

# FOLLOW UP EVALUATION OF THE LIBRARY OF CONGRESS'S VISITOR EXPERIENCE MASTER PLAN PROJECT

PUBLIC RELEASE

**OFFICE OF  
INSPECTOR GENERAL  
LIBRARY**  
LIBRARY OF CONGRESS



2023-SP-104  
February 2025

# MEMO

**Date** February 11, 2025  
**To** Dr. Carla Hayden  
Librarian of Congress  
**From** Kimberly F. Benoit  
Inspector General  
**Subject** Final Evaluation Report– *Follow Up Evaluation of the Library of Congress’s Visitor Experience Master Plan Project*, Report No. 2023-SP-104

This transmits the final report for the Office of the Inspector General’s follow-up evaluation of the Library of Congress’s (Library) Visitor Experience Master Plan (VEMP) project.

In March 2024, we identified the VEMP project as a new top management challenge in our Semiannual Report to Congress based on evidence collected during this evaluation. We determined that the VEMP project was experiencing significant schedule delays and projected cost overruns. This report outlines the details of what we have learned.

Based on management’s written response to the draft report, we consider all the recommendations resolved. Your response to the draft report indicated the Library agreed with the recommendations, in accordance with Library of Congress Regulation 9-160, *Rights and Responsibilities of Library Employee to the Inspector General*, §6.A. Additionally, the Library indicated it had implemented the recommendations. We will request and evaluate the documentation needed to close the recommendations.

The report also includes matters for congressional consideration aimed at improving the collaboration and coordination between the Library and Architect of the Capitol as the VEMP project moves forward.

We appreciate the cooperation and courtesies extended by the Office of the Librarian.

**cc** Principal Deputy Librarian of Congress  
Chief of Staff  
Chief Financial Officer  
Director, Center for Exhibits & Interpretation  
General Counsel



**FOLLOW-UP EVALUATION OF THE  
LIBRARY OF CONGRESS'  
VISITOR EXPERIENCE MASTER PLAN PROJECT**

**SUBMITTED TO THE  
LIBRARY OF CONGRESS  
OFFICE OF THE INSPECTOR GENERAL**

**EVALUATION REPORT**

**FEBRUARY 9, 2025**

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**SIKICH.COM**

Kimberly F. Benoit  
Inspector General  
Office of the Inspector General  
Library of Congress

Dear Ms. Benoit,

Sikich CPA LLC (Sikich)<sup>1</sup> is pleased to submit the attached report detailing the results of our follow-up evaluation of the Library of Congress' (Library's) Visitor Experience Master Plan (VEMP) project.

The Library Office of the Inspector General (OIG) engaged Sikich to conduct this evaluation pursuant to Contract Number LCOIG20D0004, Task Order OIG23T0012.

Sikich conducted this evaluation in accordance with the Council of the Inspectors General on Integrity and Efficiency's (CIGIE's) *Quality Standards for Inspection and Evaluation*, as well as the Statement on Standards for Consulting Services, promulgated by the American Institute of Certified Public Accountants (AICPA). Sikich performed the work from September 2023 through February 2025.

Sincerely,

***Sikich CPA LLC***

February 9, 2025

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<sup>1</sup> Effective December 14, 2023, we amended our legal name from "Cotton & Company Assurance and Advisory, LLC" to "Sikich CPA LLC" (herein referred to as "Sikich").

## I. Executive Summary

The Library of Congress (Library) Office of the Inspector General (OIG) engaged Sikich CPA LLC (Sikich) to conduct this follow-up evaluation of the Library's Visitor Experience Master Plan (VEMP) project.<sup>2</sup> The VEMP is an ambitious project focused on three new feature exhibits that the Library planned to add to the Thomas Jefferson Building (TJB): the Treasures Gallery, the Youth Center, and the Orientation Gallery.<sup>3</sup> The evaluation identified several issues related to the project's schedule and cost. Specifically:

- We were unable to assess whether the VEMP project was on schedule because the Library and Architect of the Capitol (AOC) have continuously changed the VEMP project's opening and completion dates over time. We found that portions of the project will open earlier than scheduled, but that the Library and AOC will likely not be able to complete or open the project in its entirety by the congressional deadline of the United States' semiquincentennial in July 2026.<sup>4</sup>
- The VEMP project's cost estimates, while updated regularly, continuously fluctuated, exceeded the funding available to complete the VEMP project, did not include all facets of the VEMP, and were not considered final estimates to complete the VEMP project. Because the cost estimates continuously fluctuated, we could not assess whether they were reasonable.

Specifically, since March 2023, the Library's project cost estimates have remained unchanged; however, AOC's cost estimates for the construction of the VEMP project have continuously changed and grown. Reasons for this fluctuation included changing design documentation, ineffective coordination and communication, compressed scheduling, project management, and segregated cost-estimating processes.

However, we did determine that the Library is on target to raise the private funds pledged to support the VEMP project.

To address these findings, we prepared eight recommendations to assist the Library in addressing the lack of established and shared policies, processes, procedures, internal controls, and project management between the Library and AOC. Specifically, we noted continuously changing and incomplete design documentation; a lack of agreed-upon definitions, communication methodologies, and processes; and a lack of collaborative scheduling and cost estimation processes. Without establishing these collaborative processes, the VEMP project's schedule and cost estimates will continue to change, which may cause the Library to miss the revised March 2027 deadline for the opening of the third feature exhibit.

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<sup>2</sup> In this report, "VEMP" refers to the original plan that Congress approved in FY 2019, while "VEMP project" or "project" refers to the individual exhibit features outlined in the VEMP approved by Congress. The Library never revised the original approved VEMP and submitted it for re-approval; instead, the Library adjusted the individual phases of the VEMP based on the phases' individual management, progress, and execution.

<sup>3</sup> The VEMP also included plans and requested funding for amenities, wayfinding/signage, a gift shop, administrative support, a welcome area (Congressional Crossroads), an entry hall (Capitol Visitor Center entrance), and egress.

<sup>4</sup> On June 27, 2023, the House Report accompanying the Legislative Branch Appropriations Bill of 2024 stated, "Every effort must be made to complete this project in time for the nation's semiquincentennial celebration." Additionally, the explanatory statement accompanying Division I of the Legislative Branch Appropriations Act of 2023 and in support of House Report 117-389 stated, "It is the expectation of the Committees that the construction for the three project initiatives will be completed by the AOC in a phased manner over the following three years, thereby ensuring minimal impact to public access at the Thomas Jefferson Building; and all project construction actions will be completed by no later than January 1, 2026, to coincide with the activities set forth in Public Law 114-196, United States Semiquincentennial Commission Act of 2016."

## II. Background

The VEMP is an ambitious project focused on three new feature exhibits that the Library plans to add to the TJB: the Treasures Gallery, the Youth Center, and the Orientation Gallery.<sup>5</sup> The Treasures Gallery is on the second floor and displays exhibitions of the Library's collected treasures.<sup>6</sup> The Youth Center will be on the ground floor and will provide education and engagement to visitors ages 7 and up. The Orientation Gallery will ensure first-time visitors to the Library discover the history and mission of the Library immediately upon entering the building.

In Fiscal Year (FY) 2018, the Library received \$2 million in appropriated funds from Congress to begin the planning and development of the VEMP. The Library moved forward with further design of the VEMP in coordination with AOC, as the Library had entered into an inter-agency agreement with AOC to coordinate construction of the VEMP. In FY 2019, appropriators released additional funding for the VEMP. The Library moved forward with further design of the VEMP and coordinated with AOC on cost estimates and construction.

At the time Congress approved the VEMP, the budget included \$40 million in appropriated funds and \$20 million in private donations to be raised by the Library's Development Office. In September 2019, as part of its approval for moving forward with the VEMP, Congress directed that any:

*...requests for appropriations to support the implementation phases of the project, such as construction and fabrication and installation of exhibits, should be accompanied by full cost estimates and details resulting from the design process now to be undertaken, including the information discussed in the explanatory statement accompanying the fiscal year 2018 appropriation. For construction, estimates should be done by the Architect of the Capitol, as is standard practice for construction funding requests to our subcommittee in the regular annual budget process. These estimates will be considered during the annual appropriations process along with other competing priorities.*

In accordance with the inter-agency agreement with AOC, the Library transferred \$20 million of the original \$60 million to AOC for the design and construction of the VEMP project. The remaining \$20 million of appropriated funds and \$20 million in private donations were allocated to the Library for its design and development of the VEMP project. Additionally, in March 2020, the inter-agency agreement between the Library and AOC established responsibilities for VEMP project execution as follows:

The AOC will:

1. Design and construct building modifications and improvements in support of the Library's VEMP project initiative. The improvements will occur in three major phases: (1) Treasures Gallery on the 2nd Floor, Northwest Curtain and observation area in the Main Reading Room of the TJB; (2) Orientation/Welcome Experience on the Ground Floor and in the Main Reading Room of the TJB; and (3) Youth Center located on the Ground Floor, Southwest Curtain of the TJB. Other elements of work in the VEMP project will also be included. AOC's design and construction support will be funded by the Library, with funds transferred to AOC.

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<sup>5</sup> The VEMP also included plans and requested funding for amenities, wayfinding/signage, a gift shop, administrative support, a welcome area (Congressional Crossroads), an entry hall (Capitol Visitor Center entrance), and egress.

<sup>6</sup> The Treasures Gallery opened to the public in June 2024.

2. Provide design and construction of all facilities and building system changes needed to support and achieve the overall space/exhibit design. AOC will produce design and documents to prepare the building and spaces to support the Library's exhibits, audiovisual (AV) components, security devices, amenities, and overall sense of place. AOC design work will generally be scheduled to follow the Library exhibit and AV design efforts, to ensure the AOC designs capture and reflect the Library's space requirements in a compliant package.
3. Perform construction to prepare the building and spaces to receive the exhibits and AV components, and to attain the overall space layout. Construction will include installation of the mechanical, electrical, fire protection, architectural, and structural systems, as required to support the exhibits, AV features, and overall space configuration. The AOC work will remove, replace, or provide walls and architectural finishes where needed.
4. Incorporate AV and exhibit design infrastructure requirements into the design and construction efforts as required by the Library through separate Library-managed exhibit and AV contracts.
5. Design work that complies with reference documents.
6. Comply with the project delivery milestones as mutually developed and agreed to by the parties.

The Library will:

1. Participate in AOC's design development process to help ensure exhibit, security, visitor, and AV requirements are incorporated in AOC design packages.
2. Provide Library exhibit and AV design deliverables to AOC to support development of AOC design and construction documents.
3. Support AOC design and construction requirements according to the initial funding amounts for the three phases, as described in reference documents or as mutually agreed upon by the parties.
4. Comply with the project delivery milestones as mutually developed and agreed to by the parties.
5. Make space available for construction efforts in accordance with the project delivery milestone schedule.
6. Support construction planning and execution requirements to allow AOC to complete the construction work as scheduled.

In addition to the Library tracking the anticipated completion of the VEMP project, Congress stated in House Report 118-120, which accompanied the Legislative Branch Appropriations Act for FY 2024, dated June 27, 2023, that "every effort must be made to complete this project in time for the nation's semiquincentennial."<sup>7</sup> Additionally, the explanatory statement accompanying Division I of the Legislative Branch Appropriations Act of 2023 and in support of House Report 117-389 stated that "it is the expectation of the Committees that the construction for the three project initiatives will be completed by the AOC in a phased manner over the following three years, thereby ensuring minimal impact to public access at the Thomas Jefferson Building; and all project construction actions will be completed by no later than

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<sup>7</sup> July 4, 2026, represents the 250<sup>th</sup> anniversary of the signing of the Declaration of Independence; the nation's semiquincentennial. ([America250](#))

January 1, 2026, to coincide with the activities set forth in Public Law 114-196, United States Semiquincentennial Commission Act of 2016.”

Since the establishment of the original budget for the VEMP project, the cost estimates for the project have risen. As referenced in the February 1, 2023, bi-weekly congressional report, the Library and AOC communicated a projected increase of \$4.8 million in the estimated cost to complete the VEMP project. Since February 1, 2023, the Library and AOC reported additional increases in cost estimates that exceeded the original VEMP budget of \$60 million, with the current project cost projected as \$95.6 million as of February 10, 2024, the end date of our evaluation fieldwork.

As such, on February 10, 2024, the Library and AOC requested an additional \$30 million in appropriations to address the VEMP project’s forecasted budget shortfall.<sup>8</sup> The appropriators released this \$30 million as part of AOC’s care of the Library’s buildings and grounds in Public Law 118-47, enacted March 23, 2024. Additionally, the Library, in coordination with AOC, revised the anticipated feature exhibit opening dates to June 2024 for the Treasures Gallery, December 2025 for the Youth Center, and March 2027 for the Orientation Gallery. To address a portion of the increased estimated cost, the Library is raising additional private funding through public donations.

### **Prior Evaluation of the VEMP Project**

The Library OIG engaged Sikich to conduct a prior evaluation of the VEMP project that concluded with a report in May 2022.<sup>9</sup> The report identified the following:

- The VEMP project was on schedule and within budget, although the Library had extended the schedule since it published the VEMP in 2019. The VEMP had a target completion date of 2023, in line with the Library’s 5-year strategic plan; however, the Library extended this schedule because the scope of the VEMP project needed to be better defined and because the Library terminated a design vendor contract.
- The Library’s cost estimates were reasonable and current, and the Library updated these estimates with the actual costs as the VEMP project progressed. The Library also adjusted the cost estimates as it solidified the design and scope of the VEMP project.
- The Library’s Development Office was in the process of raising private funds. It was on track with its internal fundraising targets, and it had procedures in place to attract and retain donors.

The Library was on schedule and cost estimates were reasonable at the time of the May 2022 evaluation; however, the report noted that the project was still in the early stages of design and defining scope.

As the VEMP project has progressed since our 2022 evaluation, it has experienced cost and schedule changes. The objectives of this follow-up evaluation were to:

- Determine whether the Library’s Integrated Master Schedule (IMS) and VEMP are on schedule and within budget.

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<sup>8</sup> The additional \$30 million request would only deliver portions of the VEMP project, and the request acknowledged that several portions of the VEMP project would still be unfunded and incomplete. However, the Library and AOC agreed to evaluate any unused funds that could be reallocated to incomplete portions of the VEMP project.

<sup>9</sup> *Report on the Evaluation of the Library of Congress’s Visitor Experience Project, 2021-SP-101 (May 2022).*

- Determine whether the cost estimates are reasonable and current and whether the Library updates these estimates with actual costs as the project progresses or when requirements change.
- Determine whether the Library is on target to raise the private funds pledged to complete the project on time and with the necessary funds.

The VEMP is a joint project between the Library and AOC. The scope of this evaluation is limited to the Library's role in the VEMP. For the full scope and methodology of this evaluation, refer to Appendix A.

As a result of the VEMP project's importance to the Library and the seriousness of the issues identified during this follow-up evaluation, the Library OIG identified the VEMP project as a top management challenge in its March 2024 Semiannual Report to Congress.

### III. Evaluation Results

We found that the VEMP project is facing schedule and cost challenges as the project progresses.

#### **THE VEMP PROJECT'S CONTINUOUSLY CHANGING SCHEDULE LIMITS THE ABILITY TO DETERMINE IF THE VEMP PROJECT IS ADHERING TO PROJECT MILESTONES**

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The VEMP project's schedule could not be assessed as on or off schedule as a result of the scheduled dates continuously changing. The Library and AOC have continuously changed the VEMP project's opening and completion dates over time. We found that portions of the project will open earlier, but the project in its entirety will not be open or completed by the congressional deadline of the United States semiquincentennial in July 2026.

#### ***The VEMP Project's Two Schedules: The Visitor Experience Schedule<sup>10</sup> and the Schedule Included in the Bi-weekly Congressional Reports***

The Library tracks the timing of the VEMP projects using a Visitor Experience Schedule and a schedule included in the bi-weekly congressional reports that the Appropriations Committees directed the Library, in collaboration with AOC, to provide until the gallery openings.<sup>11</sup> The Library tracks and maintains the VEMP project schedule via the Visitor Experience Schedule and communicates the official, joint Library-AOC project opening schedule in the bi-weekly congressional report.<sup>12</sup> The Library noted that it considers the bi-weekly congressional reports to be the project's official schedule. The Visitor Experience Schedule provides start and completion dates for a detailed list of activities that comprise the development and execution of each VEMP project feature gallery (i.e., the Treasures Gallery, the Youth Center, and the

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<sup>10</sup> The Visitor Experience Schedule is the title the Library uses for its Integrated Master Schedule (IMS), which includes its critical path. According to the Project Management Body of Knowledge, sixth edition, the critical path is used to estimate the minimum project duration and determine the amount of schedule flexibility on the logical network paths within the schedule. The critical path is the sequence of activities that represents the longest path through a project, which determines the shortest possible project duration. Comparing projects along the critical path will help determine schedule status, and the variance on the critical path will have a direct impact on the project end date.

<sup>11</sup> Congress requested the bi-weekly congressional reports to track the ongoing progress of the VEMP project. The bi-weekly congressional reports include a schedule of opening dates for the VEMP project. They do not identify the start and end dates of the activities to achieve the VEMP project completion. The reports are expected to include costs, schedules, and progress updates for specific construction activities aligned to the three major VEMP feature galleries.

<sup>12</sup> According to the Library team tasked with managing the schedule.

Orientation Gallery), including the opening target dates for each feature gallery. We found the schedule in the bi-weekly congressional reports does not include completion dates<sup>13</sup> past the opening dates for each feature gallery and that differences in dates existed between the two schedules.

**Similar Information Communicated on VEMP Project Feature Galleries’ Opening Target Dates**

As illustrated in Table 1, the Visitor Experience Schedule and the schedule included in the bi-weekly congressional reports share opening target dates for the project. For example, as of February 2024, both schedules estimate the opening of the Treasures Gallery will occur in June 2024. Both schedules also estimate the opening of the Youth Center will occur in December 2025. However, the Orientation Gallery and the Amenities and Wayfinding did not reflect similar dates.

**Table 1: VEMP Project Feature Galleries Opening Target Dates Comparison**

| Source Date  | Treasures Gallery | Youth Center      | Orientation Gallery                   | Amenities & Wayfinding <sup>14</sup> |
|--|-------------------|-------------------|---------------------------------------|--------------------------------------|
| February 5, 2024, Visitor Experience Schedule Feature Opening Dates    | June 13, 2024     | December 15, 2025 | December 19, 2025                     | No Specific Dates Communicated       |
| February 9, 2024, bi-weekly Congressional Report Feature Opening Dates | June 2024         | December 2025     | On Hold; Pending [Construction] Funds | Phased/ January 2026                 |

*Source: February 5, 2024, Visitor Experience Schedule and February 9, 2024, bi-weekly congressional report*

<sup>13</sup> Post-opening activities include AV maintenance (which is included in an AV integration contract) and construction and fabrication punch-list activities. A completion end date is when all post-opening activities have been completed.

<sup>14</sup> The Library does not specify opening dates for Amenities and Wayfinding in the Visitor Experience Schedule, as these items are installed along with the varying feature galleries over time.

### ***VEMP Project Feature Galleries' Completion Target Dates Do Not Reflect Post-Opening Tasks***

Although the Visitor Experience Schedule and the schedule included in the bi-weekly congressional reports showed similar opening target dates for the project, as illustrated in Table 1, the bi-weekly congressional reports did not reflect the actual feature gallery completion dates that are referenced in the more detailed Visitor Experience Schedule. Following the opening of the galleries, the Library and AOC will execute post-opening tasks to fully complete the individual galleries, as reflected in the Visitor Experience Schedule.<sup>15</sup>

The Visitor Experience Schedule may change based on AOC's construction schedule, and AOC's construction schedule may change based on additional design details provided by the Library. The Library's Center for Exhibits and Interpretations (CEI) meets bi-weekly to update and maintain the Visitor Experience Schedule based on information obtained from AOC in the prior weeks. With that information in hand, the Library updates the Visitor Experience Schedule. Table 2 illustrates the project feature gallery completion target dates within the Visitor Experience Schedule. We found the bi-weekly congressional reports did not provide information on these project completion target dates.

**Table 2: VEMP Project Feature Galleries Completion Target Dates Comparison**

| Source Date   | Treasures Gallery  | Youth Center      | Orientation Gallery | Amenities & Wayfinding <sup>16</sup> |
|---|--------------------|-------------------|---------------------|--------------------------------------|
| February 5, 2024, Visitor Experience Schedule Completion Dates    | September 30, 2024 | May 31, 2024      | December 18, 2025   | November 2, 2027                     |
| February 9, 2024, Bi-weekly Congressional Report Completion Dates | None Communicated  | None Communicated | None Communicated   | None Communicated                    |

*Source: Visitor Experience Schedule dated February 5, 2024, and bi-weekly congressional report dated February 9, 2024, the end date of our evaluation fieldwork.*

<sup>15</sup> The Library noted that the completion dates for each feature gallery shown in the Visitor Experience Schedule are designed to allow time for the Library and AOC to complete post-opening tasks.

<sup>16</sup> The Library does not specify opening dates for Amenities and Wayfinding in the Visitor Experience Schedule, as these items are installed along with each of the feature galleries over time. As such, the date reflected is the last date referenced in the schedule.

### ***Continuously Changing Opening and Completion Dates for the Library’s VEMP Project Feature Galleries***

The VEMP project’s scheduled opening and completion dates for the VEMP project feature galleries have continuously changed in both the Visitor Experience Schedule and the bi-weekly congressional reports. Table 3 illustrates changes in the opening target dates for the feature galleries as reported in the bi-weekly congressional reports.

**Table 3: VEMP Project Feature Galleries’ Opening Target Dates Reported in the Bi-weekly Congressional Reports<sup>17</sup>**

| <b>Congressional Report Date</b> | <b>Treasures Gallery</b>                           | <b>Youth Center</b> | <b>Orientation Gallery</b> | <b>Amenities &amp; Wayfinding<sup>18</sup></b> |
|----------------------------------|--|---------------------|----------------------------|--|
| <b>February 1, 2023</b>          | January 2024                                       | September 2025      | January 2026               | January 2026                                   |
| <b>March 24, 2023</b>            | February 2024                                      | September 2025      | January 2026               | Phased/<br>January 2026                        |
| <b>June 2, 2023</b>              | February 2025                                      | September 2025      | January 2026               | Phased/<br>January 2026                        |
| <b>September 22, 2023</b>        | September 2024; working towards spring/summer 2024 | September 2025      | April 2026                 | Phased/<br>January 2026                        |
| <b>December 15, 2023</b>         | June 2024  | Spring 2026         | April 2026                 | Phased/<br>January 2026                        |
| <b>February 9, 2024</b>          | June 2024  | December 2025       | On Hold;<br>Pending Funds  | Phased/<br>January 2026                        |

*Source: Bi-weekly congressional reports issued between February 1, 2023, and February 9, 2024, the period of our evaluation fieldwork.*

<sup>17</sup> Table 3 is not a comprehensive list of the bi-weekly congressional reports; rather, it includes examples of reports that reflected changes since February 1, 2023.

<sup>18</sup> The Library does not specify opening dates for Amenities and Wayfinding in the bi-weekly reports, as these items are installed along with each of the feature galleries over time.

The opening dates for the VEMP project feature galleries in the Visitor Experience Schedule have also continuously changed, as noted in Table 4.

**Table 4: VEMP Project Feature Galleries' Opening Target Dates Reported in the Visitor Experience Schedule<sup>19</sup>**

| Visitor Experience Schedule Date | Treasures Gallery | Youth Center      | Orientation Gallery | Amenities & Wayfinding <sup>20</sup> |
|----------------------------------|-------------------|-------------------|---------------------|--------------------------------------|
| April 7, 2020                    | December 19, 2022 | December 15, 2023 | December 16, 2024   | -                                    |
| June 15, 2020                    | December 19, 2022 | December 15, 2023 | December 16, 2024   | -                                    |
| September 2, 2020                | May 22, 2023      | March 3, 2025     | September 1, 2025   | -                                    |
| October 27, 2021                 | October 20, 2023  | May 1, 2024       | September 1, 2025   | -                                    |
| February 22, 2022                | December 8, 2023  | May 1, 2024       | November 10, 2025   | -                                    |
| June 1, 2023                     | January 23, 2024  | January 19, 2026  | December 16, 2025   | -                                    |
| September 15, 2023               | June 17, 2024     | December 3, 2026  | December 19, 2025   | -                                    |
| February 5, 2024                 | June 13, 2024     | December 15, 2025 | December 19, 2025   | -                                    |

Source: Visitor Experience Schedules prepared between April 7, 2020, and February 5, 2024.

<sup>19</sup> Table 4 is not a comprehensive list of the Visitor Experience Schedules; rather, it includes examples of reports that reflected changes since April 7, 2020.

<sup>20</sup> The Library does not specify opening dates for Amenities and Wayfinding in the Visitor Experience Schedule, as these items are installed along with each of the feature galleries over time.

Lastly, the completion dates for the VEMP project feature galleries in the Visitor Experience Schedule also continuously changed, as noted in Table 5.

**Table 5: VEMP Project Feature Galleries' Completion Target Dates Reported in the Visitor Experience Schedule**

| Visitor Experience Schedule Date | Treasures Gallery  | Youth Center      | Orientation Gallery | Amenities & Wayfinding |
|----------------------------------|--------------------|-------------------|---------------------|------------------------|
| April 7, 2020                    | December 19, 2022  | December 18, 2023 | December 16, 2024   | October 8, 2025        |
| June 15, 2020                    | December 19, 2022  | December 18, 2023 | December 16, 2024   | October 8, 2025        |
| September 2, 2020                | May 22, 2023       | May 1, 2024       | September 1, 2025   | September 10, 2025     |
| October 27, 2021                 | October 23, 2023   | May 1, 2024       | September 1, 2025   | September 10, 2025     |
| February 22, 2022                | December 8, 2023   | May 31, 2024      | October 8, 2025     | October 20, 2025       |
| June 1, 2023                     | November 13, 2024  | May 31, 2024      | December 19, 2025   | November 3, 2027       |
| September 15, 2023               | September 30, 2024 | May 31, 2024      | December 18, 2025   | November 2, 2027       |
| February 5, 2024                 | September 30, 2024 | May 31, 2024      | December 18, 2025   | November 2, 2027       |

*Source: Visitor Experience Schedules prepared between April 7, 2020, and February 5, 2024.*

As previously noted, the Library and AOC have completion dates that fall after the feature gallery opening dates to account for post-opening tasks they will need to complete; however, in one instance, the dates are reversed. Table 5 shows that, as of the June 1, 2023, Visitor Experience Schedule, the Library had identified a completion date of May 31, 2024, for the Youth Center. However, Table 4 shows that the same schedule identified the Youth Center opening date as January 19, 2026, which is after the Youth Center is scheduled to be completed (i.e., opened and all post-opening tasks complete).

***The VEMP Project’s Official End Date Will Likely Extend Beyond July 2026***

As of February 6, 2024, the Library and AOC were in communication on revising the VEMP project opening dates, as the design and construction schedules remained in development. The Library and AOC jointly agreed to request congressional approval to change the schedule beyond July 2026. Similarly, AOC executed its Government Accountability Office (GAO)-mandated construction project risk assessment over the VEMP project, and the results of the risk assessment also indicated that the Library and AOC should revise the schedule.<sup>21</sup>

According to AOC’s VEMP project risk assessment issued in February 2024, the VEMP project will not be completed in its entirety by the United States semiquincentennial in July 2026. Specifically, the risk assessment determined with 80 percent certainty that AOC and the Library would not complete the VEMP project until May 2027, 10.5 months beyond the July 2026 deadline.<sup>22</sup> The risk assessment identified 15 factors contributing to the delay. The risk assessment in conjunction with other funding and scheduling delays resulted in the Library and AOC agreeing to extend the VEMP project schedule for the Orientation Gallery to March 2027, as illustrated in Table 6.<sup>23</sup>

**Table 6: Program Schedule as of February 10, 2024**

| Responsibility                               | Treasures Gallery | Youth Center  | Entry and Orientation Phase 1 |
|--|-------------------|---------------|-------------------------------|
| AOC Completion of Base Building Modification | June 2024         | June 2025     | September 2026                |
| Library Completion of Gallery Installation   | June 2024         | December 2025 | March 2027                    |

*Source: AOC and Library Visitor Experience Letter to Chairman of Subcommittee on Legislative Branch, Committee on Appropriations*

**Conclusion**

We found the Library and AOC did not establish the shared policies, processes, procedures, internal controls and project management needed to ensure they maintained a consistent schedule to meet the established deadlines set by internal and external stakeholders.

Contributing factors include:

- Changing and incomplete design information;

<sup>21</sup> AOC is required to perform a risk assessment on all of its large projects. GAO-14-333 included a recommendation for AOC to submit the confidence level derived from its risk and uncertainty analyses, along with budget documentation.

<sup>22</sup> AOC noted in the July 14, 2023, bi-weekly congressional report that AOC did not have enough cash on hand to award the Orientation Gallery AOC construction contract and stay within to the project schedule. The scope of this evaluation was limited to the Library portion of the VEMP; accordingly, we did not evaluate reported AOC cash on hand or the accuracy of the projected May 2027 project end date.

<sup>23</sup> According to the February 10, 2024, letter issued by the Library and AOC to the Honorable Jack Reed and the Senate Committee on Appropriations Subcommittee on Legislative Branch, the Library and AOC extended the VEMP project schedule to March 2027 for the completion of the entryway and phase one of the Orientation Gallery. However, there are portions of the VEMP that are not included in the March 2027 timeline and will require additional time and funding beyond March 2027 if pursued.

- Lack of agreed-upon definitions, communication methodologies, and processes for the execution of the VEMP project;
- Lack of centralized project management; and
- Lack of coordinated scheduling.

### **Changing and Incomplete Design Information**

The Library and AOC have not established finalized design documentation or a common understanding of what a 100 percent design entails. In December 2023, the Library communicated that the Orientation Gallery was 100 percent designed, with the center column re-design in progress; however, in January 2024, AOC indicated that it was still awaiting the Library's final designs.

Typically, AOC begins its construction design process when the gallery fabrication drawings are 100 percent complete; however, in an effort to stay on schedule, AOC began its construction design process without 100 percent completed gallery fabrication drawings from the Library. As such, AOC was required to update its construction design and recalculation of estimated costs as the Library provided additional gallery design documentation. For example, while attempting to finalize its construction design, AOC continued to receive changes to the Orientation Gallery center re-design. The Library continued to communicate in the bi-weekly congressional reports that it was at 100 percent design, with a final exhibit design for the re-designed center still to come. One of the key design elements outstanding was a gallery design component the Library implemented as a replacement for the proposed Oculus.<sup>24</sup> The Library communicated to AOC its intent to replace the Oculus design with a new center re-design in January 2023. As of February 1, 2023, the Library noted in the bi-weekly congressional report that its gallery designer would require an estimated 2 to 3 months for the re-design of the space, separate from a final gallery design package by March 31, 2023. The Library delivered a final exhibit design package on March 31, 2023, with the exception of the center component, to allow AOC's construction process to continue and minimize further schedule impacts. The Library continued to provide additional structural design documentation through January 2024. We found that, as of February 9, 2024, the Library still needs to finalize design documentation for the two remaining feature galleries that have not yet opened (i.e., the Youth Center and the Orientation Gallery).

### **Lack of Agreed-Upon Definitions, Communication Methodologies, and Processes for the Execution of the VEMP Project**

Although the Library and AOC have coordinated throughout the VEMP project, they have not established agreed-upon definitions, documented communication methodologies and processes to manage the project, or established documented expectations related to the delivery and execution of final design documentation. Each agency stated that the lack of productive communication limited the VEMP project's progress. Specifically:

- The Library and AOC did not establish agreed-upon, documented definitions of key terms, like "scope." A Library official defined scope as "the physical square footage of the space." As such, the Library official stated the scope has not changed. From the perspective of the Library, the only change to the VEMP project was the Oculus

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<sup>24</sup> In November 2022, the Library communicated via the Gazette, its internal newsletter, that the Oculus was being eliminated from the Orientation Gallery plans due to suboptimal design, significant increases in cost, and unacceptable extension of the entire project's timeline. The Library announced it would develop a new approach to enhance the Orientation Gallery's design.

removal.<sup>25</sup> Separately, AOC officials defined scope as anything that would fall within the construction design. As a result, AOC interprets any changes in the Library's design documentation as a change in scope and it requires AOC to change its construction design. For example, AOC describes a change in scope to include granular details such as changing the planned number of outlets in a wall.

- The Library and AOC did not establish agreed-upon, documented expectations regarding the delivery and execution of final design documentation. This includes expected documents, approvals, certifications, timing, and other relevant information to support a final design. For example, in one instance, when AOC provided the Library and its fabrication contractor with comments on design documentation for the Treasures Gallery, AOC noted a requirement late in the Library's detail drawing process, after the Library's fabrication contract had already commenced, that engineering drawings were required to be stamped by a firm licensed in Washington, D.C. However, the Library's fabrication contractor's structural engineer was not licensed in Washington, D.C., and this requirement was not specifically identified in the contractor's statement of work.
- The Library and AOC did not establish agreed-upon, documented expectations for the VEMP project's build methodology. The Library and AOC collaborated back and forth without a clear understanding of each other's methodology and expectations. This resulted in various status changes to the design and estimates. Specifically, the Library has used a mix of exhibit design and exhibit fabrication contracts, while AOC used a Design-Bid-Build methodology.<sup>26</sup> This has resulted in misunderstandings regarding how each organization is executing its specific responsibilities with regard to exhibit design and construction. The Library stated its expectation was that AOC would change the way it operates to execute the VEMP project in a collaborative and supportive manner. AOC stated it had deviated from some of its more typical processes to be more collaborative and supportive, including performing construction designs without having complete gallery designs and engaging in more routine conversations regarding expectations. Nevertheless, AOC has firm statutory responsibilities and policy and code requirements for designs and construction under its build methodology that the Library does not have, and AOC did not effectively communicate these requirements and methodologies to the Library.
- The Library and AOC did not develop an agreed-upon, documented communication plan to define each agency's roles and responsibilities until nearly four years after the project began.<sup>27</sup> During the evaluation, both the Library and AOC indicated that communication can be improved and that each felt that inputs from the other had been disregarded. As of August 2023, an AOC drafted communication plan has yet to be finalized and implemented.<sup>28</sup> Another example in which collaboration broke down was during the preparation of the January 12, 2024, bi-weekly congressional report. As instructed by

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<sup>25</sup> AOC stated they disagreed and claimed that the Orientation Gallery's square footage is larger than originally planned.

<sup>26</sup> Design-Bid-Build is a traditional construction method that involves three sequential phases: the design phase, which requires the services of a designer (the Library or AOC contractor who designs the intended creation), the bid phase when a contractor is selected (building construction firms or exhibit manufacturers), and the build phase when the project is built (AOC/building construction firm; Library/exhibit manufacturer).

<sup>27</sup> VEMP approval was issued in September 2019.

<sup>28</sup> AOC noted that it provided the final communication plan to the Library. The Library acknowledged a plan was shared on November 3, 2023; however, the Library disagreed that its edits to the document were accepted or incorporated. The Library indicated that it resubmitted its edits on January 30, 2024.

Congress, the Library drafted the report to include AOC-provided cost and schedule information that informed the Library's decisions. The report included information specific to how the project management of certain portions of the VEMP project would move forward. The project decisions also included associated cost information that was caveated and generalized for communication to Congress. However, AOC had not fully validated the cost information or briefed its leadership on the changes to the reorganized information. The Library did make changes suggested by AOC; however, AOC also had concerns about the inclusion of the cost caveats and those concerns did not appear to be addressed as it remained in the report. The Library stated that they believed the concerns were addressed with the edits made pursuant to established process, however during our evaluation AOC officials indicated that they felt differently.

- The Library and AOC did not have a common understanding of the expected roles of senior leadership in the VEMP project execution. Library leadership indicated that they felt the AOC leadership turnover posed a challenge to effectively coordinating the VEMP project. Since the inception of the project, the AOC has had two appointed Architects and three acting Architects. The impact of changing AOC senior leadership directly on the VEMP is unclear, however AOC officials involved with the project indicated to us that they felt the impact was minimal.

### **Lack of Centralized Project Management**

Neither the Library nor AOC implemented centralized project management for the VEMP project until August 2023. The Appropriation Committees expressed concern with progress made on the VEMP project, including the way AOC conducted its cost estimation and project scoping.<sup>29</sup> As such, the Appropriation Committees directed the Library and AOC to assign a dedicated project manager to the VEMP project so the agencies could implement the focus and internal controls needed to facilitate timely completion. The Library and AOC addressed this lack of centralized project management in August 2023 by establishing two contracted project managers through an AOC contractor. One contractor was assigned to support the Library, and one contractor was assigned to support the AOC. Collectively, the two project managers operate as liaisons between the two agencies to move the VEMP project forward. Prior to that appointment, in January 2023, the Library detailed a Library employee for 6 months to improve the collaboration between the Library and AOC. There was no centralized project manager or collaborator prior to January 2023.

### **Lack of Coordinated Scheduling**

The Library managed updates to the bi-weekly congressional report with routine input from AOC; however, the Library does not obtain specific input from AOC to update the Visitor Experience Schedule. Although AOC contributes to the bi-weekly congressional reporting, the Library has final control of what is included in the reports issued to Congress as they are the aggregator and final submitter of the documentation. AOC project management is not included in the Library's bi-weekly meetings to update the line-item, detailed schedule for the VEMP project. Rather, the Library takes AOC's inputs from other meetings and conversations to update the Visitor Experience Schedule. This presents the risk that the AOC may be unaware of how the scheduling-related information provided by them is incorporated in the Visitor Experience Schedule. We found that the lack of coordinated scheduling resulted in no

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<sup>29</sup> The expressed concern was specifically noted in House Report 118-120, which accompanied the Legislative Branch Appropriations Act for FY 2024, published in July 2023.

indication the schedule was adjusted to reflect the results of AOC's VEMP project risk assessment published in February 2024.<sup>30</sup>

Because the Library and AOC have not collaborated effectively to maintain control of the VEMP project schedule, the schedule has constantly changed, making it difficult to determine a consistent, accurate completion date. These changes have resulted in portions of the VEMP project schedule moving beyond the congressional request date of the United States semiquincentennial in July 2026. The project is at risk of further slippages due to a lack of established, shared policies, processes, procedures, and internal controls between the Library and AOC.

Accordingly, we recommend the Library:

- 1.1 Finalize design documentation for the two remaining feature galleries (Youth Center and Orientation Gallery) with the individual agencies' final approval by an agreed-upon date, to expedite the finalization of design documentation for both the Library and AOC, to lessen the risk of additional cost escalation on the VEMP project.
- 1.2 Document and publish definitions of key terms specific to the design and construction of the VEMP project.
- 1.3 Document and publish policies, procedures, definitions, and expectations specific to the Library's exhibition design and fabrication methodology.
- 1.4 Document and publish an intergovernmental construction communication plan including roles and responsibilities for Library personnel.
- 1.5 Document and publish expectations for the delivery and execution of final design documentation. Documented expectations for final design documentation could include expected documents, approvals, certifications, timing, and other relevant information that may be necessary to support a final design.
- 1.6 Implement standing, periodic, working meetings with AOC, the AOC and Library project managers, and Library personnel to discuss and document scheduling changes that will then be reflected in the bi-weekly congressional report and the Visitor Experience Schedule.

We identified matters for congressional consideration that are relevant to this finding. We have provided these matters in Appendix B.

Below, we list the finding's applicable criteria.

GAO's *Standards for Internal Control in the Federal Government*, dated September 2014, states:

*Principle 10 – Design Control Activities*

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<sup>30</sup> The last day of our engagement fieldwork was February 10, 2024. As such, changes to the schedule may have occurred beyond that date.

10.01 Management should design control activities to achieve objectives and respond to risks.

...

10.03 Management designs appropriate types of control activities for the entity's internal control system. Control activities help management fulfill responsibilities and address identified risk responses in the internal control system. Specifically, management establishes activities to monitor performance measures and indicators. These may include comparisons and assessments relating different sets of data to one another so that analyses of the relationships can be made, and appropriate actions taken. Management designs controls aimed at validating the propriety and integrity of both entity and individual performance measures and indicators.

...

*Principle 13 – Use Quality Information*

13.01 Management should use quality information to achieve the entity's objectives.

*The following attributes contribute to the design, implementation, and operating effectiveness of this principle:*

- *Identification of Information Requirements*
- *Relevant Data from Reliable Sources*
- *Data Processed into Quality Information*

*Project Management Body of Knowledge (PMBok) v6, Section 6.5.2.2: Critical Path Method, states:*

*The critical path is the sequence of activities that represents the longest path through a project, which determines the shortest possible project duration.*

*PMBok, v6, Section 6.5.3.2, Project Schedule, states:*

*The project schedule is an output of a schedule model that presents linked activities with planned dates, durations, milestones, and resources. At a minimum, the project schedule includes a planned start date and planned finish date for each activity. If resource planning is done at an early stage, the project schedule remains preliminary until resource assignments have been confirmed and scheduled start and finish dates are established. This process usually occurs no later than the completion of the project management plan (Section 4.2.3.1). A target project schedule model may also be developed with a defined target start and target finish for each activity. The project schedule may be presented in summary form, sometimes referred to as the master schedule or milestone schedule, or presented in detail.*

*PMBok, v6, Section 6.6.2.2, Critical Path Method, states:*

*Comparing the progress along the critical path can help determine schedule status. The variance on the critical path will have a direct impact on the project end date. Evaluating the progress of activities on near critical paths can identify schedule risk.*

*PMBok, v6, Section 3.3.2, The Project, states:*

*The project manager leads the project team to meet the project's objectives and stakeholders' expectations. The project manager works to balance the competing constraints on the project with the resources available.*

*The project manager also performs communication roles between the project sponsor, team members, and other stakeholders. This includes providing direction and presenting the vision of success for the project. The project manager uses soft skills (e.g., interpersonal skills and the ability to manage people) to balance the conflicting and competing goals of the project stakeholders in order to achieve consensus. In this context, consensus means that the relevant stakeholders support the project decisions and actions even when there is not 100% agreement.*

According to 2 U.S. Code § 141, *Allocation of responsibilities for Library buildings and grounds*:

*(a) Architect of the Capitol (1) In general, the Architect of the Capitol shall have charge of all work at the Library of Congress buildings and grounds that affects the structural integrity of the buildings, building systems including mechanical, electrical, plumbing, and elevators, the architectural features of the buildings, compliance with building and fire code, laws, and regulations with respect to the specific responsibilities, the care and maintenance of Library grounds, and purchase of all equipment necessary to fulfill the responsibilities set forth under this paragraph.*

*(b) Librarian of Congress. The Librarian of Congress shall have charge of all work (other than work under subsection (a)) at the Library of Congress buildings and grounds.*

**Library of Congress Response:** The Library generally concurred with the recommendations in the evaluation report and indicated that they have already implemented and resolved the recommendations directed toward the Library. However, the Library objected to portions of the findings. Specifically, the Library objects to sentiments from the Architect of the Capitol (AOC) and believes they are incomplete as a result of the limitations of the scope during the evaluation.

**Evaluator's Additional Comments:** Our position regarding this finding has not changed. We believe the recommendations above will improve coordination between the Library and AOC, which is necessary to ensure that the agencies complete the VEMP within its established schedule. The OIG will request and evaluate documentation from the Library to support the Library's statement that it has implemented the recommendations prior to formally closing the recommendations. With regard to the Library's objections, we discuss the scope of this evaluation in Appendix A, and we believe that the testimonial and documentary evidence we obtained from both the Library and AOC is sufficient to support our assertions. As such, the documented recommendations are written to enhance collaboration, processes, and procedures that are already in place and not for them to remain status quo.

## THE VEMP PROJECT’S COST ESTIMATES, WHILE UPDATED REGULARLY, EXCEEDED THE FUNDING AVAILABLE AND WERE NOT COMPLETE

The VEMP project’s cost estimates, while updated regularly, continuously fluctuated, exceeded the funding available to complete the VEMP project, did not include all facets of the VEMP, and were not considered final estimates to complete the VEMP project. As the cost estimates continuously fluctuated, we could not assess what was reasonable.

Specifically, since March 2023, the Library project cost estimates have remained unchanged. The VEMP project cost estimates for the AOC design and construction of the VEMP project have continuously changed and grown. There were a variety of reasons the AOC costs fluctuated including changing design documentation, ineffective coordination and communication, compressed scheduling, project management, and segregated cost estimating processes.<sup>31</sup> In total, the VEMP project cost estimation rose from \$60 million,<sup>32</sup> to \$96.2 million through February 2024, as illustrated in Table 7.

**Table 7: VEMP Cost Estimates as Reported to Congress<sup>33</sup>**

| Congressional Report Dates | Total Cost Estimate <sup>34</sup> |
|----------------------------|-----------------------------------|
| Baseline 2019 VEMP Budget  | \$60 million                      |
| February 1, 2023           | \$74.5 million                    |
| March 3, 2023              | \$71.2 million                    |
| April 7, 2023              | \$73.2 million                    |
| May 5, 2023                | \$87 million                      |
| August 25, 2023            | \$87 million                      |
| December 15, 2023          | \$87 million                      |
| January 12, 2024           | \$109 million <sup>35</sup>       |
| February 9, 2024           | \$96.2 million                    |

*Source: Visitor Experience Master Plan (Baseline 2019 VEMP Budget) and the bi-weekly congressional reports as represented by the date in the table.*

<sup>31</sup> The scope of this evaluation was the Library and its processes for the management of the VEMP project. Although we engaged AOC to gain an understanding of its perspective with respect to the VEMP project, the evaluation did not include the AOC’s policies, processes, procedures for construction management and the cost estimation processes or AOC’s methodology for updating the cost estimation at each iteration of revised designs.

<sup>32</sup> The original VEMP stated that the Library would fund the VEMP project through \$40 million in appropriated funds and \$20 million in donations.

<sup>33</sup> Since the development of the VEMP, the aspects of the project that the Library has prioritized for initial execution have changed over time, which has impacted the estimations. As of February 10, 2024, in a letter to Senator Reed, Chairman of the Senate Committee on Appropriations, Subcommittee for the Legislative Branch, the total cost estimate was revised to \$95.6 million.

<sup>34</sup> The VEMP project total estimate includes the three major program elements (Treasures Gallery, Youth Center, and Orientation Gallery) but also includes other items outlined in the VEMP.

<sup>35</sup> The amount reported to Congress on January 12, 2024, included cost estimations for all VEMP project-related items, including estimations for the Congressional Crossroads and Welcome Area. This represented \$13.9 million that the Library did not include in the February 9, 2024, report. The remaining difference in cost estimations is the result of a reduction in the cost estimates for project management (\$0.1 million), the Treasures Gallery (\$0.2 million), and the Youth Center and East Exit Corridor (\$1.8 million). Separately, the Library reported a cost increase related to the Orientation Gallery and Capitol Visitor Center Egress Stair (\$1.1 million).

### ***Project Costs for the VEMP Have Increased Due to Changing AOC Cost Estimates***

As the Library and AOC reported in the bi-weekly congressional reports, the VEMP project's cost estimation has continuously changed between 2023 and 2024. The Library transferred \$20 million of the \$40 million in appropriated funds to AOC to cover the \$18.5 million in budgeted construction costs;<sup>36</sup> however, AOC's estimated cost of completion rose to \$53 million, as referenced in the February 9, 2024, bi-weekly congressional report, illustrated in Table 8.

**Table 8: AOC Cost Estimates as Reported to Congress<sup>37</sup>**

| <b>Congressional Report Dates</b> | <b>Treasures Gallery</b> | <b>Youth Center</b>     | <b>Orientation Gallery</b> | <b>Other Costs<sup>38</sup></b> | <b>Total AOC Cost Estimate<sup>39</sup></b> |
|-----------------------------------|--------------------------|-------------------------|----------------------------|---------------------------------|---|
| <b>Baseline 2019 VEMP Budget</b>  | \$1,000,000              | \$3,000,000             | \$14,500,000               | \$0                             | \$18,500,000                                |
| <b>February 1, 2023</b>           | 375,000                  | 3,400,000               | 16,500,000                 | 8,000,000                       | 28,275,000                                  |
| <b>March 3, 2023</b>              | 450,000                  | 4,300,000               | 16,500,000                 | 6,700,000                       | 28,000,000                                  |
| <b>April 7, 2023</b>              | 450,000                  | 4,300,000               | 21,700,000                 | 3,500,000                       | 30,000,000                                  |
| <b>May 5, 2023</b>                | 2,700,000                | 5,200,000               | 28,900,000                 | 7,000,000                       | 43,800,000                                  |
| <b>August 25, 2023</b>            | 2,700,000                | 5,200,000               | 28,900,000                 | 7,000,000                       | 43,800,000                                  |
| <b>December 15, 2023</b>          | 2,700,000                | 5,200,000               | 28,900,000                 | 7,000,000                       | 43,800,000                                  |
| <b>January 12, 2024</b>           | 800,000                  | 5,900,000               | 36,000,000                 | 23,100,000                      | 65,800,000                                  |
| <b>February 9, 2024</b>           | 1,000,000                | 7,700,000 <sup>40</sup> | 34,900,000 <sup>41</sup>   | 9,300,000                       | 53,000,000                                  |

*Source: Visitor Experience Master Plan (Baseline 2019 VEMP Budget) and the bi-weekly congressional reports as represented by the date in the table.*

<sup>36</sup> \$18.5 million is the amount estimated for AOC in the 2019 VEMP document.

<sup>37</sup> This table shows the three major program elements (Treasures Gallery, Youth Center, and Orientation Gallery), as well as Other Costs, which includes a variety of smaller areas, such as the welcome area, entry hall, Orientation Gallery door, Capitol Visitor Center entrance, and egress. These amounts generally relate to AOC's construction and administrative expenses for each project.

<sup>38</sup> Each bi-weekly congressional report included additional costs outside of the three feature galleries of the VEMP. Those costs were summed into the Other Costs column and included the VEMP welcome area, entry hall, Orientation Gallery door, Capitol Visitor Center entrance, and egress. These costs also fluctuated over time and were reprioritized, re-organized, or added periodically as the project feature galleries were rescheduled or shifted.

<sup>39</sup> Cost estimates in the March 3, 2023, April 7, 2023, and February 9, 2024, congressional reports were rounded to the nearest million and did not foot to the exact amount for all feature galley costs and other costs.

<sup>40</sup> In the February 9, 2024, bi-weekly congressional report, the Youth Center base and east exit corridor elements were combined.

<sup>41</sup> In the February 9, 2024, bi-weekly congressional report, the Orientation Gallery and Capitol Visitor Center egress stair elements were combined.

**Library Cost Estimates Have Fluctuated Slightly from Baseline Budget**

The Library’s VEMP project cost estimates slightly increased since the VEMP was approved and have remained unchanged since March 2023, as illustrated in Table 9.

**Table 9: Library Cost Estimates as Reported to Congress<sup>42</sup>**

| Congressional Report Dates | Treasures Gallery | Youth Center | Orientation Gallery | Other Costs <sup>43</sup> | Total Library Cost Estimate |
|----------------------------|-------------------|--------------|---------------------|---------------------------|-----------------------------|
| Baseline 2019 VEMP Budget  | \$9,000,000       | \$7,000,000  | \$14,500,000        | \$9,000,000               | \$39,500,000                |
| February 1, 2023           | 9,250,000         | 9,500,000    | 14,500,000          | 12,950,000                | 46,200,000                  |
| March 3, 2023              | 9,250,000         | 9,500,000    | 14,500,000          | 9,950,000                 | 43,200,000 <sup>44</sup>    |
| April 7, 2023              | 9,250,000         | 9,500,000    | 14,500,000          | 9,950,000                 | 43,200,000                  |
| May 5, 2023                | 9,300,000         | 9,500,000    | 14,300,000          | 10,100,000                | 43,200,000                  |
| August 25, 2023            | 9,300,000         | 9,500,000    | 14,300,000          | 10,100,000                | 43,200,000                  |
| December 15, 2023          | 9,300,000         | 9,500,000    | 14,300,000          | 10,100,000                | 43,200,000                  |
| January 12, 2024           | 9,300,000         | 9,500,000    | 14,300,000          | 10,100,000                | 43,200,000                  |
| February 9, 2024           | 9,300,000         | 9,500,000    | 14,300,000          | 10,100,000                | 43,200,000                  |

Source: Visitor Experience Master Plan (Baseline 2019 VEMP Budget) and the bi-weekly congressional reports as represented by the date in the table.

<sup>42</sup> This table shows the three feature galleries: Treasures Gallery, Youth Center, and Orientation Gallery, and Other Costs, which includes a variety of smaller areas including the VEMP’s welcome area, entry hall, Orientation Gallery door, Capitol Visitor Center entrance, and egress. This generally relates to the Library’s design, exhibit case fabrication, and administrative expenses for each piece of the VEMP project.

<sup>43</sup> Each bi-weekly congressional report included additional costs outside of the three feature galleries of the VEMP. Those costs were summed into the Other Costs column and included the VEMP Welcome Area, Entry Hall, Orientation Gallery Door, Capitol Visitor Center Entry, and Egress Exit. These costs also fluctuated over time and were re-organized, re-prioritized or added periodically as the project feature galleries were rescheduled or shifted.

<sup>44</sup> The Library reduced its reporting for the gift shop renovation by \$3 million as a correction. The gift shop was always considered a Library-funded project in concert with VEMP. From 2019 to 2023, the VEMP budget allocated \$400,000 in potential costs to move the gift shop to its new location, if needed.

***The VEMP Project's Budget Shortfall Has Necessitated Additional Funding Requests***

The VEMP's project cost estimations exceeded the available funding and resulted in a budget shortfall. As of February 2023, the estimated cost to complete the VEMP project had risen to \$74.5 million, \$14.5 million higher than the original VEMP budget. Since that estimate, the estimated cost to complete the project has grown. To address the budget shortfall, AOC submitted one reprogramming request to Congress and prepared and contemplated another reprogramming request to ensure it completed construction in time to meet the congressional deadline of the United States semiquincentennial in July 2026.

In August 2023, AOC requested the reprogramming of \$30.4 million appropriated for the Capitol Power Plant; however, the House Appropriations Committee declined to approve the request. In December 2023, AOC prepared a request for the reprogramming of \$37 million appropriated to replace the John Adams Building sprinkler system, which AOC only contemplated and did not submit. At the January 2024 monthly congressional check-in meeting, the parties discussed a different approach to funding the project and deferred this different approach to the appropriators for further discussion. However, both of AOC's requests were based on the total value devoted to other AOC projects, not on the cost estimate needed to deliver the VEMP project.

On February 6, 2024, the Senate Appropriations Committee held a meeting to discuss the budget shortfall and its impact on the VEMP project. On February 10, 2024, the Library and AOC requested \$30 million<sup>45</sup> in additional federal appropriations to address the VEMP project's budget shortfall and the risk that the Library and AOC would be unable to complete the VEMP project. The Library and AOC made the request via a formal letter addressed to Senator Reed as Chairman of the Senate Committee on Appropriations Subcommittee on the Legislative Branch and described the impact the funds would have on the completion of the three VEMP feature galleries. Previously, on February 5, 2024, AOC delivered a VEMP risk assessment, which noted that the VEMP project costs would exceed the funds originally appropriated if the Library and AOC did not mitigate the risk. AOC issued this risk assessment with 80 percent certainty that the VEMP project costs would exceed the funds originally appropriated. Table 10 illustrates the available funds and the funds requested to address the budget shortfall.

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<sup>45</sup> According to Public Law 118-47, enacted on March 23, 2024, AOC's Library Buildings and Grounds line item was appropriated \$30,000,000 in additional funding. The Library confirmed on April 3, 2024, that the appropriation is earmarked for the VEMP project to address the shortfall, as requested in the letter to Chairman Reed on February 10, 2024.

**Table 10: VEMP Funding Resources**

| Funding Type  | AOC                   | Library               | Funds Total           |
|---|-----------------------|-----------------------|-----------------------|
| Federal Funds Provided <sup>46</sup>                    | \$22.4 million        | \$20.0 million        | \$42.4 million        |
| Non-Federal Funds                                       | -                     | 20.0 million          | 20.0 million          |
| Additional Federal Funds Appropriated in FY24           | 30.0 million          | -                     | 30.0 million          |
| Additional Non-Federal Funds to Be Raised <sup>47</sup> | -                     | 3.2 million           | 3.2 million           |
| <b>Total Funding</b>                                    | <b>\$52.4 million</b> | <b>\$43.2 million</b> | <b>\$95.6 million</b> |

Source: AOC and Library Visitor Experience Letter to Chairman of Subcommittee on Legislative Branch, Committee on Appropriations

### **Cost Estimates and Funding Requests Do Not Include All VEMP Elements**

The Library and AOC have noted that the \$33.2 million in additional federal and non-federal funds will not address the VEMP project’s budget shortfall entirely and guarantee full completion as designed. Specifically, portions of the Capitol Visitor Center Entry will not be completed. The Welcome Area, Carriage Entry Plaza, Congressional Crossroads, and Main Reading Room Vestibule were originally included as parts of the Capitol Visitor Center Entry and Orientation Gallery; however, in an effort to successfully implement portions of the VEMP project within the current budget, AOC recommended the Library identify base and optional construction areas. The Library identified the Treasures Gallery, Youth Center, and Orientation Gallery as base areas to construct. As there continues to be outstanding scope and design issues for the optional construction areas, reliable cost estimates cannot be generated and are not included in the request for additional funds. If unspent contingency funds remain after closing out work on base areas, the AOC will, in consultation with the Library, allocate any remaining funding towards executing optional VEMP project elements that were originally included as parts of the project. It is likely that not all originally envisioned project elements will be completed given the current amount of funds available.

### **Incomplete Final Cost Estimates from AOC Have Made It Difficult for the Library to Appropriately Manage the Project**

At the time of AOC’s efforts to identify reprogramming options for construction funding for the VEMP project, AOC acknowledged that the final budget, scope, and schedule were still incomplete and could continue to change, but stated that they would become more certain over time.<sup>48</sup> Separately, the Library communicated to us that it did not sufficiently understand how AOC was creating its cost estimates, as the estimates were constantly and quickly changing, making it difficult to manage project costs. For example, as of December 15, 2023, AOC reported a total cost estimate of \$43.8 million in the bi-weekly congressional report. However, on December 21, 2023, AOC provided the Library with a more detailed total cost estimate of \$58.8 million. In January 2024, Library leadership stated that they did not understand how cost

<sup>46</sup> Congress appropriated \$40 million in federal funds to the Library for the VEMP project. The Library transferred \$20 million of those funds to AOC. Two million dollars in expiring funds was reprogrammed in FY23 from a separate AOC-Library project. Another \$387,000 was reprogrammed from AOC general funds.

<sup>47</sup> In 2022, the Library approved a budget increase for the Youth Center to create an enhanced interactive experience. This \$3.2 million will be paid for with donated funds.

<sup>48</sup> The scope of this evaluation was the Library and its processes for the management of the VEMP project. Although we engaged AOC to gain an understanding of its perspective with respect to the VEMP project, the evaluation did not include the AOC’s policies, processes, procedures for construction management and the cost estimation processes or AOC’s methodology for updating the cost estimation at each iteration of revised designs.

estimates could increase to such a degree, given that details about the VEMP project were becoming clearer.<sup>49</sup>

## Conclusion

The Library and AOC did not establish the shared policies, processes, procedures, internal controls, and project management needed to ensure that they jointly maintained control of cost estimates for the VEMP project. Specifically, as discussed further below, cost estimates have risen in 2023 and 2024 due to:

- Changing and incomplete design information;
- VEMP project schedule compression caused cost increases;
- Insufficient design documentation for the original cost estimate;
- Lack of agreed-upon definitions, communication methodologies, and processes for the execution of the VEMP project;
- Lack of centralized project management; and
- Cost estimates are not developed in a collaborative manner.

## Changing and Incomplete Design Information

The Library and AOC have not established finalized design documentation or a common understanding of what a 100 percent design entails. In December 2023, the Library communicated that the Orientation Gallery was 100 percent designed, with the center column re-design in progress; however, in January 2024, AOC indicated that it was still awaiting the Library's final designs.

Typically, AOC begins its construction design process when the gallery fabrication drawings are 100 percent complete; however, in an effort to stay on schedule, AOC began its construction design process without 100 percent completed gallery fabrication drawings from the Library. As such, AOC was required to update its construction design and recalculation of estimated costs as the Library provided additional gallery design documentation. For example, while attempting to finalize its construction design, AOC continued to receive changes to the Orientation Gallery center re-design. The Library continued to communicate in the bi-weekly congressional reports that it was at 100 percent design, with a final exhibit design for the re-designed center still to come. One of the key design elements outstanding was a gallery design component the Library implemented as a replacement for the proposed Oculus.<sup>50</sup> The Library communicated to AOC its intent to replace the Oculus design with a new center re-design in January 2023. As of February 1, 2023, the Library noted in the bi-weekly congressional report that its gallery designer would require an estimated 2 to 3 months for the re-design of the space, separate from a final gallery design package by March 31, 2023. The Library delivered a final exhibit design package on March 31, 2023, with the exception of the center component, to allow AOC's construction process to continue and minimize further schedule impacts. The Library continued to provide additional structural design documentation through January 2024. We found that, as of February 9, 2024, the Library still needs to finalize design documentation for the two remaining feature galleries that have not yet opened (i.e., the Youth Center and the Orientation Gallery).

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<sup>49</sup> AOC officials stated to us that they have explained why they reported higher costs, but that throughout the process, the Library did not understand how scope changes resulted in increased costs.

<sup>50</sup> In November 2022, the Library communicated via the Gazette, its internal newsletter, that the Oculus was being eliminated from the Orientation Gallery plans due to suboptimal design, significant increases in cost, and unacceptable extension of the entire project's timeline. The Library announced it would develop a new approach to enhance the Orientation Gallery's design.

### **VEMP Project Schedule Compression Caused Cost Increases**

As adjustments to the final designs of the VEMP project continued, the scheduled completion date was extended. However, once Congress identified the July 2026 United States semiquincentennial as the VEMP project's deadline, the schedule could no longer be extended, and a growing number of activities needed to fit in a shortening timeframe, causing schedule compression. The only way to complete the planned scope under these circumstances would be to commit greater resources (e.g., overtime), which would result in increased costs.

### **Insufficient Design Documentation for the Original Cost Estimate**

The VEMP's original cost estimate was not based on sufficient design documentation. Specifically, the cost estimation process utilized the original VEMP concept and was not based on detailed gallery design documentation needed to determine a reasonable cost estimate. The Library utilized a contractor to develop a cost estimation, and AOC was consulted on the estimation created.<sup>51</sup> However, AOC officials indicated to us that there was not sufficient information to develop a cost estimate. This is likely due to a lack of common understanding and terminology between the Library and AOC as previously described.

### **Lack of Agreed-Upon Definitions, Communication Methodologies, and Processes for the Execution of the VEMP Project**

Although the Library and AOC have coordinated throughout the VEMP project, they have not established agreed-upon definitions, documented communication methodologies and processes to manage the project, or established documented expectations related to the delivery and execution of final design documentation. Each agency stated that the lack of productive communication limited the VEMP project's progress. Specifically:

- The Library and AOC did not establish agreed-upon, documented definitions of key terms, like "scope." A Library official defined scope as "the physical square footage of the space." As such, the Library official stated the scope has not changed. From the perspective of the Library, the only change to the VEMP project was the Oculus removal.<sup>52</sup> Separately, AOC officials defined scope as anything that would fall within the construction design. As a result, AOC interprets any changes in the Library's design documentation as a change in scope and it requires AOC to change its construction design. For example, AOC describes a change in scope to include granular details such as changing the planned number of outlets in a wall.
- The Library and AOC did not establish agreed-upon, documented expectations regarding the delivery and execution of final design documentation. This includes expected documents, approvals, certifications, timing, and other relevant information to support a final design. For example, in one instance, when AOC provided the Library and its fabrication contractor with comments on design documentation for the Treasures Gallery, AOC noted a requirement late in the Library's detail drawing process, after the Library's fabrication contract had already commenced, that engineering drawings were required to be stamped by a firm licensed in Washington, D.C. However, the Library's fabrication contractor's structural engineer was not licensed in Washington, D.C., and

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<sup>51</sup> AOC stated they did not participate in the cost estimation process that resulted in the original cost estimate, however, the Library provided documentation demonstrating that AOC participated in developing the original VEMP and that the AOC supported the original cost estimate created by the Library's cost estimator contractors.

<sup>52</sup> AOC stated they disagreed and claimed that the Orientation Gallery's square footage is larger than originally planned.

this requirement was not specifically identified in the contractor's statement of work.

- The Library and AOC did not establish agreed-upon, documented expectations for the VEMP project's build methodology. The Library and AOC collaborated back and forth without a clear understanding of each other's methodology and expectations. This resulted in various status changes to the design and estimates. Specifically, the Library has used a mix of exhibit design and exhibit fabrication contracts, while AOC used a Design-Bid-Build methodology.<sup>53</sup> This has resulted in misunderstandings regarding how each organization is executing its specific responsibilities with regard to exhibit design and construction. The Library stated its expectation was that AOC would change the way it operates to execute the VEMP project in a collaborative and supportive manner. AOC stated it had deviated from some of its more typical processes to be more collaborative and supportive, including performing construction designs without having complete gallery designs and engaging in more routine conversations regarding expectations. Nevertheless, AOC has firm statutory responsibilities and policy and code requirements for designs and construction under its build methodology that the Library does not have, and AOC did not effectively communicate these requirements and methodologies to the Library.
- The Library and AOC did not develop an agreed-upon, documented communication plan to define each agency's roles and responsibilities until nearly four years after the project began.<sup>54</sup> During the evaluation, both the Library and AOC indicated that communication can be improved and that each felt that inputs from the other had been disregarded. As of August 2023, an AOC drafted communication plan has yet to be finalized and implemented.<sup>55</sup> Another example in which collaboration broke down was during the preparation of the January 12, 2024, bi-weekly congressional report. As instructed by Congress, the Library drafted the report to include AOC-provided cost and schedule information that informed the Library's decisions. The report included information specific to how the project management of certain portions of the VEMP project would move forward. The project decisions also included associated cost information that was caveated and generalized for communication to Congress. However, AOC had not fully validated the cost information or briefed its leadership on the changes to the reorganized information. The Library did make changes suggested by AOC; however, AOC also had concerns about the inclusion of the cost caveats and those concerns did not appear to be addressed as it remained in the report. The Library stated that they believed the concerns were addressed with the edits made pursuant to established process, however during our evaluation AOC officials indicated that they felt differently.
- The Library and AOC did not have a common understanding of the expected roles of senior leadership in the VEMP project execution. Library leadership indicated that they felt the AOC leadership turnover posed a challenge to effectively coordinating the VEMP project. Since the inception of the project, the AOC has had two appointed Architects and three acting Architects. The impact of changing AOC senior leadership directly on

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<sup>53</sup> Design-Bid-Build is a traditional construction method that involves three sequential phases: the design phase, which requires the services of a designer (the Library or AOC contractor who designs the intended creation), the bid phase when a contractor is selected (building construction firms or exhibit manufacturers), and the build phase when the project is built (AOC/building construction firm; Library/exhibit manufacturer).

<sup>54</sup> VEMP approval was issued in September 2019.

<sup>55</sup> AOC noted that it provided the final communication plan to the Library. The Library acknowledged a plan was shared on November 3, 2023; however, the Library disagreed that its edits to the document were accepted or incorporated. The Library indicated that it resubmitted its edits on January 30, 2024.

the VEMP is unclear, however AOC officials involved with the project indicated to us that they felt the impact was minimal.

### **Lack of Centralized Project Management**

Neither the Library nor AOC implemented centralized project management for the VEMP project until August 2023. The Appropriation Committees expressed concern with progress made on the VEMP project, including the way AOC conducted its cost estimation and project scoping.<sup>56</sup> As such, the Appropriation Committees directed the Library and AOC to assign a dedicated project manager to the VEMP project so the agencies could implement the focus and internal controls needed to facilitate timely completion. The Library and AOC addressed this lack of centralized project management in August 2023 by establishing two contracted project managers through an AOC contractor. One contractor was assigned to support the Library, and one contractor was assigned to support the AOC. Collectively, the two project managers operate as liaisons between the two agencies to move the VEMP project forward. Prior to that appointment, in January 2023, the Library detailed a Library employee for 6 months to improve the collaboration between the Library and AOC. There was no centralized project manager or collaborator prior to January 2023.

### **Cost Estimates Are Not Developed in a Collaborative Manner**

AOC utilized designs provided by the Library, as well as AOC's own design development, to estimate construction costs, but AOC exclusively managed the methodology and outputs of the cost estimation process without the Library's involvement, unless the Library specifically asked for additional information. The Library and Appropriations Committees have periodically requested additional detail and documentation to support the calculation of the rising cost estimations, but this information is provided on a upon request basis rather than a continuous one.

By not ensuring that they jointly maintained control of cost estimates, the VEMP project's cost estimates have constantly changed and will continue to change until the Library and AOC put in place, as described above, shared policies, processes, procedures, and internal controls. In an effort to slow and minimize rising costs, the Library and AOC—as of February 10, 2024—agreed to extend the VEMP project schedule for the Orientation Gallery to March 2027. This limits the risk of additional cost increases, as the cost of the VEMP project has risen from \$60 million to \$95.6 million between 2019 and 2024. The current cost estimate of \$95.6 million does not include all of the elements in the original VEMP plan and without credible cost estimates moving forward, it will be difficult for the AOC and Library to determine what, if any, reserve funding can be used to add originally planned elements back to the VEMP.

Taking into account the recommendations provided in our previous finding, which addressed several of the underlying issues relevant to this finding, we recommend the Library:

- 2.1 Implement standing, periodic, working meetings with AOC, the AOC and Library project managers, and Library personnel to discuss and document cost estimation changes as a result of design changes to VEMP project cost estimations.

We identified matters for congressional consideration that are relevant to this finding. We have provided these matters in Appendix B.

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<sup>56</sup> The expressed concern was specifically noted in House Report 118-120, which accompanied the Legislative Branch Appropriations Act for FY 2024, published in July 2023.

Below, we list the finding's applicable criteria.

GAO's *Standards for Internal Control in the Federal Government*, dated September 2014, states:

*Principle 6 – Define Objectives and Risk Tolerance*

*6.01 Management should define objectives clearly to enable the identification of risks and define risk tolerances.*

**Attributes**

*The following attributes contribute to the design, implementation, and operating effectiveness of this principle:*

- *Definitions of Objectives*
- *Definitions of Risk Tolerances*

*6.02 Management defines objectives in specific and measurable terms to enable the design of internal control for related risks. Specific terms are fully and clearly set forth so they can be easily understood.*

*6.04 Management defines objectives in measurable terms so that performance toward achieving those objectives can be assessed. Measurable objectives are generally free of bias and do not require subjective judgments to dominate their measurement. Measurable objectives are also stated in a quantitative or qualitative form that permits reasonably consistent measurement.*

...

*Principle 10 – Design Control Activities*

*10.01 Management should design control activities to achieve objectives and respond to risks.*

*The following attributes contribute to the design, implementation, and operating effectiveness of this principle:*

- *Response to Objectives and Risks*
- *Design of Appropriate Types of Control Activities*
- *Design of Control Activities at Various Levels*
- *Segregation of Duties.*

...

*Principle 12 - Implement Control Activities*

*12.01 Management should implement control activities through policies.*

*The following attributes contribute to the design, implementation, and operating effectiveness of this principle:*

- *Documentation of Responsibilities through Policies*
- *Periodic Review of Control Activities.*

...

*Principle 13 – Use Quality Information*

*13.01 Management should use quality information to achieve the entity’s objectives.*

*The following attributes contribute to the design, implementation, and operating effectiveness of this principle:*

- *Identification of Information Requirements*
- *Relevant Data from Reliable Sources*
- *Data Processed into Quality Information.*

GAO’s *Cost Estimating and Assessment Guide*, dated March 2009, states:

*Chapter 1: The Characteristics of Credible Cost Estimates and a Reliable Process for Creating Them.*

*Basic Characteristics of Credible Cost Estimates*

*Clear identification of task: Estimator must be provided with the system description, ground rules and assumptions, and technical and performance characteristics. Estimate’s constraints and conditions must be clearly identified to ensure the preparation of a well-documented estimate.*

*Standardized structure for the estimate: A standard work breakdown structure, as detailed as possible, should be used, refining it as the cost estimate matures and the system becomes more defined.*

PMBok, v6, Section 7.2, *Estimate Costs*, states:

*A cost estimate is a quantitative assessment of the likely costs for resources required to complete the activity...Cost estimates should be reviewed and refined during the course of the project to reflect additional detail as it becomes available and assumptions are tested. The accuracy of a project estimate will increase as the project progresses through the project life cycle. For example, a project in the initiation phase may have a rough order of magnitude (ROM) estimate in the range of -25% to +75%. Later in the project, as more information is known, definitive estimates could narrow the range of accuracy to -5% to +10%.*

PMBok, v6, Section 7.4, *Control Cost*, states:

*Control Costs is the process of monitoring the status of the project to update the project costs and managing changes to the cost baseline. The key benefit of this process is that the cost baseline is maintained throughout the project. This process is performed throughout the project... Updating the budget requires knowledge of the actual costs spent to date. Any increase to the authorized budget can only be approved through the Perform Integrated Change Control process (Section 4.6). Monitoring the expenditure of funds without regard to the value of work being accomplished for such expenditures has little value to the project, other than to track the outflow of funds. Much of the effort of cost control involves analyzing the relationship between the consumption of project funds and the work being accomplished for such expenditures. The key to effective cost control is the management of the approved cost baseline.*

PMBok, v6, Section 4.3.3.4, *Change Requests*, states:

*Change request is a formal proposal to modify any document, deliverable, or baseline. When issues are found while project work is being performed, change requests can be submitted, which may modify project policies or procedures, project or product scope, project cost or budget, project schedule, or quality of the project or product results. Other change requests cover the needed preventive or corrective actions to forestall negative impact later in the project.*

PMBok, v6, Section 3.3.2, *The Project*, states:

*The project manager leads the project team to meet the project's objectives and stakeholders' expectations. The project manager works to balance the competing constraints on the project with the resources available.*

*The project manager also performs communication roles between the project sponsor, team members, and other stakeholders. This includes providing direction and presenting the vision of success for the project. The project manager uses soft skills (e.g., interpersonal skills and the ability to manage people) to balance the conflicting and competing goals of the project stakeholders in order to achieve consensus. In this context, consensus means that the relevant stakeholders support the project decisions and actions even when there is not 100% agreement.*

According to 2 U.S. Code § 141, *Allocation of responsibilities for Library buildings and grounds*:

*(a) Architect of the Capitol (1) In general, the Architect of the Capitol shall have charge of all work at the Library of Congress buildings and grounds that affects the structural integrity of the buildings, building systems including mechanical, electrical, plumbing, and elevators, the architectural features of the buildings, compliance with building and fire code, laws, and regulations with respect to the specific responsibilities, the care and maintenance of Library grounds, and purchase of all equipment necessary to fulfill the responsibilities set forth under this paragraph.*

*(b) Librarian of Congress. The Librarian of Congress shall have charge of all work (other than work under subsection (a)) at the Library of Congress buildings and grounds.*

**Library of Congress Response:** The Library generally concurred with the recommendations in the evaluation report and indicated that they have already implemented and resolved the recommendations directed toward the Library. However, the Library objected to portions of the findings. Specifically, the Library objects to sentiments from the Architect of the Capitol (AOC) and believes they are incomplete as a result of the limitations of the scope during the evaluation.

**Evaluator's Additional Comments:** Our position regarding this finding has not changed. We believe the recommendations above will improve coordination between the Library and AOC, which is necessary to ensure that the agencies complete the VEMP within its established budget. The OIG will request and evaluate documentation from the Library to support the Library's statement that it has implemented the recommendations prior to formally closing the recommendations. With regard to the Library's objections, we discuss the scope of this evaluation in Appendix A, and we believe that the testimonial and documentary evidence we

obtained from both the Library and AOC is sufficient to support our assertions. As such, the documented recommendations are written to enhance collaboration, processes, and procedures that are already in place and not for them to remain status quo.

## THE LIBRARY IS ON TARGET TO RAISE THE PRIVATE FUNDS PLEDGED TO SUPPORT THE VEMP PROJECT

The Library is on target to raise the \$20 million in private funds budgeted to support the VEMP. Specifically, as of February 2, 2024, the Library’s Development Office (Dev/O) had obtained \$20.98 million in total pledges, or 105 percent of the original goal. Of the \$20.98 million in total pledges, the Library received \$13.43 million, or 64 percent, as illustrated in Table 11.

**Table 11: Non-Federal Funding**

| Description                   | Total Pledged | Pledges Received |
|-------------------------------|---------------|------------------|
| Pledges                       | \$20,245,000  | \$12,692,342     |
| Non-Pledges                   | 733,140       | 733,140          |
| Total Pledged and Non-Pledged | 20,978,140    | 13,425,482       |
| Percent of Fundraising Goal   | 105%          | 64%              |

Source: VEMP Project Non-Federal Funding Tracker

The Library anticipates receiving the remaining pledged funds through FY 2027, as illustrated in Table 12.

**Table 12: Anticipated Collections**

| Description                   | FY 2024     | FY 2025     | FY 2026   | FY 2027   | Total       |
|-------------------------------|-------------|-------------|-----------|-----------|-------------|
| Anticipated Collection Amount | \$3,987,500 | \$3,023,778 | \$283,766 | \$260,000 | \$7,555,044 |

Source: VEMP Project Non-Federal Funding Tracker

In addition to the original \$20 million goal identified in the VEMP, as of February 10, 2024, the Library communicated to Congress its intent to raise an additional \$3.2 million.<sup>57</sup>

### Conclusion

The Library leveraged its donor database—including its Friends of the Library, Madison Council, and alumni giving programs—to achieve the original goal. However, the Library did not solicit the general public for donations. The Dev/O plans to meet the Library’s additional funding needs through continued engagement with current and future donors using the opening of the Library’s Treasures Gallery and the National Book Festival as key opportunities to steward and solicit donors.

The additional \$3.2 million donation goal is a result of the rising cost estimates and the funding gap between the original cost estimate of \$60 million and the current cost estimate of \$95.6 million. AOC has requested and received additional appropriated funds to cover the remaining budget shortfall.

With receipt of the outstanding pledges, Dev/O and the Library will have raised the private funds pledged to support the Library in completing the project on time and with the necessary funds.

<sup>57</sup> As of February 10, 2024, the Library added an additional fundraising goal of \$3.2 million to its original fundraising goal of \$20 million. As the Library has already obtained pledges of \$20.9 million, it has a remaining \$2.3 million to raise in support of the VEMP.

Accordingly, we recommend the Library:

- 3.1 Continue fundraising efforts from all available sources to support the fundraising goals set for the VEMP.

Below, we list the finding's applicable criteria.

Visitor Experience Master Plan – “VEMP (Phase One) implementation costs total \$58 million and will be funded publicly (\$38 million) and privately (\$20 million).”

VEMP letter issued by the Acting Architect of the Capitol and the Librarian of Congress on February 10, 2024, to Senator Jack Reed, Chairman of the Senate Committee on Appropriations Subcommittee on the Legislative Branch: Additional Non-Federal Funds To Be Raised – “In 2022, the Library of Congress approved a budget increase for the Youth Center to create an enhanced interactive experience, which will cost \$3.2 million to be paid for with donated funds.”

**Library of Congress Response:** The Library generally concurred with the recommendations in the evaluation report and indicated that it has already implemented and resolved the recommendations directed toward the Library. The Library did note that, subsequent to the February 10, 2024, letter, they have decreased their additional fundraising need from \$3.2 million to \$1.5 million; however, the Library stated that they will continue to explore opportunities to raise non-federal funds for the visitor experience project to address unanticipated construction costs and future programming.

**Evaluator's Additional Comments:** Our position regarding this finding has not changed.

## APPENDIX A – OBJECTIVES, SCOPE, AND METHODOLOGY

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### **Objectives**

The Library of Congress (Library) Office of the Inspector General (OIG) engaged Sikich to conduct a follow-up evaluation of the Library's Visitor Experience Master Plan (VEMP) project. The objectives of this evaluation were to determine whether: (1) the Library's Integrated Master Schedule (IMS) and VEMP are on schedule and within budget; (2) cost estimates are reasonable and current and the Library updates these estimates with the actual costs as the project progresses or whenever requirements change; and (3) the Library is on target to raise the private funds pledged to complete the project on time and with the necessary funds. As the VEMP is a joint project between the Library and the Architect of the Capitol (AOC), to achieve the engagement objectives, Sikich engaged and met with AOC personnel to obtain their perspective on the VEMP project, schedule, and cost. Although the AOC OIG participated in those discussions, at the time of this evaluation, the AOC OIG has not conducted its own evaluation of the VEMP project. As such, this evaluation's scope was directed toward the Library's execution of the VEMP project and AOC's contributions to the VEMP project. We did not separately evaluate AOC. As the Library OIG's jurisdiction is only over the Library, we have directed the recommendations to the Library for implementation.

### **Scope**

The scope of this review included evaluating the Library's IMS, VEMP, and other related documents from the project's inception through February 10, 2024, and conducting interviews with relevant Library and AOC personnel, as determined necessary, to evaluate whether the VEMP project is on schedule and within budget. The evaluation did not include AOC's policies, processes, procedures for construction management, cost estimation processes, or methodology for updating the cost estimation at each iteration of the revised designs.

### **Methodology**

To meet our evaluation objectives, we performed the following steps:

- Met with key Library and AOC personnel to understand any changes they made to the methodology used to track and monitor the VEMP project schedule and expenditures, including updates to the IMS.
- Met with key Library and AOC personnel to understand their respective roles on the VEMP project, their current assessment of project risk, and whether the schedule is on track, is within budget, and will be completed as designed.
- Obtained and reviewed all IMSs and their corresponding critical paths. Our review included assessing the changes in each document over time to determine the significance of the changes.
- Obtained and reviewed all bi-weekly congressional reports to assess the changes in the target dates for opening the feature exhibits. We also assessed whether the opening dates reported in the bi-weekly congressional reports differed from those reported in the IMS.
- Determined the reasonableness of policies and procedures used to update the IMS, critical path, and bi-weekly congressional report.
- Met with key Library and AOC personnel to determine how the Library and AOC prepare the cost estimates.

- Obtained and reviewed all bi-weekly congressional reports to assess the changes in the reported cost estimates.
- Met with key Library personnel to gain an understanding of the Library's plan for obtaining and tracking donations.
- Obtained and reviewed documentation supporting the donations secured to date.
- Obtained and reviewed documentation supporting the Library's estimated additional donations and its plan for obtaining these donations.
- Determined the reasonableness of the policies and procedures the Library is using to obtain and track donations.

At the conclusion of our fieldwork, we provided notices of findings and recommendations (NFRs) to Library OIG personnel for review. We also provided the NFRs to Library and AOC personnel for their verification.

We conducted our evaluation in accordance with the Council of the Inspectors General on Integrity and Efficiency's (CIGIE's) *Quality Standards for Inspections and Evaluations* (December 2020), as well as the Statement on Standards for Consulting Services, promulgated by the American Institute of Certified Public Accountants (AICPA).

## APPENDIX B – MATTERS FOR CONGRESSIONAL CONSIDERATION

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Given the cost and public nature of the VEMP, there are items Congress may want to consider as the project moves forward to improve coordination:

- Requiring the Library and AOC to establish and use common terminology and definitions;
- Requiring the establishment of an agreed upon communication plan that includes roles, responsibilities, points of contact, communication methodologies, and reporting requirements;
- Designating an AOC employee with authority to make final decisions regarding the VEMP on behalf of AOC to support the continuous progress of the VEMP to completion;
- Setting requirements for final design documentation that includes expected documents, approvals, certifications, timing, and other relevant information necessary to proceed to construction; and
- Establishing standing, periodic working meetings with the Library and AOC to ensure that cost estimates are complete and accurate and that any modifications to cost estimates are fully understood by all parties.

Specifically, regarding the VEMP schedule, Congress may want to consider:

- 1.1 Requiring the Library of Congress and Architect of the Capitol to document and publish agreed-upon definitions of key terms specific to the design and construction of the VEMP project.
- 1.2 Requiring the Library of Congress and Architect of the Capitol to document and publish an agreed-upon communication plan that includes roles, responsibilities, points of contact, expectations, communication methodologies, bi-weekly reporting responsibilities, and other items of note as needed, including statutory responsibilities and requirements with respect to the Library buildings and grounds.
- 1.3 Designating an Architect of the Capitol employee with authority to make final decisions regarding the VEMP on behalf of the Architect of the Capitol to support continuous progress of the VEMP project until its completion.
- 1.4 Requiring the Library of Congress and Architect of the Capitol to document and publish agreed-upon expectations and process exceptions, where necessary, for the delivery and execution of final design documentation. Documented expectations for final design documentation could include expected documents, approvals, certifications, timing, and other relevant information that may be necessary to support a final design.
- 1.5 Requiring VEMP project personnel from the Library of Congress and Architect of the Capitol and the project managers representing each respective agency to implement standing, periodic working meetings, with authorizing and Congressional representation, to discuss and document scheduling changes that will then be reflected in the bi-weekly congressional report and the Visitor Experience Schedule.

Further, in addition to the matters for congressional consideration referenced above, which address several of the underlying issues relevant to VEMP project cost estimates, Congress may want to consider:

- 2.1 Requiring the Library of Congress and Architect of the Capitol to finalize design documentation for the two remaining feature galleries (Youth Center and Orientation Gallery), with the individual agencies' final approvals, by an agreed-upon date. Additionally, include Appropriations Committee representation in the design finalization discussions, to expedite the finalization of design documentation for both the Library of Congress and Architect of the Capitol and to lessen the risk of additional cost escalation on the VEMP project.
- 2.2 Directing the Architect of the Capitol to implement standing, periodic working meetings with the Library of Congress, including the Architect of the Capitol and Library of Congress project managers and other necessary Architect of the Capitol and Library of Congress personnel, to discuss and document changes to the VEMP project cost estimations. Additionally, direct the Architect of the Capitol to provide supporting documentation and detail to the Appropriations Committees and the Library of Congress to support VEMP project cost estimations.

**APPENDIX C – MANAGEMENT RESPONSE AND CORRECTIVE ACTION PLAN (CAP)**


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We provided Library management with our draft version of this report, and Library management provided the following responses. We have not evaluated management's responses and therefore do not express an opinion on them.



Office of the Librarian

## MEMORANDUM

**DATE** January 27, 2025  
**TO** Kimberly Benoit, Inspector General  
**FROM** J. Mark Sweeney, Principal Deputy Librarian of Congress   
**SUBJECT** Management Response to OIG report 2023-SP-104, Visitor Experience Master Plan (VEMP)

The Library of Congress (Library) generally concurs with recommendations in the Office of the Inspector General's (OIG) report on the Visitor Experience Master Plan (VEMP) and has already resolved the recommendations directed to the Library.

As a preliminary matter, the Library objects to findings representing sentiments of the Architect of the Capitol (AOC) that are inherently incomplete given the limitations of this audit. The public-private arrangement approved by Congress required a combination of Library and AOC budgets and resources – both appropriated and non-appropriated -- and necessitated flexibilities within the traditional federal funding and construction processes. While we understand the OIG's jurisdictional limitations, as described in Appendix A, and appreciate the OIG's efforts (albeit ultimately unsuccessful) to engage the AOC's OIG directly in this audit, we lament that the Library was not able to obtain a comprehensive report on the lessons learned for this project or gain useful insight into the AOC's management or processes. Although the Library's budgeted responsibilities did not increase, the AOC's fluctuating cost estimates and processes introduced challenges that resulted in Congress providing the AOC additional appropriations and the Library having to raise additional private funding. It would have been useful for this report to have identified specific areas for improvement for future collaborations between the Library and AOC, especially in light of the auditor's claims the AOC may have had project documentation that differed from the evidence the Library provided during the course of this audit.

Leaders and staff of the Library and AOC met with representatives and staff of the House of Representatives and U.S. Senate Committees on Appropriations for the Legislative Branch on February 6, 2024. In a letter dated February 10, 2024, the Librarian and Architect agreed to and memorialized the plan for completion of the Visitor Experience. That plan was dependent on an additional appropriation of \$30 million to the AOC. Congress approved of the plan and appropriated the additional funding in the

Further Consolidated Appropriations Act, Pub. L. 118-47 at div. E, title I, on March 23, 2024.

Accordingly, the Library and AOC are executing the new Congressionally-approved plan. The plan in the February 10, 2024 letter provides a new schedule for completion of the visitor experience project with AOC target completion dates and LOC public opening dates for the galleries as follows:

- Treasures Gallery – AOC target June 2024, LOC opening June 2024;
- Youth Center – AOC target June 2025, LOC opening Dec. 2025;
- Entry and Orientation Phase 1 – AOC target Sept. 2026, LOC opening Mar. 2027.

With respect to cost, the February 10<sup>th</sup> plan lays out the specific costs for each phase, funding amounts for each phase and sources (e.g., each agency's contributions, transfers that have or will occur, and appropriated and non-appropriated values), necessary fiscal contingencies, and specific scope exclusions. The plan identifies risk factors applicable for given phases and proposes resolutions to significant project risks by: memorializing actions needed for exhibit coordination and responsibilities of each agency to ensure final exhibit designs are facilitated with AOC planned base building scope requirements; providing for use of a change management plan to minimize impact on scope, budget, and schedule and outlining an escalation process in the event changes significantly impact any of those elements; and establishing agreed upon logistics and building restrictions to resolve conflicts between construction contractor access and Library operational requirements, including creation of a Construction Coordination Center charter that delineates the hours of construction and adjustments to schedule necessary to accommodate Library events.

Pursuant to commitments made on February 6 and 10, 2024, the Library and AOC have provided joint bi-weekly reports to the Congress conveying the project status. These reports provide further details and updates on the actions taken to mitigate risks as agreed upon by both the Library and AOC and challenges encountered by the agencies. Notably, in the joint reports dated July 26, 2024 and August 23, 2024, the agencies' progress has resulted in cost adjustments, which decrease the amount of Library fundraising needed from \$3.2 to \$1.5 million. The Library continues to explore opportunities to raise non-federal funds for the visitor experience project both for the unanticipated construction cost increases and for future programming.

The attached spreadsheet maps the OIG's recommendations to the Library to the documentation of their resolution. Thus, the Library considers all of the recommendations to be closed.

cc: David Mandel, Chief, Center for Exhibits and Interpretation  
Ryan Ramsey, Chief of Staff  
Meg Williams, General Counsel

Management Comments on Draft OIG Report No. 2023-SP-104

| Rec # | Recommendation   | Resp | Comments  | Target completion |
|-------|--|------|---|-------------------|
| 1.1   | Finalize design documentation for the two remaining feature galleries (Youth Center and Orientation Gallery) with the individual agencies' final approval by an agreed-upon date, to expedite the finalization of design documentation for both the Library and AOC, to lessen the risk of additional cost escalation on the VEMP project. | CEI  | See 2/10/24 letter to Congress providing the Library and AOC joint plan for completion of visitor experience phases.  | Completed         |
| 1.2   | Document and publish definitions of key terms specific to the design and construction of the VEMP project.   | CEI  | See 2/10/24 letter to Congress providing the Library and AOC joint plan for completion of visitor experience phases.  | Completed         |
| 1.3   | Document and publish policies, procedures, definitions, and expectations specific to the Library's exhibition design and fabrication methodology.  | CEI  | See generally LCR 7-110 requiring use of the Federal Acquisition Regulations; see 2/10/24 letter to Congress providing the Library and AOC joint plan for completion of visitor experience phases.  | Completed         |
| 1.4   | Document and publish an intergovernmental construction communication plan including roles and responsibilities for Library personnel.  | CEI  | See 2/10/24 letter to Congress providing the Library and AOC joint plan for completion of visitor experience phases. Specifically, the agencies identified responsibilities for each phase of the project and created a Construction Coordination charter specifying hours for construction and Library operation and events.                             | Completed         |
| 1.5   | Document and publish expectations for the delivery and execution of final design documentation. Documented expectations for final design documentation could include expected documents, approvals, certifications, timing, and other relevant information that may be necessary to support a final  | CEI  | See 2/10/24 letter to Congress providing the Library and AOC joint plan for completion of visitor experience phases and remaining documentation necessary to support each phase.  | Completed         |
| 1.6   | Implement standing, periodic, working meetings with AOC, the AOC and Library project managers, and Library personnel to discuss and document scheduling changes that will then be reflected in the bi-weekly congressional report and the Visitor  | CEI  | See 2/10/24 letter to Congress providing the Library and AOC joint plan for completion of visitor experience phases and subsequently issued bi-weekly reports to Congress.  | Completed         |
| 2.1   | Implement standing, periodic, working meetings with AOC, the AOC and Library project managers, and Library personnel to discuss and document cost estimation changes as a result of design changes to VEMP project cost estimations.   | CEI  | See 2/10/24 letter to Congress providing the Library and AOC joint plan for completion of visitor experience phases. Specifically, the plan delineated a change management process to minimize impacts on scope, budget, and schedule and an escalation process in the event changes significantly impact any of those elements.                          | Completed         |
| 3.1   | Continue fundraising efforts from all available sources to support the fundraising goals set for the VEMP.   | DEV  | In addition to the Development Office's continued outreach for the capital campaign, the Development Office has been coordinating with the Office of the Librarian and has identified existing Library gift and trust funds to support the visitor experience and has been exploring other opportunities for future programming to be held in the spaces. | Completed         |