



# OFFICE OF INSPECTOR GENERAL

## *2021-0019-INVI-P – Architect of the Capitol (AOC) Supervisor Suspected of Wasteful Spending for a Third Time*

### **Suspected Violations of the AOC “Standards of Conduct” Policy; “Government Ethics” Policy. **Substantiated.****

On September 16, 2021, the AOC Office of Inspector General (OIG) received a complaint via the AOC Hotline advising that an AOC Supervisor within the AOC’s Records and Archives Management Branch (RMAB) had conducted mismanagement of archival records and had wasted AOC funds by shipping 114 boxes containing records from the 1980s and 1990s to the AOC’s off-site vault location. The complainant stated that the 114 boxes were previously scanned and microfilmed by an AOC Archivist in 2013, and that the original documents were scheduled for destruction. However, due to the lack of funding at that time, the boxes were stored in the Rayburn House Office Building.

Further investigation revealed that the AOC Supervisor held a meeting with their team of archivists on August 17, 2021, to discuss the final outcome of the 114 boxes that contained building maintenance records for the Library of Congress buildings. The AOC Supervisor disagreed with their employees’ recommendations to have the duplicate items destroyed and directed the records be sent to the off-site facility in September 2021.

The OIG reviewed the invoice pertaining to the total cost of the truck rental and shipment of the 114 boxes to the off-site location and determined that it cost the AOC a total of \$4,367.25. Additionally, the monthly contract that the AOC has with a vendor to shred documents is a fixed price cost of \$185.00 per month for full-service collection and shredding of up to 2,313 pounds of documents. The estimated average weight per records box is 35 pounds, which indicates that the 114 boxes could have been destroyed in two months.

Overall, the cost of destroying the documents was less than it would have cost the AOC to send the boxes off-site. Additionally, a review of Records Schedule 22: Superintendent, Library of Congress, identified that building maintenance records were not listed as a category of archival records<sup>1</sup> that need to be preserved indefinitely or a Heritage Asset<sup>2</sup> indicating they should have

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<sup>1</sup> Per Order 37-1, 12.8. Archival Records, Reference and Library, include:

- Architectural and engineering drawings
- Architectural models
- Art and reference files
- Art and reference library
- Conservation reports
- Manuscripts and textual records
- Photographs and videos

<sup>2</sup> The buildings, structures, cultural landscapes, fine art, architectural fine art, decorative art, architectural decorative art, monuments, memorials, archival records, photographic records, living botanical assets, views and vistas, archeological resources, and stored art and architectural materials in the care of the AOC that have historical, architectural, artistic, cultural or educational significance. Heritage Assets are generally expected to be preserved indefinitely.



# Investigative Summary

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been destroyed. This investigation substantiated that the AOC Supervisor's decision to ship the 114 boxes to the off-site location was wasteful and did not conform to AOC Policy. The sum of \$4,367.25 for removal and transportation to the offsite location is identified as questioned costs.

A review of the OIG's Case Management Tracking System revealed that the same AOC Supervisor had been the subject of two previous OIG Investigations in 2019 ([AOC OIG 2019-0013-INVI-P](#)) and 2020 ([AOC OIG 2020-0003-INVI-P](#)), both pertaining to wasteful spending. The charges were substantiated in each of the previous cases and the AOC Supervisor was found to have cost the AOC a total of \$3,779.95.

**Final Management Action:** The OIG substantiated that the AOC Supervisor violated multiple AOC policies when they knowingly shipped duplicate documents to the off-site facility and was wasteful with AOC funds that may have been put to better use. On September 7, 2022, AOC Management determined that they disagreed with our substantiation of violations of AOC Order 38-1, Government Ethics, or AOC Order 752-2, Standards of Conduct and no administrative action would be taken against the employee.

In accordance with AOC Order 752-1, Discipline, Dated March 31, 2014, Appendix A, Violation of Standards of Conduct and Government Ethics policies, the First Offense is Reprimand; Second Offense is Suspension; Subsequent Offenses is Removal. OIG does not provide recommendations for punishment but includes AOC Order 752-1, Discipline, in its final report as guidance for the jurisdiction.

AOC Order 752-1, Discipline, does not include in the table of penalties, a definition or mention of Waste (a major tenant of an Inspector General's credo). The OIG has identified Waste and Accountability as a persistent challenge facing the AOC within the Management Opportunities and Performance Challenges over the last five years. The OIG has regularly highlighted inconsistencies in the AOC holding employees accountable for actions that have the potential to create an agency culture where recurrent instances of Waste of government resources could become commonplace. The agency has remained silent in its policy and communications with AOC personnel to address Waste and this is yet another example of its allowance, since current AOC policies do not directly address this issue.

Based on the employee's previous infractions and the nature and severity of these most recent violations, the OIG disagrees with AOC Management's decision to unsubstantiate the Ethics and Standards of Conduct violations in regard to wasteful spending. Wasteful spending positions the AOC for increased risk and financial loss if not properly addressed through policy, internal controls, and measures of accountability via senior leadership tone and action.

The case is closed.