. As applicable, recover any additional amounts resulting from the application of items, such as overhead and profits to the unallowable costs.</p> <p>AOC Management Decision: Concur. The AOC will reevaluate whether the CO properly exercised their broad discretion in determining the level of proposal detail needed to determine a fair and reasonable price. The AOC will reevaluate the CO's determination that the settlement was in the overall best interest of the government. If questioned costs are deemed unallowable, the AOC will recover them to the extent legally and administratively possible.</p> <p>OIG Response: Open-resolved.</p>
		5	<p>Recommendation: We recommend the AOC ensure it uses the contractual markups when preparing independent government estimates to make sure the resulting price is consistent with the costs allowed under the contract and to avoid overpayment (e.g., \$17,199.00 in funds put to better use).</p> <p>AOC Management Decision: Concur. While the price element in question was part of a negotiated global settlement resulting [in] more than \$180,000.00 in government savings, the AOC will reevaluate whether the overall benefits of the settlement warranted the concession.</p> <p>OIG Response: Open-resolved.</p>
	OIG-AUD-2023-08 September 25, 2023 Cannon House Office Building Renewal Project's Punch List and Warranty Work Process Lacked Sufficient Oversight	1	<p>Report Summary: The OIG performed an audit of the AOC's CHOB Project punch list and warranty work.</p> <p>Recommendation: We recommend the CHOB Project team align the punch list requirements with the CMc contract and specifications and resolve any discrepancies.</p> <p>AOC Management Decision: Concur. The AOC will perform the recommended reconciliation and will resolve any discrepancies if necessary.</p> <p>OIG Response: Open-resolved.</p>
		2	<p>Recommendation: We recommend that, for the remaining contract phases (Phases 3 and 4), the CHOB Project team update its written quality control (QC) procedures to ensure compliance with all requirements for punch list items prescribed in the CMc contract and specifications.</p> <p>AOC Management Decision: Concur. The AOC will review its existing process related to QC (i.e., punch list-related procedures) and reconcile with the CMc contract and specifications to update where necessary.</p> <p>OIG Response: Open-resolved.</p>

TABLE D: Audits Unimplemented Recommendations *(continued)*

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		3	<p>Recommendation: We recommend the CHOB Project team conduct a review of all punch list items for Phase 2 to ensure it has properly identified each item and listed the correct status for each item (i.e., open or closed).</p> <p>AOC Management Decision: Concur. The AOC, to the extent administratively possible, will develop a methodology to review the Phase 2 punch list and perform the requested scope by the OIG. Additional resources may be required.</p> <p>OIG Response: Open-resolved.</p>
		4	<p>Recommendation: We recommend the AOC consider tying the start of contractual warranty periods to final completion rather than to substantial completion to ensure that the AOC does not lose warranty coverage on work completed after substantial completion and to incentivize the timely completion of all work needed to meet final completion, including punch list items.</p> <p>AOC Management Decision: Concur. The AOC will consider pursuing this recommendation to the extent legally and administratively possible.</p> <p>OIG Response: Open-resolved.</p>
		5	<p>Recommendation: We recommend the CHOB Project team ensure it maintains sufficient documentation for all punch list items to accurately identify (1) the work completed to close out punch list items and (2) the individual who approved the completed work.</p> <p>AOC Management Decision: Concur. To the extent administratively possible, the AOC will determine and issue guidance on the appropriate level of documentation that should be retained to do the following: accurately identify (1) the work completed to close out punch list items and (2) the individual who approved the completed work. Additional resources may be required.</p> <p>OIG Response: Open-resolved.</p>
		6	<p>Recommendation: We recommend the CHOB Project team review all items listed as warranty items for Phase 2 and ensure they are (1) properly categorized as punch list (this includes in-scope work), warranty or latent defect; (2) correctly recorded as open or closed and (3) sufficiently documented to support closed items, including the work completed and the individual who approved.</p> <p>AOC Management Decision: Concur. The AOC, to the extent administratively possible, will develop a methodology to review the Phase 2 warranty items and perform the requested scope by the OIG. Additional resources may be required.</p> <p>OIG Response: Open-resolved.</p>

TABLE D: Audits Unimplemented Recommendations (*continued*)

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		7	<p>Recommendation: We recommend, for those items categorized as punch list (in-scope work) and completed during and/or after the warranty period, the CHOBr Project team negotiate an extended warranty period with the CMc, to the extent legally and administratively feasible.</p> <p>AOC Management Decision: Concur. The AOC will determine if the OIG's recommended approach is feasible. We anticipate this may be an additional cost to the CHOBr Project.</p> <p>OIG Response: Open-resolved.</p>
		8	<p>Recommendation: We recommend the CHOBr Project team improve its process for managing warranty items to ensure the only items included on its warranty list are those that meet the definition and description of a warranty item provided in the contract and specification requirements.</p> <p>AOC Management Decision: Concur. The AOC will review its existing process for managing warranty items and update it, where necessary, to ensure the list includes only warranty items, as defined by contract and specification requirements.</p> <p>OIG Response: Open-resolved.</p>
		9	<p>Recommendation: We recommend the CHOBr Project team review all punch list items discovered during the one-year warranty inspection to determine how the QC reviewers overlooked those items during prior inspections and whether the CHOBr Project team should make any improvements to the QC process to avoid future oversights.</p> <p>AOC Management Decision: Concur. The AOC, to the extent administratively possible, will develop a methodology to review punch list items and perform the requested scope by the OIG. Additional resources may be required.</p> <p>OIG Response: Open-resolved.</p>

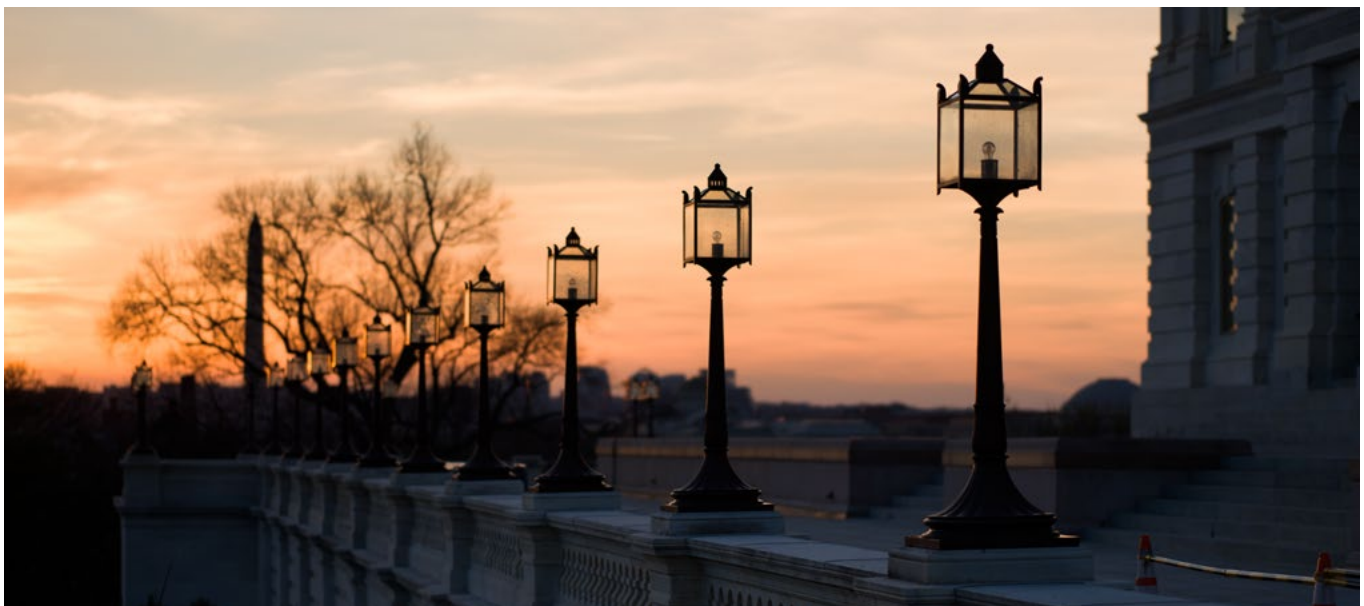


TABLE E: Inspections & Evaluations Unimplemented Recommendations

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
Architect of the Capitol Office of the Chief Administrative Officer	2019-0001-IE-P June 5, 2020 Evaluation of the Architect of the Capitol's Compliance with Its Discipline Order	C	<p>Report Summary: The OIG performed an evaluation to determine if AOC disciplinary actions taken from FY 2015 to FY 2019 in response to employee misconduct complied with established policy and penalty guidance. The OIG also reviewed disciplinary actions to determine if punitive actions were applied consistently based on appropriate criteria and evidence.</p> <p>Recommendation: We recommend the AOC develop and publish a discipline policy for exempt personnel for transparency and consistency with other employee groups.</p> <p>AOC Management Decision: Concur. The AOC concurs with the recommendation. The AOC has drafted AOC Order 213-1 Senior Rated Executive System, which addresses the OIG recommendation. Section 42 of the order addresses discipline involving AOC's SR staff. The policy order will be reviewed, revised as directed, signed and implemented upon the appointment of a permanent Architect.</p> <p>OIG Response: Open-resolved.</p>
	2021-0001-IE-P November 29, 2021 Evaluation of the Architect of the Capitol's Fleet Management Program	1	<p>Report Summary: The OIG performed an evaluation to determine if adequate mechanisms and controls were in place to account for the AOC's vehicle fleet, including agency cost and usage rate of vehicles.</p> <p>Recommendation: We recommend the Chief Administrative Officer (CAO) develop and implement additional policies and procedures that:</p> <ul style="list-style-type: none"> • Ensure adherence to vehicle utilization reporting • Include a more formal scheduled vehicle maintenance program • Collect, track, monitor and analyze fleet costs throughout the vehicle life cycle, at the vehicle level <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. Initial review and update of AOC Order 34-2 has been completed. The draft is with the Policy and Special Programs (PSP) Division for review. Publication of the updated policy is expected by the end of FY 2024.</p> <p>OIG Response: Open-resolved.</p>
		2	<p>Recommendation: We recommend the CAO review jurisdiction-level fleet policies and standardize jurisdictional best practices across the AOC where appropriate.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. Updates to AOC Order 34-2 to incorporate best practices [have] been completed and forwarded to the PSP for review. Publication of the updated policy is expected by the end of FY 2024.</p> <p>OIG Response: Open-resolved.</p>

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

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		3	<p>Recommendation: We recommend the CAO procure an agencywide fleet management information system with best-in-class fleet management capabilities, to include: vehicle inventory, acquisition, disposal, utilization, cost, mileage and fuel-use information for each vehicle and automatic notification to fleet managers of maintenance due.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. AOC procured a best-in-class fleet management information system. Installation is complete on 91% of [the] agency-owned fleet. The remaining fleet items are awaiting the delivery of devices or have no power source to run a device. [The] AOC will request closure of this recommendation in the second quarter of FY 2024.</p> <p>OIG Response: Open-resolved.</p>
		5	<p>Recommendation: We recommend the CAO, in coordination with AOC organization leaders, review and revise agencywide and jurisdictional policies, including standards for vehicle utilization and guidance for implementing these standards while maintaining jurisdiction-level operational flexibility.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. Updates to AOC Order 34-2 to incorporate best practices [have] been completed and forwarded to the PSP for review. Publication of the updated policy is expected by the end of FY 2024.</p> <p>OIG Response: Open-resolved.</p>
		6	<p>Recommendation: We recommend the CAO procure a fleet management information system with fleet management capabilities, to include vehicle utilization information for each vehicle.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. AOC procured a best-in-class fleet management information system. Installation is complete on 91% of [the] agency-owned fleet. The remaining fleet items are awaiting the delivery of devices or have no power source to run a device. [The] AOC will request closure of this recommendation in the second quarter of FY 2024.</p> <p>OIG Response: Open-resolved.</p>
	2022-0002-IE-P July 28, 2022 Evaluation of the Architect of the Capitol's Information Technology Division Inventory Accountability and Controls	1	<p>Report Summary: The OIG performed an evaluation to determine if adequate mechanisms and controls are in place to account for issued IT equipment, such as laptops and cell phones, and to what extent procedures are in place to report, track and replace missing property.</p> <p>Recommendation: We recommend the Chief Information Officer update the ITD's current policy for accountable IT property, including incorporating defined program personnel roles, requirements aligned with the property management life cycle and all current program procedures.</p> <p>AOC Management Decision: Concur. The AOC concurs with the recommendation. The ITD is currently updating AOC Order 8-4 Accountable IT Property to include personnel roles, information on the property management life cycle and all current program procedures and requirements. ITD will coordinate with the Policy and Special Programs Division for review and publication. The AOC anticipates publishing the policy in early 2024. The review and publication of updates to AOC Order 8-4 Accountable IT Property has been delayed due to delays in the appointment of a permanent CAO.</p> <p>OIG Response: Open-resolved.</p>

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

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		2	<p>Recommendation: We recommend the Chief Information Officer continue the pursuit of transitioning to a single asset management system that addresses its program needs to track accountable and consumable IT property and establish a detailed implementation plan with target dates to transition to a single asset management system for accountable and consumable IT property as currently captured in Cireson and JumpStock.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. ITD has requested funding to support the acquisition of and transition to a more robust IT service management and asset management system. ITD plans are contingent upon FY 2024 budget approval since this acquisition represents a new start project. ITD completed an internal feasibility assessment for consolidating the agency's accountable and consumable IT property into a single system. While consolidation within ITD's existing system was determined to be technically feasible, the level of effort would be significant. Another consideration was the very small cost for the JumpStock system that costs AOC \$1,102.50 annually. The new Information Technology Service Management (ITSM) solution (subject to FY 2024 funding) will replace the current systems (Cireson and JumpStock) and supports transitioning to single asset management system for accountable and consumable IT property. Therefore, ITD determined it would be most fiscally responsible to perform a single migration to the new, long-term ITSM solution and not perform multiple migrations to legacy systems that will be retired within the next 12-18 months. As a result, the implementation plan to transition to a single asset management system will be a subset of the larger acquisition and transition plan for the new ITSM solution.</p> <p>OIG Response: Open-resolved.</p>
		3	<p>Recommendation: We recommend the AOC revise the Board of Survey process with codified punitive actions to act as a deterrent against future instances of egregious employee negligence and misconduct regarding the loss of AOC property, including both IT mobile devices and personal property.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. As referenced in the AOC's management response to this recommendation in the evaluation report, ITD will be incorporating a process to address the auditor's recommendation within the update to AOC Order 8-4. The review and publication of updates to AOC Order 8-4 Accountable IT Property has been delayed due to delays in the appointment of a permanent CAO.</p> <p>OIG Response: Open-resolved.</p>
	2022-0005-IE-P June 22, 2023 Evaluation of the Architect of the Capitol's Implementation of the Federal Information Security Modernization Act of 2014, Fiscal Year 2022	1-20	<p>Report Summary: The OIG performed an evaluation to determine whether the AOC developed and implemented effective information security programs and practices in accordance with the Federal Information Security Modernization Act of 2014 (FISMA).</p> <p>Recommendation: Due to the sensitive nature of this evaluation, specific language pertaining to findings and recommendations is protected and will not be disclosed.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendations.</p> <p>OIG Response: Open-resolved.</p>

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

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
Architect of the Capitol Office of the Chief Security Officer	2022-0001-IE-P	1	<p>Report Summary: The OIG performed an evaluation to assess the badging process for AOC employees and contractors and to determine if vulnerabilities exist within the program.</p> <p>Recommendation: We recommend the Chief Security Officer (CSO) develop and implement a suitability policy for AOC employees and consolidate and implement revisions, as appropriate, to the current contractor suitability policy. Additionally, we recommend developing and implementing a standardized timeline for policy revisions and updates within the current fiscal year.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. AOC Order 42-6 Staff Personnel Suitability Program Policy and AOC Order 42-7 Contractor Suitability Policy are in draft form due to recent transitions with executive leadership and CSO management. [The] CSO is developing a plan of action and milestones (POA&M) to finalize these policies for review in FY 2024.</p> <p>OIG Response: Open-resolved.</p>
	July 25, 2022 Evaluation of the Architect of the Capitol's Security Badging Program	3	<p>Recommendation: We recommend the OCSO develop and implement suitability policy language, including clear lines of responsibility and processes. Improvements should include:</p> <ul style="list-style-type: none"> • In the Contractor Suitability Policy, assigning the responsibility for the centralized recordkeeping of intra-agency badging agreement memoranda of understanding or agreements to the OCSO • In both policies, guidance and requirements for secure badge return and protection and oversight of PII <p>AOC Management Decision: Concur. The AOC concurs and will include responsibilities in the draft AOC Order 42-7 Contractor Suitability Policy. We are developing a POA&M to finalize this policy for review in FY 2024.</p> <p>OIG Response: Open-resolved.</p>

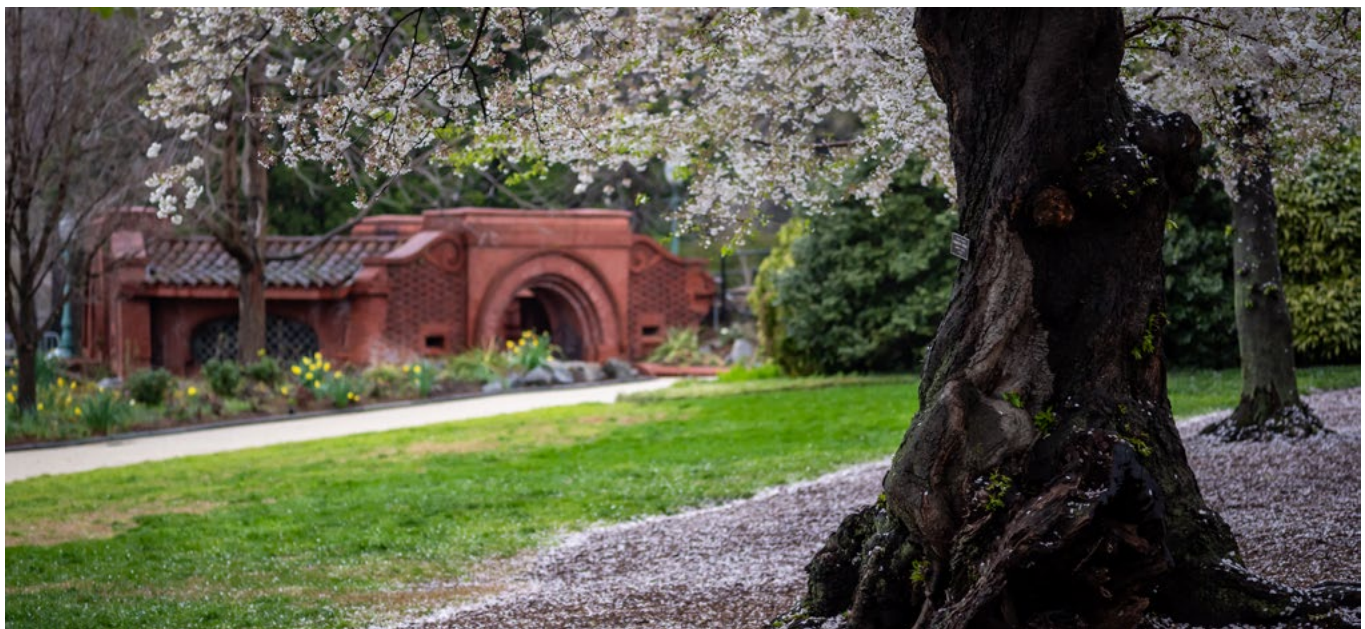


TABLE F: Follow-Up Unimplemented Recommendations

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
Architect of the Capitol Diversity, Inclusion and Dispute Resolution Office	2022-0001-FLD-P June 1, 2023 Follow-Up Evaluation of the Congressional Request for the Architect of the Capitol's Response to Sexual Harassment	1	<p>Report Summary: The OIG performed a follow-up evaluation of the 2019 report Congressional Request for Office of Inspector General Review of the Architect of the Capitol's Response to Sexual Harassment (2019-0001-INVQ-P).</p> <p>Recommendation: We recommend the Diversity, Inclusion and Dispute Resolution Office (DI/DR) develop and implement office-specific policies and procedures for documenting, monitoring and reporting cases in Entellitrak to ensure quality non- Equal Employment Opportunity (EEO) and EEO data.</p> <p>AOC Management Decision: Concur. DI/DR established a Plan of Action and Milestones (POA&M) to process map all DI/DR programs. It is important to capture these policies in writing, and DI/DR will do so when the POA&M is complete.</p> <p>In September 2023, AOC updated its management response. DI/DR has established a plan for developing and improving written Standard Operating Procedures (SOPs) for several case management procedures and has defined a phased approach to address the large scope of updating and documenting these SOPs. Phase I will include procedures associated with the claims process, from entry to conclusion. Phase 2 will focus on cases received through management referrals or other avenues of referral as well as those on the director's docket. The full scope is expected to be completed by the end of the second quarter of Fiscal Year (FY) 2024.</p> <p>OIG Response: Open-resolved.</p>
		2	<p>Recommendation: We recommend the DI/DR perform a climate assessment for jurisdictions that frequently work with the public to identify and address concerns regarding nonemployee harassment and hostile work environments.</p> <p>AOC Management Decision: Concur. The AOC will implement this recommendation, limiting the scope to nonemployee harassment concerns.</p> <p>In September 2023, AOC updated its management response. In the fall of 2023, the AOC will implement this recommendation with the U.S. Botanic Garden (USBG) and U.S. Capitol Visitor Center (CVC) to provide an avenue to capture employee perspectives outside of the normal reporting procedures, limiting the scope to nonemployee harassment and hostile work environment concerns.</p> <p>OIG Response: Open-resolved.</p>
		4	<p>Recommendation: We recommend the AOC develop or update policies and procedures to address how the agency will document and investigate nonemployee harassment.</p> <p>AOC Management Decision: Partially Concurs. The AOC claims process covers all allegations of discrimination, including sexual harassment by employees and nonemployees. The AOC will continue to apply standard investigative procedures to document track, monitor trends, and investigate non-employee harassment allegations. The AOC policies on workplace anti-harassment and sexual harassment are reviewed periodically.</p> <p>In September 2023, AOC updated its management response. The AOC concurs with this recommendation. As noted above, the AOC is currently developing written SOPs for documenting and investigating claims and will ensure wording related to nonemployee harassment is clear in the SOPs. AOC Order 24-2, Architect of the Capitol Workplace Anti-Harassment, will be updated to more clearly define nonemployee harassment by the end of FY 2024.</p> <p>OIG Response: Open-resolved.</p>

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

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		6	<p>Recommendation: We recommend that the Architect of the Capitol (AOC) document and implement a process to conduct follow up inquiries after resolution to identify employee concerns, verify safety, address fears of retaliation and ensure effective reintegration (as appropriate) to minimize negative impacts on its workforce.</p> <p>AOC Management Decision: Nonconcur. It is inappropriate to implement victim advocacy in the DI/DR program, because the neutrality of an EEO office is paramount to its effective operations and mission. For this reason, “victim support and advocacy” is not an appropriate charge for DI/DR. Rather, the AOC provides other, more appropriate avenues for employee support. Cultivating trust under the lens of an EEO program arguably goes back to the consistent application of the process. Accordingly, the guidelines outlined in AOC Order 24-2, Workplace Anti-Harassment Policy, are the appropriate source for addressing concerns about retaliation and providing a communications strategy. An essential tenet of EEO is confidentiality, and there is great consideration given to striking the balance between confidentiality and transparency. Party communications are limited to ensure the integrity of an investigation and ward against a chilling effect. Further, while DI/DR investigates and makes determinations of policy violations, its scope does not extend to the disciplinary process. This division in authority is proper and consistent with best practices. Appropriate mechanisms are already in place to identify employee concerns (DI/DR investigations, climate assessments, the 24-hour Hotline, ELRB, the Employee Assistance Program, the Ombuds), to verify safety concerns (Office of Safety, Workplace Violence Program) and to address fears of retaliation (DI/DR investigations).</p> <p>In September 2023, AOC updated its management response. The AOC will implement this recommendation. The agency currently provides several avenues for employees to seek assistance and support; each of these avenues originate with the employee, meaning employee outreach triggers action. As this recommendation is for agency outreach to an employee following resolution of a case, the AOC will establish an avenue of outreach that respects employee privacy and does not make employees fearful or suspicious of being approached. This avenue will be documented in the internal SOPs mentioned above by the end of the second quarter of FY 2024.</p> <p>OIG Response: Open-resolved.</p>
		7	<p>Recommendation: We recommend the AOC update AOC Order 24-1 Conciliation Program Guide to ensure it provides consistent and current information about the conciliation process and resources available.</p> <p>AOC Management Decision: Concur. While AOC Order 24-1 Conciliation Program Guide is still accurate, the AOC is currently updating several orders, including AOC Order 24-1.</p> <p>In September 2023, AOC updated its management response. Upon completion of the SOPs for case management processing, AOC Order 24-1 Conciliation Program Guide will be updated by the end of FY 2024.</p> <p>OIG Response: Open-resolved.</p>

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

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		8	<p>Recommendation: We recommend the DI/DR develop office-specific internal policies and procedures that require regular communication and updates to individuals on the status of their complaints and cases.</p> <p>AOC Management Decision: Concur. The AOC will provide more frequent case updates to the complainant in the investigative process.</p> <p>In September 2023, AOC updated its management response. AOC is currently developing written SOPs for its case management processes and will ensure regular communication and updates to individuals on the status of their complaints/cases is clear in the SOPs and subsequent policy by the end of the second quarter of FY 2024.</p> <p>OIG Response: Open-resolved.</p>
		10	<p>Recommendation: We recommend the DI/DR develop and implement a process to receive and document recommendations and actions taken by AOC jurisdiction deciding officials involving sexual harassment allegations.</p> <p>AOC Management Decision: Concur. DI/DR will request this information from the Employee and Labor Relations Branch (ELRB), the advisor to and repository of this information, not the jurisdictions.</p> <p>In September 2023, AOC updated its management response. DI/DR will establish this in the SOPs for case management processing by the end of the second quarter of FY 2024.</p> <p>OIG Response: Open-resolved.</p>
		11	<p>Recommendation: We recommend the DI/DR update its antiharassment training to include language options that employees commonly use; examples specific to the AOC workplace and workforce; consequences for supervisors if they fail to fulfill their responsibilities related to reporting and preventing harassment, retaliation and other prohibited conduct; consequences for misconduct and explanations of the complaint process.</p> <p>AOC Management Decision: Concur. Outside of accessibility for those with disabilities, AOC is not legally required to provide language options. However, as a best practice, AOC is currently working on a Language Access Plan for various aspects of employment at AOC.</p> <p>In September 2023, AOC management updated its management response. DI/DR is working with Triliant, the contractor that designs our mandatory, annual anti-harassment training course, to modify this training to include specific workplace examples as well as explanations of the complaints process and consequences for failing to report and prevent harassment and other prohibited behaviors. The AOC anticipates completion of the revisions by the end of the second quarter of FY 2024. Additionally, the AOC is researching options and costs for a Language Access Plan for various aspects of employee support at the AOC, which would include language assistance for training but would require additional resources.</p> <p>OIG Response: Open-resolved.</p>

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

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
Architect of the Capitol	OIG-FLD-2023-01 September 5, 2023 Follow-Up Evaluation of the Architect of the Capitol's Inventory Accountability and Controls	1	<p>Report Summary: The OIG performed a follow-up evaluation of the 2019 report, Evaluation of the Architect of the Capitol's Inventory Accountability and Controls (2018-0002-IE-P).</p> <p>Recommendation: We recommend the AOC update and revise AOC Order 34-45 Personal Property Manual to (1) establish a dollar threshold for accountable property; (2) ensure mission-critical nonconsumable property is consistently defined, to the greatest extent possible, across AOC jurisdictions; (3) provide guidance on how to identify, document and track mission-critical nonconsumable and nonaccountable property; (4) provide clear directions on administrative controls; and (5) develop and enforce additional inventory and accountability procedures for accountable and nonaccountable property to reduce the risk of mismanagement and lost property in accordance with federal best practices.</p> <p>AOC Management Decision: Concur. The AOC will review, edit and update [AOC] Order 34-45. The updates will clarify dollar thresholds for accountable property; ensure mission-critical nonconsumable property is consistently defined; provide guidance on how to identify and track mission-critical property; provide clear direction; and develop additional inventory and accountability procedures for accountable and nonaccountable property to reduce the risk of mismanagement and lost property. [AOC management anticipates] completion by the third quarter [of] FY 2024.</p> <p>OIG Response: Open-resolved.</p>
		2	<p>Recommendation: We recommend the AOC research and implement federal government best practices for acquiring and maintaining adequate storage space to reduce the risk of theft.</p> <p>AOC Management Decision: Concur. The AOC will research best practices for acquiring and maintaining adequate storage to reduce the risk of theft. Additionally, the AOC will review [AOC] Order 34-45 and make edits and updates as necessary to clarify the disposition of property, which in turn could increase storage space and reduce the risk of theft. [AOC management anticipates] completion by the third quarter [of] FY 2024.</p> <p>OIG Response: Open-resolved.</p>
		3	<p>Recommendation: We recommend the AOC conduct an agencywide assessment to identify disposable property and discard the property per AOC Order 34-45 Personal Property Manual to ensure adequate storage space.</p> <p>AOC Management Decision: Concur. The AOC will assess, identify and discard disposable property agencywide in accordance with [AOC] Order 34-45. This effort could provide additional storage space. [AOC management anticipates] completion by the third quarter [of] FY 2024.</p> <p>OIG Response: Open-resolved.</p>

TABLE G: Audits Implemented and Closed Recommendations

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
Architect of the Capitol Office of the Chief Financial Officer	OIG-AUD-2021-02	2	Report Summary: The OIG oversaw an IPA audit of the AOC FY 2020 financial statements.
	December 14, 2020		Recommendation: We recommend determining whether the National Finance Center (NFC), Invoice Processing Platform (IPP) and subservice provider System and Organization Controls (SOC 1®) reports will be delivered in a timely manner and contain the following information required for an effective review and analysis:
	FY 2020 Financial Statements Audit Management Letter		Complete system description Description of controls tested and the results of those tests Applicable management responses Any applicable changes incorporated to IPP and Treasury Web Application Infrastructure (TWAI) subservice providers to the AOC IPP risk assessment that impact the accounts payable financial statement assertion for transactions through IPP AOC Management Decision: Concur. OIG Response: Closed-resolved.
		3	Recommendation: We recommend completing an IPP/TWAI-specific risk assessment to ensure implementation of key controls relevant to the accounts payable financial statement assertion (e.g., through complete and timely SOC 1® reports and/or internal AOC Complementary User Entity Control [CUEC]). If the AOC becomes aware that the content of IPP/TWAI-related SOC 1® reports will continue to be provided in an untimely manner or presented in redacted format, through its risk assessment, AOC management should implement a process to separately identify and assess mitigating and compensating controls to its environment. Additionally, for known control deficiencies at the service and key subservice providers, the AOC should identify a compensating control(s) to mitigate risks within the AOC control environment. AOC Management Decision: Concur. OIG Response: Closed-resolved.
		4	Recommendation: We recommend completing an NFC-specific risk assessment to ensure implementation of key controls relevant to the payroll financial statement assertion (e.g., through complete and timely SOC 1® reports and/or internal AOC CUECs). If the AOC becomes aware that the content of NFC-related SOC 1® reports will be provided in an untimely manner, through its risk assessment, AOC management should implement a process to separately identify and assess mitigating and compensating controls to its environment. Additionally, for known control deficiencies at the service and key subservice providers, the AOC should identify a compensating control(s) to mitigate risks within the AOC control environment. AOC Management Decision: Concur. OIG Response: Closed-resolved.

TABLE G: Audits Implemented and Closed Recommendations *(continued)*

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
	OIG-AUD-2022-05 June 16, 2022 FY 2021 Financial Statements Audit Management Letter	2	<p>Report Summary: The OIG oversaw an IPA audit of AOC FY 2021 financial statements.</p> <p>Recommendation: We recommend AOC management implement the existing documented procedures over the review of SOC 1® reports, establish procedures to transfer responsibilities for control operations to other team members upon an employee's separation and monitor internal controls to assess their effectiveness.</p> <p>AOC Management Decision: Concur.</p> <p>OIG Response: Closed-resolved.</p>
	OIG-AUD-2023-03 December 8, 2022 FY 2022 Financial Statements Audit Management Letter	1	<p>Report Summary: The OIG oversaw an IPA audit of AOC FY 2022 financial statements.</p> <p>Recommendation: We recommend AOC management design control activities, including policies and procedures, that require the use of quality information in the preparation of the footnote.</p> <p>AOC Management Decision: Concur.</p> <p>OIG Response: Closed-resolved.</p>
		2	<p>Recommendation: We recommend AOC management (1) enforce adherence to existing documented procedures to require appropriate review of SOC 1® reports and (2) monitor the status of internal controls performed by third parties to assess their effectiveness.</p> <p>AOC Management Decision: Concur.</p> <p>OIG Response: Closed-resolved.</p>
Architect of the Capitol Office of the Chief Engineer	OIG-AUD-2023-04 March 30, 2023 Review of the Architect of the Capitol's Multimillion-Dollar Construction Project Change Orders	6	<p>Report Summary: The OIG performed a review of the AOC's change orders for multimillion-dollar construction projects.</p> <p>Recommendation: We recommend the AOC work with the contractor to ensure proposals submitted for change orders are factually sound, contain the required cost detail and exclude unallowable costs.</p> <p>AOC Management Decision: Concur. We will review existing processes for the AOC's review of contractor-submitted potential changes and their respective supporting documentation to ensure compliance with the contract.</p> <p>OIG Response: Closed-resolved.</p>

TABLE H: Inspections and Evaluations Implemented and Closed Recommendations

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
Architect of the Capitol Office of the Chief Administrative Officer	2021-0001-IE-P November 29, 2021 Evaluation of the Architect of the Capitol's Fleet Management Program	4	<p>Report Summary: The OIG performed an evaluation to determine if adequate mechanisms and controls were in place to account for the AOC's vehicle fleet, including agency cost and usage rate of vehicles.</p> <p>Recommendation: We recommend the CAO conduct a feasibility study to develop and implement centralized vehicle maintenance contract(s) for routine and nonroutine maintenance to standardize the AOC's maintenance processes and realize efficiencies resulting from centralized contract(s).</p> <p>AOC Management Decision: Concur. The AOC conducted a fleet maintenance study to determine the feasibility of awarding a centralized vehicle maintenance contract to perform agencywide routine and nonroutine maintenance.</p> <p>OIG Response: Closed-resolved.</p>
	2023-0001-IE-P May 9, 2023 Flash Report Series – Architect of the Capitol Records and Archives Management Flash Report Flash Report Series – Architect of the Capitol Records and Archives Management Flash Report	1	<p>Report Summary: The OIG performed an evaluation to assess the efficiency, effectiveness and internal controls of the AOC Records and Archives Management Program in accordance with AOC policies and procedures and applicable federal laws and regulations. We also determined if document handling procedures complied with AOC's security requirements.</p> <p>Recommendation: We recommend the CAO prioritize the revision of the records and archives policies and procedures and all other associated policy directives to establish effective and efficient operational guidance and internal controls. Additionally, we recommend the CAO develop and implement a standardized timeline for policy revision and update within the current fiscal year. Though the AOC is not required to follow the National Archives and Records Administration guidelines and policies, they are noted as best practices.</p> <p>AOC Management Decision: Concur. A revised AOC Order 36-1 Records Management Program has been submitted to the Policy and Special Programs division. The revised policy combines several outdated policies into a single, comprehensive records management policy. The policy is currently out for agency review, and Records Management Liaisons across the agency have been afforded an opportunity to provide input. In addition, the Records Management and Archives Branch (RMAB) will continue to develop and document its own internal procedures and controls. RMAB has prioritized existing operating procedures and continues to progress toward completion with staff input.</p> <p>OIG Response: Closed-resolved.</p>
		2	<p>Recommendation: We recommend the CAO, within 90 days, conduct an organizational assessment of the RMAB structure and responsibilities to determine if the branch is appropriately staffed and assigned.</p> <p>AOC Management Decision: Concur. In 2018, the Office of the CAO conducted a workload assessment of each CAO division, including RMAB. The organizational assessment included workload inputs and outputs, organizational structure and the staffing needed to meet RMAB's workload demands. No organizational or operational changes have since occurred within RMAB. The AOC feels that the 2018 assessment is still valid; however, upon the appointment of a permanent CAO, a future workload study may be deemed appropriate.</p> <p>OIG Response: Closed-resolved.</p>

TABLE H: Inspections and Evaluations Implemented and Closed Recommendations *(continued)*

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		3	<p>Recommendation: To address the immediate need of archival backlog items and digitization processes, we recommend the CAO (a) source a temporary contracting staffing option to assist RMAB staff with processing and clearing backlog items and (b) procure the services of an archival digitalization specialist to assist records retention, processing, research and preservation.</p> <p>AOC Management Decision: Concur. [The] AOC determined that the referenced duties should be performed by a permanent government employee within RMAB due to the inherently governmental nature of the work. The position has now been advertised, selected and filled. This [full-time equivalent] is working with the other staff within the RMAB to address the backlog as an operational priority.</p> <p>OIG Response: Closed-resolved.</p>
		4	<p>Recommendation: We recommend the CAO, within 90 days, develop a corrective action plan for the RMAB and Curator Division leaders to address the leadership and management deficiencies within the division. At a minimum, the corrective action plan should address communication skills, change management, how to lead and empower high-performing teams and effective federal leadership.</p> <p>AOC Management Decision: Concur. While the corrective action plan awaits the appointment of a permanent CAO, the Curator has explored training options through AOC University to enhance overall management within the organization.</p> <p>OIG Response: Closed-resolved.</p>



TABLE H: Inspections and Evaluations Implemented and Closed Recommendations *(continued)*

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
Architect of the Capitol Office of Chief Security Officer	2022-0001-IE-P July 25, 2022 Evaluation of the Architect of the Capitol's Security Badging Program	2	<p>Report Summary: The OIG performed an evaluation to assess the badging process for AOC employees and contractors and determine if vulnerabilities exist within the program.</p> <p>Recommendation: We recommend the CSO, in coordination with the USCP and the House Sergeant at Arms (HSAA), perform a joint feasibility study to consider:</p> <ul style="list-style-type: none"> Reassigning signature authority for CP-491 forms for HSAA-issued contractor badges from the OCSO to CORs, eliminating the hand carry of the CP-491 forms to the USCP (Fairchild Building) for fingerprinting and implementing the use of approval buttons or PDF secure signatures in place of manual signatures Identifying, developing or acquiring a badge management software solution that uses notification-based processes and ensures secure and efficient execution, monitoring and tracking of badging actions <p>AOC Management Decision: Partially Concur. While the AOC agrees it is important to improve the overall process and timelines related to completing CP-491 forms for HSAA-issued contractor badges, the AOC notes that the ability to fully implement this recommendation is outside of the AOC's authority. The responses to specific components of the recommendation follow:</p> <ul style="list-style-type: none"> <i>Joint feasibility study:</i> The AOC will continue to partner with the Sergeants at Arms and the USCP about potential changes to existing badging systems. However, as noted during the exit conference on June 17, 2022, the AOC does not have the authority to modify existing processes or systems we do not own. <i>Reassigning signature authority for CP-491 forms for HSAA-issued contractor badges from the OCSO to CORs:</i> The AOC does not concur with this recommendation due to the increased administrative burden to the existing process. Within the AOC, COR assignments change more frequently than OCSO security specialist assignments. COR changes require approval by the Architect and an updated memo from the Architect to the HSAA and the Chief of the USCP listing the authorized requestors. In addition, ensuring CORs are current on procedures and the nearly constant authorization updates filed with the USCP/HSAA creates a training and administrative burden that would increase processing time and cause further delays. <p>The OCSO will continue to explore alternatives to the current process and will remain engaged in discussions with the HSAA and USCP points of contact (POCs) on options to enhance the existing process.</p> <ul style="list-style-type: none"> <i>Eliminating the hand carry of CP-491 forms to the USCP (Fairchild Building) for fingerprinting:</i> Although there were discussions regarding automation of key components of the process at the beginning of the pandemic in 2020, the requirement to hand carry CP-491 forms was kept. The AOC will re-engage the USCP and HSAA about eliminating the hand-carry requirement but cannot compel the change; the AOC does not own the forms or this stage of the process. <p>(Continued on page 55)</p>

TABLE H: Inspections and Evaluations Implemented and Closed Recommendations (*continued*)

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
			<p>(Continued from page 54)</p> <ul style="list-style-type: none"> Implementing the use of approval buttons or PDF secure signatures in place of manual signatures: The USCP is the CP-491 form and process owner; the HSAA is the form and process owner for the ID badge form. The OCSO has recommended automation of the forms to these process owners based on AOC user suggestions; however, the OCSO has no authority to compel the USCP or HSAA to review or change any internal processes to add approval buttons or secure signature methods on their forms. The OCSO will remain engaged in discussions with the HSAA and USCP POCs on options to enhance the existing process. Identification, development or acquisition of a badge management software solution that uses notification-based processes that ensures secure and efficient execution, monitoring and tracking of badging actions: The AOC's current SharePoint site sends automated notifications at each step of the badging process. Identification, development or acquisition of a badge management software solution that uses notification-based processes and ensures secure, efficient execution, monitoring and tracking of badging actions would need to be developed in house or through a contract. No commercial, off-the-shelf products exist that meet the complexity of the badging process. Even if the AOC builds badge management software, it would not improve many of the identified issues — the USCP and HSAA own the key processes and forms associated with badging. The AOC has no authority to compel the USCP or HSAA to develop or acquire a badge management software system that is compatible for all three agencies. The OCSO will coordinate with the AOC's ITD to submit a funding request to assess the current SharePoint site and develop recommendations for a new software solution. The OCSO will further request funding to develop a software solution that addresses security lapses inherent in the current use of SharePoint to process AOC security badging. <p>OIG Response: Closed-unresolved.</p>

4

Recommendation: We recommend the CSO, in coordination with the USCP and HSAA, perform a joint feasibility study to develop and implement a centralized security badge management process using shared software that allows for secure and efficient issuance, monitoring and tracking of badging actions, including tracking and reporting lost/stolen badges and follow-up actions.

AOC Management Decision: Partially Concur. The AOC will continue discussions with legislative branch partners but cannot commit to implementing this recommendation. The AOC has no authority to compel the USCP or HSAA to develop or acquire a badge management software system that is compatible for all three agencies. Although a centralized system has been previously discussed, the identification, development or acquisition of a centralized security badge management software solution would require significant investments in personnel and IT resources.

OIG Response: Closed-unresolved.

TABLE H: Inspections and Evaluations Implemented and Closed Recommendations (continued)

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
Architect of the Capitol Office of Safety and Code Compliance	2022-0004-IE-P July 14, 2023 Evaluation of the Architect of the Capitol's Safety Inspection Program	1	<p>Report Summary: The OIG performed an evaluation to assess the compliance and internal controls of the AOC's Safety Self-Inspection Program in accordance with AOC policies and procedures and with applicable federal laws and regulations.</p> <p>Recommendation: We recommend the Office of Safety and Code Compliance (SCC) issue guidance to the AOC's organizations to complete all elements of the self-inspection checklists (e.g., no blank responses or unchecked boxes).</p> <p>AOC Management Decision: Concur. On March 6, 2024, AOC published Policy Memorandum 10-2 AOC Self-Inspection Program Implementation, which states that AOC organizations must use the Computerized Maintenance Management System (CMMS) and provide checklists to perform self-inspections, and that "no items on the self-inspection checklist can be left blank."</p> <p>OIG Response: Closed-resolved.</p>
		2	<p>Recommendation: We recommend the SCC issue guidance instructing the AOC's organizations to report all self-inspection findings, including those resolved during the self-inspection process, in a centralized and consistent manner, and for SCC to analyze the data for proactive safety and compliance issue identification and management.</p> <p>AOC Management Decision: Concur. The new Policy Memorandum, 10-2 AOC Self-Inspection Program Implementation, directs AOC organizations to use the CMMS to capture data related to scheduling and performing self-inspections and to document hazards identified and remediated during self-inspections by "automatically creating and closing work orders in the CMMS from failed inspection checks." SCC has a Self-Inspection Dashboard that analyzes data from the CMMS for safety and compliance issue identification and management and will continuously improve it as the program continues to evolve.</p> <p>OIG Response: Closed-resolved.</p>

TABLE H: Inspections and Evaluations Implemented and Closed Recommendations (*continued*)

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		3	<p>Recommendation: We recommend the SCC update its WebTMA Inspection Findings Module Quick Guide to (1) document how to categorize non-AOC findings that are the responsibility of other agencies (e.g., USCP), (2) reiterate that SCC is responsible for both coordinating findings remediation with other agencies and defining the processes it will use to remediate findings and (3) provide the SCC's contact information. The SCC should ensure each AOC organization acknowledges receipt and understanding of the process for documenting and reporting other agencies' findings.</p> <p>AOC Management Decision: Concur. SCC has updated the WebTMA Inspection Findings Module Guide which contains a new section titled, "Documenting Findings for non-AOC entities". This new section provides step by step instructions on how to categorize non-AOC findings that are the responsibility of other agencies. Additionally, it states that the Office of Safety and Code Compliance is responsible for coordinating the remediation of findings that are the responsibility of non-AOC entities (e.g., Capitol Police). The SCC's contact information is provided in this document. To ensure receipt and understanding of the updated Quick Guide, the guide was emailed to all Jurisdiction Safety Specialists. The SCC communicated all changes to leadership at the January 2024 Executive Safety Meeting and via email. Additionally, a live demo of the new process was delivered at the January 2024 OSH Community of Practice meeting.</p> <p>OIG Response: Closed-resolved.</p>
		4	<p>Recommendation: We recommend the SCC obtain an understanding of escape hood respirators to ensure the Senate and HSAA regularly inspect respirators and ready them for use by AOC employees and others in emergency situations.</p> <p>AOC Management Decision: Concur. The SCC reached out to the Sergeants at Arms to obtain this information Q4 FY23.</p> <p>OIG Response: Closed-resolved.</p>
		5	<p>Recommendation: We recommend the SCC, in its next update to the self-inspection checklists, consider adding steps to address applicable items related to hazardous materials, including hazard communication.</p> <p>AOC Management Decision: Concur. After consultation and review, SCC has determined it will add container labeling and Safety Data Sheet availability to the next update of the self-inspection checklist.</p> <p>OIG Response: Closed-resolved.</p>

TABLE H: Inspections and Evaluations Implemented and Closed Recommendations *(continued)*

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		6	<p>Recommendation: We recommend the SCC develop guidance for how AOC organizations should develop a complete list of self-inspection areas, including guidance for shared spaces.</p> <p>AOC Management Decision: Concur. The new policy memorandum, Policy Memorandum 10-2 defines spaces that must be inspected on a quarterly or annual basis. Specifically, Policy Memorandum 10-2 states that AOC organizations identify and inspect quarterly, “all shops, plant operations and other agency work areas occupied and controlled by the AOC (excluding office areas), or areas where routine maintenance occurs” and annually, “all AOC employee offices, public access areas and corridors not including stairwells or utility tunnels.” The policy memorandum in progress, referenced under the response to Recommendation 1, also includes instructions for jurisdictions to identify self-inspection areas.</p> <p>OIG Response: Closed-resolved.</p>
		7	<p>Recommendation: We recommend AOC organizations review their lists of physical areas to self-inspect to validate that they are complete and in line with updated guidance from the SCC. In addition, AOC organizations should report validation review results to the SCC during ongoing and regular intervals.</p> <p>AOC Management Decision: Concur. All AOC organizations provided the SCC with a list of physical areas to be inspected under the self-inspection program and validated their lists were in alignment with the SCC’s updated guidance. Additionally, the Policy Memorandum 10-2 states that AOC organizations “must validate the list of spaces and the names of employees performing self-inspection tasks annually” and that they must “submit a copy to SCC by December 15 of each year.”</p> <p>OIG Response: Closed-resolved.</p>
		8	<p>Recommendation: We recommend the SCC require all AOC employees performing self-inspections to complete standardized self-inspection training. The SCC should also consider requiring periodic refresher training to maintain readiness and awareness.</p> <p>AOC Management Decision: Concur. The new AOC Policy Memorandum 10-2 directs AOC organizations to ensure “all employees performing self-inspections receive SCC’s Self-Inspection training.” SCC is also developing a virtual Self-Inspection training by the end of FY 24 to ensure employees executing the task acquire new skills and knowledge. SCC has been performing in-person training as requested by offices and jurisdictions.</p> <p>OIG Response: Closed-resolved.</p>



TABLE I: Follow-Up Implemented and Closed Recommendations

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
Architect of the Capitol Diversity, Inclusion and Dispute Resolution Office	2022-0001-FLD-P June 1, 2023 Follow-Up Evaluation of the Congressional Request for the Architect of the Capitol's Response to Sexual Harassment	3	<p>Recommendation: We recommend AOC jurisdictions that frequently work with the public review and update, as needed, all visitor guidelines and communications to include language that promotes an antiharassment workplace.</p> <p>AOC Management Decision: Concur. DI/DR reviewed the guidelines posted for visitors to the USBG and CVC and determined the USBG's current language is sufficient but the guidelines for CVC visitors were insufficient. DI/DR and CVC leadership collaborated to revise and strengthen the visitor guidance wording to affirm the commitment to a harassment-free workplace for AOC staff. The updated CVC guidelines were provided as evidence the AOC proposed this recommendation be closed.</p> <p>OIG Response: Closed-resolved.</p>
		5	<p>Recommendation: We recommend the DI/DR establish and document minimum training requirements for its staff related to the staff's field and area of expertise.</p> <p>AOC Management Decision: Partially Concur. As the legislative branch does not have a formal process, there is no formal external training for claims the agency can use to establish a minimum training requirement. However, [the] DI/DR will establish minimum training requirements in writing that articulate the need for initial and refresher training in this area.</p> <p>In September 2023, AOC updated its management decision. The AOC concurs with this recommendation. The DI/DR staff have met all industry standards for training in EEO, Alternative Dispute Resolution and Investigations. By the end of the first quarter of FY 2024, the DI/DR office will identify and establish minimum initial and refresher training standards for its staff moving forward. DI/DR identified and established initial, annual, and refresher training for its staff.</p> <p>OIG Response: Closed-resolved.</p>

TABLE I: Follow-Up Implemented and Closed Recommendations *(continued)*

Report No. Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
	9	<p>Recommendation: We recommend that the Architect of the Capitol (AOC) develop and implement a process to report Equal Employment Opportunity-related information, as appropriate, to increase transparency and employee trust.</p> <p>AOC Management Decision: Nonconcur. While the AOC understands the importance of perception in the EEO process, studies have consistently shown the primary tools to increase reporting are the ability to pursue matters anonymously, the ability to raise claims informally and transparency of the process for the individual case. The AOC provides a 24-hour hotline that allows individuals to report anonymously. DI/DR's processes provide the ability to reach informal resolution. The AOC's Ombuds program also provides informal resolution for employees. The AOC has addressed individual case transparency in Finding 6. The AOC believes the potential negative effects of publicizing statistical case data outweigh the perceived benefits. This is supported by the fact that no federal agency requirement to report this type of information exists. Federal notification of case information is covered by sections 1133 and 1134 of the Elijah E. Cummings Federal Employee Antidiscrimination Act, which amends the No FEAR Act. The Elijah E. Cummings Act only requires agencies to post findings of intentional discrimination (including retaliation), not statistical aggregate data, and while the act does not apply to the legislative branch, the AOC briefs information monthly to the House and Senate Committees of Oversight and Administration. A significant percentage of the matters raised with DI/DR are done so by employees seeking dispute resolution support, which is not addressed by publishing case information. Additionally, data reporting does not effectively message the AOC's response to sexual harassment allegations. The AOC communicates its response to sexual harassment more effectively through training, targeted messaging through all levels of leadership, and continued enforcement of the AOC's anti-discrimination policies.</p> <p>In September 2023, AOC updated their response. While the AOC believes transparency and employee trust can be improved, independent studies have consistently shown the primary tools to increase reporting are:</p> <ul style="list-style-type: none"> • the ability to pursue matters anonymously • the ability to raise claims informally • the visibility/transparency of the process for the individual case¹⁷ <p>AOC employees have several avenues to raise claims anonymously or informally. In documenting its case management procedures (as noted above), the agency can improve the visibility and transparency of its case processes with employees. Following completion of SOP documentation by the end of FY 2024, the AOC will expand its communications strategy publicizing these updated harassment prevention, response and follow-up processes and procedures. While it is true that executive branch federal agencies post summary level case data for the formal stage of the discrimination case process, the executive branch and legislative branch EEO procedures are markedly different, with significantly different goals. The AOC's data reporting of this information is in line with that of other legislative agencies and we will continue to follow congressional lead on this point.</p> <p>OIG Response: Closed-unresolved</p>

¹⁷Harvard Business Review "Do your Employees Feel Safe Reporting Abuse and Discrimination."
<https://hbr.org/2020/10/do-your-employees-feel-safe-reporting-abuse-and-discrimination>.

FUNDS QUESTIONED OR PUT TO BETTER USE

TABLE J: List of Audit, Inspections and Evaluations Reports, Including Total Value of Questioned Costs and Funds Put to Better Use

Report No.	Report Title	Date Published	Questioned Costs ^a	Unsupported Costs ^b	Funds Put to Better Use ^c	Management Decision ^d
<u>OIG-AUD-2024-01</u>	Audit of FY 2023 Financial Statements	November 21, 2023	\$ -	\$ -	\$ -	Yes
<u>OIG-AUD-2024-02</u>	FY 2023 Financial Statements Audit Management Letter	December 4, 2023	\$ -	\$ -	\$ -	Yes
Totals	—	—	\$ -	\$ -	\$ -	—

^aA cost that is questioned because (1) of an alleged violation of a provision of a law, regulation, contract or other agreement or document governing the expenditure of funds; (2) the cost is not supported by adequate documentation or (3) the expenditure of funds for the intended purpose is unnecessary or unreasonable.

^bA cost that is questioned because the OIG found that, at the time of the audit, such cost is not supported by adequate documentation.

^cA recommendation that funds could be used more efficiently if management took action(s) to implement and complete the recommendation.

^dThe evaluation by the management of an establishment of the findings and recommendations included in an audit report and the issuance of a final decision by management concerning its response to the findings and recommendations, including actions concluded to be necessary.

—Not applicable.



TABLE K: Status of Questioned and Disallowed Costs

					Status of Reported Costs				Status to Date
Report Name	Report No.	Date Issued	Reported Costs		Status of Questioned Costs		Status of Disallowed Costs		
			Questioned Costs ^a	Disallowed Costs ^b	Allowed Costs	Disallowed Costs	Recovered Costs	Not Recovered Costs	
Audit of the Architect of the Capitol's Unliquidated Obligations	<u>OIG-AUD-2021-06</u>	9/29/21	\$90,110.00	\$ -	\$ -	\$ -	\$ -	\$ -	Open
Review of the Architect of the Capitol's Multimillion-Dollar Construction Project Change Orders ^c	<u>OIG-AUD-2023-04</u>	3/30/23	\$722,083.00	\$19,675.00	\$ -	\$ -	\$ -	\$ -	Open
Review of the Architect of the Capitol's Multimillion-Dollar Construction Project Change Orders	<u>OIG-AUD-2023-07</u>	9/21/23	\$88,025.00	\$ -	\$ -	\$ -	\$ -	\$ -	Open

^aA cost that is questioned because (1) of an alleged violation of a provision of a law, regulation, contract or other agreement or document governing the expenditure of funds; (2) the cost is not supported by adequate documentation or (3) the expenditure of funds for the intended purpose is unnecessary or unreasonable.

^bA Disallowed Cost is a Questioned Cost that management, in a management decision, has sustained or agreed should not be charged to the Government.

^cDisallowed costs of \$19,675.00 were reported separately from Questioned Costs of \$722,083.00. The total Questioned Costs for the report are \$741,758.00 (Questioned Costs plus Disallowed Costs).

TABLE L: Investigation Recommendations for Better Use of Funds: Cost Avoidance, Savings and Recoveries Resulting from OIG Investigations

Item	Quantity
Cost avoidance from employee removals/resignations*	\$0.00
Savings from employee salaries from suspensions and reductions in grade*	\$24,242.00
Administrative repayment determinations	\$0.00
Court ordered fines/forfeitures/restitution	\$0.00
OIG recovery of stolen government property/funds	\$0.00
Questioned costs:	
Salary and Benefits (subtotal)	\$24,242.00
Net Questioned Costs	\$80.00
Waste	\$130,707.43
Total	\$154,949.43

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



APPENDICES

APPENDIX A: Inspector General Reporting Requirements¹⁸

IG Act Section	Review of Legislation and Regulations	Page No.
Section 404(a)(2)	Review of Legislation and Regulations	24–26
Section 405(b)(1)	Significant Problems, Abuses and Deficiencies, and Associated Reports and Recommendations for Corrective Action	None
Section 405(b)(2)	Recommendations for Which Corrective Action has not been Completed, Including Potential Cost Savings	29
Section 405(b)(3)	Significant Investigations Closed During the Reporting Period	17–23
Section 405(b)(4)	Summary of Matters Referred for Prosecution and Resulting Convictions	14
Section 405(b)(5)	Listing of Audit, Inspection and Evaluation Reports, Including Total Value of Questioned Costs and Funds Put to Better Use	62–63
Section 405(b)(6)	Information Regarding Management Decisions Made During the Reporting Period for Reports Issued During a Previous Reporting Period	30–61
Section 405(b)(8)	An Appendix Containing the Results of Any Peer Review	66
Section 405(b)(9)	A Listing of Outstanding Recommendations From Any Peer Review That Have Not Been Fully Implemented	28
Section 405(b)(10)	Listing of Peer Reviews Conducted	28
Section 405(b)(11)	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	14
Section 405(b)(12)	Description of the Metrics Used for Developing the Statistical Tables Under Section 405(b)(17)	14–15
Section 405(b)(13)	Report on Each Investigation Conducted by the OIG Involving Senior Government Employees (refer to statute for specific info required)	17
Section 405(b)(15)	Detailed Description of Any Attempt to Interfere with OIG Independence (see statute for specifics)	26
Section 405(b)(16)	Closed Reports Not Disclosed to the Public	26

¹⁸This section was derived from Section 5 of the Inspector General Act of 1978 (IG Act), Pub. L. 95–452, which was set out in a former Appendix to Title 5. On December 23, 2022, the IG Act was amended by Pub. L. 117–263, div. E, Title LII, which recodified the IG Act at 5 U.S.C. §§ 401–424 (including the semiannual reporting requirements), before being repealed and reenacted on December 27, 2023, by Pub. L. 117–286. For applicability of those amendments to this section, refer to Section 5(b) of Pub. L. 117–286, Transitional and Savings Provisions. The semiannual reporting requirements of former Section 5 and the recodified 5 U.S.C. § 405(b) apply to the AOC’s OIG through the Architect of the Capitol Inspector General Act of 2007, as amended, Title 2 U.S.C. § 1808(d)(1) states, “Each Inspector General shall, not later than April 30 and October 31 of each year, prepare semiannual reports summarizing the activities of the Office during the immediately preceding six-month periods ending March 31 and September 30.”

APPENDIX B: Peer Reviews Conducted During the Reporting Period

There was no peer review activity during the reporting period.

APPENDIX C: Definitions of Terms Used in This Semiannual Report

Term	Definition
funds put to better use	A recommendation that funds could be used more efficiently if management took action(s) to implement and complete the recommendation.
management decision	The evaluation by the management of an establishment of the findings and recommendations included in an audit report and the issuance of a final decision by management concerning its response to the findings and recommendations, including actions concluded to be necessary.
open-resolved	AOC Management has agreed (concur) to implement the recommendation or has proposed corrective actions that will address the recommendation.
open-unresolved	AOC Management disagrees with the recommendation (non-concur); does not provide a response or has not proposed corrective actions that will address the recommendation. Recommendations remain open unresolved until the AOC submits a corrective action plan that addresses the findings and recommendations and the AOC OIG accepts the plan.
potential cost savings	The sum of questioned costs and recommendations that funds be put to better use.
questioned cost	A cost that is questioned because (1) of an alleged violation of a provision of a law, regulation, contract or other agreement or document governing the expenditure of funds; (2) the cost is not supported by adequate documentation or (3) the expenditure of funds for the intended purpose is unnecessary or unreasonable.
unsupported cost	A cost that is questioned because the OIG found that, at the time of the audit, such cost is not supported by adequate documentation.



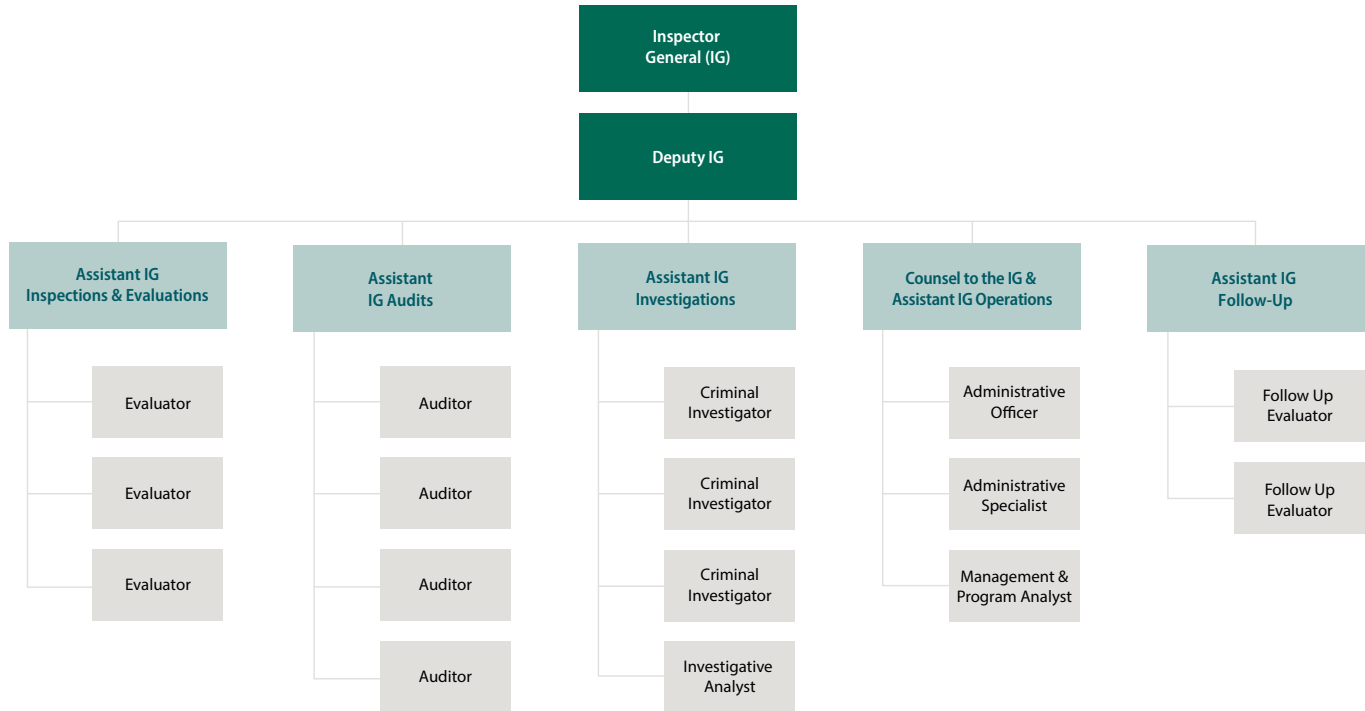


LIST OF ACRONYMS USED IN THIS REPORT

AOC	Architect of the Capitol	ITSM	Information Technology Service Management
BIM	Building Information Modeling	NFC	National Finance Center
CAO	Chief Administrative Officer	OCFO	Office of the Chief Financial Officer
CCJV	Clark/Christman, A Joint Venture	OCSO	Office of the Chief Security Officer
CHOB	Cannon House Office Building Renewal	OIG	Office of Inspector General
CIGIE	Council of the Inspectors General on Integrity and Efficiency	OMB	Office of Management and Budget
CMc	construction manager as constructor	PCO	potential change order
CO	Contracting Officer	PII	personally identifiable information
COR	Contracting Officer's Representative	POA&M	Plan of Action and Milestones
CSO	Chief Security Officer	POC	point of contact
CUEC	Complementary User Entity Control	PPM Memo	Planning and Project Management Memorandum
DI/DR	Diversity, Inclusion and Dispute Resolution Office	PSP	Policy and Special Programs
EEO	Equal Employment Opportunity	PWFA	Pregnant Workers Fairness Act
FISMA	Federal Information Security Modernization Act of 2014	QC	quality control
FY	Fiscal Year	RMAB	Records Management and Archives Branch
GAO	Government Accountability Office	SAR	Semiannual Report
HCMD	Human Capital Management Division	SOC 1[®]	System and Organization Controls
HSAA	House Sergeant at Arms	SOP	standard operating procedure
HVAC	Heating, Ventilation and Air Conditioning	SR	Senior Rated
IG	Inspector General	TWAI	Treasury Web Application Infrastructure
IPA	independent public accounting firm	ULO	unliquidated obligation
IPP	Invoice Processing Platform	USAO	United States Attorney's Office
IT	information technology	U.S.C.	United States Code
ITD	Information Technology Division	USCP	United States Capitol Police



OFFICE OF INSPECTOR GENERAL ORGANIZATION CHART



Report Fraud, Waste and Abuse



OIG Website Hotline Report <http://aocoig.oversight.gov>



Email Hotline@aoc-oig.org



Confidential Toll-Free Hotline 877.489.8583



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

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