



# Inspector General

## 2024-0022-INVI-P — Student Loan Repayment Program Violations

### **Suspected Violations of the Architect of the Capitol (AOC) “Student Loan Repayment Program (SLRP)” Policy and Multiple SLRP Agreements.**

**Substantiated**

### **Suspected Violations of Title 18 U.S.C. § 641 Public Money, Property or Records. Not Substantiated**

In January 2023, the AOC Office of Inspector General (OIG) initiated a proactive investigation (2023-0001-INVPRO-P)<sup>1</sup> to review the AOC’s SLRP with the goal to ensure that individuals receiving AOC funds were compliant with AOC policy and service agreements and that the program was being administered in compliance with agency policy. Our initial review of the data provided revealed that between Fiscal Year (FY) 2017 and FY 2022, 17 AOC employees separated from the agency prior to the fulfillment of their Student Loan Repayment Agreement. Of those, seven former employees had outstanding balances, two of whom had not made any payments at the time of the report but were not yet considered delinquent. In May 2024, while conducting a follow up review of the outstanding debt, it was determined that of those seven former employees, one paid their balance in full and three maintained outstanding balances but had made regular payments and were not identified as delinquent.

Former AOC employee, Ms. Sherita Holt, GS-11, Special Events Manager, U.S. Capitol Visitor Center, was identified as one of the remaining three employees with a delinquent and unfulfilled financial obligation to the AOC. Holt entered into four loan agreements with the AOC in 2019, 2020, 2021 and 2022, respectively, receiving a total of \$40,000 in return for six years of service to the AOC. Holt then departed the AOC in January 2023 for a position with another government agency.

The OIG’s investigation showed that Holt had not made a single loan payment since her departure and as of October 16, 2024, due to late fees and penalties, had an outstanding balance of \$30,523.87. The OIG identified these funds to be a questioned cost,<sup>2</sup> or potentially, theft of government funds. When interviewed by the OIG, Holt acknowledged her participation in the AOC’s SLRP and stated she had missed a previously received letter from the United States Department of Agriculture (USDA). Holt told the OIG that she had a travel reimbursement from her most recent government employer withheld through the Treasury Offset Program and had since made four payments to the AOC through the USDA, National Finance Center. Holt was forthcoming with the OIG and provided all relevant documentation following her interview.

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<sup>1</sup> AOC OIG 2023-0001-INVPRO-P AOC Student Loan Repayment Program

<sup>2</sup> Net Questioned Costs: As defined in 5 USC §405(a)(4)(A), the term “questioned cost” means a cost that is questioned by the Office because of— (A) an alleged violation of a provision of a law, regulation, contract, grant, cooperative agreement, or other agreement or document governing the expenditure of funds.



Neither AOC Order 537-1, Student Loan Repayment Program, April 16, 2014, nor the Student Loan Repayment Service Agreement specify how a former employee is expected to repay AOC if they violate their Service Agreement. Section 17.3 of the Order states: “If an employee fails to repay the AOC for the amount owed, a sum equal to the amount outstanding shall be recovered from the employee under applicable regulations for collection by offset from an indebted government employee, or governing debt collection if the individual is no longer a federal employee.” Similarly, the Service Agreement states only, “I understand that if I fail to reimburse the AOC for the full amount owed as described in paragraph 2 above, the amount outstanding may be recovered from me through collection by salary offset or through the appropriate provisions under the Federal Claims Collection Standards.” Additionally, the Order states in Section 20: “As part of the ongoing administration of the Student Loan Repayment Program, Human Capital Management Division is required to regularly monitor and review regulatory changes that affect the Student Loan Repayment Program.” The Order does not identify a process in place for ensuring continued compliance with Service Agreements once debts have been submitted to the National Finance Center.

While the conditions of repayment to the agency for violating the Service Agreement may have been left vague intentionally as the circumstances for each loan repayment are unique, the AOC may benefit by informing program participants on the expectations of repayment upfront in the event employees break their Service Agreement. The concerns identified within the investigation may be referred to other divisions within the OIG for potential future work.

**Final Management Action:** The OIG substantiated that Holt violated AOC policy and the administrative violation was submitted to the Architect of the Capitol for action deemed appropriate, if any. Because the OIG was unable to obtain sufficient evidence of a criminal violation of theft, the case was not presented to the United States Attorney’s Office for criminal prosecutorial consideration. On June 5, 2025, the AOC advised OIG that Holt has continued to make payments to satisfy her outstanding SLRP debt. Additionally, the AOC will begin to track such debts with the National Finance Center to ascertain whether the debts are being satisfied and will provide a monthly report regarding the status of SLRP debts to the Office of the Chief Financial Officer. The AOC is also updating AOC Order 537-1, Student Loan Repayment Program, to further reinforce employee requirements involving repayment of SLRP benefits as well as the process to recoup SLRP funds when an employee breaches his/her executed SLRP service agreement. The case is closed.