

ARCHITECT OF THE CAPITOL

SEMIANNUAL REPORT TO CONGRESS

Office of Inspector General
April 1, 2024–September 30, 2024





INSPECTOR GENERAL MESSAGE



I am pleased to submit the Architect of the Capitol's (AOC's) Office of Inspector General (OIG) Semiannual Report (SAR) to Congress for the second half of Fiscal Year (FY) 2024. Every six months, the OIG provides Congress a report detailing our independence and oversight of the AOC during the

reporting period. This report highlights our activities for the six-month period from April 1, 2024, to September 30, 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.

This report is the AOC's 33rd SAR, and it is the 15th report of my seven-year tenure. During this tenure, the AOC OIG has identified \$8.6 million in potential cost savings (questioned costs + funds put to better use) and issued more than 280 recommendations.

During this reporting period, across the AOC's programs and operations, our office initiated 4 audits, 4 evaluations, and 8 investigations and closed 3 audits, 2 evaluations and 8 investigations. 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 \$820,572.55 in questioned costs and provided valuable efficiencies and safety, security and internal control

enhancements. 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.

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. We are appreciative that, when they see something, they say something—an action that greatly supports OIG work.

The OIG staff welcomes Architect of the Capitol Thomas E. Austin to his new role. Mr. Austin is the seventh Architect or Acting Architect during my tenure, and I look forward to working cooperatively and independently 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 and operations.

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 Architect, Congress and the public with valuable oversight of the funds spent in support of our symbols of democracy.



OIG PRODUCTIVITY

Reporting Period
April 1, 2024–September 30, 2024

40 Projects in
Progress at Start of
Reporting Period

78 Projects
Initiated During
Reporting Period

77 Projects
Completed During
Reporting Period

41 Projects in
Progress at End of
Reporting Period





OUR MISSION

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

OUR VISION

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



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Inspector General Act

The Architect of the Capitol Inspector General Act of 2007, Title 2 United States Code (U.S.C.) § 1808, establishes the OIG as an independent, objective office within the AOC and applies certain sections of the Inspector General Act of 1978, 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 Title 2 § 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 (SARs), note their impact on the economy and efficiency or the prevention and detection of fraud, waste 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

Evaluation of Cannon House Office Building Renewal Project's Construction Materials ([OIG-AUD-2024-05](#))

The OIG contracted with an independent public accounting firm (IPA) to conduct an evaluation of the CHOBr Project's construction materials. The objectives of the evaluation were to determine whether the materials used for Phase 4 of the CHOBr Project complied with contractual requirements and to assess the quality of the work performed.

The OIG determined that the materials used for Phase 4 of the CHOBr Project complied with contract requirements and the quality of the work performed was also compliant with contractual standards.

The OIG served as the Contracting Officer's Representative (COR), overseeing contract requirements and transmitting the IPA's final report on August 1, 2024.

The IPA issued no recommendations in the report.

Audit of the Architect of the Capitol's Construction Division ([OIG-AUD-2024-06](#))

The OIG contracted with an IPA to conduct a performance audit of the AOC Construction Division's (CD) projects. The objectives of the audit were to determine if CD projects address stakeholder needs and if the CD completes its projects in a timely and cost-effective manner.

The OIG determined that the CD projects sampled for the performance audit did address stakeholder needs and were completed in a timely and cost-effective manner. However, the OIG found that the AOC lacks formal processes and standard operating procedures (SOP) to ensure the agency is fully using resources dedicated to construction projects. Additionally, the CD needs to improve its data-collection process for trade labor, which would assist the AOC in its management of construction resources.

The OIG served as the COR, overseeing contract requirements and transmitting the IPA's final report on September 26, 2024.

The IPA made three recommendations to correct the findings, and the AOC concurred.



AUDIT DIVISION PROJECTS IN PROGRESS

Fiscal Year 2024 Financial Statement Audit (2024-AUD-002-A)

The OIG has contracted with an IPA to perform an audit of AOC financial statements as of and for the Fiscal Year (FY) ending September 30, 2024. The IPA is responsible for conducting the audit in accordance with auditing standards generally accepted in the United States; the standards applicable to financial audits contained in Government Auditing Standards,¹ issued by the Comptroller General of the United States under the Government Accountability Office (GAO); Office of Management and Budget (OMB) Bulletin No. 24-02, Audit Requirements for Federal Financial Statements;² the GAO's Federal Information System Controls Audit Manual;³ and the GAO/Council of the Inspectors General on Integrity and Efficiency (CIGIE) Financial Audit Manual.⁴ Specifically, the IPA is responsible for providing an opinion on whether the financial statements that were prepared by AOC management, with the oversight of those charged with governance, were prepared in all material respects in accordance with the applicable financial reporting framework.

The OIG announced this audit on April 4, 2024. The OIG is serving as the COR, overseeing contract requirements. The OIG plans to transmit the IPA's final report in November 2024.

Audit of the Architect of the Capitol's Senate Furniture Program (2024-AUD-003-A)

The OIG initiated an audit of the AOC Senate Office Buildings' Furniture Program (i.e., the Senate Furniture Program). The objective of this audit is to assess the efficiency and effectiveness of the AOC's Senate Furniture Program. Specifically, the OIG will evaluate the AOC's policies, procedures and processes for acquiring,

safeguarding, transferring and disposing of Senate furniture to determine if the program is operating efficiently and effectively.

The OIG announced this audit on June 7, 2024. The OIG plans to issue the final report in April 2025.

Audit of the Architect of the Capitol's CHOBr Project's Substantial and Final Completion for Phase 3 and Phase 4 (2024-AUD-004-A)

The OIG has contracted with an IPA to perform an audit of substantial and final completion activities for the CHOBr Project. The objective of the audit is to determine if the CHOBr Project's Phase 3 and Phase 4 reported and projected substantial and final completion dates are accurate and reliable, while assessing if the designation of substantial and final completion is being managed effectively and in accordance with contractual requirements.

The OIG announced this audit on July 19, 2024. The OIG is serving as the COR, overseeing contract requirements. The OIG plans to transmit the IPA's final report in April 2025.

Audit of the Architect of the Capitol's CHOBr Project's Contract Labor (2024-AUD-005-A)

The OIG has contracted with an IPA to perform an audit of CHOBr Project's contract labor. The objective of the audit is to determine if the CHOBr Project's Phase 3 and Phase 4 contract labor complied with contract requirements and/or specifications and applicable federal laws and regulations.

The OIG announced this audit on September 10, 2024. The OIG is serving as the COR, overseeing contract requirements. The OIG plans to transmit the IPA's final report in July 2025.

¹GAO. 2018. Government Auditing Standards (Yellow Book). <https://www.gao.gov/yellowbook>.

²OMB. 2024. Bulletin No. 24-02, Audit Requirements for Federal Financial Statements. <https://www.whitehouse.gov/wp-content/uploads/2024/07/OMB-Bulletin-No.-24-02.pdf>.

³GAO. 2009. Federal Information System Controls Audit Manual. <https://www.gao.gov/assets/gao-09-232g.pdf>.

⁴GAO. 2022. Financial Audit Manual. https://www.gao.gov/financial_audit_manual.

INSPECTIONS AND EVALUATIONS

COMPLETED ACTIVITY THIS REPORTING PERIOD

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

The OIG contracted with an IPA to evaluate AOC Contracting Officer (CO) and COR oversight duties. The objective of this evaluation was to determine if COs and CORs were 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.

This evaluation determined that the AOC's organizational structure hinders the ability of COs and CORs to provide proper oversight of contracts. Specifically, the OIG concluded that (1) the AOC's organizational reporting structure for acquisition limits CO authority and independence, (2) independent government estimates (IGE) are accessible to non-AOC personnel, (3) the AOC lacks formal policies and procedures for COR selection/nomination, (4) the AOC's tracking of COR certifications and trainings need improvement as well as the COR certification process (5) appropriations law training is not required for CORs, (6) Some CORs do not consistently or adequately maintain oversight documentation and (7) The AOC lacks detailed guidance for COR file audits and CO accountability.

The OIG served as the COR, overseeing contract requirements and transmitting the IPA's final report on June 12, 2024.

The IPA made 13 recommendations to improve CO and COR oversight, and AOC management concurred.

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

The OIG contracted with an IPA to evaluate the AOC's Human Capital Management Program (HCMP). The objective of this evaluation was to assess the efficiency, effectiveness and internal controls of the program's activities and operations in accordance with AOC policies, procedures, organizational transformation milestones, Human Capital Strategy (HCS) and applicable federal laws and regulations.

This evaluation determined that the Human Capital Management Division (HCMD) employs structured procedures for creating and disseminating AOC policy. However, the OIG found deficiencies within HCMD activities, operations and internal controls (i.e., control environment, control activities, information, communications and monitoring). Specifically, the OIG concluded that (1) communication, maintenance, and implementation of human capital policies were deficient; (2) there were HCMD operational inefficiencies within the agency; (3) there were gaps in policy guidance and processes as well as deficiencies in oversight procedures; and (4) there were instances of noncompliance with HCMD-owned policies at both the division and jurisdiction levels.

The OIG served as the COR, overseeing contract requirements and transmitting the IPA's final report on August 29, 2024.

The IPA made 12 recommendations to improve HCMP activities and operations across the AOC, and AOC management concurred.

INSPECTIONS AND EVALUATIONS DIVISION PROJECTS IN PROGRESS

Evaluation of the Architect of the Capitol's Implementation of Information Security Modernization Fiscal Year 2024 (2024-0004-IE-P)

The OIG has contracted with an IPA to evaluate the AOC's information security programs and practices. The objective of the evaluation is to determine whether the AOC developed and implemented effective information security programs and practices when compared to

Federal Information Security Modernization Act of 2014 (FISMA) standards.⁵ The AOC is not required to follow FISMA, but it is a best practice and will be used as criteria for the evaluation.

The OIG announced this evaluation on September 16, 2024. The OIG is serving as the COR, overseeing contract requirements. The OIG plans to transmit the IPA's final report in May 2025.

⁵Pub. L. No. 118-283. Federal Information Security Modernization Act of 2014. <https://www.congress.gov/bill/113th-congress/senate-bill/2521/text>.



Evaluation of the Architect of the Capitol's Supply Chain Risk Management (2024-0003-IE-P)

The OIG has contracted with an IPA to evaluate the AOC's Supply Chain Risk Management program and activities. The objective of the evaluation is to determine the extent to which the AOC implemented an organizational supply chain risk management process and program that identifies, assesses, mitigates and responds to supply

chain risk throughout the agency. The OIG will also determine if vulnerabilities exist for fraud, waste, abuse and mismanagement.

The OIG announced this evaluation on September 12, 2024. The OIG is serving as the COR, overseeing contract requirements. The OIG plans to transmit the IPA's final report in June 2025.

FOLLOW-UP

COMPLETED ACTIVITY THIS REPORTING PERIOD

Follow-Up Evaluation of the Architect of the Capitol Data Center (OIG-FLD-2024-01)

The OIG announced a follow-up evaluation of the AOC's Data Center on September 12, 2023. The objective of this follow-up evaluation was to determine whether the AOC had effectively implemented corrective actions to address findings and recommendations in the OIG's 2019 report Audit of the Architect of the Capitol Data Center.⁶ The OIG issued the official report to the AOC on May 9, 2024.

The OIG found that the AOC implemented the OIG 2019 audit recommendations by complying with updated procedures for requesting Data Center access for non-Information Technology Division (ITD) personnel. In addition,

the OIG observed that the AOC enhanced its communication and coordination efforts for OSF tenants by providing monthly updates to stakeholders and publishing emergency communication procedures. However, the OIG found that the AOC did not comply with procedures to monitor AOC Data Center access. Specifically, the ITD did not comply with its SOP that required them to create and maintain an ITD Authorized Access List for proxy card access and to conduct annual validation and quarterly reconciliation of access to the AOC Data Center in the Off-Site Facility (OSF).

The OIG made three recommendations to improve monitoring of AOC Data Center access, and AOC management concurred.

FOLLOW-UP DIVISION PROJECTS IN PROGRESS

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 November 2024.

⁶AOC OIG. 2019. Audit of the Architect of the Capitol Data Center, Report No. OIG-AUD-2019-04. https://www.oversight.gov/sites/default/files/oig-reports/Final%20Audit%20of%20the%20Capitol%20Data%20Center%20OIG-AUD-2019-04_Redacted.pdf.

⁷AOC OIG. 2019. Evaluation of the Architect of the Capitol's 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>.



Capitol South Station
Mezzanine
Elevator



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 41 complaints. From those complaints, investigators opened eight investigations. We referred 14 complaints to other government agencies, AOC program offices and/or AOC Avenues of Assistance. Seven cases were referred for prosecutorial consideration.

Executive Order 14074, Advancing Effective, Accountable Policing and Criminal Justice Practices to Enhance Public Trust and Public Safety, Section 10(c),⁸ requires that federal law enforcement agencies provide an annual report and post publicly the number of no-knock entries that occurred pursuant to judicial authorization, the number of no-knock entries that occurred pursuant to exigent circumstances and disaggregated data by circumstances for no-knock entries in which a law enforcement officer or other person was injured in the course of a no-knock entry. The AOC OIG had zero instances of no-knock entries to report during this reporting period.

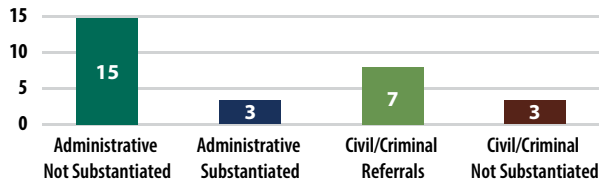
⁸Executive Order 14074. May 25, 2022. Advancing Effective, Accountable Policing and Criminal Justice Practices to Enhance Public Trust and Public Safety. <https://www.whitehouse.gov/briefing-room/presidential-actions/2022/05/25/executive-order-on-advancing-effective-accountable-policing-and-criminal-justice-practices-to-enhance-public-trust-and-public-safety/>.

Table A: Investigative Data This Reporting Period

Investigative Activity	Count
Complaints	
Hotline Complaints Received (phone and/or email)	16
Complaints Received (walk-ins)	0
Direct Phone or Email to the OIG	20
U.S. Mail or Facsimile Machine	0
OIG-observed or -developed	5
Total Complaints	41
Investigations	
Investigations Opened	8
Investigations Closed	8
Issuance of Subpoenas	
OIG Subpoenas Served	16
Grand Jury Subpoenas Served	17
Allegations Not Substantiated or Disproven by the OIG	15
Allegations Substantiated by the OIG	3
Disciplinary Actions Resulting from Administrative Investigations	
AOC Management Actions Pending	1
Employee Removals/Resignations/Retirements (in lieu of)	1
Employee Reprimands/Warnings/Counseling	2
Employee Suspensions/Reduction in Grade	1
Total Disciplinary Actions	4
Referrals	
Criminal/Civil Investigation Referrals	
Accepted for Prosecution ¹	1
Declined for Prosecution ²	2
Prosecutorial Decision Pending	4
Administrative Investigation Referrals	
Informal Referrals (to AOC Program Offices, no follow-up or report required)	4
Formal Referrals (follow-up required within 60-90 days)	8
Law Enforcement Referrals	2
Employee Assistance Referral (to AOC Avenue of Assistance)	0
Total Referrals	14

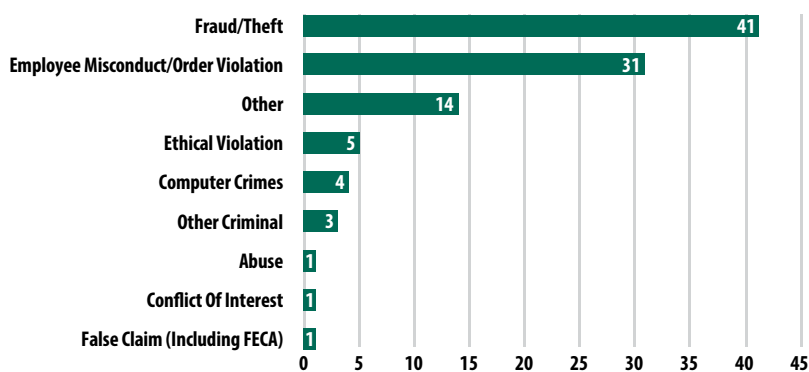
¹Reflects one investigation opened during previous periods.

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

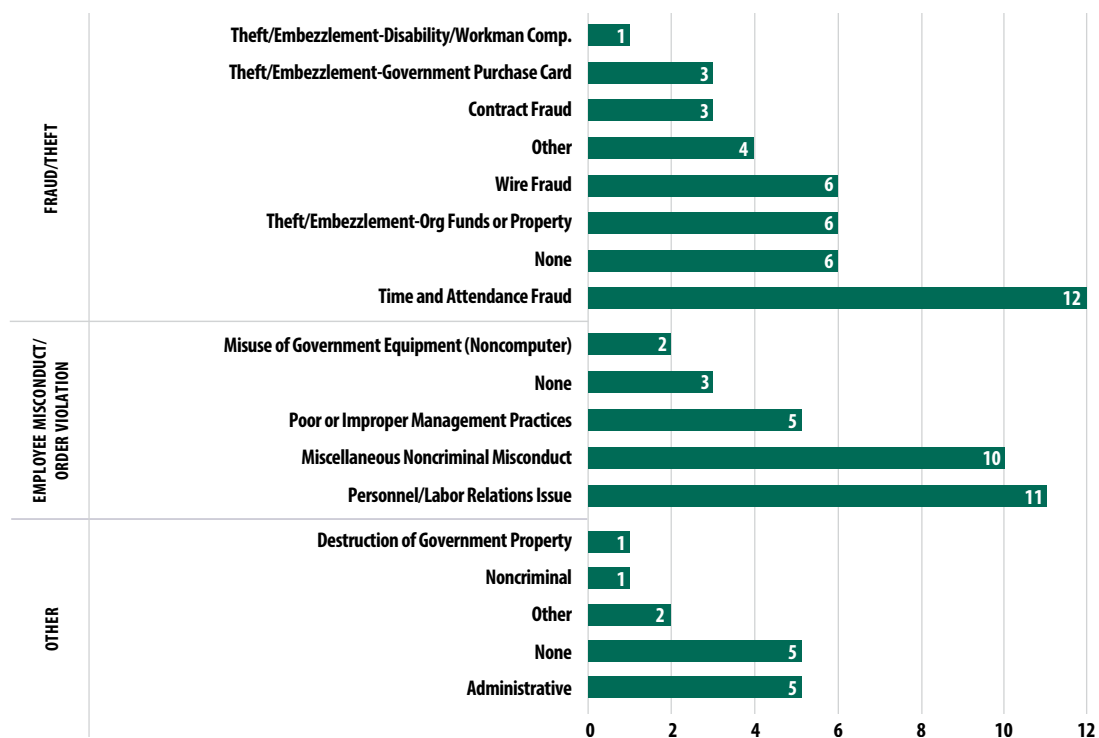
Note: This chart reflects the outcome of investigations only.
An investigation may have more than one charge associated with each case.

Figure 1 highlights the number of charges, both substantiated and not substantiated, as well as criminal and civil referrals for the eight investigations closed during the reporting period. There were 18 identified administrative charges. Of those, the OIG substantiated three. Two of the substantiated administrative charges have been adjudicated by the agency during this reporting period. Management action is pending regarding the one remaining substantiated charge. There were 10 criminal/civil charges. Three criminal and civil charges were identified and not substantiated. The OIG made seven criminal/civil referrals to the USAO or other prosecutorial entities.

FIGURE 2: Investigations Division Violations by Category

Note: The Other category includes violations that did not meet certain case criteria when initiated.

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

FIGURE 3: Top Three Violations by Subcategory

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 the 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.



OPEN INVESTIGATIONS

The OIG currently has 15 open investigations:

- 2023-0002-INVI-P
- 2023-0010-INVI-P
- 2023-0016-INVI-P
- 2024-0004-INVI-P
- 2024-0005-INVI-P
- 2024-0009-INVI-P
- 2024-0010-INVI-P
- 2024-0013-INVI-P
- 2024-0015-INVI-P
- 2024-0018-INVI-P
- 2024-0019-INVI-P
- 2024-0020-INVI-P
- 2024-0021-INVI-P
- 2024-0022-INVI-P
- 2024-0023-INVI-P

Per OIG policy, the OIG is unable to comment about ongoing investigations. The OIG anticipates closing these investigations during the next reporting period or as soon as practical.

CLOSED INVESTIGATIONS INVOLVING SENIOR GOVERNMENT EMPLOYEES

Attempted Identity Theft ([2024-0011-INVI-P](#))

Suspected Violations of Title 18 U.S.C. § 1028 Fraud and Related Activity in Connection with Identification Documents, Authentication Features and Information; Title 18 U.S.C. § 1343 Fraud by Wire, Radio or Television and Title 18 U.S.C. § 1344 Bank Fraud.

Unresolved and Referred to Other Law Enforcement Agencies.

The OIG initiated an investigation after being notified that an unknown person had emailed the AOC's HCMD and attempted to update a Senior Rated (SR) employee's direct deposit information. The OIG's investigation identified that the account used to email the HCMD, as well as additional email accounts owned by the same individual, all originated from a foreign country. Additional information obtained by the OIG identified an associated suspect who resides within the United States, has been arrested for similar bank fraud schemes and has also been identified as having attempted to wire money to the same foreign country as the email account owner. The OIG provided all information obtained to multiple law enforcement agencies, including a Financial Crimes Task Force in the area of the United States where the suspect resides. The Financial Crimes Task Force agreed to investigate the matter further. As such, the OIG has closed its investigation pending additional reported incidents or requests for assistance.

Senior Manager Alleged to Have Influenced a Contract for the Architect of the Capitol ([2024-0002-INVI-P](#))

Suspected Violations of the AOC Standards of Conduct and Government Ethics Policies and the AOC Contracting Manual.

Not Substantiated.

The OIG received an allegation that a senior manager at the AOC improperly influenced a contract with a technology company that provides information technology and cybersecurity support to the AOC. The senior manager had previously been employed by the company, during which time they provided direct contract support and program management to the AOC. The allegation further claimed that the senior manager had increased the number of contractors from the company working on AOC projects. The OIG obtained documentation from the AOC Office of General Counsel that confirmed the senior manager had divested all financial interests, including non-vested shares, in the technology company. Furthermore, the former Acting Architect of the Capitol granted the senior manager's request to be recused from procurement functions involving the technology company for one year. Additional investigative steps determined the senior manager properly followed AOC protocol and did not violate any AOC policies. The case is closed.



CLOSED INVESTIGATIONS AWAITING MANAGEMENT ACTION

Misuse of Government-Issued iPhone (2024-0017-INVI-P)

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

Suspected Violations of the AOC IT Resources and De Minimis Use Policy and the ITD Rules of Behavior. **Not Substantiated.**

The OIG received an allegation that an AOC employee used their AOC-issued mobile iPhone to send inappropriate images of their child on multiple occasions to their supervisor to advise them of the child's health status and support their request for leave. The OIG's investigation did not identify violations of criminal law or find that the employee had intent to violate AOC policies; however, the employee unknowingly committed violations of AOC policy while attempting to provide medical information to their supervisor. Because the employee was not provided with the ITD Rules of Behavior and related documentation was not on file, the OIG did not substantiate violations of ITD policy. The case is closed, and management action is pending.

CLOSED INVESTIGATIONS WITH NO RESPONSE PENDING

Misuse of Government Fuel Cards (2024-0016-INVI-P)

Suspected Violations of the AOC Fleet Management Policy, Waste and Theft. **Substantiated.**

The OIG received an allegation that a U.S. General Services Administration fuel card intended for diesel fuel purchases for a short-term box truck rental had instead been used to purchase 15.71 gallons of unleaded regular fuel (\$67.55). The investigation identified sufficient evidence to label the purchase as theft and waste due to the lack of oversight and procedural policies to track and monitor vehicle usage, vehicle keys and fuel cards. Additionally, the lack of controls and overall management of the jurisdiction's vehicle fleet caused violations of AOC policy and left the AOC vulnerable to additional instances of waste and abuse. As a result, the AOC retrained all operators on AOC policy and vehicle SOPs. The vehicle keys and fuel cards are now kept together and maintained in the electronic key system, which will ensure tracking and reduce the possibility of additional waste and abuse. The case is closed.



Allegation That Architect of the Capitol Employee Submitted a False Resume When Applying for Current Position (2024-0014-INVI-P)

Suspected Violations of the AOC Standards of Conduct Policy, the AOC Career Staffing Plan Policy and Title 18 U.S.C. § 1001 Statements or Entries Generally. **Not Substantiated.**

The OIG received an allegation that an employee falsified their resume work history when applying to the AOC, which resulted in them being unqualified for a position they were hired for. The investigation determined that, although the employee's resume pertaining to previous employment history was vague, they did not falsify any information. Further, it was determined that the employee was a member of a local union for their position and had historical job references that stated the employee had performed similar job-related skills for years before being hired at the AOC. The case is closed.

Congressional Office Gifts (2024-0012-INVI-P)

Suspected Violation of Appropriations Law. **Not Substantiated.**

The OIG initiated an investigation into potential violations of the Antideficiency Act, Title 31 U.S.C. § 1341(a),⁹ and the Purpose Statute, Title 31 U.S.C. § 1301(a),¹⁰ based on articles published by Politico and Roll Call alleging that the AOC created gavels made from fallen trees on the Capitol campus at the request of former Speaker of the House Kevin McCarthy. The investigation found that Speaker McCarthy's request for gavels was approved. AOC personnel located several pieces of suitable wood to create eight gavels, and the gavels were delivered to Speaker McCarthy.

The investigation did not determine by a preponderance of the evidence that any funds expended on the creation

of the gavels were in excess of legally available amounts or expended in violation of a statutory prohibition in violation of the Antideficiency Act. To determine a violation of the Purpose Statute, the GAO applies a three-part test known as the necessary expense rule. After conducting this test, the OIG again did not determine that any funds expended violated the Purpose Statute. The OIG has referred this matter to the House Committee on Ethics to determine whether any actions by Speaker McCarthy violated the House of Representatives Code of Official Conduct. The case is closed.

Inappropriate Relationship Between Supervisor and Subordinate Employee (2024-0007-INVI-P)

Supervisor: Suspected Violations of the AOC Relationships Between Supervisors and Subordinates Policy and the Standards of Conduct Policy. **Not Substantiated.**

Employee: Suspected Violations of the AOC Career Staffing Plan Policy, the Relationships Between Supervisors and Subordinates Policy and the Standards of Conduct Policy. **Not Substantiated**

The OIG received an allegation that a supervisor hired an employee despite their alleged lack of knowledge, skills and ability for the position in addition to engaging in a romantic relationship with the subordinate employee. The investigation did not find sufficient evidence to substantiate charges related to an inappropriate romantic relationship and revealed that the employee was hired under direct-hire authority, which can be used when there is a severe shortage of qualified candidates and exempts applicants from traditional competitive rating and ranking requirements. The interview panel agreed that the employee was the best qualified candidate for the position at the time. The case is closed.

⁹Title 31 U.S.C. § 1341(a), Limitations on Spending and Obligating Amounts. <https://uscode.house.gov/view.xhtml?path=/prelim@title31/subtitle2/chapter13/subchapter3&edition=prelim>.

¹⁰Title 31 U.S.C. § 1301(a), Purpose Statute. <https://uscode.house.gov/view.xhtml?path=/prelim@title31/subtitle2/chapter13&edition=prelim>.



MANAGEMENT ACTION RESULTING FROM INVESTIGATIONS REPORTED IN PREVIOUS SEMIANNUAL REPORTS

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, the AOC 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 AOC 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 the employee violated multiple AOC policies and submitted the administrative violations to the Acting Architect of the Capitol for action deemed appropriate, if any. The AOC issued a letter of reprimand to both the supervisor and the subordinate employee. The case is closed.

False Medical Documentation (2023-0015-INVI-P)

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

The OIG received an allegation that now former employee Mr. Daniel Money (WG-10, Air Conditioning Equipment Mechanic, Capitol Building) provided a fraudulent, unsigned medical excuse following his return from sick leave. Money's supervisor requested a medical excuse when it was suspected he was abusing sick leave. He provided an unsigned note alleging he was 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 Money had not been seen at the dental practice on the date and time provided on the medical excuse.

The OIG substantiated that Money 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. Money resigned from the AOC before management action being taken. The case is closed.

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

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

The OIG received an allegation that now former employee, Mr. James Newton (WG-4, Laborer [Recycler], Capitol Building) had misused his 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 Newton and identified another AOC employee to whom the employee had sent explicit images. In addition, Newton told the OIG that he had sent additional nude images of himself using applications downloaded and installed on his AOC-issued iPhone.

The OIG substantiated that Newton violated multiple AOC policies and submitted these violations to the agency for action deemed appropriate. Newton was removed from his position with the AOC. The case is closed.

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

Suspected Violations of the AOC Standards of Conduct and Privacy Policies. **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. In addition, the employee was alleged to have used their AOC mobile device to take photos of government documents containing the would-be volunteers' personally identifiable information (PII), which the employee emailed to their aoc.gov 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 submitted the administrative violations to the Architect of the Capitol for action deemed appropriate. The employee was issued a one-day suspension for their actions. The case is closed.

OTHER WORK

White Paper on the Research of the Architect of the Capitol's Management of Deferred Maintenance and Capital Renewals Report ([OIG-AUD-2024-04](#))

The OIG's research projects serve as a tool to gather information for future projects and determine whether a particular area warrants an audit or in-depth review. The objective for this research project was to gather information on the AOC's strategies for managing deferred maintenance and capital renewals. Specifically, the OIG collected information and data on how the AOC manages, monitors and tracks deferred maintenance and capital renewals and the strategies used to reduce the backlog.

The OIG concluded that the AOC's management of deferred maintenance and capital renewals within its Enterprise Asset Management (EAM) program is progressing. In December 2023, the EAM program received certification for compliance to ISO 55001¹¹ regarding the John Adams Building's asset management system. Based on the OIG's review, it determined that an in-depth review or audit was not warranted. The OIG will reassess once the EAM program is fully implemented.

The OIG issued this white paper on May 3, 2024.

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 did not issue any Management Advisories with recommendations to the AOC during the reporting period.



¹¹ISO 55001:2014, Asset Management — Asset Management System — Requirements.



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 commenting on AOC draft guidance documents as part of the OIG's 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. The OIG's review is an integral part of its effort to identify and prevent fraud, waste and abuse. During this reporting period, the OIG reviewed 11 orders or other policy or guidance documents, which are described in Table B.

TABLE B: Review of AOC Legislation and Policies

Document No.	Title	Description
AOC Order 4-2	Parking Program Policy	This new order establishes the AOC Parking Program and describes the framework to implement, administer and manage staff parking. It addresses eligibility, exclusions, responsibilities, office/jurisdiction parking POCs, enforcement and alternatives for eligible permanent and specific third-shift temporary AOC employees.
AOC Order 6-1	Photography, Video and Audio Recording in Congressional Offices and Committee Spaces Policy	This new order outlines the requirements for photography, video and audio recording in congressional offices or committee spaces.
AOC Order 7-4	Cybersecurity Policy	This revised order establishes the policy, requirements and responsibilities to protect information systems under the authority or control of the Architect of the Capitol. The order also elaborates on responsibilities and requirements for using artificial intelligence.
AOC Order 28-3	Stormwater Retention Credit Board Charter	This new order establishes the authority, scope, composition, function and responsibilities of the AOC Stormwater Retention Credit Board to comprehensively monitor and manage AOC stormwater credits.
AOC Policy Memorandum 34-1	Contracting Officer's Representative (COR) Training Requirements	The purpose of this memorandum is to update the training requirements for AOC CORs. This memorandum supersedes the COR requirements in AOC Order 34-1 Contracting Manual Section 13.1.2 COR (a) (1)-(4).
AOC Order 36-2	Access to Records	This revised order supersedes AOC Order 36-4, Access to Records Maintained in the Curator's Office, Records Management Branch, and Photography Branch, dated June 26, 2001, and outlines the record types made available by the Curator's Division, which includes the Curator's Office, the Records Management and Archives Branch and the Photography and Technical Imaging Branch.
AOC Order 37-1	Preservation Policy and Standards	This revised order provides added definitions and clarifications of common preservation terminology, establishes the roles and responsibilities of AOC personnel and sets forth treatment standards for preservation of the AOC Heritage Assets.
AOC Order 42-8	Contractor Personnel Suitability Policy	This revised order formalizes the AOC's Personnel Suitability Program Policy and establishes requirements enabling the AOC to operate an efficient and cost-effective personnel suitability program. This program will ensure accurate, timely and equitable suitability determinations of an individual's eligibility for access to sensitive information and/or facilities.
AOC Order 630-2	Family and Medical Leave Act Policy	This order serves as a wholesale update to AOC Order 630-2 Family and Medical Leave Act (FMLA) Policy, published August 23, 2013. Changes from the 2013 policy include updates to office/program names, the addition of required language and clarifications to various leave items covered under the law. This policy also establishes uniform procedures for requesting leave under the FMLA.

TABLE B: Review of AOC Legislation and Policies *(continued)*

Document No.	Title	Description
AOC Order 310-1	Employment of Relatives	This revised order sets forth the AOC's policy on the employment of relatives. The policy provides guidance to AOC officials and employees regarding the appointment, employment, promotion or advancement of relatives for AOC positions.
AOC Order 900-3	Transit Benefits Program Policy	This revised order sets forth the AOC's policy for its Transit Benefits Program and prescribes responsibilities and procedures for program administration. Transit subsidies are available to eligible AOC employees for commuting costs involving public mass transportation.

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

There were no instances of the OIG disagreeing with the disciplinary action taken by agency management following the referral of OIG investigations.

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

The Peace Corps OIG commenced a peer review of the Audit Division during the reporting period. The final report is expected in November 2024.

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 functions 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 Book¹² standards. There were no outstanding recommendations in the final report.

FOLLOW-UP

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

INVESTIGATIONS

The OIG conducted an external peer review, in accordance with the CIGIE Quality Standards for Investigations, of the Corporation for Public Broadcasting during this rating period.¹³

¹²CIGIE. 2020. Quality Standards for Inspection and Evaluation (Blue Book). <https://www.ignet.gov/sites/default/files/files/QualityStandardsforInspectionandEvaluation-2020.pdf>.

¹³CIGIE. 2011. Quality Standards for Investigations. <https://www.ignet.gov/sites/default/files/files/invprg1211appi.pdf>.



RECOMMENDATIONS

Table C through Table I reflect 119 recommendations associated with 20 reports. Of those, 40 recommendations were implemented and designated as closed-resolved and 79 remain open-resolved.¹⁴ 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.^{15,16}

TABLE C: Summary of Potential Cost Savings¹⁷ 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	2	\$0	\$0	\$0
OIG-AUD-2022-07	3	\$0	\$0	\$0
OIG-AUD-2023-04	6	\$0	\$734,800	\$734,800
OIG-AUD-2023-05	3	\$0	\$0	\$0
OIG-AUD-2023-06	8	\$29,324	\$0	\$29,324
OIG-AUD-2023-07	2	\$0	\$85,705	\$85,705
OIG-AUD-2023-08	3	\$0	\$0	\$0
OIG-AUD-2024-02	2	\$0	\$0	\$0
OIG-AUD-2024-06	3	\$0	\$0	\$0
2019-0001-IE-P	1	\$0	\$0	\$0
2021-0001-IE-P	3	\$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	1	\$0	\$0	\$0
2023-0002-IE-P	13	\$0	\$0	\$0
2023-0003-IE-P	12	\$0	\$0	\$0
OIG-FLD-2022-01	3	\$0	\$0	\$0
OIG-FLD-2023-01	2	\$0	\$0	\$0
OIG-FLD-2024-01	2	\$0	\$0	\$0
Total	79	\$44,709	\$820,505	\$865,214

¹⁴“Open-resolved” means that AOC management has agreed (concurred) to implement the recommendation or has proposed corrective actions that will address the recommendation.

¹⁵OMB. 1982. OMB Circular No. A-50 Revised, Audit Followup. <https://www.whitehouse.gov/wp-content/uploads/2017/11/Circular-050.pdf>.

¹⁶While 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.

¹⁷“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	2	<p>Report Summary: The OIG performed an audit of the AOC's unliquidated obligations (ULO).</p> <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>
		2	<p>Recommendation: We recommend AOC management execute the process that assesses and monitors payment accuracy in its program and activities every one to three years.</p> <p>AOC Management Decision: Concur. The OCFO will execute their updated enterprise risk assessment process to assess and monitor payment accuracy in its program and activities every one to three years.</p> <p>OIG Response: 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 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 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 Office of the Chief Security Officer (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>
		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>

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 coordinate with the USCP 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	2	<p>Report Summary: The OIG performed an audit of the contract provisions of AOC multimillion-dollar construction projects.</p> <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>

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 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>
	<p>OIG-AUD-2023-04</p> <p>March 30, 2023</p> <p>Review of the Architect of the Capitol's Multimillion-Dollar Construction Project Change Order</p>	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.</p> <p>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>

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 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. 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>
		4	<p>Recommendation: We recommend the AOC perform the following:</p> <ol style="list-style-type: none"> Recover the questioned costs of \$2,716.00 identified within the R-Tunnel Project to the extent legally and administratively possible Review the insufficiently supported questioned costs of \$478,557.00 (\$481,273.00 – \$2,716.00) identified within the CHOB 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 CHOB 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 CHOB 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>

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 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>
	OIG-AUD-2023-06 September 6, 2023 The Architect of the Capitol Lacked Sufficient Oversight of the Cannon Caucus Room Renovations	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 Building Information Modeling (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 [Project] 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 construction manager as constructor (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>

TABLE D: Audits Unimplemented Recommendations *(continued)*

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		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>
		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 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	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>
		4	<p>Recommendation: We recommend the AOC review the insufficiently supported questioned costs identified within the Russell Exterior Envelope Project (\$66,449.00) and the Thurgood Marshall Federal Judiciary Building Administrative Office Space Realignments project (\$18,968.00) to determine if the costs are supported and allowable. For any of the costs deemed unsupported and/or unallowable, recover the costs to the extent legally and administratively possible. As applicable, recover any additional amounts resulting from the application of items, such as overhead and profits to the unallowable costs.</p> <p>AOC Management Decision: Concur. 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>
	OIG-AUD-2023-08 September 25, 2023 Cannon House Office Building Renewal Project's Punch List and Warranty Work Process Lacked Sufficient Oversight	4	<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 AOC consider tying the start of contractual warranty periods to final completion rather than to substantial completion to ensure 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>
		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 CHOB 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 CHOB Project.</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)
		9	<p>Recommendation: We recommend the CHOB Project team review all punch list items discovered during the one-year warranty inspection to determine how the quality control (QC) reviewers overlooked those items during prior inspections and whether the CHOB 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>
	OIG-AUD-2024-06 September 26, 2024 Audit of the Architect of the Capitol's Construction Division	1	<p>Report Summary: The OIG performed an audit of AOC CD projects.</p> <p>Recommendation: We recommend that the Architect of the Capitol develop standardized policies and procedures that govern how jurisdictions should evaluate and document their decision to either engage internal resources or hire external contractors.</p> <p>AOC Management Decision: Concur. The Office of the Chief Engineer will collaborate with the Chief of Operations to determine the appropriate methodology for engaging jurisdictions in the development and implementation of policies and procedures related to contractor or internal resource selection.</p> <p>OIG Response: Open-resolved.</p>
		2	<p>Recommendation: We recommend that the Construction Division develop or enhance the data-collection processes/system it uses to track staff's unassigned and underutilized hours to obtain better insight into its actual capacity and staffing needs.</p> <p>AOC Management Decision: Concur. The Office of the Chief Engineer will assess the Construction Division's (CD) existing data collection process and systems for making enhancements. At the conclusion of the assessment, an action plan will be developed and implemented that will provide a set of data that will be analyzed to understand if the data provides valuable insight into the CD's capacity and staffing needs. Should the data set yield substantive information, the OCE may implement the new data collection as standard process.</p> <p>OIG Response: Open-resolved.</p>
		3	<p>Recommendation: We recommend that the Construction Division finalize and formalize its standard operating procedures.</p> <p>AOC Management Decision: Concur. The AOC anticipates a new Director of Construction will be in place in early Fiscal Year 2025 and this will be a priority focus. Once in place, the Director will work with the CD to finalize and formalize its standard operating procedures.</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 [Fleet Management] 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 [Fleet Management] 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)
		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 [Fleet Management] 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>
	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 (CIO) 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 Information Technology Division will update AOC Order 8-4 [Accountable Information Technology Property] to incorporate defined program personnel roles and align requirements with the property management life cycle and all current program procedures.</p> <p>OIG Response: Open-resolved.</p>
		2	<p>Recommendation: We recommend the CIO 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 determined it would be most fiscally responsible to perform a single migration to the new, long-term ITSM [Information Technology Service Management] 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>

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 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 [Accountable Information Technology Property].</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	18	<p>Report Summary: The OIG performed an evaluation to determine whether the AOC developed and implemented effective information security programs and practices in accordance with FISMA.</p> <p>Recommendation: Due to the sensitive nature of this evaluation, specific language pertaining to findings and recommendations is protected and 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>
	2023-0003-IE-P August 29, 2024 Evaluation of the Architect of the Capitol's Human Capital Management Program	1	<p>Report Summary: The OIG performed an evaluation to assess the efficiency, effectiveness and internal controls of AOC HCMP activities and operations in accordance with AOC policies, procedures, transformation milestones, HCS and applicable federal laws and regulations. Our review of these items focused primarily on the applicability to hiring, retention, turnover and quality step increases (QSI).</p> <p>Recommendation: We recommend the CAO ensure consistent communication and collaboration between responsible parties. We recommend reviewing and assessing the human capital policy management roles and responsibilities to identify opportunities for improvement in human capital policy management and oversight. We also recommend enhancing or developing and implementing specific measures to foster consistent communication and collaboration between the HCMD and the PSP Division.</p> <p>AOC Management Decision: Concur. The AOC concurs with the recommendation and cites AOC Order 4-1 Issuing AOC Policy as its avenue for defining clear communication and collaboration requirements between the two responsible parties, which includes providing feedback and recommendations on policy drafts, collaborating throughout the process of obtaining and reconciling feedback on draft policies from stakeholders, and notification of and follow up on outdated policies in need of updating. Additionally, HCMD will hire a dedicated HCMD Policy Analyst who will identify opportunities for improvement and strengthen the agency's human capital policy management and oversight, further enhancing HCMD's communication and collaboration with the PSP Division as it develops new or revises draft policies. Completion is anticipated in the first quarter of FY 2025.</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: Per AOC Order 4-1 [Issuing AOC Policy], we recommend the CAO effectively execute the policy review process to verify the assignment of policies to the appropriate Office of Primary Responsibility within the AOC Policy Library, particularly following any transfers or changes in ownership between offices/jurisdictions.</p> <p>Additionally, this recommendation should include a focus on ensuring that, when applicable, policy memorandums reference the original order number and section of the overarching policies to maintain alignment with their provisions.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. The AOC notes the PSP Division as responsible for updating the data housed in the AOC Policy Library. The PSP Division updated ownership of policies in the fall of 2023 and has implemented an internal process to review ownership of policies annually to ensure all policies are appropriately aligned to the correct office/jurisdiction.</p> <p>OIG Response: Open-resolved.</p>
		3	<p>Recommendation: We recommend the CAO review and assess the policy governance framework over jurisdictions to identify opportunities to improve policy governance, standards and communication. We recommend enhancing or developing and implementing a comprehensive policy governance framework across all jurisdictions.</p> <p>Furthermore, this recommendation should include a focus on designating a POC at the HCMD to handle policy-related inquiries, thereby discouraging reliance on nondesignated resources and promoting adherence to policies.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. Policies are communicated via a variety of mediums, all at the agencywide, jurisdiction and individual employee levels. HCMD is currently recruiting a dedicated Policy Analyst whose work will include proactive communication and coordination with offices/jurisdictions across the AOC to enhance the policy governance framework for human capital policies and procedures. Completion is anticipated in the first quarter of FY 2025.</p> <p>OIG Response: Open-resolved.</p>
		4	<p>Recommendation: We recommend the CAO establish a review process that effectively addresses any inconsistencies or manual input errors encountered during preparation and submission of Standard Form 52s (SF-52s).</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. HCMD will establish a review process to ensure that inconsistencies or manual input errors that are not aligned with the AOC Career Staffing Plan Policy are appropriately addressed either during the preparation or submission of SF-52s by AOC offices and jurisdictions. Completion is anticipated in the third quarter of FY 2025.</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)
		5	<p>Recommendation: We recommend the CAO establish data management protocols, incorporating routine review and reconciliation of employee data, alongside procedures for data entry and updates.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. HCMD will implement data management quality review procedures to ensure consistency and reconciliation of employee data involving the agency's human resources information systems and applicable reports. Completion is anticipated in the third quarter of FY 2025.</p> <p>OIG Response: Open-resolved.</p>
		6	<p>Recommendation: We recommend the CAO revise the Feedback to Non-Selected Internal Candidates Interviewed Form to incorporate explicit criteria and pertinent evidence validating that feedback was extended to interviewed, nonselected internal candidates for vacant positions.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. HCMD will revise the Feedback to Non-Selected Internal Candidates Interviewed Form to identify the employee names and dates on which feedback was provided or offered to internal candidates who were interviewed for vacant positions. Completion is anticipated in the third quarter of FY 2025.</p> <p>OIG Response: Open-resolved.</p>
		7	<p>Recommendation: We recommend the CAO establish clear procedures and defined timelines for administering and conducting exit interviews with separating employees.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. HCMD will strengthen and regularly communicate the process for offering separating employees the opportunity to participate in the online exit interview survey program. Completion is anticipated in the third quarter of FY 2025.</p> <p>OIG Response: Open-resolved.</p>
		8	<p>Recommendation: We recommend the CAO review and assess AOC Order 4-1 [Issuing Architect of the Capitol Policy] protocols for update and retirement of outdated policies and identify opportunities to improve policy protocol activities. We recommend enhancing or developing and implementing protocol measures to affect timely updates to older policies and the prompt retirement or revision of outdated or unclear policies, ensuring continuous alignment with regulatory requirements and organizational objectives.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. AOC Order 4-1 [Issuing AOC Policy] will be updated as a part of the regular policy review cycle to include updated protocols. HCMD is also hiring a Policy Analyst whose responsibilities will include coordinating with the PSP Division to ensure outdated HCMD policies are updated in a timely manner, in accordance with AOC Order 4-1, and aligned to regulatory requirements and organization objectives. Completion is anticipated in the fourth quarter of FY 2025.</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)
		9	<p>Recommendation: We recommend the CAO ensure all interrelated policies are tracked to facilitate the identification of those potentially impacted by the update of a single policy.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. The AOC Policy Library has been updated to ensure that AOC Orders and related Policy Memoranda, if any, appear sequentially, and HCMD will commit resources for reviewing all HCMD policies, identifying interrelated HCMD policies and facilitating updates as needed. Anticipated completion date: Fourth quarter of FY 2025</p> <p>OIG Response: Open-resolved.</p>
		10	<p>Recommendation: We recommend the CAO practice timely reporting of the exit interview survey program to ensure its results are analyzed consistently and effectively. This effort includes defining timelines for reporting results to upper management and ensuring prompt action on identified issues.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. HCMD will establish a regular reporting cadence of exit interview survey results to AOC senior leaders. Identified issues that have simple solutions will be addressed promptly; some of the issues may be systemic and require a longer-term strategy. Completion is anticipated in the fourth quarter of FY 2025.</p> <p>OIG Response: Open-resolved.</p>
		11	<p>Recommendation: We recommend the CAO implement and sustain a centralized repository where all telework application packages, both approved and denied, across the agency are maintained. This effort includes establishing a regular review process of the repository to sustain its integrity and ensure consistency, fairness and policy compliance.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. While HCMD has maintained a centralized database of all approved telework application packages, going forward, HCMD will communicate requirements for AOC Office/Jurisdiction Telework Coordinators to submit denied telework application packages for maintenance in AOC's centralized database. Completion is anticipated in the fourth quarter of FY 2025.</p> <p>OIG Response: Open-resolved.</p>
		12	<p>Recommendation: We recommend the CAO review and align the processes for submitting, tracking and maintaining QSI awards with the established policy provisions to address potential noncompliance in QSI submission and approval processes.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. HCMD will automate the approval process for QSIs to ensure alignment with current applicable AOC policies. Completion is anticipated in the fourth quarter of FY 2025.</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 Administrative Officer and Office of the Chief Engineer	2023-0002-IE-P	1	<p>Report Summary: The OIG performed an evaluation to determine if COs and CORs were performing their duties in accordance with AOC policies, procedures and contractual requirements. The OIG also assessed whether there were any limitations that might hinder opportunities for efficiency in the CO and COR work process.</p> <p>Recommendation: We recommend that the AOC review the GAO's Framework for Assessing the Acquisition Function at Federal Agencies and make necessary adjustments to the AOC's current hierarchical reporting structure to provide sufficient independence and support for COs.</p> <p>AOC Management Decision: Concur. The AOC concurs with the recommendation. The AOC will develop a team of key stakeholders, led by the AOC Chief of Staff, that will collectively assess the GAO Framework and make recommendations to agency leadership for decision and implementation. Completion is anticipated in May 2025.</p> <p>OIG Response: Open-resolved.</p>
	June 12, 2024	2	<p>Recommendation: We recommend the AOC provide CORs in each jurisdiction access to the data, tools and training necessary to prepare IGEs.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. The AOC will assess the level of access to data, tools and training that CORs currently have to prepare IGEs and identify any gaps. At the conclusion of the assessment, a corrective action plan will be developed and implemented. Completion is anticipated in May 2025.</p> <p>OIG Response: Open-resolved.</p>
	Evaluation of the Architect of the Capitol's Contracting Officer and Contracting Officer's Representative Oversight	3	<p>Recommendation: We recommend the AOC review the contracting manual to determine whether the language restricting access to IGE information solely to AOC personnel who require knowledge of the estimate is appropriate. If the AOC determines the language is appropriate as written, it should enforce this requirement. If the AOC determines that it is appropriate to use non-AOC personnel in the IGE process, it should update its contracting manual to reflect that decision and implement appropriate safeguards to ensure the process remains both independent and confidential.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. The AOC will review the contracting manual rules restricting access to IGEs. If appropriate, the manual will be updated to include access and rules for non-AOC personnel. Completion is anticipated in May 2025.</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)
		4	<p>Recommendation: We recommend the AOC analyze Cost Estimating Group's (CEG) capacity to assist in the IGE process and determine whether CEG has the necessary placement within the Office of the Chief Engineer and resources to assist with the IGE process.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. The Office of the Chief Engineer is in the process of reviewing CEG's ability to support the COR's development of IGEs. Completion is anticipated in December 2024.</p> <p>OIG Response: Open-resolved.</p>
		5	<p>Recommendation: We recommend the AOC document its policies and procedures for selecting individuals to serve as CORs in line with the contracting manual and the COs discretion. At a minimum, these policies and procedures should identify the criteria that jurisdictions must consider when determining who to select for the COR position.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. The AOC will review current policies and procedures for selecting individuals to serve as CORs in line with the contracting manual and the COs discretion. At the conclusion of the review, the AOC will make any necessary updates to the contracting manual with agencywide criteria. Completion is anticipated in May 2025.</p> <p>OIG Response: Open-resolved.</p>
		6	<p>Recommendation: We recommend the AOC identify or develop COR training courses more closely related to the AOC's acquisitions policies and procedures.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. The AOC has already initiated an update to COR training requirements and intends to issue new guidance in FY 2024. Completion is anticipated in September 2024.</p> <p>OIG Response: Open-resolved</p>
		7	<p>Recommendation: We recommend the AOC develop and implement a master COR file to track the status of CORs training and certifications across the agency.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. The AOC will include guidance in the update to its COR training requirements (discussed in our response to Recommendation 6). Completion is anticipated in January 2025.</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)
		8	<p>Recommendation: We recommend the AOC require an appropriations law training course for all CORs.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. The AOC will coordinate with the Office of the Chief Financial Officer, the Office of the General Counsel and AOC University for implementation of this recommendation. Completion is anticipated in December 2024.</p> <p>OIG Response: Open-resolved.</p>
		9	<p>Recommendation: We recommend the AOC update the requirements prescribed in the contracting manual for serving as a CO and/or include a reference to AOC Order 30-1 [Funds Control Administration].</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. The AOC will review the contracting manual and update the requirements for serving as a CO and/or include a reference to AOC Order 30-1 [Funds Control Administration]. Completion is anticipated in May 2025.</p> <p>OIG Response: Open-resolved.</p>
		10	<p>Recommendation: We recommend the AOC implement compliance monitoring and enforcement standards for the current policies and procedures requiring CORs to document their roles and responsibilities.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. The AOC will review the contracting manual and develop guidelines for compliance monitoring and enforcement standards for current policies and procedures related to COR roles and responsibilities. Completion is anticipated in May 2025.</p> <p>OIG Response: Open-resolved.</p>
		11	<p>Recommendation: We recommend the AOC develop and implement guidance that directs the format and manner that CORs maintain documentation. This guidance should require COR files to be maintained in a readily accessible and uniform manner.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. The AOC will review the contracting manual and develop guidelines for the consistent format, maintenance and accessibility of COR files. Completion is anticipated in May 2025.</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)
		12	<p>Recommendation: We recommend the AOC develop and implement guidance that requires COs to document the procedures they undertook to complete their audit of CORs' files, explain how any deficiencies were resolved and report the results to their management.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. The AOC will review the contracting manual and develop guidelines for the execution of file audits. Completion is anticipated in May 2025.</p> <p>OIG Response: Open-resolved.</p>
		13	<p>Recommendation: We recommend that the Design and Construction Acquisition Division and Supplies, Services, and Material Management Division require COs to complete the number of COR file audits specified in their performance plan.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendation. During the annual performance planning process, the AOC will emphasize with CO supervisors that the file audit is a requirement and will ensure supervisors monitor its compliance during each FY. Completion is anticipated in September 2024.</p> <p>OIG Response: Open-resolved.</p>
Architect of the Capitol Office of the Chief Security Officer	2022-0001-IE-P July 25, 2022 Evaluation of the Architect of the Capitol's Security Badging Program	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>
		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	OIG-FLD-2022-01 June 1, 2023 Follow-Up Evaluation of the Congressional Request for the Architect of the Capitol's Response to Sexual Harassment	2	<p>Report Summary: The OIG performed a follow-up evaluation of the 2019 report Congressional Request: Office of Inspector General Harassment Inquiry (2019-0001-INVQ-P).</p> <p>Recommendation: We recommend the Diversity, Inclusion and Dispute Resolution Office (DI/DR) perform a climate assessment for jurisdictions that frequently work with the public to identify and address concerns regarding nonemployee harassment and hostile work environments.</p> <p>AOC Management Decision: Concur. The AOC will implement this recommendation, limiting the scope to nonemployee harassment concerns.</p> <p>OIG Response: Open-resolved.</p>
		6	<p>Recommendation: We recommend the AOC document and implement a process to conduct follow-up inquiries after resolution to identify employee concerns, verify safety, address fears of retaliation and ensure effective reintegration (as appropriate) to minimize negative impacts on its workforce.</p> <p>AOC Management Decision: Nonconcur. It is inappropriate to implement victim advocacy in the DI/DR program because the neutrality of an Equal Employment Opportunity (EEO) office is paramount to its effective operations and mission. For this reason, “victim support and advocacy” is not an appropriate charge for the DI/DR. Rather, the AOC provides other, more appropriate avenues for employee support. 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 the 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 — [such as] DI/DR investigations, climate assessments, the 24-hour Hotline, Employee and Labor Relations Branch (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, the 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>

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

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		7	<p>Recommendation: We recommend the AOC update AOC Order 24-1 [Conciliation Program Guide] to ensure it provides consistent and current information about the conciliation process and resources available.</p> <p>AOC Management Decision: Concur. While AOC Order 24-1 [Conciliation Program Guide] is still accurate, the AOC is currently updating several orders, including AOC Order 24-1.</p> <p>OIG Response: Open-resolved.</p>
Architect of the Capitol Office of the Chief Administrative Officer	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>

TABLE F: Follow-Up Unimplemented Recommendations (continued)

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
	OIG-FLD-2024-01 May 9, 2024 Follow-up Evaluation of the Architect of the Capitol Data Center	2	<p>Recommendation: We recommend the CIO require the ITD perform an annual validation of the ITD Authorized Access List in accordance with the ITD Authorized Data Center Proxy Card Access List Maintenance SOP.</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 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 2024.]</p> <p>OIG Response: Open-resolved.</p>
		3	<p>Recommendation: We recommend the CIO require the ITD reconcile the ITD Authorized Access List against the USCP Access Clearance Definition Report at the end of every calendar quarter in accordance with the ITD Authorized Data Center Proxy Card Access List Maintenance SOP.</p> <p>AOC Management Decision: Concur. ITD is currently reconciling the ITD Authorized Access List against the USCP Access Clearance Definition Report and will continue to do so quarterly in accordance with the ITD Authorized Data Center Proxy Card Access List Maintenance SOP. After April 2024, the USCP agreed to provide their next quarterly reports in August (for the fourth quarter) and December (for the first quarter of FY 2025), which ITD can provide as evidence along with ITD's Authorized Access Lists and any reconciliation required in January 2025 as evidence of reconciliation.</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-2021-06	1	Report Summary: The OIG performed an audit of the AOC's ULOs.
	September 29, 2021		Recommendation: We recommend the AOC review and properly close out the following dormant ULOs:
	Audit of the Architect of the Capitol's Unliquidated Obligations		<ul style="list-style-type: none"> • 68 invalid ULOs valued at \$479,907.61 • 9 unsupported, questioned ULOs valued at \$90,109.58 • 9 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: Closed-resolved.</p>
Architect of the Capitol Office of the Chief Engineer	OIG-AUD-2022-07	1	Report Summary: The OIG performed an audit of the contract provisions of AOC multimillion-dollar construction projects.
	July 29, 2022		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.
	Multimillion-Dollar Construction Projects' Contract Provisions Comply With Federal Guidance, Architect of the Capitol Policies and Industry Standards Although Improvements Can Be Added		<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: Closed-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: Closed-resolved.</p>
	OIG-AUD-2023-06	1	Report Summary: The OIG performed an audit of the AOC's CHOB Project Cannon Building Caucus Room.
	September 6, 2023		Recommendation: We recommend the AOC ensure the CMc complies with the contractual requirements outlined in the CHOB Project's BIM Project Execution Plan.
	The Architect of the Capitol Lacked Sufficient Oversight of the Cannon Caucus Room Renovations		<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: Closed-resolved.</p>

TABLE G: Audits 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 AOC review its commissioning process and implement internal controls to ensure the commissioning agent properly completes all required steps before commissioning work.</p> <p>AOC Management Decision: Concur. We will review existing processes and contract requirements related to commissioning and implement any necessary improvements to related controls for CHOBr [Project] Phase 4.</p> <p>OIG Response: Closed-resolved.</p>
	<p>OIG-AUD-2023-07 September 21, 2023 Review of the Architect of the Capitol's Multimillion-Dollar Construction Project Change Orders</p>	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: Closed-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: Closed-resolved.</p>

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

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		5	<p>Recommendation: We recommend the AOC ensure it uses the contractual markups when preparing IGEs 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: Closed-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: Closed-resolved.</p>
		2	<p>Recommendation: We recommend that, for the remaining contract phases (Phase 3 and Phase 4), the CHOB Project team update its written 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: Closed-resolved.</p>
		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: Closed-resolved.</p>

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

Office	Report and Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		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: Closed-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: Closed resolved.</p>
		8	<p>Recommendation: We recommend the CHOB 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: 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	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	1–17 and 19–20	<p>Report Summary: The OIG performed an evaluation to determine whether the AOC developed and implemented effective information security programs and practices in accordance with FISMA.</p> <p>Recommendation: Due to the sensitive nature of this evaluation, specific language pertaining to findings and recommendations is protected and will not be disclosed.</p> <p>AOC Management Decision: Concur. The AOC concurs with the OIG's recommendations.</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	1	<p>Recommendation: We recommend the DI/DR develop and implement office-specific policies and procedures for documenting, monitoring and reporting cases in Entellitrak to ensure quality non- EEO and EEO data.</p> <p>AOC Management Decision: Concur. The DI/DR established a POA&M to process map all DI/DR programs. It is important to capture these policies in writing, and the DI/DR will do so when the POA&M is complete.</p> <p>OIG Response: Closed-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: Nonconcur. The AOC respectfully declines this recommendation and will continue to apply standard investigation procedures. Additionally, allegations raised against external parties are covered by our claims process, and the only difference between internal and external claims is the analysis of employer liability, which has no bearing on how claims are handled. A separate process for external parties is illogical, contrary to industry best practice, has no benefit to the employee or the agency, and statistical data does not support the need. The AOC's claims process covers all allegations of discrimination, including sexual harassment by employees and nonemployees. The AOC will continue to apply standard investigative procedures to document, track, monitor trends of and investigate nonemployee harassment allegations. The AOC policies on workplace antiharassment and sexual harassment are reviewed periodically.</p> <p>OIG Response: Closed-resolved.</p>
		8	<p>Recommendation: We recommend the DI/DR develop office-specific internal policies and procedures that require regular communication and updates to individuals on the status of their complaints and cases.</p> <p>AOC Management Decision: Concur. The AOC will provide more frequent case updates to the complainant in the investigative process.</p> <p>OIG Response: Closed-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. The AOC will implement this recommendation. However, [the] DI/DR will request this information from the ELRB, the advisor to and repository of this information, not the jurisdictions.</p> <p>OIG Response: vClosed-resolved.</p>

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

	Report No. Issue Date	Rec No.	Summary of Recommendation(s) and Action(s)
		11	<p>Recommendation: We recommend the DI/DR update its antiharassment training to include language options that employees commonly use; examples specific to the AOC workplace and workforce; consequences for supervisors if they fail to fulfill their responsibilities related to reporting and preventing harassment, retaliation and other prohibited conduct; and consequences for misconduct and explanations of the complaint process.</p> <p>AOC Management Decision: Concur. The AOC will implement this recommendation. Outside of accessibility for those with disabilities, the 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>The DI/DR is currently revising the sexual harassment training for FY 2024 and will ensure these suggestions remain, or for those not already in place, are included.</p> <p>OIG Response: Closed-resolved.</p>
Architect of the Capitol Office of the Chief Administrative Officer	OIG-FLD-2023-01 September 5, 2023 Follow-Up Evaluation of the Architect of the Capitol's Inventory Accountability and Controls	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: Closed-resolved.</p>
	OIG-FLD-2024-01 May 9, 2024 Follow-up Evaluation of the Architect of the Capitol Data Center	1	<p>Report Summary: The OIG performed a follow-up evaluation of the 2019 report Audit of Architect of the Capitol's Data Center (OIG-AUD-2019-04).</p> <p>Recommendation: We recommend the CIO require the ITD to create and maintain an ITD Authorized Access List in accordance with the ITD Authorized Data Center Proxy Card Access List Maintenance SOP.</p> <p>AOC Management Decision: Concur. Based on the OIG's draft report (March 28, 2024), ITD has created the ITD Authorized Access List as a baseline in April 2024 and will maintain it in accordance with the ITD Authorized Data Center Proxy Card Access List Maintenance SOP. The SOP requires ITD to save the requesting and notifying emails for access changes, which ITD can provide as evidence along with the ITD Authorized Access List in August 2024 to close the recommendation.</p> <p>OIG Response: Closed-resolved.</p>

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-2024-05</u>	Evaluation of Cannon House Office Building Renewal Project's Construction Materials	August 1, 2024	\$ -	\$ -	\$ -	Yes
<u>OIG-AUD-2024-06</u>	Audit of the Architect of the Capitol's Construction Division	September 26, 2024	\$ -	\$ -	\$ -	Yes
<u>2023-0002-IE-P</u>	Evaluation of the Architect of the Capitol's Contracting Officer and Contracting Officer's Representative Oversight	June 12, 2024	\$ -	\$ -	\$ -	Yes
<u>2023-0003-IE-P</u>	Evaluation of the Architect of the Capitol's Human Capital Management Program	August 29, 2024	\$ -	\$ -	\$ -	Yes
<u>OIG-FLD-2024-01</u>	Follow-Up Evaluation of the Architect of the Capitol Data Center	May 9, 2024	\$ -	\$ -	\$ -	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				
Report Name	Report No.	Date Issued	Reported Costs		Status of Questioned Costs		Status of Disallowed Costs		Status to Date
			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 ^c	OIG-AUD-2021-06	9/29/21	\$90,110.00	\$ -	\$ -	\$90,110.00	\$90,110.00	\$ -	Closed
Review of the Architect of the Capitol's Multimillion-Dollar Construction Project Change Orders ^d	OIG-AUD-2023-04	3/30/23	\$722,083.00	\$19,675.00	\$ -	\$ -	\$ -	\$ -	Open
Semiannual Review of the Architect of the Capitol's Multimillion-Dollar Construction Project Change Orders	OIG-AUD-2023-07	9/21/23	\$88,025.00	\$ -	\$2,105.00	\$215.00	\$215.00	\$ -	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.

^cStatus of Disallowed: Recovered of \$90,110.00 were open obligations that were de-obligated within AOC financial system. The de-obligated costs are funds to be put to better use.

^dDisallowed 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*	\$55,004.80
Savings from employee salaries from suspensions and reductions in grade*	\$318.25
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)	\$0.00
Net Questioned Costs	\$0.00
Waste	\$67.55
Total	\$55,390.60

*Salary and wage data obtained from the HCMD 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	25–27
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	19–23
Section 405(b)(4)	Summary of Matters Referred for Prosecution and Resulting Convictions	16
Section 405(b)(5)	Listing of Audit, Inspection and Evaluation Reports, Including Total Value of Questioned Costs and Funds Put to Better Use	61–62
Section 405(b)(6)	Information Regarding Management Decisions Made During the Reporting Period for Reports Issued During a Previous Reporting Period	30–60
Section 405(b)(8)	An Appendix Containing the Results of Any Peer Review	28
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	16
Section 405(b)(12)	Description of the Metrics Used for Developing the Statistical Tables Under Section 405(b)(17)	16–17
Section 405(b)(13)	Report on Each Investigation Conducted by the OIG Involving Senior Government Employees (refer to statute for specific info required)	19
Section 405(b)(15)	Detailed Description of Any Attempt to Interfere with OIG Independence (see statute for specifics)	27
Section 405(b)(16)	Closed Reports Not Disclosed to the Public	27

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: 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.
closed-resolved	The OIG verified that the agreed-upon corrective actions were implemented.
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 (concurred) to implement the recommendation or has proposed corrective actions that will address the recommendation.
open-unresolved	AOC management disagrees with the recommendation (nonconcurs), 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.

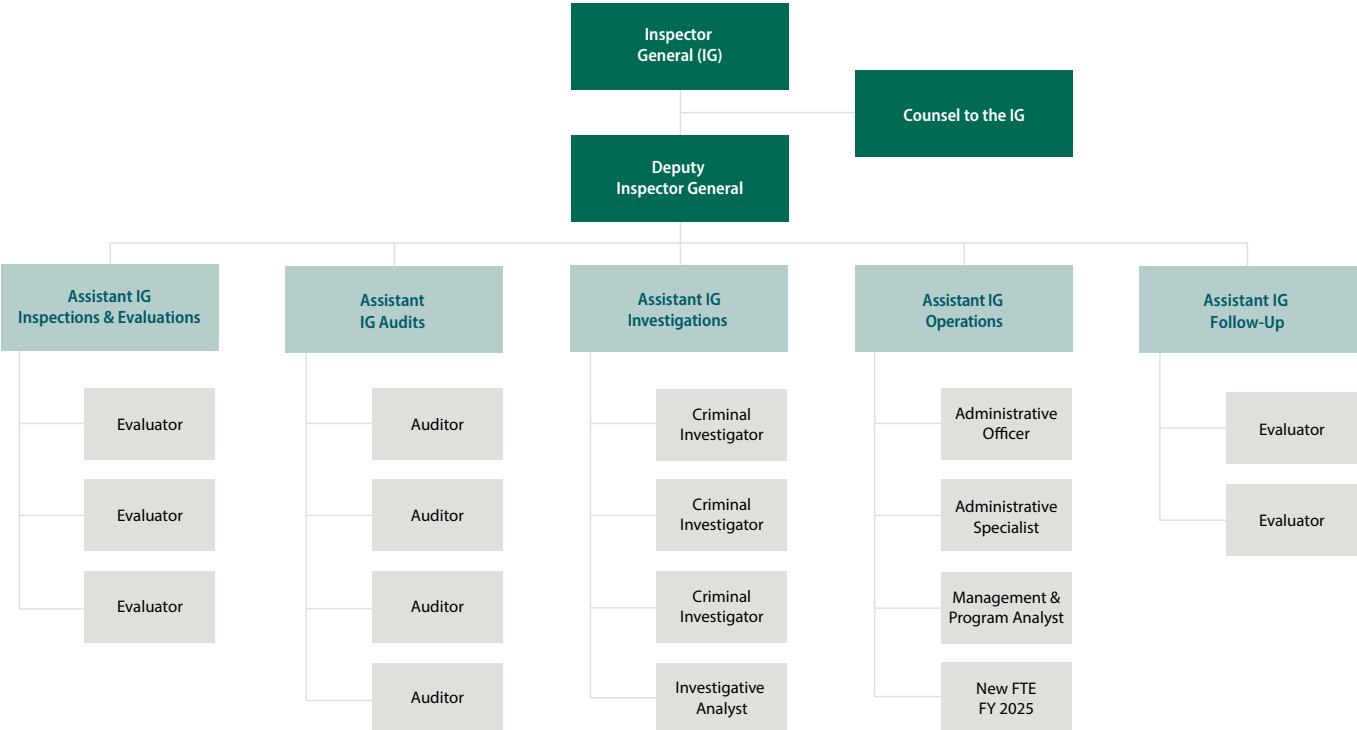


LIST OF ACRONYMS USED IN THIS REPORT

AOC	Architect of the Capitol	IGE	independent government estimate
BIM	Building Information Modeling	IPA	independent public accounting firm
CAO	Chief Administrative Officer	IT	information technology
CCJV	Clark/Christman, A Joint Venture	ITD	Information Technology Division
CD	Construction Division	ITSM	Information Technology Service Management
CEG	Cost Estimating Group	OCFO	Office of the Chief Financial Officer
CHOB^r	Cannon House Office Building Renewal	OCSO	Office of the Chief Security Officer
CIGIE	Council of the Inspectors General on Integrity and Efficiency	OIG	Office of Inspector General
CIO	Chief Information Officer	OMB	Office of Management and Budget
CMc	construction manager as constructor	OSF	Off-Site Facility
CO	Contracting Officer	PCO	potential change order
COR	Contracting Officer's Representative	PII	personally identifiable information
CSO	Chief Security Officer	POA&M	plan of action and milestones
DI/DR	Diversity, Inclusion and Dispute Resolution Office	POC	point of contact
EAM	Enterprise Asset Management	PPM Memo	Planning and Project Management Memorandum
EEO	Equal Employment Opportunity	PSP	Policy and Special Programs
ELRB	Employee and Labor Relations Branch	QC	quality control
FISMA	Federal Information Security Modernization Act of 2014	QSI	quality step increase
FMLA	Family and Medical Leave Act	SAR	Semiannual Report
FY	Fiscal Year	SOP	standard operating procedure
GAO	Government Accountability Office	SR	Senior Rated
HCMP	Human Capital Management Program	ULO	unliquidated obligation
HCMD	Human Capital Management Division	USAO	United States Attorney's Office
HCS	Human Capital Strategy	U.S.C.	United States Code
HVAC	heating, ventilation and air conditioning	USCP	U.S. Capitol Police
IG	Inspector General		



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We welcome any feedback, comments, concerns or suggestions on this report. Please send any comments to Sally Smith, Counsel to the Inspector General, at Sally.Smith@aac.gov.



