

Combating Fraud, Waste, Abuse & Mismanagement · Architect of the Capitol



Follow-up Evaluation of the Architect of the Capitol's Tree Maintenance Program

OIG-FLD-2025-03

May 30, 2025



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



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Results in Brief

Follow-up Evaluation of the Architect of the Capitol's Tree Maintenance Program

MAY 30, 2025



OBJECTIVE

The objective of this evaluation was to determine whether the Architect of the Capitol (AOC) effectively implemented corrective actions to address the findings and recommendations in the February 2021 Office of Inspector General (OIG) report, *Evaluation of the Architect of the Capitol's Tree Maintenance Program* ([Report No. 2020-0003-IE-P](#)). The 2021 OIG evaluation found that the AOC appropriately implemented and maintained improvements directed by the Office of Congressional Workplace Rights (OCWR). Additionally, the Capitol Grounds and Arboretum's (Capitol Grounds) response to the COVID-19 pandemic was proactive and effective. The OIG found one area for improvement. The Capitol Grounds did not have a formal training tracking system and supervisors were not monitoring the employee training necessary for maintaining professional certifications.

This evaluation follows up on the finding and one recommendation made for improvement to the AOC's tree maintenance program.

FINDINGS

Our follow-up evaluation found that although the Capitol Grounds jurisdiction does not include Continuing Education Unit (CEU) reports in arborists' annual performance reviews, supervisors monitor arborists' progress toward completing the training required to maintain their certifications. Specifically, supervisors discuss professional development and required CEUs during performance reviews and track employee training through their budgetary process, using the AOC training portal and external certification websites. Additionally, our evaluation found that most arborists have exceeded the number of CEUs required to maintain their certifications for Fiscal Year (FY) 2023 and FY 2024. We suggest that the Capitol Grounds establish a written policy for employee certification requirements to reinforce clear job expectations and support consistent hiring practices.

RECOMMENDATIONS

There are no recommendations.

MANAGEMENT COMMENTS

There are no management comments.

RECOMMENDATIONS TABLE

Management	Recommendation Required	Comment
Capitol Grounds	None	



Inspector General

DATE: May 30, 2025

TO: Thomas E. Austin, PE, CCM, PMP
Architect of the Capitol

FROM: Michael J. Rich, CIG, PMP, CFE, SHRM-SCF *Michael J. Rich*
Deputy Inspector General performing the duties of the Inspector General

SUBJECT: Follow-up Evaluation of the Architect of the Capitol's Tree Maintenance Program (OIG-FLD-2025-03)

Please see the attached final report for our follow-up evaluation of the Architect of the Capitol's (AOC's) tree maintenance program, which we announced on January 22, 2025. Based on our follow-up evaluation, we found that supervisors monitor arborists' progress toward completing the training required to maintain their certifications. Additionally, our evaluation found that most arborists have exceeded the number of CEUs required to maintain their certifications for Fiscal Year (FY) 2023 and FY 2024. We suggest that the Capitol Grounds establish a written policy for employee certification requirements to reinforce clear job expectations and support consistent hiring practices.

We appreciate the courtesies extended to the staff during the evaluation. Please direct questions to Brittany Banks, Assistant Inspector General for Follow-Up, at 202.436.1445 or Brittany.Banks@aoc.gov.

Distribution List:

- Joseph Campbell, Deputy Architect of the Capitol
- Patrick Briggs, Chief of Staff
- Danna Planas Ocasio, Deputy Chief of Staff
- Angela Freeman, General Counsel
- James Kaufmann, Executive Director, Capitol Grounds and Arboretum

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INTRODUCTION

Objective

The objective of this evaluation was to determine whether the AOC effectively implemented corrective actions to address the findings and recommendations in the February 2021 OIG report, *Evaluation of the Architect of the Capitol's Tree Maintenance Program* ([Report No. 2020-0003-IE-P](#)).

Background

2021 OIG Evaluation Report

On April 18, 2017, an AOC Capitol Grounds jurisdiction employee was killed by a falling tree limb while performing work for the AOC. In response to this incident, the OCWR investigated the AOC's urban tree management practices. Their investigation report contained two findings of violations of the General Duty clause of the Occupational Safety and Health Act (OSHA) — one for specific trees posing an imminent danger and one based on deficiencies in the AOC's tree management practices.

The 2021 OIG evaluation report, *Evaluation of the Architect of the Capitol's Tree Maintenance Program* ([Report No. 2020-0003-IE-P](#)), focused on determining whether OCWR-directed improvements to the AOC processes for tree inspection and safety-related issues were appropriately implemented and maintained and if they effectively addressed safety hazards from trees located on the Capitol campus. This evaluation also included a limited review of the Capitol Grounds' response efforts to the COVID-19 pandemic. The OIG found that the AOC appropriately implemented and maintained improvements directed by the OCWR and continues to make significant improvements to its tree management practices. Additionally, the Capitol Grounds' response to the COVID-19 pandemic was proactive and effective. The OIG found one area for improvement. The Capitol Grounds did not have a formal training tracking system and supervisors were not monitoring the employee training necessary for maintaining professional certifications.

This evaluation follows up on the finding and one recommendation made for improvement to the AOC's tree maintenance program.

Capitol Grounds and Arboretum Jurisdiction

The Capitol Grounds is responsible for preserving and maintaining 286 acres of landscape, including plantings and infrastructure, across the Capitol campus that includes the House and Senate Office Buildings. Capitol Grounds employees are involved in a variety of professional ground management services daily. Specialty services include turfgrass management, seasonal

horticultural display beds, comprehensive tree care as well as the upkeep of the grounds' supporting historic features, memorials, infrastructure, vehicles and equipment.

The Tree Section within the Capitol Grounds' Gardening Division performs tree maintenance and inspections on the Capitol campus. The section comprises eight employees (i.e., an arborist supervisor, an assistant supervisor, three arborists and three arborist workers) who are responsible for the approximately 890 trees surrounding the immediate U.S. Capitol Building including Union Square and more than 4,800 trees throughout the entire Capitol landscape.

The U.S. Capitol Grounds stands as one of the 46 Level III accredited arboreta globally, as recognized by ArbNet.¹ Level III arboreta have at least 500 species of woody plants, employ a collections curator, have substantial educational programming, collaborate with other arboreta, publicize their collections, and actively participate in tree science and conservation.

Criteria

- The International Society of Arboriculture's (ISA's), *Continuing Education Policy*²
- ISA's *ISA Certified Arborist Application Guide* (December 2022)³
- The AOC's Capitol Grounds and Arboretum, *Strategic Plan, Fiscal Years 2025–2030*
- The Government Accountability Office's (GAO's), *Standards for Internal Control in the Federal Government* (September 2014)⁴

¹ ArbNet is an international arboretum accreditation program with a global network for tree-focused professionals focused on facilitating the sharing of knowledge, expertise and resources to help arboreta meet their institutional goals. <https://arbnet.org/morton-register/united-states-capitol-grounds>.

² <https://www.isa-arbor.com/Portals/0/Assets/PDF/Certification/ISAContinuingEducationPolicy.pdf>

³ <https://www.isa-arbor.com/portals/0/assets/pdf/certification-applications/cert-application-certified-arborist.pdf>

⁴ <https://www.gao.gov/assets/gao-14-704g.pdf>

FINDING

Capitol Grounds Improved its Monitoring of Arborist Training

The 2021 OIG evaluation found that the Capitol Grounds lacked a formal training tracking system, and supervisors were not monitoring employee training necessary for maintaining professional certifications. The Capitol Grounds hired outside experts to provide safety training focused on addressing industry trends and risks. Additionally, they conducted symposium-style training sessions to offer the CEUs necessary for certification renewal. However, the planning for these sessions was ad hoc, with minimal supervisory involvement in tracking which training sessions were appropriate against certification requirements. The OIG concluded that implementation of a formal training tracking system would help supervisors certify that employees maintain their certifications and tailor individual training plans to match employee job descriptions and career growth.

Previous Recommendation

We recommend that the Capitol Grounds implement a formalized training tracking system, with consideration given to the AOC Training department initiatives planned or currently in place. This system should be regularly reviewed by Supervisors to ensure employees appropriately maintain their professional certifications and as a tool for individualized career development planning.

Evaluation Results

AOC Arborists Completed Relevant Training with Supervisory Oversight

AOC concurred with the recommendation made in the OIG's 2021 evaluation report and stated that the Capitol Grounds' certified arborists would be required to submit a copy of their individual certified arborist CEU report for inclusion in their annual performance review.

Our follow-up evaluation found that although the Capitol Grounds does not include CEU reports in arborists' annual performance reviews, supervisors monitor arborists' progress toward completing the training required to maintain their certifications. Specifically, supervisors discuss professional development and required CEUs during performance reviews and track employee training through their budgetary process, using the AOC training portal and external certification websites. For example, the CEU report for an ISA-certified arborist can be accessed from the ISA website to ensure that they complete 30 CEUs every three years, which is necessary to maintain their certification.

We reviewed the Capitol Grounds' Tree Section arborists' annual performance reviews, ISA CEU reports and arborist certifications for FY 2023 and FY 2024 and observed the following:

- Seven Tree Section employees are ISA-certified arborists, and one is a Maryland Licensed Tree Expert.
- During FY 2023 and FY 2024, five out of the seven ISA-certified arborists completed more than the 30 hours of required CEUs to maintain their arborist certification.
- All Tree Section arborists' annual performance reviews documented training goals and supervisory review of progress towards achieving those goals. Examples of training goals include the following:
 - Aerial Rescue Training
 - Climber Specialist Certification
 - ISA Certified Tree Worker Climber Training
 - Precision Felling and Chainsaw Safety Class
 - Pest Management Training
 - ISA Arborist Certification
 - ISA Tree Risk Assessment Qualification
 - Integrated Pest Management Training
 - Pesticide Applicator License

Observation

According to GAO's "Standards for Internal Control in the Federal Government," referenced as a best practice, management establishes expectations of competence for key roles at its discretion to help the entity achieve its objectives. Competence requires relevant knowledge, professional experience, training and certification. Management may also establish expectations of competence for all personnel through policies within the entity's internal control system. AOC arborists are required to maintain their ISA Arborist certification or an equivalent certification. AOC arborist workers are encouraged to pursue the ISA certification or an equivalent as part of their professional development. The Maryland Licensed Tree Expert, issued by Maryland's Department of Natural Resources, is considered an equivalent certification. However, we found that there is no written policy to document certification requirements. Certification requirements are not documented in the position descriptions but are mentioned in the job vacancy announcements. Policies strengthen accountability and promote transparency by reinforcing job expectations, supporting consistent hiring practices and ensuring employees possess the necessary qualifications. We suggest that the Capitol Grounds establish a written policy to include employee certification requirements.

Conclusion

We found that the Capitol Grounds improved its monitoring of arborist training. Its strategic goals emphasize professional development and safety. For AOC arborists, obtaining professional certifications and completing CEUs to maintain those certifications is essential for

promoting safety on the Capitol campus. This process ensures that tree maintenance staff are current with the latest tree care techniques, pest and disease management, safety protocols and environmental regulations. Supervisors encourage development opportunities and professional certifications, which helps the jurisdiction hire and retain knowledgeable and skilled staff to perform quality work. To further improve performance management, we encourage the Capitol Grounds to formalize employee certification requirements.

Recommendations

None.

APPENDIX A

Scope and Methodology

We conducted this evaluation from January 2025 through March 2025 in accordance with the Council of the Inspectors General on Integrity and Efficiency's (CIGIE's) "Quality Standards for Inspection and Evaluation" (also known as the Blue Book).⁵ Those standards require that we plan and perform the evaluation to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our evaluation objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our evaluation objectives.

This follow-up evaluation was self-initiated by the AOC OIG. The objective of this follow-up evaluation was to determine whether the AOC effectively implemented corrective actions to address the findings and recommendations in the February 2021 OIG report, *Evaluation of the Architect of the Capitol's Tree Maintenance Program* ([2020-0003-IE-P](#)).

To address our evaluation objective, we reviewed relevant AOC policies, procedures, federal best practices and followed up on the implementation of prior recommendations. We interviewed Capitol Grounds personnel responsible for the oversight of the AOC's tree maintenance program. We also reviewed arborist ISA certifications, CEU reports and annual employee performance reviews for FY 2023 and FY 2024 to determine whether supervisors tracked employee CEUs as part of the employee's annual performance.

Use of Computer-Processed Data

We did not use computer-processed data to perform this evaluation.

Prior Coverage

In the past five years, prior OIG reports relevant to this follow-up evaluation: *Evaluation of the Architect of the Capitol's Tree Maintenance Program* ([Report No. 2020-0003-IE-P](#)).

⁵ CIGIE. 2020. Quality Standards for Inspection and Evaluation.
<https://www.ignet.gov/sites/default/files/files/QualityStandardsforInspectionandEvaluation-2020.pdf>.

APPENDIX B

Notification Letter



Office of Inspector General
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Washington, D.C. 20515
202.593.1948
www.aoc.gov

United States Government
MEMORANDUM

DATE: January 22, 2025

TO: Thomas E. Austin, PE, CCM, PMP
Architect of the Capitol

FROM: Dr. Michael J. Rich, CIG, PMP, CFE, SHRM-SCP *Michael J. Rich*
Deputy Inspector General performing the duties of the Inspector General

SUBJECT: Announcement for Follow-up Evaluation of the Architect of the Capitol's
(AOC's) Tree Maintenance Program
(Project No. 2025-0003-FLD-P)

This is to notify you that the Office of Inspector General (OIG) is initiating a follow-up evaluation of the February 2021 OIG report, *Evaluation of the AOC's Tree Maintenance Program (2020-0003-IE-P)*. Our objective is to determine whether the AOC has effectively implemented corrective actions to address the findings and recommendations in the February 2021 OIG report.

Please provide an agency point of contact for this follow-up evaluation. We will contact the appropriate AOC offices to schedule an entrance conference in the upcoming weeks. If you have any questions, please contact Brittany Banks, Assistant Inspector General for Follow-Up, at 202.436.1445 or Brittany.Banks@aoc.gov.

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Angela Freeman, General Counsel
James Kaufmann, Director, Capitol Grounds and Arboretum

APPENDIX C

Management Comments

There were no management comments.

ACRONYMS AND ABBREVIATIONS

AOC	Architect of the Capitol
CEU	Continuing Education Unit
CIGIE	Council of the Inspectors General on Integrity and Efficiency
FY	Fiscal Year
GAO	Government Accountability Office
ISA	International Society of Arboriculture
OCWR	Office of Congressional Workplace Rights
OIG	Office of Inspector General
OSHA	Occupational Safety and Health Act