

ARCHITECT OF THE CAPITOL

SEMIANNUAL REPORT TO CONGRESS

Office of Inspector General







October 1, 2024–March 31, 2025





REPORT FRAUD WASTE ABUSE

Report

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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@aoc.gov.*

Message From the Deputy Inspector General



M. J. Rich

Michael Rich
Deputy Inspector General

I am pleased to present this Semiannual Report (SAR) to Congress covering the oversight activities of the Architect of the Capitol's (AOC's) Office of Inspector General (OIG) from October 1, 2024–March 31, 2025, in accordance with 2 United States Code 1808: Inspector General of the Architect of the Capitol. This report highlights OIG's ongoing efforts to safeguard the integrity of taxpayer funds appropriated to the AOC as well as OIG's work to promote efficiency, effectiveness and economy to deter and prevent fraud, waste, abuse and mismanagement in AOC programs and operations.

During this 6-month SAR period, OIG completed one audit and two follow-up evaluations. Additionally, three audits, two inspections and evaluations and two follow-up evaluations remain in progress. OIG's work focused on the Cannon House Office Building Renewal Project and continued to identify risk areas concerning auditability, weak internal controls, property accountability and documentation. OIG's findings led to impactful recommendations aimed at enhancing the effectiveness and efficiency of AOC programs and operations and ensuring that federal funds are used appropriately.

OIG continues to manage an independent hotline to report fraud, waste or abuse in AOC programs and operations. During this SAR period, OIG completed 10 investigations. Of noteworthy mention, OIG concluded a proactive investigation into the AOC's Student Loan Repayment Program, with nearly \$60,000 identified as questioned costs and an additional investigation leading to nearly \$74,000 in court-ordered restitution.

Oversight is a shared responsibility, and OIG would like to thank AOC staff for doing their part to mitigate fraud in support of taxpayer funds. Additionally, I would like to thank Congress, the Architect and the OIG team for their support and trust in our shared values to ensure the AOC continues to serve, preserve and inspire.

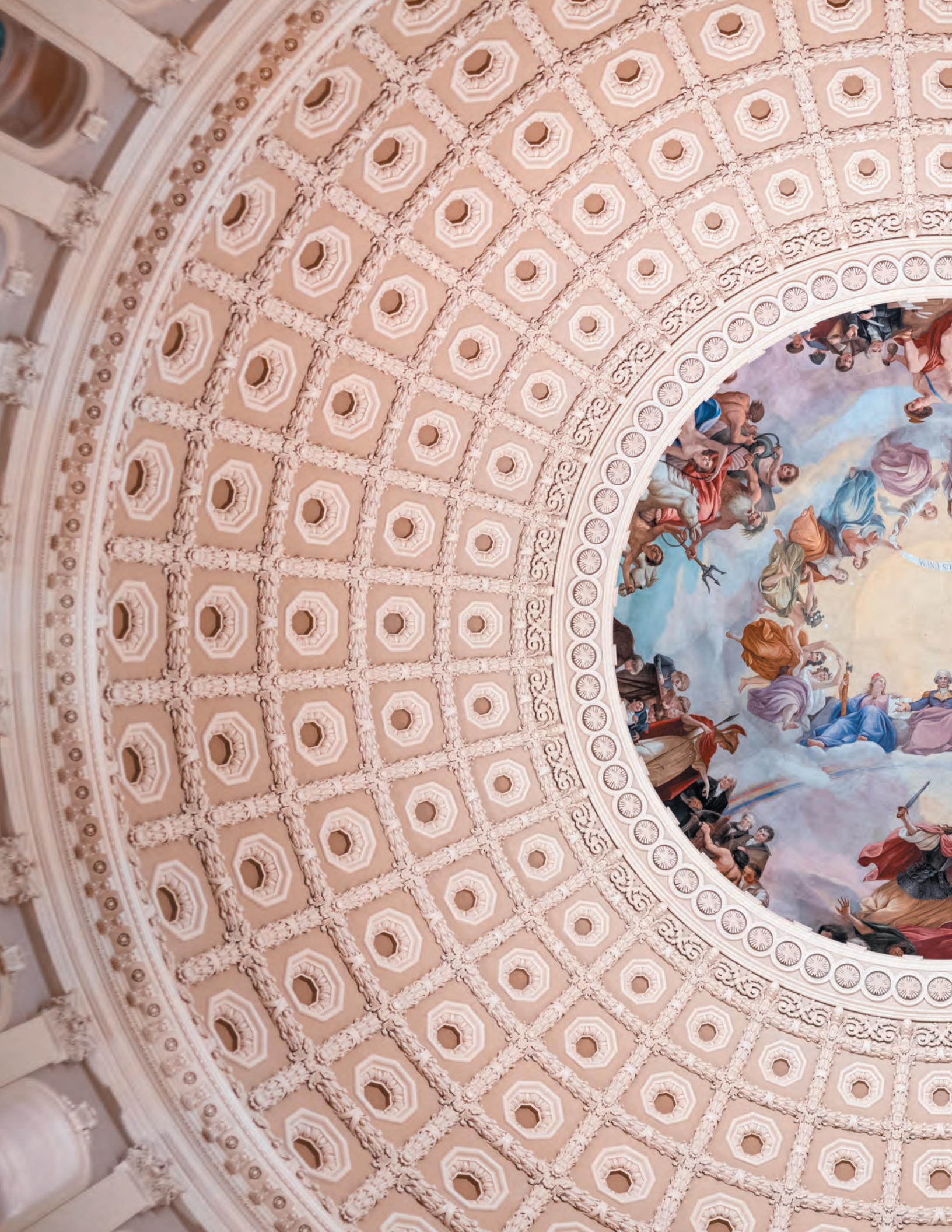


Inspector General Act

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

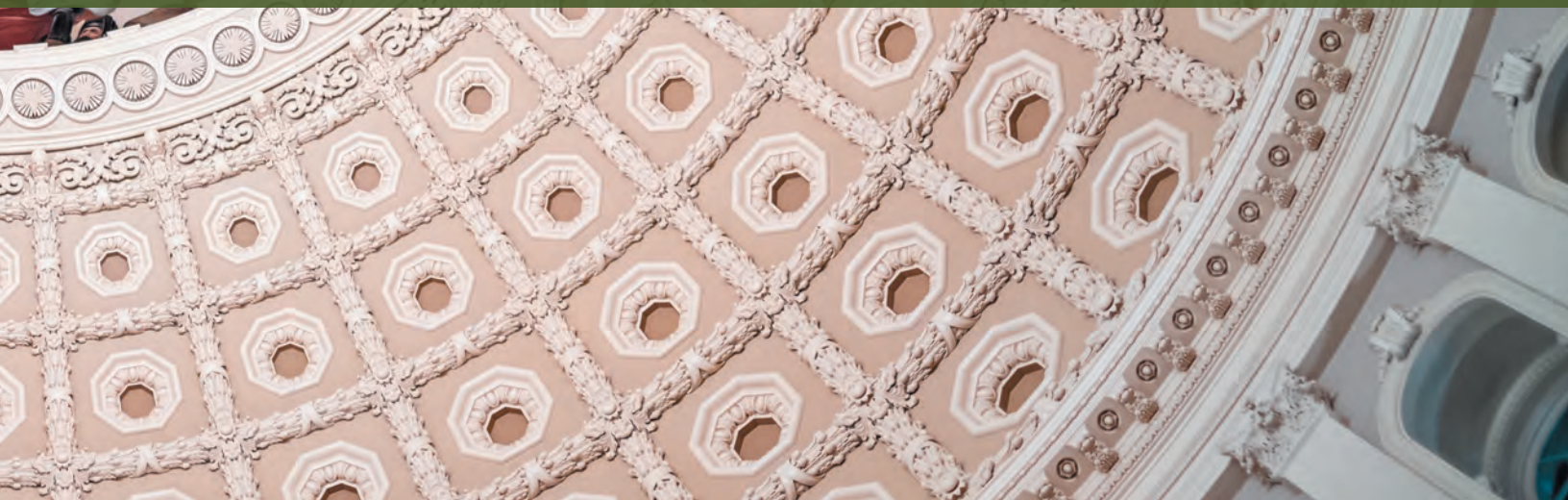
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Highlights





Executive Summary

About This Report

The Semiannual Report (SAR) to Congress provides a means for the Office of Inspector General (OIG) to keep the Architect of the Capitol (AOC) and Congress fully informed concerning fraud and other serious problems, abuses and deficiencies related to the administration of AOC programs and operations. As required by the Inspector General Act of 1978 (5 United States Code § 405), the Inspector General must prepare SARs summarizing OIG's activities for the preceding 6-month period. This 34th SAR highlights OIG's activities from October 1, 2024–March 31, 2025.

During the period under review, OIG completed 3 non-investigative and 10 investigative reports assessing AOC programs and operations as well as perceived vulnerabilities and risks. OIG's oversight activities revealed concerning trends pertaining to the AOC's ability to properly account for the millions of dollars in assets acquired annually. The AOC continues to experience difficulty safeguarding and accounting for government property, an issue that has been consistently identified as a management challenge for the last 6 years. Recent reporting efforts have identified theft, loss and waste amounting to approximately \$133,000.

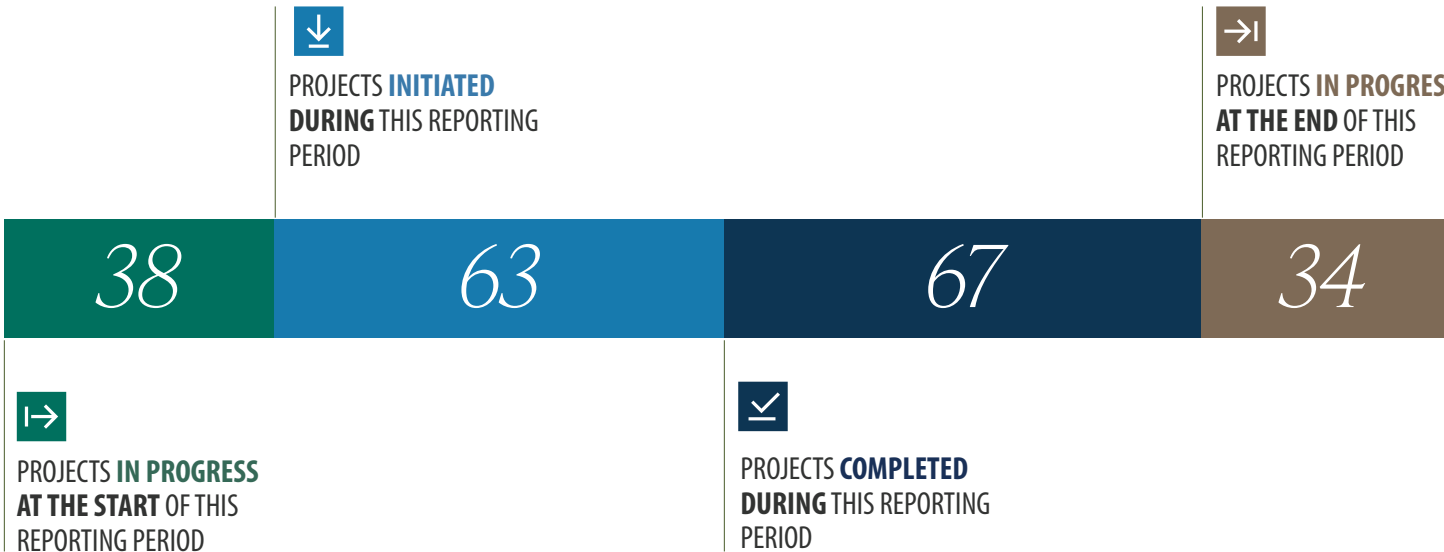
Through these SARs, OIG seeks to provide impactful and actionable recommendations that drive positive changes within the AOC. During this reporting period, the AOC has made significant progress toward addressing OIG's recommendations, implementing and closing 37 recommendations. Recommendations closed during the SAR period addressed continued construction oversight efforts, Capitol campus security initiatives, efforts to increase efficacy in the execution of Contracting Officer and Contracting Officer's Representative duties and accountable property theft mitigation strategies.

Looking forward, OIG continues to carry out its mission with an eye toward campus safety and security efforts, enterprise asset management and, as always, mitigating the potential for fraud, waste and abuse.

By the Numbers

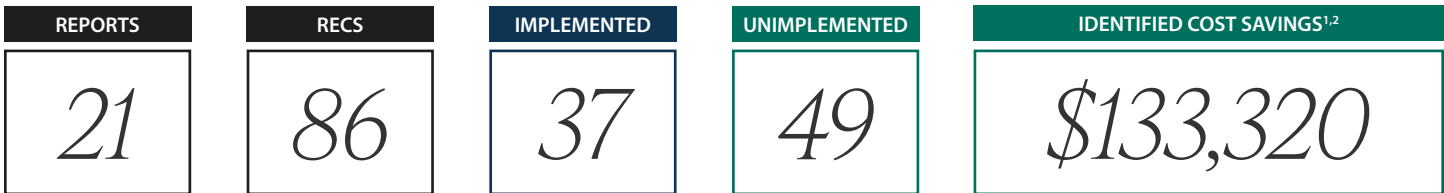
The following data represent OIG's activity from October 1, 2024–March 31, 2025. Within this reporting period, 1 audit, 2 follow-up evaluations and 10 investigations were completed, while 3 audits, 2 inspections and evaluations, 2 follow-up evaluations and 13 investigations remain in progress.

Overview



Note: A "project" is defined as an OIG work product.

Recommendations



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Budget and Staffing

Table 1. Fiscal Year 2025 Budget and Staffing

Category	Budget (Thousands)	Authorized Positions ^a
AOC	\$830,261	2,428
AOC's OIG	\$6,110	25
AOC's OIG % of AOC	0.74%	1.03%

^a As of March 31, 2025, OIG comprised 21 full-time staff.

¹ "Cost savings" is defined as the sum of questioned costs and recommendations of funds that could be put to better use.
² Investigative efforts led to \$133,320 identified in cost savings, \$74,000 of which has been recovered/recouped by the AOC.

About the Architect of the Capitol

AOC Overview

The Architect of the Capitol's (AOC's) permanent authority for the care and maintenance of the U.S. Capitol is derived 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 grounds include the U.S. Capitol, House and Senate Office Buildings, the U.S. Capitol Visitor Center, the Library of Congress (LOC), 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 the AOC's 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.



OIG Overview

The Architect of the Capitol Inspector General Act of 2007, 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 OIG's duties and authorities. It also established employee protections from retaliation for contacting OIG or participating in OIG activities. OIG reports to and is under the general supervision of the Architect of the Capitol. OIG's duties include the following:

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

ESTABLISHED IN *2007*
AS AN INDEPENDENT
AND OBJECTIVE OFFICE



MISSION

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

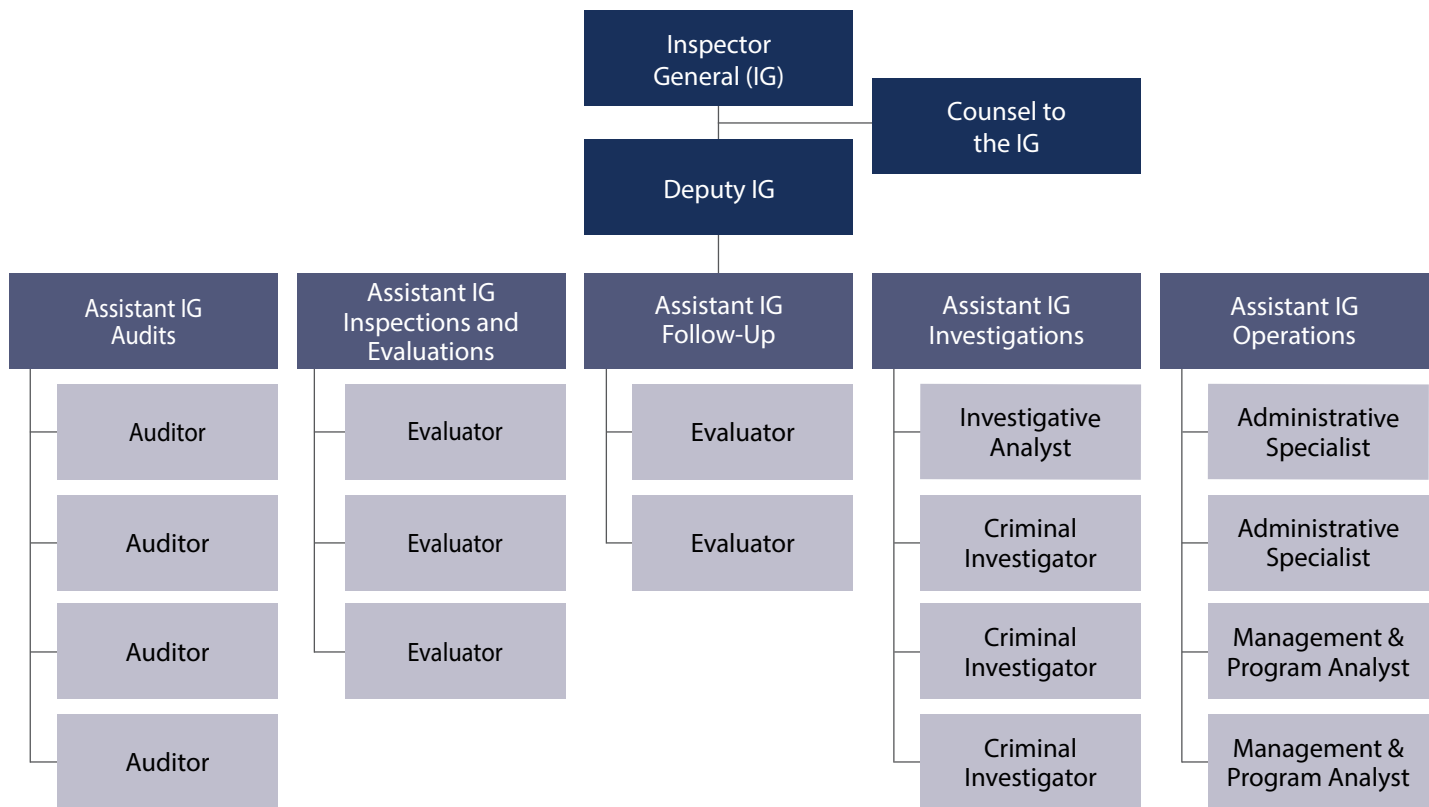
VISION

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



ORGANIZATIONAL STRUCTURE

The following chart details OIG's organizational structure as of March 31, 2025.







Reporting Activity

Audits

What is an Audit?

OIG's Audits Division (AUD) is responsible for conducting audits and program and performance assessments of the management and financial operations of the AOC, including their financial statements, construction projects and operations, information security, internal operations and external activities funded by the AOC. Many of the projects performed annually focus on high-risk management challenges within the AOC, including construction management. Because of limited resources, AUD generally focuses its work on high-cost programs, key management challenges and vital operations that will provide AOC managers with information that can assist them in identifying additional risk areas and making sound operational decisions. In addition to performing discretionary work, AUD uses a significant amount of its resources to fulfill mandatory requirements, such as the annual financial statement and Cannon construction audits, or to respond to congressional and AOC requests.

By the Numbers

From October 1, 2024–March 31, 2025, one audit was completed, and three remain in progress.

COMPLETED	IN PROGRESS
1	3

Completed This Reporting Period

1. Audit of Fiscal Year 2024 Financial Statements (OIG-AUD-2025-01)

OIG contracted with an independent public accounting (IPA) firm to audit the AOC's financial statements as of and for the fiscal years that ended September 30, 2024, and 2023, report on internal control over financial reporting and report on compliance and other matters. The contract required that the audits be performed in accordance with auditing standards generally accepted in the United States. Additionally, the audits must adhere to the standards applicable to financial audits as outlined in Government Auditing Standards issued by the Comptroller General of the United States, the Office of Management and Budget (OMB) Bulletin No. 24-02: Audit Requirements for Federal Financial Statements, the U.S. Government Accountability Office's (GAO's) Federal Information System Controls Audit Manual and GAO's/ Council of the Inspectors General on Integrity and Efficiency's (CIGIE) Financial Audit Manual. Specifically, the IPA firm was responsible for forming and expressing an opinion on whether the financial statements prepared by AOC management, with the oversight of those charged with governance, are prepared in all material respects in accordance with the applicable financial reporting framework.

The IPA firm issued an unmodified opinion for the AOC's Fiscal Year (FY) 2024 financial statements. The combined report did not identify a material weakness, significant deficiency or noncompliance with the AOC's financial management systems, provisions of laws tested or other matters.

OIG served as the Contracting Officer's Representative (COR), providing oversight of contract requirements. OIG transmitted the IPA firm's final report on November 15, 2024.

- *IPA firm recommendations:* Zero

In Progress This Reporting Period

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

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, 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.

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

2. Audit of the Architect of the Capitol's Cannon House Office Building Renewal (CHOBr) Project Substantial and Final Completion for Phase 3 and Phase 4 (2024-AUD-004-A)

OIG has contracted with an IPA firm 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 as well as to assess if the designation of substantial and final completion is being managed effectively and in accordance with contractual requirements.

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

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

OIG has contracted with an IPA firm to perform an audit of the 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.

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

Inspections and Evaluations

What is an Inspection or Evaluation?

OIG's Inspections and Evaluations Division (I&E) conducts independent and objective assessments of AOC programs and operations. These management and programmatic evaluations are intended to provide insight into issues of concern to the AOC, Congress and the American public. I&E blends multidisciplinary analytic skills to perform the following:

- Analyze patterns, policies and practices contributing to waste and abuse of funds and resources under AOC control.
- Develop reports with a focus on thematic and systemic issues.
- Proactively examine resource management and management controls.
- Conduct special reviews.

By the Numbers

From October 1, 2024–March 31, 2025, no inspection or evaluation reports were completed, and two remain in progress.

COMPLETED	IN PROGRESS
0	2



Completed This Reporting Period

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

In Progress This Reporting Period

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

OIG has contracted with an IPA firm 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.³ The AOC is not required to follow FISMA, but it is a best practice and will be used as criteria for the evaluation.

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

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

OIG has contracted with an IPA firm 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. OIG will also determine if vulnerabilities exist for fraud, waste, abuse and mismanagement.

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

³ Pub. L. No. 113-283, FISMA, <https://www.congress.gov/113/statute/STATUTE-128/STATUTE-128-Pg3073.pdf>

Follow-Up

What is a Follow-Up Evaluation?

OIG's Follow-Up Division (FLD) conducts independent and objective follow-up evaluations of corrective actions and recommendations implemented by AOC management from previous OIG audits, evaluations and investigations. These evaluations assess whether the AOC's corrective actions are complete, efficient and effective and address the original condition. Follow-up and monitoring implementation is a shared responsibility between OIG and AOC management. Therefore, the results aim to provide insight into the impact of OIG's work and the AOC's efforts to improve AOC operations. These evaluations further assist OIG competencies, standards and capabilities as a continuous learning organization.

By the Numbers

From October 1, 2024–March 31, 2025, one follow-up evaluation was completed, and two remain in progress.

COMPLETED	IN PROGRESS
1	2



Completed This Reporting Period

1. Follow-up Evaluation of the Architect of the Capitol's Compliance with the Government Purchase Card Program (OIG-FLD-2025-01)

OIG announced a follow-up evaluation of the AOC's compliance with the Government Purchase Card Program on March 14, 2024. The objective of this follow-up evaluation was to determine whether the AOC had effectively implemented corrective actions to address findings and recommendations in OIG's 2019 report, Evaluation of the AOC's Compliance with the Government Purchase Card Program ([2018-0003-IE-P](#)).

OIG issued the official report to the AOC on November 25, 2024. OIG found that the AOC improved its purchase card review process, hired additional staff and developed a purchase card review standard operating procedure (SOP). However, OIG determined that the AOC does not use data analytics and lacks specific guidance for conducting purchase card reviews. Additionally, cardholders may have split transactions, as AOC policy lacks specific guidance for staff on split purchases and strategies on how to avoid them. The AOC also lacks guidance on purchases from third-party processors and vendors and does not monitor or track the amount of sales tax paid.

- *OIG recommendations:* Seven

In Progress This Reporting Period

1. Follow-up Evaluation of the Architect of the Capitol's Emergency Preparedness Posture (2025-0002-FLD-P)

OIG is conducting a follow-up evaluation of the AOC's Emergency Preparedness Posture. The objective of this evaluation is to determine whether the AOC has effectively implemented corrective actions to address the findings and recommendations in the 2021 OIG report, Evaluation of the Architect of the Capitol's Emergency Preparedness Posture ([2020-0002-IE-P](#)).

OIG announced this follow-up evaluation on January 24, 2025, with plans to transmit the final report in September 2025.

2. Follow-up Evaluation of the Architect of the Capitol's Tree Maintenance Program (2025-0003-FLD-P)

OIG is conducting a follow-up evaluation of the AOC's Compliance Tree Maintenance 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 2021 OIG report, Evaluation of the Architect of the Capitol's Tree Maintenance Program ([2020-0003-IE-P](#)).

OIG announced this follow-up evaluation on January 22, 2025, with plans to transmit the final report in May 2025.

Investigations

What is an Investigation?

OIG’s 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 U.S. 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, together, further enhance OIG’s capabilities to identify and mitigate fraud within the AOC.

By the Numbers

From October 1, 2024–March 31, 2025, 10 investigations were closed, and 8 were opened. Additionally, approximately \$133,000 were identified as funds for better use, as highlighted in Table 2.

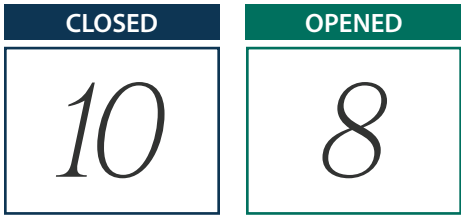


Table 2. Cost Avoidance, Savings and Recoveries Resulting From OIG Investigations

Item	Quantity
Cost avoidance from employee removals/resignations ^a	\$0.00
Savings from employee salaries during suspensions ^a	\$0.00
Administrative repayment determinations	\$48.25
Court ordered fines/forfeitures/restitution	\$73,747.64
OIG recovery of stolen government property/funds	\$0.00
Funds put to better use: salary and benefits	\$0.00
Funds put to better use: net questioned costs	\$59,524.21
Funds put to better use: waste	\$0.00
Total	\$133,320.10

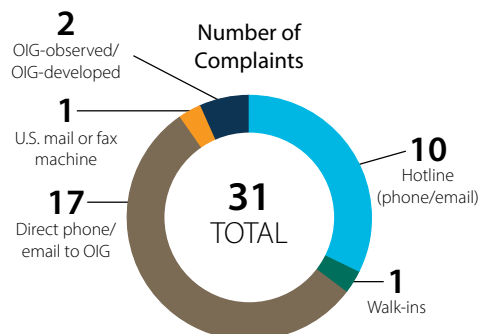
^a Salary and wage data obtained from the Office of the Chief Financial Officer is used to calculate positive impact and savings from investigations that result in the suspension, removal or resignation of employees engaged in misconduct in the workplace or who submit fraudulent workers’ compensation claims.



Investigative Data This Reporting Period

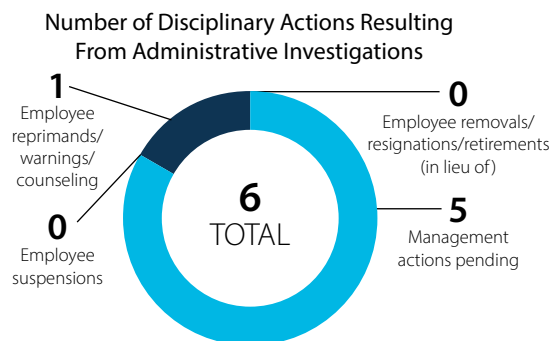
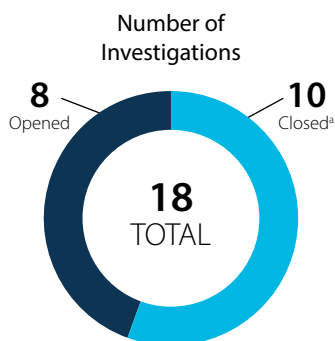
Complaints

During this reporting period, OIG received or initiated 31 complaints.



Investigations

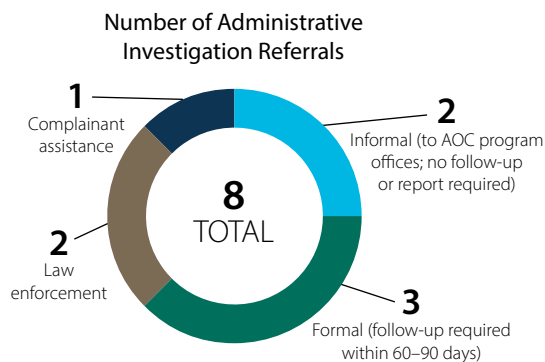
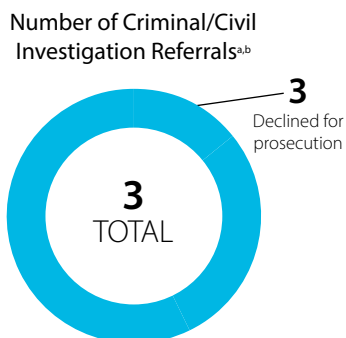
From the 31 complaints, investigators opened 8 investigations.



^a Value includes eight investigations opened during previous SAR periods.

Referrals

OIG referred eight complaints to other government agencies, AOC program offices and/or AOC Avenues of Assistance. Three cases were referred to USAO for prosecutorial decision.

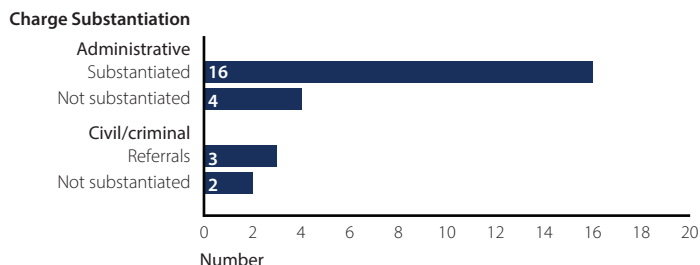


^a Referred to USAO, States Attorney's Office, or local entity for prosecutorial decision. Source: OIG investigative files.

^b There was one indictment or criminal information obtained for a matter referred during the previous reporting period. No criminal investigations were accepted for prosecution.

Investigations Division Charge Substantiation

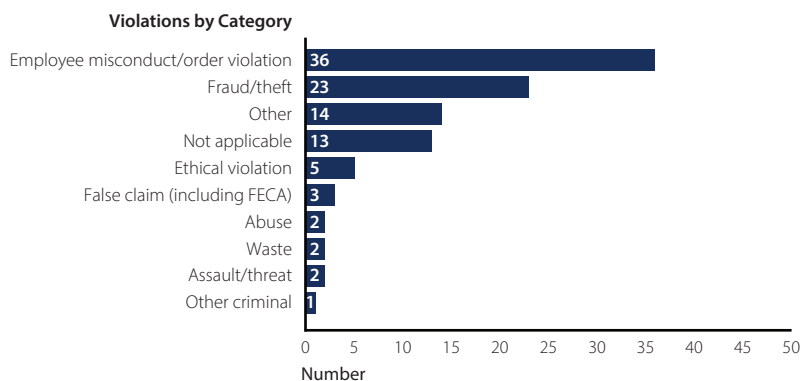
The following figure highlights the number of charges, both substantiated and not substantiated, by type for the 10 investigations closed during this reporting period. Of the 20 administrative charges, OIG substantiated 16 of them. Five of the substantiated administrative charges have been adjudicated by the agency during this reporting period. Management action is pending for five investigations with substantiated charges. Of the five criminal/civil charges, two were not substantiated. For the remaining three, OIG made referrals to USAO or other prosecutorial entities.



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

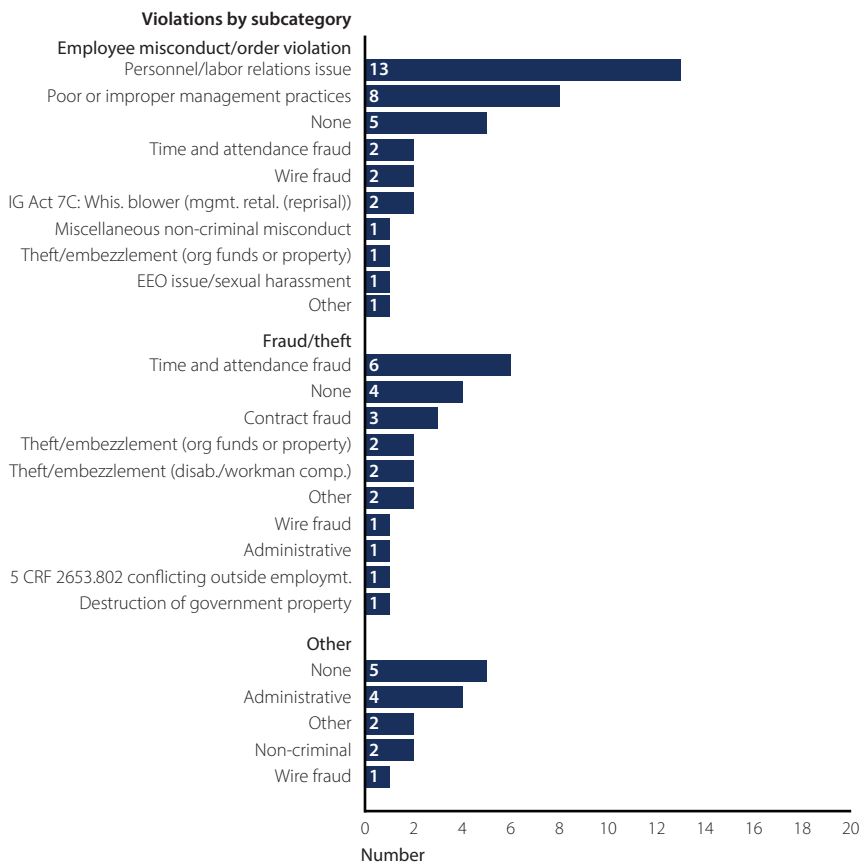
Investigations Division Violations by Category

The following figure highlights investigation activities for this reporting period that include complaints and referrals broken out by violation type. Employee misconduct/order violation, fraud/theft and other (i.e., violations that did not meet certain case criteria when initiated) continue to be the most frequent types of violations committed by AOC employees.



Top Three Violations by Subcategory

A further breakout of the top three investigative violation types by subcategory is depicted in the following figure.



Closed This Reporting Period

CLOSED FINAL

1. Unreported Outside Employment and Allegations of Paycheck Protection Program (PPP) and Economic Injury Disaster Loan (EIDL) Fraud (2024-0015-INVI-P)

OIG initiated a proactive investigation to review AOC employees' participation in the Small Business Administration's PPP and EIDL Program to determine (1) whether employees who received PPP or EIDL funds were entitled to the funds and were in compliance with AOC policy in receiving the funds and (2) if any AOC employees were victims of identity theft. The review identified now former AOC employee, John Coxon, GS-11, Industrial Engineering Technician, Capitol Power Plant, as an individual who allegedly received PPP and EIDL funds and met criteria identified by OIG for potential fraud. While OIG's investigation into Coxon found no evidence of fraudulent actions, it did find substantiated violations of AOC administrative policy. The case is closed.

- Suspected Violations of the AOC Government Ethics Policy. **Substantiated**
- Suspected Violations of the AOC Standards of Conduct Policy and Violations of Title 18 U.S.C. § 1343 – Fraud by wire, radio or television. **Not Substantiated**

2. Theft of Government Property (2023-0016-INVI-P)

OIG initiated an investigation after receiving an allegation against now former AOC employee, Eric Eugene Cavalier, UT-17, Electrician Supervisor, Construction Branch, Office of the Chief Engineer. The allegation stated that Cavalier had been illegally taking copper materials from the AOC and selling them to various scrap metal facilities in Maryland for personal profit. OIG's investigation found substantial evidence to the allegations and referred the matter to USAO in Greenbelt, MD, for prosecutorial consideration. USAO opened a case and charged Cavalier with eight counts of violations of 18 U.S.C. § 641. Cavalier resigned from the AOC during completion of the investigation. On February 18, 2025, Cavalier pled guilty to one count of 18 U.S.C. § 641 for knowingly and unlawfully misappropriating government property. On March 4, 2025, Cavalier submitted full payment to the AOC's Office of the Chief Financial Officer in the amount of \$73,747.65. On March 12, 2025, Cavalier was sentenced to 30 days of home confinement, 1 year of supervised probation and 50 hours of community service. The case is closed.

- Former Employee: Suspected Violation of the AOC Standards of Conduct Policy and Title 18 U.S.C. § 641 – Public money, property or records. **Substantiated**

3. Allegation of Federal Employees' Compensation Act (FECA) Fraud (2025-0001-INVI-P)

OIG initiated a proactive investigation to review the AOC's FECA Program to detect instances of abuse and ensure individuals receiving funds complied with the AOC's and the U.S. Department of Labor's Office of Workers' Compensation Program (OWCP) policies. The review identified an AOC employee who received FECA assistance on multiple occasions despite concerns

raised by both OIG and the Human Capital Management Division (HCMD). Additionally, OIG received an additional complaint that alleged the same AOC employee filed a new fraudulent FECA claim for an injury sustained while sweeping the floor at the AOC. The investigation showed that both claims were filed correctly with supporting medical documentation, and the employee was approved for FECA benefits by OWCP. OIG's investigation did not yield sufficient evidence to contradict the employee's claims that their injuries happened while on duty at the AOC. In January 2025, after being on leave without pay since 2024, the employee was terminated from the AOC. The case is closed.

- Suspected Violations of the AOC Workers' Compensation and Standards of Conduct Policies and Violations of Title 18 U.S.C. § 1920 – False statement or fraud to obtain Federal employees' compensation. **Not Substantiated**

4. Student Loan Repayment Program Violations (2024-0021-INVI-P)

OIG initiated a proactive investigation to review the AOC's Student Loan Repayment Program (SLRP) 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. Former AOC employee Samantha Parker, Health and Fitness Specialist, House Office Buildings, was identified as one of three employees with a delinquent and unfulfilled financial obligation to the AOC. OIG obtained documentary evidence that confirmed Parker had discussed her potential departure from the AOC with the Employee Benefits & Services Branch and was aware of the outstanding balance she would owe. The remaining balance of \$10,394.92 has since been paid in full. OIG substantiated that Parker violated AOC policy. The case is closed.

- Suspected Violations of the AOC SLRP Policy and Multiple SLRP Agreements. **Substantiated**
- Suspected Violations of Title 18 U.S.C. § 641 – Public money, property or records. **Not Substantiated**

5. Former Architect of the Capitol (AOC) Employee Committed Destruction of Government Property Inside Library of Congress Adams Building (2024-0004-INVI-P)

OIG received a complaint from LOC's OIG regarding alleged misconduct by former AOC employee Joseph Wayne Brame; Heating, Ventilation and Air Conditioning (HVAC) Electronics Mechanic; Library Buildings and Grounds. The complaint detailed concerns that equipment had been moved and was potentially missing from the weight room in the Wellness Center located in LOC's Adams Building. AOC's OIG, in collaboration with LOC's OIG, conducted an investigation and confirmed that Brame had removed and damaged the equipment. OIG substantiated the administrative and criminal violations against Brame. In lieu of prosecution by USAO in Washington, D.C., Brame was permitted to fully reimburse the government for the damages caused. Brame reimbursed the AOC \$48.25 and the LOC \$270.00. The case is closed.

- Joseph Wayne Brame: Suspected Violations of the AOC Standards of Conduct Policy and Violations of 18 U.S.C. § 1361 – Destruction of government property. **Substantiated**

AWAITING MANAGEMENT ACTION

1. Inappropriate Relationship, Retaliation and Truthfulness (2025-0003-INVI-P)

OIG was notified that although a previous investigation was completed (2024-0007-INVI-P), there was now additional evidence to support the previously not substantiated allegation of an inappropriate romantic relationship between former AOC Supervisor, Bryan Glotfelty, Sheet Metal Mechanic Supervisor, Capitol Building, and a subordinate employee. Furthermore, the complainant alleged multiple instances of threatening, harassing and inappropriate behavior by Glotfelty that were concurrently investigated by a separate AOC office. Subsequent review of previously obtained evidence, new testimonial evidence and additional documentary evidence obtained by OIG during this investigation provided sufficient evidence to substantiate, based on the preponderance of the evidence, an inappropriate relationship between Glotfelty and the subordinate employee. The investigation also found that both parties had been untruthful with OIG during the initial investigation. The substantiated administrative violations involving the current AOC employee have been submitted to the AOC for action deemed appropriate, if any. OIG referred the false statements under Title 18, U.S.C. § 1001 to USAO in Washington, D.C. for prosecutorial consideration, which declined to open a criminal matter given their limited resources and other prosecutorial priorities. The case is closed, and management action is pending.

- Supervisor: Suspected Violations of the AOC Standards of Conduct and Authority and Responsibilities of the OIG and Cooperation of AOC Employees Policies; Relationships Between Supervisors and Subordinates Policy Memorandum and Title 18 U.S.C. § 1001 – False statements. **Substantiated**
- Employee: Suspected Violations of the AOC Standards of Conduct Policy, Relationships Between Supervisors and Subordinates Policy Memorandum, and Title 18 United States Code § 1001 – False statements. **Substantiated**

2. Allegation of Malingering (2025-0005-INVI-P)

OIG received an allegation that an employee had falsified or had been exaggerating a nonwork-related injury to avoid having to complete their assigned duties. The investigation determined that the medical documentation supporting the employee's injury was legitimate. The investigation revealed that the employee failed to submit a current Outside Employment or Self-Employment Form for their personal business in violation of AOC policy. Additionally, records indicate that the employee did not report business income from their personal business to their respective state, a potential violation of tax law. OIG referred the matter to the appropriate comptroller for further investigation as deemed appropriate. The substantiated administrative violation has been submitted to the AOC for action deemed appropriate, if any. The case is closed, and management action is pending.

- Suspected Violations of the AOC Standards of Conduct and Government Ethics Policies. **Substantiated**
- Suspected Violations of AOC policy for having submitted fraudulent medical documentation in support of light-duty work. **Not Substantiated**

3. Fraudulent Medical Documentation (2024-0019-INVI-P)

OIG initiated an investigation after receiving a complaint regarding questionable medical documentation submitted by an AOC employee. The investigation revealed evidence that the employee had falsified information and provided fraudulent medical documentation. OIG substantiated administrative violations against the employee and submitted them to the AOC for action deemed appropriate, if any. OIG presented its findings of false claims to USAO in Washington, D.C., which declined to prosecute due to the availability of administrative remedies. The case is closed, and management action is pending.

- Suspected Violations of the AOC Standards of Conduct and Absence and Leave Policies. **Substantiated**

4. Student Loan Repayment Program Violations (2024-0022-INVI-P)

OIG initiated a proactive investigation to review the AOC's SLRP 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. Former AOC employee, Sherita Holt, Special Events Manager, U.S. Capitol Visitor Center, was identified as one of three employees with a delinquent and unfulfilled financial obligation to the AOC. The investigation revealed that Holt had an outstanding balance of \$30,523.87. Holt was forthcoming during the investigation and has since made some payments on the outstanding debt. OIG substantiated that Holt violated AOC policy and submitted the administrative violation to the AOC for action deemed appropriate, if any. The case is closed, and management action is pending.

- Suspected Violations of the AOC SLRP Policy and Multiple SLRP Agreements. **Substantiated**
- Suspected Violations of Title 18 U.S.C. § 641 – Public money, property or records. **Not Substantiated**

5. Student Loan Repayment Program Violations (2024-0020-INVI-P)

OIG initiated a proactive investigation to review AOC's SLRP 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. Former AOC employee Michael Buratty, Maintenance Mechanic, Senate Office Buildings, was identified as one of the remaining three employees with a delinquent and unfulfilled financial obligation to the AOC. Buratty had not made a loan payment since 2020 and, as of October 8, 2024, had an outstanding balance of \$18,605.42 due to late fees and penalties. Following the interview, Buratty immediately took steps to begin repayment to the AOC. OIG substantiated that Buratty violated AOC policy and submitted the administrative violation to the AOC for action deemed appropriate, if any. The case is closed, and management action is pending.

- Suspected Violations of the AOC SLRP Policy and Multiple SLRP Agreements. **Substantiated**
- Suspected Violations of Title 18 U.S.C. § 641 – Public money, property or records. **Not Substantiated**

INVOLVING SENIOR GOVERNMENT EMPLOYEES

OIG did not conduct any investigations involving senior government employees during this reporting period.

ACTION RESULTING FROM INVESTIGATIONS
REPORTED IN PREVIOUS SARS

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

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. 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 Information Technology Division (ITD) Rules of Behavior, and related documentation was not on file, OIG did not substantiate violations of ITD policy. The AOC issued a letter of counseling addressing the misuse of the AOC-issued iPhone. Additionally, ITD issued the Rules of Behavior form to the employee, who completed and signed it on October 30, 2024. The case is closed.

- Suspected Violations of the AOC Standards of Conduct Policy. *Substantiated*
- Suspected Violations of the AOC’s IT Resources and De Minimis Use Policy and the ITD Rules of Behavior. *Not Substantiated*

Opened This Reporting Period

1. OIG currently has the following 13 open investigations:

- 2023-0002-INVI-P
- 2023-0010-INVI-P
- 2024-0005-INVI-P
- 2024-0009-INVI-P
- 2024-0010-INVI-P
- 2024-0013-INVI-P
- 2024-0018-INVI-P
- 2024-0023-INVI-P
- 2025-0002-INVI-P
- 2025-0004-INVI-P
- 2025-0006-INVI-P
- 2025-0007-INVI-P
- 2025-0008-INVI-P

Per OIG policy, OIG is unable to comment on ongoing investigations. OIG anticipates closing these investigations during the next reporting period.

Other Reporting Requirements



Other Work

WHITE PAPER ON THE ARCHITECT OF THE CAPITOL'S EMERGENCY MANAGEMENT (OIG-FLD-2025-02)

OIG announced its plans to initiate follow-up work on prior OIG open and closed recommendations from reports pertaining to the AOC's emergency management on October 31, 2024. The purpose was to inform stakeholders — including congressional oversight bodies, the public and AOC leadership — on the status of emergency management efforts and areas for improvement. Additionally, it serves as a resource to support strategic decision-making, resource allocation and the implementation of policies that address vulnerabilities in the AOC's emergency management framework.

To strengthen emergency management, OIG collectively made 20 recommendations focused on interagency coordination, training programs and policy alignment. Five recommendations remain open⁴ and resolved. The AOC should continue efforts toward closing outstanding OIG recommendations to enhance both preparedness and resilience across the Capitol complex.

OIG issued the official report to the AOC on January 16, 2025.

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.

OIG issued one Management Advisory to the AOC during this reporting period.

Notices of Concern

A Notice of Concern reports on specific AOC safety or security issues observed during the course of OIG work and is provided to AOC management for any immediate action they deem appropriate. These reports do not provide recommendations. OIG did not issue any Notices of Concern during this reporting period.

Review of Legislation and Policies

OIG provides resources in reviewing and providing comments on AOC draft guidance documents as part of its requirement to comment on proposed legislation and policy. This requirement ensures that the AOC's orders and/or policy revisions are consistent and promote economy and efficiency. Some of these orders result directly from OIG recommendations to improve internal controls and maintain orderly operation. OIG's review is an integral part of its effort to identify and prevent fraud, waste and abuse. During this reporting period, OIG reviewed 11 AOC orders or other policy or guidance documents, as highlighted in Table 3.

⁴ As of the end of this reporting period, only one recommendation remains open.

Table 3. Review of AOC Orders or Other Policy or Guidance Documents

Document	Title	Description
Order 4-4	Use and Creation of Websites and Social Media	This order supersedes AOC Policy Memorandum 4-13 dated September 4, 2015. It outlines agency policy for the use and creation of official AOC websites and social media. It has been updated to reflect current office titles, recent AOC policies and a comprehensive list of relevant digital media platforms and applications.
Order 8-3	Information Technology Governance Structure	This order supersedes Order 8-3, AOC Information Technology (IT) Governance Charter, dated February 14, 2019, and the October 23, 2009, memorandum titled Information Technology projects 'Buy a Priority' procedure. This revised order updates the titles and division names of the members in the Information Technology Council (ITC) in accordance with the AOC reorganization and formation of the C-suite. It outlines the updated process to include integrated project teams and removes the role of the ITC Working Group. The role and responsibilities of the Chief Artificial Intelligence Officer is described in this updated order. This policy also defines the IT investment threshold.
Order 8-4	Accountable IT Property	This policy supersedes AOC Order 8-4, Accountable Information Technology Property, dated April 24, 2015. The revised policy defines the IT asset management lifecycle and identifies which assets are accountable property. It outlines the escalation process for lost, damaged and stolen assets and introduces formal reprimand for misuse of property.
Order 8-6	Data Management Policy	This policy establishes comprehensive guidelines, procedures and standards for effective data management, data security and responsible data use within the AOC. It defines the roles and responsibilities of key data governance bodies to ensure strategic oversight and coordination of data-related initiatives. Additionally, the policy outlines requirements for data collection, data handling, data security, data privacy, quality assurance, data procurement, retention, disposal, access, sharing and ethical use supported by references to relevant AOC orders and regulations.
Order 10-1	Occupational Health and Safety Program Policy	This order supersedes AOC Policy Memorandum 10-1A Safety and Occupational Health. It affirms AOC's commitment to occupational safety and health (OSH) as an agency core value. It establishes the building blocks for a world-class integrated OSH program and serves as the foundation for all other requirements within the AOC Safety Manual.
Order 32-10	Quarterly Financial Reviews	This order supersedes AOC Order 32-10 dated October 8, 2021. This version updates the quarterly financial review policy to apply to the AOC's new web-based application, which automates the process to validate open obligations. The new process alleviates the burden previously placed on the community of fund managers.
Order 32-13	Construction Division Indirect Cost Allocation Policy	This order establishes AOC policy for allocating project-related indirect costs incurred by OCE's Construction Division (CD) to office/jurisdiction project funding.
Order 34-45	Personal Property Policy	This order supersedes AOC Order 34-45 dated October 15, 2020. It guides AOC property management personnel through the personal property management life cycle, describing the roles and responsibilities at each step of the process while complying with all applicable AOC-issued orders. Changes include updates to the accountable property dollar threshold and requirements surrounding mission-critical non-consumable and consumable property.
Order 36-2	Access to Records in the Curator Division	This order supersedes AOC Order 36-4 dated June 26, 2001. It 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 & Technical Imaging Branch.
PM 213-2	Senior-Rated Pay Plan, Awards and Annual Leave	This policy memorandum amends and supersedes Paragraph 6.4, Performance Review Board; Paragraph 9, Tier Positions; Paragraph 12, Awards; and Appendix A of AOC Order 213-2, Senior-Rated Pay Plan, Awards and Annual Leave dated April 3, 2017. This policy memorandum also rescinds AOC Policy Memorandum 213-2 dated November 28, 2023.
PM 250-2	Succession Plan for Architect of the Capitol C-Suite and Office/Jurisdiction Head Senior-Rated Position Vacancies	This memorandum supplements AOC Order 250-2, Assignment of Authorities and Responsibilities in the Architect of the Capitol, and outlines the succession plan for the AOC's C-Suite and Office/Jurisdiction Head Senior-Rated positions in the event of a vacancy involving these senior leadership positions.

Refusal to Provide Information or Assistance or Interference

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

Status of Reports or Recommendations

1. *For which no management decision was made*
2. *For which no management comment was made within 60 days*

There were no reports or recommendations more than 6 months old for which OIG had not received management decisions during this reporting period. Further, there were no reports or recommendations for which management did not provide comments within 60 days.

Significantly Revised Management Decisions

There were no significantly revised management decisions during this reporting period.

Significant Management Decisions With Which OIG Disagrees

There were no significant management decisions with which OIG disagreed with during this reporting period.

Instances in Which an Inspection, Evaluation or Audit Was Completed and Not Disclosed to the Public

There were no instances during this reporting period in which 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

AUDITS

The Peace Corps' OIG conducted an external peer review of OIG's AUD operations and issued a final report on December 13, 2024. OIG received a peer review rating of "Pass," the highest rating possible, confirming that AUD operations are performed in accordance with Generally Accepted Government Auditing Standards. There are no outstanding recommendations in the final report.

INSPECTIONS AND EVALUATIONS

There was no peer review activity for OIG's I&E during this reporting period. The Equal Employment Opportunity (EEO) Commission's OIG conducted an external peer review of I&E operations and issued a final report on September 23, 2021. OIG received a peer review rating of "Pass," and there are no outstanding recommendations in the final report.

FOLLOW-UP

There was no peer review activity for OIG's FLD during this reporting period.

INVESTIGATIONS

There was no peer review activity for OIG's Investigations Division during this reporting period. The Federal Election Commission's OIG conducted an external peer review of OIG's investigative function and issued a final report on June 8, 2023. OIG received a peer review rating of "In Compliance," the highest rating possible, confirming that investigation operations are performed in accordance with the CIGIE Quality Standards for Investigations. There are no outstanding recommendations in the final report.





Recommendations

Overview

What is a Recommendation?

The implementation of OIG's recommendations to correct problems and vulnerabilities identified during an audit, inspection, evaluation or other review is one of the most significant outcomes of OIG's oversight activities.

By the Numbers

From October 1, 2024–March 31, 2025, OIG made 86 recommendations associated with 21 reports.⁵ Of those 86 recommendations, 37 were implemented and designated as closed-resolved,⁶ while 49 remain unimplemented and designated as open-resolved.⁷

REPORTS	RECS
21	86
IMPLEMENTED	UNIMPLEMENTED
37	49

⁵ These reports span various reporting periods and are highlighted here because the recommendations were either implemented or remain unimplemented during this reporting period.

⁶ "Closed-resolved" means that OIG verified that the agreed-upon corrective actions were implemented.

⁷ "Open-resolved" means that AOC management has agreed (concurred) to implement the recommendation or has proposed corrective actions that will address the recommendation.

POTENTIAL COST SAVINGS

Table 4 provides a summary of potential cost savings for the 49 unimplemented and open-resolved recommendations across 15 of the 21 reports. “Cost-savings” are defined as the sum of questioned costs and recommendations of funds that could be put to better use.

Table 4. Summary of Potential Cost Savings for Open-Resolved Recommendations

Report No.	No. Open-Resolved Recommendations	Funds Put to Better Use	Questioned Costs	Potential Cost Savings
OIG-AUD-2021-03	1	\$0	\$0	\$0
OIG-AUD-2021-06	2	\$0	\$0	\$0
OIG-AUD-2023-05	3	\$0	\$0	\$0
OIG-AUD-2023-06	1	\$0	\$0	\$0
OIG-AUD-2024-06	2	\$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	\$0	\$0	\$0
2023-0002-IE-P	6	\$0	\$0	\$0
2023-0003-IE-P	12	\$0	\$0	\$0
OIG-FLD-2022-01	3	\$0	\$0	\$0
OIG-FLD-2023-01	1	\$0	\$0	\$0
OIG-FLD-2024-01	2	\$0	\$0	\$0
OIG-FLD-2025-01	7	\$0	\$0	\$0
Total	49	\$0.00	\$0.00	\$0.00

FUNDS QUESTIONED OR PUT TO BETTER USE

Table 5 provides a list of audit and evaluation reports, including the total value of questioned costs and funds put to better use, while Table 6 provides the status of questioned costs reported in previous SARs.

Table 5. Funds Questioned or Put to Better Use

Report No.	Report Title	Date Published	Questioned Costs ^a	Unsupported Costs ^a	Funds Put to Better Use ^a	Management Decision ^a
<u>OIG-AUD-2025-01</u>	Audit of Fiscal Year 2024 Financial Statements	11/15/2024	—	—	—	Yes
<u>OIG-FLD-2025-01</u>	Follow-up Evaluation of the Architect of the Capitol's Compliance with the Government Purchase Card Program	11/25/2024	—	—	—	Yes
Total	—	—	—	—	—	—

^a Refer to appendix A for definition of term.

—Not applicable.

Table 6. Status of Questioned Costs

Report No.	Report Title	Date Issued	Questioned Costs ^a	Disallowed Costs ^a	Status of Questioned		Status of Disallowed		Status to Date
					Allowed	Disallowed	Recovered	Not Recovered	
<u>OIG-AUD-2023-04</u>	Review of the Architect of the Capitol's (AOC's) Multimillion-Dollar Construction Project Change Orders	3/30/2023	\$722,083.00	\$19,675.00 ^b	\$595,564.00	\$146,194.00	\$6,493.00	\$139,701.00	Closed
<u>OIG-AUD-2023-07</u>	Semiannual Review of the Architect of the Capitol's (AOC's) Multimillion-Dollar Construction Project Change Orders	9/21/2023	\$88,025.00	—	\$87,810.00	\$215.00	\$215.00	—	Closed

^a Refer to appendix A for definition of term.

^b Disallowed costs of \$19,675.00 were reported separately from questioned costs of \$722,083.00. The total questioned costs for the report was \$741,758.00 (questioned costs plus disallowed costs).

—Not applicable.

Implemented Recommendations—Audits

ARCHITECT OF THE CAPITOL OFFICE OF THE CHIEF FINANCIAL OFFICER

Audits | [OIG-AUD-2024-02](#) | December 4, 2023

Fiscal Year 2023 Financial Statements Audit Management Letter

Report Summary:

OIG oversaw an IPA firm's audit of AOC FY 2023 financial statements.

Recommendation No. 1:

We recommend the AOC's Office of the Chief Financial Officer 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.

AOC Management Decision:

 **Concur**

OIG Response: **Closed-resolved**

Recommendation No. 2:

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.

AOC Management Decision:

 **Concur**

OIG Response: **Closed-resolved**

ARCHITECT OF THE CAPITOL OFFICE OF THE CHIEF SECURITY OFFICER

Audits | [OIG-AUD-2021-03](#) | May 5, 2021

Flash Report Series — Independent Assessment of the Architect of the Capitol's (AOC's) Role in Securing the Capitol Campus for Large Public Gatherings

Report Summary:

OIG performed an independent assessment of the AOC's role in securing the Capitol campus during large public gatherings.

Recommendation No. 2:

We recommend the AOC Office of the Chief Security Officer 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.

AOC Management Decision:

 **Concur**

OIG Response: **Closed-resolved**

Recommendation No. 4:

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.

AOC Management Decision:

 **Concur**

OIG Response: **Closed-resolved**

Recommendation No. 5:

We recommend the AOC Office of the Chief Security Officer 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.

AOC Management Decision:

 **Concur**

OIG Response: **Closed-resolved**

Recommendation No. 6:

We recommend the AOC inform the USCP of the deferred security maintenance work elements before large public gatherings and events on the Capitol campus.

AOC Management Decision:

 **Concur**

OIG Response: **Closed-resolved**

ARCHITECT OF THE CAPITOL OFFICE OF THE CHIEF ENGINEER

Audits | [OIG-AUD-2022-07](#) | July 29, 2022

Multi-Million-Dollar Construction Projects' Contract Provisions Comply with Federal Guidance, AOC Policies and Industry Standards Although Improvements Can Be Added

Report Summary:

OIG performed an audit of the contract provisions of AOC multimillion-dollar construction projects.

Recommendation No. 2:

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.

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.

OIG Response: Closed-resolved

Recommendation No. 5:

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.

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.

OIG Response: Closed-resolved

Recommendation No. 7:

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.

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.

OIG Response: Closed-resolved

Audits | [OIG-AUD-2023-04](#) | March 30, 2023

Review of the Architect | of the Capitol's (AOC's) Multimillion-Dollar Construction Project Change Orders

Report Summary:

OIG performed a review of the AOC's change orders for multimillion-dollar construction projects.

Recommendation No. 1:

We recommend the AOC perform the following:

- **1a:** Recover the questioned costs of \$6,464.00 identified within the R-Tunnel Project to the extent legally and administratively possible.
- **1b:** Review the questioned costs of \$68,940.00 (\$75,404.00 – \$6,464.00) identified within the CHOBr 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.
- **1c:** 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.

AOC Management Decision:

 **Partially Concur**

We concur with [recommendation] 1a. The AOC will work to recover the questioned costs if it is legally and administratively possible.

We partially concur with [recommendation] 1b. The AOC does not concur with [recommendation] 1b as it relates to the CHOBr 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 CHOBr Project.

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.

OIG Response: Closed-resolved

<p>Recommendation No. 2:</p> <p>We recommend the AOC perform the following:</p> <ul style="list-style-type: none"> • 2a: 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. • 2b: 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:</p> <p> Partially Concur</p> <p><i>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.</i></p> <p><i>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.</i></p> <p>OIG Response: Closed-resolved</p>
<p>Recommendation No. 4:</p> <p>We recommend the AOC perform the following:</p> <ul style="list-style-type: none"> • 4a: Recover the questioned costs of \$2,716.00 identified within the R-Tunnel Project to the extent legally and administratively possible. • 4b: 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:</p> <p> Partially Concur</p> <p><i>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.</i></p> <p>OIG Response: Closed-resolved</p>
<p>Recommendation No. 5:</p> <p>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:</p> <p> Concur</p> <p><i>The AOC will work to recover the questioned costs if it is legally and administratively possible.</i></p> <p>OIG Response: Closed-resolved</p>
<p>Recommendation No. 7:</p> <p>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:</p> <p> Concur</p> <p><i>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.</i></p> <p>OIG Response: Closed-resolved</p>
<p>Recommendation No. 8:</p> <p>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:</p> <p> Concur</p> <p><i>To the extent legally and administratively possible, the AOC will recover the questioned costs.</i></p> <p>OIG Response: Closed-resolved</p>

The Architect of the Capitol Lacked Sufficient Oversight of the Cannon Caucus Room Renovations

Report Summary:

OIG performed an audit of the AOC's CHOB Project Caucus Room.

Recommendation No. 2:

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.

AOC Management Decision:

 **Concur**

The AOC will ensure the Caucus Room has a complete set of as-built documents.

OIG Response: Closed-resolved

Recommendation No. 3:

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.

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.

OIG Response: Closed-resolved

Recommendation No. 5:

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 construction manager as constructor (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.

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.

OIG Response: Closed-resolved

Recommendation No. 7:

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.

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.

OIG Response: Closed-resolved

Recommendation No. 8:

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.

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.

OIG Response: Closed-resolved

Recommendation No. 9:

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.

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.

OIG Response: Closed-resolved

Recommendation No. 10:

We recommend the AOC require 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).

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.

OIG Response: Closed-resolved

Semiannual Review of the Architect of the Capitol's (AOC's) Multimillion-Dollar Construction Project Change Orders

Report Summary:

OIG performed a review of the AOC's change orders for multimillion-dollar construction projects.

Recommendation No. 3:

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.

AOC Management Decision:



The AOC Contracting Officer (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.

OIG Response: Closed-resolved

Recommendation No. 4:

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.

AOC Management Decision:



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.

OIG Response: Closed-resolved

Cannon House Office Building Renewal Project's Punch List And Warranty Work Process Lacked Sufficient Oversight

Report Summary:

OIG performed an audit of the AOC's CHOBr Project punch list and warranty work.

Recommendation No. 4:

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.

AOC Management Decision:



The AOC will consider pursuing this recommendation to the extent legally and administratively possible.

OIG Response: Closed-resolved

Recommendation No. 7:

We recommend, for those items categorized as punch list (in-scope work) and completed during and/or after the warranty period, the CHOBr Project team negotiate an extended warranty period with the CMC to the extent legally and administratively feasible.

AOC Management Decision:



The AOC will determine if the OIG's recommended approach is feasible. We anticipate this may be an additional cost to the CHOBr Project.

OIG Response: Closed-resolved

Recommendation No. 9:

We recommend the CHOBr Project team review all punch list items discovered during the 1-year warranty inspection to determine how the quality control (QC) reviewers overlooked those items during prior inspections and whether the CHOBr Project team should make any improvements to the QC process to avoid future oversights.

AOC Management Decision:



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.

OIG Response: Closed-resolved

Audits | [OIG-AUD-2024-06](#) | September 26, 2024
Audit of the Architect of the Capitol's Construction Division

Report Summary:

OIG performed an audit of the AOC's CD projects.

Recommendation No. 2:

We recommend that the CD 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.

AOC Management Decision:

 **Concur**

The Office of the Chief Engineer will assess the CD's 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 Office of the Chief Engineer may implement the new data collection as standard process.

OIG Response: Closed-resolved

Implemented Recommendations—Inspections and Evaluations

ARCHITECT OF THE CAPITOL OFFICE OF THE CHIEF ADMINISTRATIVE OFFICER

Inspections and Evaluations | [2022-0005-IE-P](#) | June 22, 2023

Evaluation of the Architect of the Capitol's (AOC's) Implementation of the Federal Information Security Modernization Act of 2014 (FISMA), Fiscal Year 2022

Report Summary:

OIG performed an evaluation to determine whether the AOC developed and implemented effective information security programs and practices in accordance with FISMA.

Recommendation No. 18:

Due to the sensitive nature of this evaluation, specific language pertaining to findings and recommendations is protected and will not be disclosed.

AOC Management Decision:

 **Concur**

The AOC concurs with the OIG's recommendations.

OIG Response: Closed-resolved

ARCHITECT OF THE OFFICE OF THE CHIEF ADMINISTRATIVE OFFICER AND OFFICE OF THE CHIEF ENGINEER

Inspections and Evaluations | [2023-0002-IE-P](#) | June 12, 2024

Evaluation of Architect of the Capitol's Contracting Officer and Contracting Officer's Representative Oversight

Report Summary:

OIG performed an evaluation to determine if COs and CORs were performing their duties in accordance with AOC policies, procedures and contractual requirements. OIG also assessed whether there were any limitations that might hinder opportunities for efficiency in the CO and COR work process.

Recommendation No. 2:

We recommend the AOC provide CORs in each jurisdiction access to the data, tools and training necessary to prepare independent government estimates (IGEs).

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.

OIG Response: Closed-resolved

Recommendation No. 4:






We recommend the AOC analyze [the] Cost Estimating Group's (CEG's) 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.

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.

OIG Response: Closed-resolved

Recommendation No. 5: 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.	AOC Management Decision: <div>  Concur </div> <p>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> OIG Response: Closed-resolved
Recommendation No. 6: We recommend the AOC identify or develop COR training courses more closely related to the AOC's acquisitions policies and procedures.	AOC Management Decision: <div>  Concur </div> <p>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> OIG Response: Closed-resolved
Recommendation No. 7: We recommend the AOC develop and implement a master COR file to track the status of CORs training and certifications across the agency.	AOC Management Decision: <div>  Concur </div> <p>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> OIG Response: Closed-resolved
Recommendation No. 8: We recommend the AOC require an appropriations law training course for all CORs.	AOC Management Decision: <div>  Concur </div> <p>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> OIG Response: Closed-resolved
Recommendation No. 13: We recommend that the Design and Construction Acquisition Division and Supplies, Services and Material Management Division (SSMMD) require COs to complete the number of COR file audits specified in their performance plan.	AOC Management Decision: <div>  Concur </div> <p>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 fiscal year. Completion is anticipated in September 2024.</p> OIG Response: Closed-resolved

Implemented Recommendations—Follow-Up

ARCHITECT OF THE CAPITOL OFFICE OF THE CHIEF ADMINISTRATIVE OFFICER

Follow-Up OIG-FLD-2023-01 September 5, 2023 Follow-Up Evaluation of the Architect of the Capitol's Inventory Accountability and Controls	
Report Summary: 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).	
Recommendation No. 2: We recommend the AOC research and implement federal government best practices for acquiring and maintaining adequate storage space to reduce the risk of theft.	AOC Management Decision: <div>  Concur </div> <p>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> OIG Response: Closed-resolved

Unimplemented Recommendations—Audits

ARCHITECT OF THE CAPITOL OFFICE OF THE CHIEF FINANCIAL OFFICER

Audits | [OIG-AUD-2021-06](#) | September 29, 2021

Audit of the Architect of the Capitol's Unliquidated Obligations

Report Summary:

OIG performed an audit of the AOC's unliquidated obligations (ULO).

Recommendation No. 2:

We recommend the AOC ensure supporting documentation for ULOs is maintained and readily available.

AOC Management Decision:

 **Concur**

OIG Response: Open-resolved

Recommendation No. 3:

We recommend the AOC finalize the new Quarterly Financial Review SharePoint application and ensure it addresses the current and prior year audit findings and revise the AOC's policies and procedures to align with the new application.

AOC Management Decision:

 **Concur**

OIG Response: Open-resolved

Audits | [OIG-AUD-2023-05](#) | April 14, 2023

Architect of the Capitol's Internal Control Plan Lacked Procedures to Assess and Monitor Payment Accuracy

Report Summary:

OIG performed an audit of the AOC's internal control plan used to monitor payment accuracy.

Recommendation No. 1:

We recommend AOC management develop a process that will assess and monitor payment accuracy in its program and activities:

- 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:
 - 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.

AOC Management Decision:

 **Concur**

The Office of the Chief Financial Officer will update its enterprise risk assessment process performed in accordance with [the] AOC's 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.

OIG Response: Open-resolved

Recommendation No. 2:

We recommend AOC management execute the process that assesses and monitors payment accuracy in its program and activities every 1 to 3 years.

AOC Management Decision:

 **Concur**

The Office of the Chief Financial Officer will execute their updated enterprise risk assessment process to assess and monitor payment accuracy in its program and activities every 1 to 3 years.

OIG Response: Open-resolved

Recommendation No. 3:

We recommend AOC management design a recovery plan that is consistent with federal guidance for implementation when improper payments are identified.

AOC Management Decision:

 **Concur**

The Office of the Chief Financial Officer 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.

OIG Response: Open-resolved

ARCHITECT OF THE CAPITOL OFFICE OF THE CHIEF SECURITY OFFICER

Audits | [OIG-AUD-2021-03](#) | May 5, 2021
Flash Report Series — Independent Assessment of the Architect of the Capitol’s (AOC) Role in Securing the Capitol Campus for Large Public Gatherings

Report Summary: OIG performed an independent assessment of the AOC’s role in securing the Capitol campus during large public gatherings.	
Recommendation No. 3: We recommend the AOC Office of the Chief Security Officer 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.	AOC Management Decision: <div>✓ Concur</div> OIG Response: Open-resolved

ARCHITECT OF THE CAPITOL OFFICE OF THE CHIEF ENGINEER

Audits | [OIG-AUD-2023-06](#) | September 6, 2023
The Architect of the Capitol Lacked Sufficient Oversight of the Cannon Caucus Room Renovations

Report Summary: OIG performed an audit of the AOC’s CHOBr Project Caucus Room.	
Recommendation No. 4: We recommend the AOC require the CMc to submit a final testing, adjusting and balancing report. If the CMc is unable to do so, the AOC should assess a credit against the CMc for failing to properly complete its contractual obligations.	AOC Management Decision: <div>✓ Concur</div> <i>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.</i> OIG Response: Open-resolved

Audits | [OIG-AUD-2024-06](#) | September 26, 2024
Audit of the Architect of the Capitol’s Construction Division

Report Summary: OIG performed an audit of the AOC’s CD projects.	
Recommendation No. 1: We recommend that AOC develop standardized policies and procedures that govern how jurisdictions should evaluate and document their decision to either engage internal resources or hire external contractors.	AOC Management Decision: <div>✓ Concur</div> <i>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.</i> OIG Response: Open-resolved
Recommendation No. 3: We recommend that the CD finalize and formalize its SOPs.	AOC Management Decision: <div>✓ Concur</div> <i>The AOC anticipates a new Director of Construction will be in place in early FY 2025, and this will be a priority focus. Once in place, the Director will work with the CD to finalize and formalize its SOPs.</i> OIG Response: Open-resolved

Unimplemented Recommendations

Unimplemented Recommendations—Inspections and Evaluations

ARCHITECT OF THE CAPITOL OFFICE OF THE CHIEF ADMINISTRATIVE OFFICER

Inspections and Evaluations | 2019-0001-IE-P | June 5, 2020
Evaluation of the Architect of the Capitol's Compliance with Its Discipline Order

Report Summary:

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. OIG also reviewed disciplinary actions to determine if punitive actions were applied consistently based on appropriate criteria and evidence.

Recommendation No. C:

We recommend the AOC develop and publish a discipline policy for exempt personnel for transparency and consistency with other employee groups.

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 [the] AOC's senior-rated staff. The policy order will be reviewed, revised as directed, signed and implemented upon the appointment of a permanent Architect.

OIG Response: Open-resolved

Inspections and Evaluations | 2021-0001-IE-P | November 29, 2021
Evaluation of the Architect of the Capitol's Fleet Management Program

Report Summary:

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.

Recommendation No. 1:

We recommend the Chief Administrative Officer (CAO) develop and implement additional policies and procedures that:

- 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.

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.

OIG Response: Open-resolved

Recommendation No. 2:

We recommend the CAO review jurisdiction-level fleet policies and standardize jurisdictional best practices across the AOC where appropriate.

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 [Division] for review. Publication of the updated policy is expected by the end of FY 2024.

OIG Response: Open-resolved

Recommendation No. 5:

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.

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 [Division] for review. Publication of the updated policy is expected by the end of FY 2024.

OIG Response: Open-resolved

Evaluation of the Information Technology Division's Inventory Accountability and Controls

Report Summary:

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.

Recommendation No. 1:

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.

AOC Management Decision:



The AOC concurs with the recommendation. ITD 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.

OIG Response: **Open-resolved**

Recommendation No. 2:

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.

AOC Management Decision:



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 Information Technology Service Management (ITSM) solution and not perform multiple migrations to legacy systems that will be retired within the next 12-18 months. As a result, the implementation plan to transition to a single asset management system will be a subset of the larger acquisition and transition plan for the new ITSM solution.

OIG Response: **Open-resolved**

Recommendation No. 3:

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.

AOC Management Decision:



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].

OIG Response: **Open-resolved**

Evaluation of Architect of the Capitol's Contracting Officer and Contracting Officer's Representative Oversight

Report Summary:

OIG performed an evaluation to determine if COs and CORs were performing their duties in accordance with AOC policies, procedures and contractual requirements. OIG also assessed whether there were any limitations that might hinder opportunities for efficiency in the CO and COR work process.

Recommendation No. 1:

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.

AOC Management Decision:



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.

OIG Response: **Open-resolved**

Recommendation No. 3:

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.

AOC Management Decision:



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.

OIG Response: **Open-resolved**

Recommendation No. 9:

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].

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.

OIG Response: Open-resolved**Recommendation No. 10:**

We recommend the AOC implement compliance monitoring and enforcement standards for the current policies and procedures requiring CORs to document their roles and responsibilities.

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.

OIG Response: Open-resolved**Recommendation No. 11:**

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.

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.

OIG Response: Open-resolved**Recommendation No. 12:**

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.

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.

OIG Response: Open-resolved

Inspections and Evaluations | 2023-0003-IE-P | August 29, 2024

The Architect of the Capitol Human Capital Management Program Evaluation

Report Summary:

OIG performed an evaluation to assess the efficiency, effectiveness and internal controls of AOC Human Capital Management Program activities and operations in accordance with AOC policies, procedures, transformation milestones, human capital strategy and applicable federal laws and regulations. OIG's review of these items focused primarily on the applicability to hiring, retention, turnover and quality step increases (QSIs).

Recommendation No. 1:

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.

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.

OIG Response: Open-resolved

Recommendation No. 2:

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.

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.

AOC Management Decision:

The AOC concurs with the OIG's recommendation. The AOC notes the PSP Division is responsible for updating the data housed in the AOC Policy Library. The PSP Division updated ownership of policies in fall 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.

OIG Response: Open-resolved

Recommendation No. 3:

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.

Furthermore, this recommendation should include a focus on designating a point of contact at the HCMD to handle policy-related inquiries, thereby discouraging reliance on nondesignated resources and promoting adherence to policies.

AOC Management Decision:

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.

OIG Response: Open-resolved

Recommendation No. 4:

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 (SF) 52s.

AOC Management Decision:

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.

OIG Response: Open-resolved

Recommendation No. 5:

We recommend the CAO establish data management protocols, incorporating routine review and reconciliation of employee data, alongside procedures for data entry and updates.

AOC Management Decision:

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.

OIG Response: Open-resolved

Recommendation No. 6:

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.

AOC Management Decision:

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.

OIG Response: Open-resolved

Recommendation No. 7:

We recommend the CAO establish clear procedures and defined timelines for administering and conducting exit interviews with separating employees.

AOC Management Decision:

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.

OIG Response: Open-resolved

Recommendation No. 8:

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.

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.

OIG Response: Open-resolved

Recommendation No. 9:

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.

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. [Completion is anticipated in the] fourth quarter of FY 2025.

OIG Response: Open-resolved

Recommendation No. 10:

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.

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.

OIG Response: Open-resolved

Recommendation No. 11:

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.

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 [the] AOC's centralized database. Completion is anticipated in the fourth quarter of FY 2025.

OIG Response: Open-resolved

Recommendation No. 12:

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.

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.

OIG Response: Open-resolved

ARCHITECT OF THE CAPITOL OFFICE OF THE CHIEF SECURITY OFFICER

Inspections and Evaluations | 2022-0001-IE-P | July 25, 2022
Evaluation of the Architect of the Capitol's Security Badging Program

Report Summary: OIG performed an evaluation to assess the badging process for AOC employees and contractors and to determine if vulnerabilities exist within the program.	
Recommendation No. 1: 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.	AOC Management Decision: <div>✓ Concur</div> <p>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> OIG Response: Open-resolved
Recommendation No. 3: We recommend the Office of the Chief Security Officer develop and implement suitability policy language, including clear lines of responsibility and processes. Improvements should include: <ul style="list-style-type: none">Assigning the responsibility for the centralized recordkeeping of intra-agency badging agreement memoranda of understanding or agreements to the Office of the Chief Security Officer in the Contractor Suitability Policy.Including guidance and requirements for secure badge return and protection and oversight of personally identifiable information in both policies.	AOC Management Decision: <div>✓ Concur</div> <p>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> OIG Response: Open-resolved

Unimplemented Recommendations—Follow-Up


ARCHITECT OF THE CAPITOL OFFICE OF THE CHIEF ADMINISTRATIVE OFFICER

Follow-Up | OIG-FLD-2022-01 | June 1, 2023
Follow-Up Evaluation of the Congressional Request for Architect of the Capitol's Response to Sexual Harassment

Report Summary: OIG performed a follow-up evaluation of the 2019 report, Congressional Request: Office of Inspector General Sexual Harassment Inquiry (2019-0001-INVQ-P).	
Recommendation No. 2: We recommend the Diversity, Inclusion and Dispute Resolution (DI/DR) Office perform a climate assessment for jurisdictions that frequently work with the public to identify and address concerns regarding nonemployee harassment and hostile work environments.	AOC Management Decision: <div>✓ Concur</div> <p>The AOC will implement this recommendation, limiting the scope to nonemployee harassment concerns.</p> OIG Response: Open-resolved

Recommendation No. 6:

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.

AOC Management Decision:
 **Nonconcur**

It is inappropriate to implement victim advocacy in the DI/DR Program because the neutrality of an EEO office is paramount to its effective operations and mission. For this reason, “victim support and advocacy” is not an appropriate charge for 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, the Employee Assistance Program [and] the Ombuds — to verify safety concerns (Office of Safety, Workplace Violence Program) and to address fears of retaliation (DI/DR investigations).

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.

OIG Response: Open-resolved

Recommendation No. 7:

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.

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.

OIG Response: Open-resolved

Follow-Up | [OIG-FLD-2023-01](#) | September 5, 2023

Follow-Up Evaluation of the Architect of the Capitol's Inventory Accountability and Controls

Report Summary:

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).

Recommendation No. 1:

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.

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.

OIG Response: Open-resolved

Follow-up Evaluation of the Architect of the Capitol Data Center

Report Summary:

OIG performed a follow-up evaluation of the 2019 report, Audit of the AOC Data Center ([OIG-AUD-2019-04](#)).

Recommendation No. 2:

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.

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.]

OIG Response: **Open-resolved**

Recommendation No. 3:

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.

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.

OIG Response: **Open-resolved**

Follow-up Evaluation of the Architect of the Capitol's Compliance with the Government Purchase Card Program

Report Summary:

OIG performed a follow-up evaluation of the 2019 report, Evaluation of the Architect of the Capitol's Compliance with the Government Purchase Card Program ([2018-0003-IE-P](#)).

Recommendation No. 1:

We recommend the AOC CAO require the SSMMMD to identify and leverage data analytics to perform purchase card reviews to ensure compliance with AOC purchase card policies and procedures.

AOC Management Decision:



Concur

The SSMMMD will work with the Chief Financial Officer's (CFO's) Chief Data Officer to develop a strategy to identify and leverage data analytics to assist with performing annual purchase card reviews. [AOC management] anticipates completion by [the] fourth quarter [of] 2025.

OIG Response: **Open-resolved**

Recommendation No. 2:

We recommend the AOC CAO require the SSMMMD to update and implement the Purchase Card Review Process SOP 4-13, January 27, 2020, to include criteria and procedures for conducting all purchase card reviews.

AOC Management Decision:



Concur

The SOP 4-13 was superseded and incorporated into the May 20, 2020, version of the Contracting Manual. SSMMMD agrees with the implementation of an SOP to provide specific guidance for conducting daily, monthly, quarterly, semiannual or annual purchase card reviews. SSMMMD will work with the Acquisition Policy Branch in the Office of the Chief Engineer to draft an agencywide Purchase Card Review Process SOP that will outline criteria and procedures for conducting purchase card reviews. Anticipated completion by fourth quarter 2025.

OIG Response: **Open-resolved**

Recommendation No. 3:

We recommend the AOC CAO require that purchase card approving officials perform quarterly or semiannual purchase card reviews to assist the Agency Program Coordinator in ensuring compliance with AOC purchase card policies and procedures.

AOC Management Decision:
 **Concur**

SSMMD will determine an appropriate timeframe (quarterly or semiannual) for purchase card approving officials to perform reviews that will assist the Agency Program Coordinator in ensuring compliance with purchase card policies and procedures. This requirement will be included in the agencywide Purchase Card Review Process SOP referenced in our response to recommendation 2. [Completion is anticipated] by [the] fourth quarter [of] 2025.

OIG Response: Open-resolved

Recommendation No. 4:

We recommend the AOC update the AOC Contracting Manual to include examples of split transactions and instructions on how to avoid them.

AOC Management Decision:
 **Concur**

The AOC concurs with the intent of the findings but believes the proper document type to address examples and instructions would be an agency SOP. Per AOC Order 4-1, Issuing AOC Policy, "An AOC Standard Operating Procedure (SOP) is an official type of AOC policy. AOC SOPs are written instructions documenting a routine or repetitive activity or procedure with significant impact to the agency and are not local SOPs." An agency SOP will have the same effect as an AOC Order but will be easier to update than AOC Order 34-1, Contracting Manual. SSMMD will work with the Acquisition Policy Branch within the Office of the Chief Engineer to draft a Purchase Card Review Process AOC SOP that will include examples of and instructions on how to avoid split transactions. Note: SOP 4-13 mentioned in recommendation 2 was a local SOP, which does not have the effect of AOC policy. [Completion is anticipated] by [the] fourth quarter [of] 2025.

OIG Response: Open-resolved

Recommendation No. 5:

We recommend the AOC develop guidance and update the AOC Contracting Manual to describe the use of third-party processors and vendors and define terms like "questionable merchant category codes," "mandatory sources," "third-party merchants," "third-party processors" and "third-party vendors" in accordance with federal government best practices.

AOC Management Decision:
 **Concur**

SSMMD will update the Contracting Manual to include a description of third-party processors and definitions of terms such as questionable merchant category codes, mandatory sources, third-party merchants, third-party processors and third-party vendors in accordance with federal best practices. The AOC will also consider joining the GSA's Commercial Platforms program. [Completion is anticipated] by [the] fourth quarter [of] 2025.

OIG Response: Open-resolved

Recommendation No. 6:

We recommend that the AOC establish a process to monitor and track sales taxes paid to detect and prevent waste of taxpayer dollars.

AOC Management Decision:
 **Concur**

SSMMD will work with the CFO's Financial Systems Branch to review ways that sales tax can be monitored and tracked in Momentum to detect waste. [Completion is anticipated] by [the] fourth quarter [of] 2025.

OIG Response: Open-resolved

Recommendation No. 7:

We recommend that the AOC update the AOC Contracting Manual to describe the process for avoiding sales tax and add the requirement to reclaim improperly assessed taxes.

AOC Management Decision:
 **Concur**

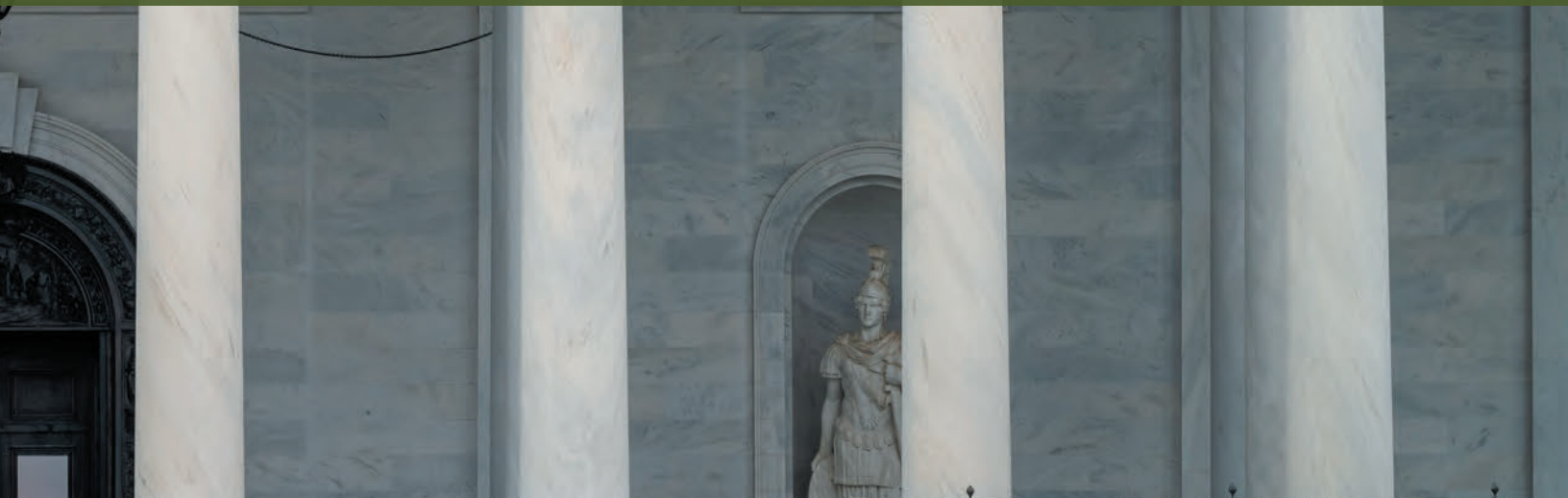
SSMMD and the Office of the Chief Engineer will update the Contracting Manual to describe the process for utilizing proper exemptions and add the requirement to reclaim improperly assessed taxes. [Completion is anticipated] by [the] fourth quarter [of] 2025.

OIG Response: Open-resolved





Appendices



Appendix A



Inspector General Reporting Requirements

This 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 SARs summarizing the activities of the Office during the immediately preceding six-month periods ending March 31 and September 30.”

Table 7. Inspector General Reporting Requirements

IG Act Section	Review of Legislation and Regulations	Page No.
Section 404(a)(2)	Review of Legislation and Regulations	22–23
Section 405(b)(1)	Significant Problems, Abuses and Deficiencies, and Associated Reports and Recommendations for Corrective Action	—
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	19–21
Section 405(b)(4)	Summary of Matters Referred for Prosecution and Resulting Convictions	17
Section 405(b)(5)	Listing of Audit, Inspection and Evaluation Reports, Including Total Value of Questioned Costs and Funds Put to Better Use	30
Section 405(b)(6)	Information Regarding Management Decisions Made During the Reporting Period for Reports Issued During a Previous Reporting Period	31–48
Section 405(b)(8)	An Appendix Containing the Results of Any Peer Review	24
Section 405(b)(9)	A Listing of Outstanding Recommendations From Any Peer Review That Have Not Been Fully Implemented	—
Section 405(b)(10)	Listing of Peer Reviews Conducted	24
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	17
Section 405(b)(12)	Description of the Metrics Used for Developing the Statistical Tables Under Section 405(b)(11)	17–18
Section 405(b)(13)	Report on Each Investigation Conducted by the OIG Involving Senior Government Employees (refer to statute for specific info required)	21
Section 405(b)(15)	Detailed Description of Any Attempt to Interfere with OIG Independence (see statute for specifics)	24
Section 405(b)(16)	Closed Reports Not Disclosed to the Public	24

— Not applicable.

Appendix B



Definitions of Terms Used

Term	Definition
closed-resolved	OIG verified that the agreed-upon corrective actions were implemented.
disallowed cost	A questioned cost that management, in a management decision, has sustained or agreed should not be charged to the government.
funds put to better use	A recommendation that funds could be used more efficiently if management took action(s) to implement and complete the recommendation.
management decision	The evaluation by the management of an establishment of the findings and recommendations included in an audit report and the issuance of a final decision by management concerning its response to the findings and recommendations, including actions concluded to be necessary.
open-resolved	AOC management has agreed (concurred) to implement the recommendation or has proposed corrective actions that will address the recommendation.
open-unresolved	AOC management disagrees with the recommendation (i.e., nonconcurs) and does not provide a response or has not proposed corrective actions that will address the recommendation. Recommendations remain open-unresolved until (1) the AOC submits a corrective action plan that addresses the findings and recommendations and (2) 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 OIG found that, at the time of the audit, such cost is not supported by adequate documentation.

Appendix C



List of Acronyms Used

Term	Definition
AOC	Architect of the Capitol
AUD	Audits Division
BIM	Building Information Modeling
CAO	Chief Administrative Officer
CCJV	Clark/Christman, A Joint Venture
CD	Construction Division
CEG	Cost Estimating Group
CFO	Chief Financial Officer
CHOB	Cannon House Office Building Renewal
CIGIE	Council of the Inspectors General on Integrity and Efficiency
CIO	Chief Information Officer
CMc	construction manager as constructor
CO	Contracting Officer
COR	Contracting Officer's Representative
CSO	Chief Security Officer
DI/DR	Diversity, Inclusion and Dispute Resolution
EEO	Equal Employment Opportunity
EIDL	Economic Injury Disaster Loan
FECA	Federal Employees' Compensation Act
FISMA	Federal Information Security Modernization Act
FLD	Follow-Up Division
FY	fiscal year
GAO	Government Accountability Office
HCMD	Human Capital Management Division
I&E	Inspections and Evaluations Division
IG	Inspector General
IGE	independent government estimate
IPA	independent public accounting
IT	information technology
ITC	Information Technology Council
ITD	Information Technology Division
ITSM	Information Technology Service Management
LOC	Library of Congress
OIG	Office of Inspector General
OMB	Office of Management and Budget
OSH	occupational safety and health
OWCP	Office of Workers' Compensation Program

Term	Definition
POA&M	plan of action and milestones
PPP	Paycheck Protection Program
PSP	Policy and Special Programs
QC	quality control
QSI	quality step increase
SAR	Semiannual Report
SF	Standard Form
SLRP	Student Loan Repayment Program
SOP	standard operating procedure
SSMMD	Supplies, Services and Material Management Division
ULO	unliquidated obligation
USAO	U.S. Attorney's Office
U.S.C.	United States Code
USCP	U.S. Capitol Police

