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OFFICE OF INSPECTOR GENERAL

FEBRUARY 5, 2021

Evaluation of the Architect of the Capitol's Emergency Preparedness Posture

Evaluation Report 2020-0002-IE-P

MISSION

The OIG promotes efficiency and effectiveness to deter and prevent fraud, waste and mismanagement in AOC operations and programs. Through value added, transparent and independent audits, evaluations and investigations, we strive to positively affect the AOC and benefit the taxpayer while keeping the AOC and Congress fully informed.

VISION

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

Results in Brief

Evaluation of the Architect of the Capitol's Emergency Preparedness Posture

February 5, 2021

Objectives

Our objective for this evaluation was to determine the effectiveness of the Architect of the Capitol's (AOC's) emergency incident drills, exercises and training in accordance with the AOC Base Emergency Action Response Plan (EARP). This evaluation also included a limited review of the AOC's response efforts to the COVID-19 pandemic. The AOC Office of Inspector General (OIG) scheduled an evaluation of the AOC's emergency preparedness posture prior to the World Health Organization's declaration of the COVID-19 pandemic. As such, we did not conduct our work in response to the current pandemic situation. This evaluation was consistent with our 2019 agency Management Challenges that listed Balancing Safety and Security with Preservation and Heritage as a Management Opportunity and Performance Challenge.

Findings

Based on our evaluation, we found that the AOC emergency incident drills, exercises and training were generally effective with minor gaps in policy, training preparation and exercise evaluation activities. We also note that the AOC's efforts to prepare for, respond to and recover from the COVID-19 pandemic allowed for efficient and sustained operations across the Capitol complex, however:

- The AOC's organizations' preparation and participation in multi-jurisdictional emergency management training was not always consistent;
- The AOC lacked a standardized emergency management training evaluation process;
- The AOC organizational EARPs were not consistently updated and aligned with the AOC Base EARP in policy structure and guidance; and
- The AOC's response efforts to the COVID-19 pandemic were proactive, efficient and sustained to support Congress, the United States Supreme Court and the AOC workforce.

Recommendations

We recommend that:

- The AOC organization leaders in coordination with the AOC organization head responsible for Emergency Management, implement a quarterly review and validation process to ensure the appropriate emergency management personnel are designated to fully represent and communicate jurisdiction interests for planning and participation in AOC emergency management exercises;
- The AOC organization head responsible for Emergency Management, perform a feasibility study to consider the development and implementation of a quarterly AOC Emergency Management Training Program to train and educate AOC executive leaders and organizational emergency management personnel on critical emergency management functions, emergency management responsibilities and emergency incident management systems;
- The AOC organization head responsible for Emergency Management in coordination with AOC Training and Employee Development, develop and implement a standardized AOC emergency management training evaluation process for all AOC organizations;

- The AOC organization leaders in coordination with the AOC organization head responsible for Emergency Management, designate appropriate personnel to review and update the organizational EARPs and Base EARP to synchronize alignment of policy structure, content and application guidance;
- The AOC organization head responsible for Emergency Management in coordination with AOC organization leaders, implement a standardized timeline for periodic review of emergency management policies and procedures to improve means of tracking and sustaining these efforts;
- The AOC organization head responsible for Emergency Management in coordination with AOC organization leaders, designate appropriate personnel to continue to monitor, review and update the AOC Pandemic Plan and organizational EARPs in accordance with emerging federal guidelines and medical best practices;
- The Chief Administrative Officer (CAO) in coordination with the AOC Return to Work Tiger Team, continue to develop and update AOC policies and operational related changes in accordance with emerging federal pandemic legislation; and
- The CAO, perform a feasibility study to consider the purchase and maintenance of an emergency stockpile of Personal Protective Equipment (PPE) and cleaning supplies beyond the standard on-hand levels for the AOC.

Management Comments

The AOC concurred with the findings and recommendations and provided comments. Please see the recommendations table on the next page for the status of recommendations.

Recommendations Table

Responsible Entity	Recommendation Resolved	Recommendation Unresolved	Recommendations Closed
AOC Orgs CSO CAO	R1, R4, R5, R6 R1, R2, R3, R4, R5, R6 R7		R8

Note: The following categories are used to describe agency management comments to individual recommendations.

- **Unresolved -** Management has not agreed to implement the recommendation or has not proposed actions that will address the recommendation.
- **Resolved -** Management agreed to implement the recommendation or has proposed actions that will address the underlying finding that generated the recommendation.
- **Closed** – The OIG verified that the agreed upon corrective actions were implemented.

INSPECTOR GENERAL

DATE: February 5, 2021

TO: J. Brett Blanton
Architect of the Capitol

FROM: Christopher P. Failla, CIG
Inspector General

SUBJECT: Evaluation of the Architect of the Capitol's (AOC's) Emergency Preparedness Posture (Project No. 2020-0002-IE-P)

Please see the attached final report for our evaluation of the AOC's Emergency Preparedness Posture, which was announced on April 10, 2020. We found that the AOC's emergency preparedness training was generally effective with minor gaps in policy, preparation, and evaluation activities. We also note that the AOC's efforts to prepare for, respond to and recover from the COVID-19 pandemic allowed for efficient and sustained operations across the Capitol complex. This report includes eight recommendations for improvements to the AOC's emergency management program.

In your response to our official draft report (Appendix B), you concurred with each of our recommendations. Based on your response, we feel the proposed corrective actions address each of our recommendations. However, the status of each recommendation will remain open until final corrective action is taken. We will contact you within 90 days to follow-up on the progress of your proposed management decisions.

I appreciate the assistance you and your staff provided throughout the evaluation. Please direct questions to Senior Evaluator Chico Bennett at 202.394.2391 or Chico.Bennett@aoc.gov, or Assistant Inspector General for Inspections and Evaluations Josh Rowell at 202.593.1949, or Joshua.Rowell@aoc.gov.

Distribution List:

Antonio Edmonds, Acting Chief of Operations
Patricia Williams, Director, Safety and Code Compliance
Valerie Hasberry, Chief Security Officer
William O'Donnell, Chief Administrative Officer
Jason Baltimore, General Counsel
Peter Bahm, Chief of Staff
Mary Jean Pajak, Senior Advisor

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Introduction

Objective

The objective for this evaluation was to determine the effectiveness of AOC emergency incident drills, exercises and training in accordance with the AOC Base Emergency Action Response Plan. This evaluation also included a limited review of the AOC's response efforts to the COVID-19 pandemic.

Background

The AOC strives to improve safety and security measures for the Capitol complex and greater protection for all who work and visit it. The AOC Base EARP[1] serves as an introduction to AOC incident management. The Base EARP further develops the AOC emergency management capabilities while incorporating an all-hazards approach. The all-hazards approach incorporates an integration of best practices and single mitigation measures to address multiple hazards and threats. The Base EARP is the framework and baseline guide for organization heads, deputies, assistants and key staff members to develop organization EARPs.

The Base EARP applies to all AOC organizations at all AOC managed and occupied facilities, which includes off-site locations, throughout all phases of emergency management. In order to maintain consistency, organizational EARPs shall be organized using the same table of contents as the Base EARP. However, since each organization is different, content in each section may be customized to better address organization-specific information; whereas, off-site facilities may have specific considerations based on location.

According to the Base EARP, an incident is an unexpected, anticipated or potentially dangerous situation that endangers a person, place or thing and calls for immediate action. This can be natural (i.e., tornados), technological (i.e., power service disruption), biological (i.e., pandemic/infectious/communicable disease) and/or man-made (i.e., imminent security threat). It is hard to determine which specific incident will have an impact. This is why the Base EARP takes an all-hazards approach. The Base EARP combines specific incident procedures and processes from across the AOC to achieve a flexible yet consistent approach.

[1] For the purposes of introducing emergency management concepts, the Background section of this report incorporates direct language and passages from the AOC Base EARP, dated April 2, 2018, and the AOC Emergency Management Program, dated June 6, 2019.

The AOC currently incorporates an emergency management lifecycle model organized into four phases: preparedness, response, recovery and mitigation. See *Figure 1: Emergency Management Life Cycle* for reference. The Base EARP integrates these four phases, which helps mitigate vulnerabilities and the impact of an incident:

Figure 1: Emergency Management Life Cycle

Preparedness: Readiness to handle an incident.

- This phase includes plans and preparations made before an incident.
- Examples include developing plans, training staff, exercising plans and acquiring equipment and supplies.

Response: Reacting safely to an incident to save lives, property and the environment.

- Response activities take place in reaction to an incident.
- Examples include actions taken to save and protect lives, property and the environment.

Recovery: Returning to normal operations after an incident.

- During recovery, actions are taken to return to a normal operating status or a safer environment following an incident. This includes physical and psychological assistance.
- Examples include debris removal and repairs to a facility damaged by an incident.

Mitigation: Minimizes the loss of life and property when an incident occurs by lessening the impact.

- Reduces the extent of damage an incident may cause.
- Examples include establishing security monitoring during a public gathering and/or installing fire sprinkler systems in a structure.

At the time of our evaluation, the AOC had developed the AOC Emergency Management Program, dated June 6, 2019. The Emergency Management Program incorporates a multi-year strategic plan with a 10 year effort to create, deploy and sustain the program. The Emergency Management Program is not expected to be fully introduced until around 2023 with implementation scheduled around 2027 and updates by 2029. The Base EARP will remain as interim guidance to the Emergency Management Program. The Emergency Management Program incorporates five foundation components: the Incident Command System (ICS); National Incident Management System (NIMS); National Frameworks; National Preparedness System; and the National Preparedness Goal. The Emergency Management Program is

designed to ensure the AOC can provide high quality and immediate, responsive support service within the AOC and to our external clients.

Review of Internal Controls

We evaluated the Architect of the Capitol's internal controls for emergency management. While the AOC has established specific requirements that apply to emergency management, there are deficiencies that exist with the current emergency preparedness activities. As a result, the lack of updated internal controls creates the potential for process gaps and vulnerabilities within the AOC emergency management framework.

Criteria

The following criteria were used during this evaluation:

- AOC Base Emergency Action Response Plan
- AOC Organizational Emergency Action Response Plans
- Applicable federal emergency standards, guidance and best practices

Finding 1

AOC Exercise Preparation and Participation

We found that AOC organizations' preparation and participation were not always consistent in multijurisdictional emergency management exercises.

This occurred because AOC organizations did not always fully participate in the planning, coordination and implementation of exercises, nor did they always send trained staff to participate in AOC planned exercises.

As a result, inconsistent exercise preparation and participation poses an increased risk to emergency management preparedness and the potential for full recovery of AOC operations in the event of a catastrophic incident across the Capitol complex.

Discussion

The AOC Base EARP, dated April 2, 2018, serves as an introduction to AOC incident management. The Base EARP applies to all AOC organizations at all AOC managed and occupied facilities, which includes off-site locations, throughout all phases of emergency management. According to the policy, each organization head must ensure the health and safety of employees as well as sustain essential functions and responsibilities during an incident. Additionally, the Base EARP underlines the importance to take the time to prepare and plan for minor and major incidents that may impact the AOC. During our review, we found that AOC organizations conducted internal emergency management training, however, their preparation and participation was not always consistent in multi-jurisdictional emergency management exercises.

The Base EARP describes emergency management as the framework for communities and organizations to prepare for, react to and recover from a variety of incidents. Additionally, the Base EARP organizes emergency management into four phases: preparedness, response, recovery and mitigation. The Base EARP integrates these four phases, which helps mitigate vulnerabilities and the impact of an incident. The preparedness phase of the Emergency Management framework as listed in the Base EARP is described as readiness to handle an incident:

- This phase includes plans and preparations made before an incident;
- Examples include developing plans, training staff, exercising plans and acquiring equipment and supplies.

Exercise Preparation and Participation

According to the Base EARP, AOC organizations' participation in a diligent training and exercise program ensures that organizations operate to the best of their abilities in the event of an incident. AOC emergency management leaders noted that agency exercises were scenario-based, typically complex events that tested organizational systems and cooperation in responding to emergencies. These typically consisted of the annual multijurisdictional exercise and the annual snow management exercise. Other drills and exercises were prioritized within the AOC based on consensus of the Emergency Management Task Force, and approved by House and Senate oversight. The AOC also provided training and exercises based on the AOC strategic performance plan, which allowed for jurisdictional input to prevent straining jurisdictional resources for training and exercise participation. However, AOC organizations did not always fully participate in the planning, coordination and implementation of exercises.

Our review of the AOC exercises included in the scope[2] for this evaluation along with the associated corrective improvement activity noted that every organization received an invitation to the planning meetings for select AOC exercises. However, some organizational representatives failed to participate in some of the exercise planning meetings. We found that some AOC organizations did have proactive and sustained actions in their engagement in select exercises, while others had areas for improvement. Some examples for areas of improvement across different exercises as documented in the AOC Emergency Management Coordinator's After Action Reports included:

- Exercise participant list not matching real-world points of contact, which affected communication and coordination;
- Personnel not engaging in exercise activity and ignoring exercise messages and continuing their normal work business; and
- Personnel sitting in their office or performing actions other than a protective action associated with the exercise activities.
- During exercise activity some organizations reported late to the AOC Emergency Operations Center (EOC) and/or did not provide full time coverage of their assigned desk. This caused some activities to stall or fail to complete without that organization's representation.

Trained Staff

The Base EARP specifies that it is the responsibility of each AOC organization to ensure all employees receive appropriate emergency preparedness training and information on emergency procedures, notification, protective actions and emergency equipment. From April 2018 to March 2020, AOC organizations conducted internal emergency management training on varying levels, and some of them in an effective and efficient manner. In addition, our review of the AOC multijurisdictional exercises found that AOC organizations didn't always send trained or prepared staff to participate in the AOC exercises.

Web Based Emergency Operations Center (WebEOC) training and familiarity was a common theme for improvement in all of the reviewed AOC exercises. The AOC Chief Information Officer (CIO) told the OIG that WebEOC is a crisis information management system and is the preferred communication tool of the AOC to manage special security events and response to incidents. The CIO also noted that WebEOC has the capability to provide an emergency incident "common operating picture" for the agency during an incident. The AOC exercise corrective action documentation noted that personnel assigned to perform data entry into WebEOC should be trained to a sufficient level for data entry and how to overcome obstacles. Additionally, it

[2] Scope - AOC drills, exercises, and training from April 2018 to March 2020.

was also noted that WebEOC is not an intuitive program and requires training to navigate some of the features.

Multijurisdictional exercise reports were developed by the Chief Security Officer (CSO) Emergency Management Coordinator. They included the planning and operational goals of the exercise, the scenarios and injects expected, and the lessons learned and action items resulting from the exercises. Some additional examples for improvement across different exercises as documented in the AOC Emergency Management Coordinator's After Action Reports included:

- Familiarization of organizational emergency plans prior to exercise so that participants understand their role and function in required response activity;
- Inconsistent refresher training within organizations to ensure effective execution of individual protective actions; and
- Familiarization with EOC and Jurisdiction Command Center (JCC) roles - a need to train EOC and JCC members on the role of their position.

Impact

The AOC framework for emergency incident preparedness will not yield sustained success without the full planning, preparation and engagement efforts from all AOC organizations. As a result, inconsistent exercise preparation and participation poses an increased risk to emergency management preparedness and the potential for full recovery of AOC operations in the event of a catastrophic incident across the Capitol complex. As such, AOC organization leaders acknowledged that they are seeking to improve training coordination and preparation for better emergency management proficiency.

Conclusion

Implementation of training validation procedures will help identify potential training vulnerabilities, and identify actions to improve planning, coordination and standardize implementation of emergency management training. Such accountability measures will promote confidence and increase proficiency in AOC emergency management preparedness.

Recommendations

Recommendation 1

We recommend that AOC organization leaders in coordination with the AOC organization head responsible for Emergency Management, implement a quarterly review and validation process to ensure the appropriate emergency management personnel are designated to fully represent and communicate jurisdiction interests for planning and participation in AOC emergency management exercises.

Recommendation 2

We recommend that the AOC organization head responsible for Emergency Management, perform a feasibility study to consider the development and implementation of a quarterly AOC Emergency Management Training Program to train and educate AOC executive leaders and organizational emergency management personnel on critical emergency management functions, emergency management responsibilities and emergency incident management systems.

AOC Comment on R.1:

Concur. The AOC implemented an Emergency Management Working Group, which allows jurisdictions to collaborate and coordinate emergency management efforts. This peer-to-peer environment facilitates equal representation and a platform to express specific needs shared across the agency.

OIG Comment:

We reviewed the management comment and determined it addresses the finding and recommendation.

AOC Comment on R.2:

Concur. The Office of the Chief Security Officer (OCSO) continues to develop a training program to meet all knowledge and skill requirements to effectively manage an incident. The training program design incorporates a tiered and building block approach and will synchronize with the exercise and evaluation program that is also under development. Additionally, we are working to transfer training material into an online training format to facilitate on-demand refresher training and accommodate scheduling conflicts.

OIG Comment:

We reviewed the management comment and determined it addresses the finding and recommendation.

Finding 2

AOC Training Evaluation Process

We found that the AOC lacked a standardized emergency management training evaluation process.

This occurred because the AOC did not have a standardized training evaluation process available for all training across the agency. As such, AOC organizations used various methods for organizational training evaluation.

As a result, the lack of a standardized AOC training evaluation process poses an increased risk to measuring the extent to which emergency management targets are being met, and detecting the factors that hinder or facilitate their realization.

Discussion

AOC emergency management leaders noted that AOC functional exercises followed the Federal Emergency Management Agency's (FEMA) Homeland Security Exercise and Evaluation Program (HSEEP)[3]. The HSEEP doctrine consists of fundamental principles that frame a common approach to exercises. The intent is to enhance consistency in exercise conduct and evaluation while ensuring exercises remain a flexible, accessible way to improve preparedness across the nation. HSEEP guidance also notes that an effective evaluation assesses performance against exercise objectives and identifies and documents strengths and areas for improvement relative to capabilities. During our review, we found that the AOC lacked a standardized emergency management training evaluation process. According to HSEEP doctrine, training evaluation is a continual and systematic process of assessing the value or potential value of a training program and exercise activity. In addition, evaluation connects the exercise to improvement planning and feeds into the overall HSEEP Integrated Preparedness Cycle[4].

Training Evaluation

The Base EARP specifies that the identification of gaps or deficiencies during trainings, drills, exercises and in post incident After Action Reports (AARs) are to be collected by each AOC organization. The Base EARP notes that this is accomplished

[3] HTTPS://WWW.FEMA.GOV/EMERGENCY-MANAGERS/NATIONAL-PREPAREDNESS/EXERCISES/HSEEP

[4] Integrated Preparedness Cycle - planning, organizing/ equipping, training, exercising, and evaluating/improving is a continuous process that ensures the regular examination of ever-changing threats, hazards, and risks.

through a Corrective Actions Program (CAP). The CAP is the entire process from training to validating implementation of corrective actions. While the AOC had policy guidance for exercise AARs and corrective actions they did not have a standardized training evaluation process for use across the AOC. Because there was no standardized AOC training evaluation process, AOC organizations used various methods for their organizational training evaluation.

Some examples of AOC organizational training evaluation methods include:

- Online surveys sent to participants immediately after each training to collect participants perception on the relevancy and effectiveness of the training;
- Evaluation meetings held immediately following each drill to identify lessons learned and areas of improvement;
- Typical "hot wash" discussions after training with supervisors;
- Formal gatherings after exercises and events to gather and address lessons learned; and
- Organization evaluation of emergency readiness and response training based on job hazard.

Impact

AOC organizations conducted various exercises and training activities with documented lessons learned for corrective action and improvement. However, the reviewed training activity across the AOC lacked a standardized evaluation process. The lack of a standardized AOC training evaluation process poses an increased risk to measuring the extent to which emergency management targets are being met, and detecting the factors that hinder or facilitate their realization. Additionally, the training evaluation process has the potential to provide critical information to multiple stakeholder groups.

Conclusion

The development of a defined training evaluation process would help identify training gaps and connect the exercise to improvement planning and feed into the overall Integrated Preparedness Cycle. Evaluation helps to define the learning outcomes more sharply, remove unnecessary training content, and ensure that the training method meets the training needs of the learners and consequently the organization. By designing a standardized training evaluation process, the AOC can obtain the information needed to improve both training program delivery and emergency incident performance.

Recommendations

Recommendation 3

We recommend that the AOC organization head responsible for Emergency Management in coordination with AOC Training and Employee Development, develop and implement a standardized AOC emergency management training evaluation process for all AOC organizations.

AOC Comment on R.3:

Concur. The Base Emergency Action and Response Plan (EARP) 2021 update addresses the need to establish a standardized approach to the emergency management program, including training and evaluation topics, scheduling and delivery.

OIG Comment:

We reviewed the management comment and determined it addresses the finding and recommendation.

Finding 3

AOC Organizational EARP Update and Alignment with the AOC Base EARP

We found that the AOC organizational EARPs were not consistently updated and aligned with the AOC Base EARP in policy structure and guidance.

This occurred because:

- The AOC organizational EARPs were not always revised at the same time;
- The AOC organizational EARPs did not consistently follow the AOC Base EARP structural table of contents and application guidance;
- Some AOC organizational EARPs had out of date key incident management information (e.g., campus and transportation maps, emergency response points of contact, annexes and appendices).

As a result, the lack of aligned policy structure and updated policy guidance increased the probability for process gaps in emergency management across the AOC.

Discussion

The AOC Base EARP, dated April 2, 2018, is the framework and baseline guide for organization heads, deputies, assistants and key staff members to develop organization emergency action and response plans. The Base EARP applies to all AOC organizations at all AOC managed and occupied facilities, which includes off-site locations, throughout all phases of emergency management. The plan reflects the AOC's commitment to prepare employees for emergencies. The Base EARP specifies that each organization shall develop and maintain an organization EARP.

The Base EARP also stipulates that in order to maintain consistency, organizational EARPs shall be organized using the same table of contents as the Base EARP, however, content in each section may be customized to better address organization-specific information; whereas, off-site facilities may have specific considerations based on location. Additionally, the Base EARP provided supplemental guidance to AOC organizations to review organization plans annually and update them based on

lessons learned. During our review, we found that the AOC organizational EARPs were not consistently updated and aligned with the AOC Base EARP in policy structure and guidance.

Organizational EARPs

At the time of our evaluation, AOC organizational EARPs were at different stages in the policy update process, with some revision dates as current as 2020, and some others with dates as old as 2009. Some AOC organization leaders noted that their plans were under review due to the ongoing COVID-19 pandemic. In addition, AOC organization leaders noted varying reasons and associated timelines for policy reviews and updates:

- Annual plan review when information, equipment, training or procedures require adjustment;
- Quarterly or semiannual plan review and annual update based on identified internal or external gap analyses for policies and procedures; and
- Select percentage of plans reviewed annually or as exercises and real world events necessitate.

While AOC organizational EARPs were not always reviewed and revised at the same time, some AOC organizations documented a record of changes chart in their EARPs for updates and revisions to their plans. The record of changes chart contains the number assigned to each change and the date the change takes effect, a description of the change and/or the affected part of the EARP, the date of its actual entry into the EARP and the initials of the person responsible for entering the change. However, AOC organizations inconsistently used the record of changes chart to document when organizational plans were reviewed or revised.

The Base EARP further prescribed guidance that AOC organization EARPs must follow the standard format of the Base EARP and address all plan requirements. The Base EARP also noted that organization heads should ensure the respective organizational EARPs reference any guidance contained in the Base EARP and incorporate the organization's latest Standard Operating Procedure and checklists. At the time of our evaluation, we found that AOC organizational EARPs did not consistently follow the AOC Base EARP structural table of contents and application guidance. While, some AOC organizations generally aligned their policy structure and application guidance with the Base EARP, others used varying formats that did not correspond to the Base EARP.

Furthermore, at the time of our evaluation, we found that some AOC organizational EARPs had out of date key incident management information (e.g., campus and transportation maps, emergency response points of contact, annexes and appendices). We note the AOC organizational EARP inconsistencies for policy and application

guidance because some of the EARPs listed annexes and appendices for emergency management linkages and references to the Base EARP that no longer existed in the Base EARP. In addition, some of the AOC organizational EARPs emergency response points of contact directed emergency response coordination to supervisors or safety personnel that were no longer current.

Impact

Outdated and unsynchronized emergency management policies and procedures have the potential to point employees in the wrong direction during an emergency incident. Keeping policies and procedures up-to-date and synchronized is an essential part of protecting the organization and ensuring operational responsiveness. As a result, the lack of aligned policy structure and updated policy guidance increased the probability for process gaps in emergency management across the AOC. Well synchronized and maintained policies have the potential to improve emergency responsiveness in the event of a catastrophic incident across the Capitol complex.

Conclusion

The synchronization and regular updating of policies can help AOC organizations reduce preparedness risks, properly train staff, and maintain a heightened culture of emergency readiness. Of course, simply updating policies isn't enough. AOC organizations must follow through on training and supervising employees to make sure emergency management practices align with emergency management policies. Improved controls could also reduce inconsistencies, inefficient training and wasted response time. Moreover, effective implementation and enforcement of a standardized policy review system will promote transparency and confidence that enables the AOC workforce to execute the AOC emergency preparedness strategy.

Recommendations

Recommendation 4

We recommend that AOC organization leaders in coordination with the AOC organization head responsible for Emergency Management, designate appropriate personnel to review and update the organizational EARPs and Base EARP to synchronize alignment of policy structure, content and application guidance.

Recommendation 5

We recommend that the AOC organization head responsible for Emergency Management in coordination with AOC organization leaders, implement a standardized timeline for periodic review of emergency management policies and procedures to improve means of tracking and sustaining these efforts.

AOC Comment on R.4:

Concur. OCSO staff continue to assist offices and jurisdictions with the review and update process. The Emergency Management Steering Committee, comprised of all AOC offices, will meet to discuss this process and formulate a way forward by the end of April. Based upon the Emergency Management Steering Committee's guidance, the Emergency Management Working Group will develop a method for jurisdictions to implement by the end of July.

OIG Comment:

We reviewed the management comment and determined it addresses the finding and recommendation.

AOC Comment on R.5:

Concur. As part of the Emergency Management Steering Committee effort detailed in the response to Recommendation 4, we will develop a standardized review process and timeline.

OIG Comment:

We reviewed the management comment and determined it addresses the finding and recommendation.

Finding 4

AOC Response Efforts to the COVID-19 Pandemic

We found that the AOC response efforts to the COVID-19 pandemic were proactive, efficient and sustained in support to Congress, the United States Supreme Court and the AOC workforce.

This occurred because:

- In the earliest stages of the pandemic, the AOC reviewed the existing pandemic influenza plan (2014) and made updates to incorporate knowledge of COVID-19;

- The AOC initiated organizational activities that facilitated continuity in Congressional communication and operations as well as continuity in AOC workforce communication, operations and policy guidance; and

- The AOC created an action plan for safely returning to normal operations through the Return to Work Tiger Team.

As a result, the AOC's pandemic planning and actions allowed the agency to make informed decisions on levels of communication and operations to balance support to Congress, the United States Supreme Court, the AOC workforce and other stakeholders while maintaining employee and public safety.

Discussion

The World Health Organization on March 11, 2020, declared the novel coronavirus (COVID-19) outbreak a global pandemic.[5] According to the Center for Disease Control (CDC), COVID-19 is a new disease, caused by a novel (or new) coronavirus that has not previously been seen in humans.[6] Additionally, the CDC notes that new data on COVID-19 are available daily, yet information about the biological aspects of SARS-CoV-2 and epidemiological characteristics of COVID-19 remain limited.[7] While many questions remain about how the pandemic will evolve in the United States, response to the pandemic had a direct impact on the federal government. Mitigation strategies for COVID-19 response efforts were critical for decision makers across each branch of government.

As part of the legislative branch, the AOC is responsible for the maintenance, operation, and preservation of the buildings and grounds that make up the U.S. Capitol complex, including the U.S. Capitol Building, the House and Senate Office Buildings, the Library of Congress, the U.S. Supreme Court, and U.S. Botanic Garden, among other facilities. The AOC's mission statement is "to serve Congress and the Supreme Court, preserve America's Capitol and inspire memorable experiences." During our evaluation, we found that the AOC response efforts to the COVID-19 pandemic were proactive, efficient and sustained in support to Congress, the U.S. Supreme Court and the AOC workforce. The planning and coordination efforts of the AOC were essential in successful COVID-19 preparedness and response.

[5] WHO Director-General's opening remarks at the media briefing on COVID-19 - 11 March 2020 https://www.who.int/dg/speeches/detail/who-director-general-s-opening-remarks-at-the-media-briefing-on-covid-19---11-march-2020

[6] Center for Disease Control Coronavirus (COVID-19): https://www.cdc.gov/coronavirus/2019-ncov/cdcresponse/about-COVID-19.html

[7] Center for Disease Control Coronavirus (COVID-19): https://www.cdc.gov/coronavirus/2019-ncov/hcp/planning-scenarios.html

AOC Response Efforts

In the earliest stages of the pandemic, the AOC reviewed the existing pandemic influenza plan (2014) and made updates to incorporate knowledge of COVID-19. The plan included updates based on changes to international and federal public health guidance, as well as lessons learned from the 2009 H1N1 pandemic flu. The Director, Safety and Code Compliance (SCC) was the AOC agency lead for emergency preparedness actions. The SCC director noted that in January 2020, she alerted the AOC Executive Leadership Team of the potential for a pandemic and initiated the update of the Pandemic Flu plan to include the information on the novel coronavirus – SARS-CoV-2 and steps to prevent coronavirus disease 2019 (COVID-19).

The Pandemic Plan was designed to guide the AOC's pandemic preparedness and response and to make sure that the AOC could continue to perform essential functions and provide essential services during a community-level outbreak of a pandemic. The plan provided strategies to limit disease transmission and respond to absenteeism and other resource shortages that may occur. Additionally, the SCC Director engaged the CAO, Human Capital Management Division (HCMD), Information Technology Division (ITD) and Acquisition and Material Management Division (AMMD) to update their sections in the Pandemic Plan; and AOC senior leaders to start implementing their tasks on the "Key Actions" and "Steps" in the Pandemic Plan.

AOC Organizational Activities

Collectively, the AOC initiated organizational activities that facilitated continuity in Congressional communication and operations as well as continuity in AOC workforce communication, operations and policy guidance. AOC initiated organizational activities included but were not limited to the following:

- Updated Defense Priorities and Allocation System (DPAS) arrangements with the Department of Defense to allow the CSO and the AMMD to order priority materials;
- Purchased cleaning products in bulk on behalf of legislative branch partners for distribution across all campus facilities;
- Developed processes for specialized cleaning and contact tracing - initiated enhanced cleaning protocols for all AOC-managed facilities and agency tools, while vehicles were also sanitized regularly;
- Held telework drill well-before the decision to close campus was made to test the agency's IT capabilities;

- The ITD purchased additional licenses for Citrix software to ensure the agency remained license compliant. The ITD also developed an application process for users to reset smartcard remotely, which previously could only be accomplished by physically reporting to the IT Help Desk;
- Initiated rotating shifts and schedules to ensure that the AOC was able to maintain institutional knowledge and technical expertise regardless of the virus' spread;
- Developed and published a daily Coronavirus newsletter for all staff that highlighted important operations changes, resources for staff, latest news, research articles, activities for employees with children at home, as well as assistance and support options;
- Developed COVID-19 Employee Toolkit and Supervisor Toolkit, which include: Frequently Asked Questions; Workplace and Leave Flexibilities Chart; Employee Assistance Program information and other related documents;
- Developed policy and infrastructure to implement the Families First Coronavirus Response Act for the benefit of AOC employees;
- Regularly provided updated health and safety guidance in coordination with Office of Attending Physician;
- Offered weekly virtual "Office Hours" sessions from primarily the HCMD and ITD staff to answer questions, hear concerns and assist employees and supervisors in managing the AOC workforce through the pandemic; and
- Provided coordinated communication responses to members of Congress and their staff about a variety of issues, including but not limited to, resource needs, cleaning protocols and cases within the agency. These responses included in-person and online briefings, spreadsheets, fact sheets and memos.

Return to Work Tiger Team

AOC organization leaders acknowledged that the agency's preparation and response efforts were helpful to their employees with regard to consistent communication through the AOC Compass webpage that provided timely and relevant information on available resources to staff. Leaders also noted that childcare concerns were addressed appropriately and that employees appreciated the AOC being concerned for everyone, especially those with preexisting medical conditions. The AOC leadership also created an action plan for safely returning to normal operations through the Return to Work Tiger Team. The CAO led the Tiger Team. The Tiger Team was also comprised of various AOC organizational staff elements.

Through the Tiger Team, the AOC established many different interim programs for the AOC workforce as well as the general public (e.g., Workforce – Employee

toolkit, and general public – educational program resource page so schools could use the U.S. Capitol and other key topic areas for resourcing since they were unable to visit the U.S. Capitol). The AOC also created a training video to teach employees about operational changes across the agency. Additionally, the Tiger Team conducted an ongoing review of all AOC policies and will recommend permanent changes due to lessons learned as a result of ongoing operations.

External Barriers to AOC Response Efforts

While the AOC efforts to prepare for and respond to the COVID-19 pandemic were largely successful, there were some external barriers the AOC had to overcome during the initial stages of the pandemic. AOC leaders and primary staff noted that many if not all of the barriers were overcome after a couple of months. AOC senior leaders and staff told the OIG that some of the AOC external barriers included but were not limited to: initial COVID-19 related supplemental funding - the AOC asked for and was funded $25 million as part of the Coronavirus Aid, Relief, and Economic Security (CARES) Act[8] legislation. However, supplies required special legislation in order to be purchased on behalf of other congressional entities. The Senate, unlike the House, had no supply distribution ability forcing the AOC to take on that role. The AOC was asked to do purchasing for the entire Capitol complex and that nearly exhausted the $25 million.

As COVID-19 related funding to purchase PPE for specialized cleaning was a part of the initial barriers, there was also the addition of stressed supply chains. As the supply chain shortages were a huge challenge, purchases were repeatedly re-routed to other higher priority entities outside of the Capitol complex. Additionally, the attempts to execute DPAS authority was also a significant challenge in the initial stages of the pandemic. The process put in place by the White House severely impeded initial ability to execute that authority when the AOC implemented the normal process through Commerce and FEMA. AOC follow-on communication to help select elements of the White House Coronavirus Task Force better understand the AOC legislative mission enabled the AOC to finally get access to FEMA representatives to clear the way with suppliers.

Impact

The AOC continued to fully-support Congress and the U.S. Supreme Court during uncertain times. Having a Pandemic Plan in place allowed the AOC to execute effective and efficient preparatory and preventative actions in the earliest stages of the pandemic. AOC efforts to procure supplies, when others couldn't, and function as the central purchasing agency was key to conducting specialized cleanings and providing PPE to the congressional community. As a result, the AOC's pandemic planning and actions allowed the agency to make informed decisions on levels of

[8] Public Law 116–136 (Mar. 27, 2020), Title IX

communication and operations to balance support to Congress, other stakeholders and the AOC workforce while maintaining employee and public safety.

Conclusion

Congressional leaders lauded the AOC's preparation and response efforts for ensuring the congressional staff could continue to operate and help Congress respond to the country's urgent needs. AOC senior leaders and key staff in coordination with organization heads were able to implement key mitigation efforts to limit the spread of COVID-19 and keep the AOC workforce, congressional stakeholders and other building occupants as safe as possible and informed.

Recommendations

Recommendation 6

We recommend that the AOC organization head responsible for Emergency Management in coordination with AOC organization leaders, designate appropriate personnel to continue to monitor, review and update the AOC Pandemic Plan and organizational EARPs in accordance with emerging federal guidelines and medical best practices.

Recommendation 7

We recommend that the CAO in coordination with the AOC Return to Work Tiger Team, continue to develop and update AOC policies and operational related changes in accordance with emerging federal pandemic legislation.

Recommendation 8

We recommend that the CAO, perform a feasibility study to consider the purchase and maintenance of an emergency stockpile of PPE and cleaning supplies beyond the standard on-hand levels for the AOC.

AOC Comment on R.6:

Concur. The Chief Security Officer has designated the Emergency Management staff as the lead to monitor, review and update the current plans to address emerging pandemic incidents

OIG Comment:

We reviewed the management comment and determined it addresses the finding and recommendation.

AOC Comment on R.7:

Concur. The AOC will continue to collaborate with other Federal agencies to incorporate best practices and emerging pandemic legislation and guidance.

OIG Comment:

We reviewed the management comment and determined it addresses the finding and recommendation.

AOC Comment on R.8:

Concur. We provided information to the OIG showing we have already met the intent of this recommendation. The information detailed the assessments and plans that have been put into place to acquire and maintain PPE and supplies. OCSO is currently maintaining a supply of key items. The new AOC organizational construct also includes a new Logistics Division within OCSO that will be responsible for long-term supply management and other logistics requirements.

OIG Comment:

We reviewed the management comment and determined it addresses the finding and recommendation and we consider it "closed" in status.

Appendix A

Scope and Methodology

We conducted this evaluation from May 2020, through December 2020, in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*. These standards require that we plan and perform the evaluation to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our evaluation objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our evaluation objectives.

This report was self-initiated by the AOC OIG and was consistent with our 2019 agency Management Challenges that listed Balancing Safety and Security with Preservation and Heritage as a Management Opportunity and Performance Challenge. Our objective for this evaluation was to determine the effectiveness of the AOC's emergency incident drills, exercises and training in accordance with the AOC Base EARP. This evaluation also included a limited review of the AOC's response efforts to the COVID-19 pandemic.

To address our evaluation objectives, we reviewed relevant AOC policies and procedures related to emergency preparedness with a specific focus on AOC drills, exercises, and training from April 2018 to March 2020. We also reviewed AOC organizational EARPs and evaluated compliance with AOC emergency management policies and procedures along with a review of the AOC Pandemic Plan for pandemic preparedness activities. Lastly, we conducted interviews with appropriate AOC officials and staff to determine how emergency preparedness processes and procedures were carried out in a day-to-day manner along with AOC COVID-19 response efforts.

Use of Computer-Processed Data

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

Prior Coverage

Prior OIG reports relevant to this evaluation included:

Pandemic Response Accountability Committee (PRAC) – Multiple Agencies
PRAC, "Semiannual Report to Congress - APRIL 1, 2020 - SEPTEMBER 30, 2020," dated October, 29, 2020.

AOC OIG
Architect of the Capitol Status of CARES Act Funding, dated August 5, 2020.

Federal Deposit Insurance Corporation (FDIC)
EVAL -20-004, "The FDIC's Readiness for Crises," dated April 7, 2020.

Appendix B
Management Comments

Architect of the Capitol
U.S. Capitol, Room SB-16
Washington, DC 20515
202.228.1793

www.aoc.gov

United States Government

MEMORANDUM

DATE: February 1, 2021

TO: Mr. Christopher P. Failla
Inspector General

FROM: J. Brett Blanton
Architect of the Capitol

SUBJECT: Official Response to the Office of the Inspector General's Emergency Preparedness Evaluation Report 2020-0002-IE-P

The Architect of the Capitol (AOC) thanks the Office of the Inspector General (OIG) for the opportunity to review and respond to the OIG's Official Draft Report. The AOC concurs with the OIG's overall findings. Below is the AOC's response to the recommendations in the report.

Finding 1
AOC Exercise Preparation and Participation

Recommendation 1
Implement a quarterly review and validation process to ensure the appropriate emergency management personnel are designated to fully represent and communicate jurisdiction interests for planning and participation in AOC emergency management exercises.

AOC Response
We concur. The AOC implemented an Emergency Management Working Group which allows jurisdictions to collaborate and coordinate emergency management efforts. This peer-to-peer environment facilitates equal representation and a platform to express specific needs shared across the agency.

Recommendation 2
Perform a feasibility study to consider the development and implementation of a quarterly AOC Emergency Management Training Program to train and educate AOC executive leaders and organizational emergency management personnel on critical emergency management functions, emergency management responsibilities and emergency incident management systems.

AOC Response
We concur. The Office of the Chief Security Officer (OCSO) continues to develop a training program to meet all knowledge and skill requirements to effectively manage an incident. The training program design incorporates a tiered and building block approach and will synchronize

with the exercise and evaluation program that is also under development. Additionally, we are working to transfer training material into an online training format to facilitate on-demand refresher training and accommodate scheduling conflicts.

Finding 2
AOC Training Evaluation Process

Recommendation 3
Develop and implement a standardized AOC emergency management training evaluation process for all AOC organizations.

AOC Response
We concur. The Base Emergency Action and Response Plan (EARP) 2021 update addresses the need to establish a standardized approach to the emergency management program, including training and evaluation topics, scheduling and delivery.

Finding 3
AOC organizational EARP update and alignment with the AOC Base EARP

Recommendation 4
Designate appropriate personnel to review and update the organizational EARP and Base EARP to synchronize alignment of policy structure, content and application guidance.

AOC Response
We concur. OCSO staff continue to assist offices and jurisdictions with the review and update process. The Emergency Management Steering Committee, comprised of all AOC offices, will meet to discuss this process and formulate a way forward by the end of April. Based upon the Emergency Management Steering Committee's guidance, the Emergency Management Working Group will develop a method for jurisdictions to implement by the end of July.

Recommendation 5
Implement a standardized timeline for periodic review of emergency management policies and procedures to improve means of tracking and sustaining these efforts.

AOC Response
We concur. As part of the Emergency Management Steering Committee effort detailed in the response to Recommendation 4, we will develop a standardized review process and timeline.

Finding 4
AOC Response efforts to the COVID-19 Pandemic

Recommendation 6
Designate appropriate personnel to continue to monitor, review and update the AOC Pandemic Plan and organizational EARPs in accordance with emerging federal guidelines and medical best practices.

AOC Response
We concur. The Chief Security Officer has designated the Emergency Management staff as the lead to monitor, review and update the current plans to address emerging pandemic incidents.

Recommendation 7
Continue to develop and update AOC policies and operational related changes in accordance with emerging federal pandemic legislation.

AOC Response
We concur. The AOC will continue to collaborate with other Federal agencies to incorporate best practices and emerging pandemic legislation and guidance.

Recommendation 8
Perform a feasibility study to consider the purchase and maintenance of an emergency stockpile of PPE and cleaning supplies beyond the standard on-hand levels for the AOC.

AOC Response
We concur. We provided information to the OIG showing we have already met the intent of this recommendation. The information detailed the assessments and plans that have been put into place to acquire and maintain PPE and supplies. OCSO is currently maintaining a supply of key items. The new AOC organizational construct also includes a new Logistics Division within OCSO that will be responsible for long-term supply management and other logistics requirements.

Thank you for the opportunity to provide comments on the draft report. Please contact Valerie Hasberry at 202.593.0119 or valerie.hasberry@aoc.gov if you have any questions.

Doc. No. 210113-15-01

Announcement Memo

Office of Inspector General
Fairchild Bldg.
499 S. Capitol St., SW, Suite 518
Washington, D.C. 20515
202.593.1948

www.aoc.gov

United States Government

MEMORANDUM

DATE: April 10, 2020

TO: J. Brett Blanton
Architect of the Capitol

FROM: Christopher P. Failla, CIG
Inspector General

SUBJECT: Announcement for Evaluation of the Architect of the Capitol's (AOC) Emergency Preparedness Posture (2020-0002-IE-P)

This is to notify you that the Office of Inspector General is initiating an evaluation of the AOC's Emergency Preparedness. Our objective for this evaluation is to determine the effectiveness of AOC emergency incident drills, exercises, and training in accordance with the AOC Base Emergency Action Response Plan. This evaluation will also include a limited review of the AOC's response efforts for the COVID-19 pandemic.

Please provide an Agency point of contact for this evaluation. We will contact the appropriate AOC offices to schedule an entrance conference in the upcoming weeks. If you have any questions, please contact Chico Bennett at Chico.Bennett@aoc.gov or 202.593.0113.

Distribution List:

Thomas J. Carroll III, Assistant to the Architect of the Capitol
Patricia Williams, Director, Safety Fire & Environmental Programs
Valerie Hasberry, Director, Office of Security Programs
Peter Bahm, Chief of Staff
Mary Jean Pajak, Senior Advisor
Jason Baltimore, General Counsel

ACRONYMS AND ABBREVIATIONS

AAR	After Action Report
AMMD	Acquisition and Material Management Division
AOC	Architect of the Capitol
CAO	Chief Administrative Officer
CAP	Corrective Actions Program
CARES	Coronavirus Aid, Relief, and Economic Security Act
CDC	Center for Disease Control
CIO	Chief Information Officer
CSO	Chief Security Officer
DPAS	Defense Priorities and Allocation Systems Program
EARP	Emergency Action Response Plan
EOC	Emergency Operations Center
FEMA	Federal Emergency Management Agency
HCMD	Human Capital Management Division
HSEPP	Homeland Security Exercise Evaluation Program
ICS	Incident Command System
ITD	Information Technology Division
JCC	Jurisdiction Command Center
NIMS	National Incident Management System
OIG	Office of Inspector General
PPE	Personal Protective Equipment
SCC	Safety and Code Compliance
WebEOC	Web Based Emergency Operations Center

OFFICE OF THE INSPECTOR GENERAL
Fairchild Building, Suite 518
499 South Capitol Street, SW
Washington, DC 20515
(202) 593-1948
hotline@aoc-oig.org