



# INSPECTOR GENERAL

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July 14, 2023

## **Evaluation of the Architect of the Capitol's Safety Inspection Program**

*Evaluation Report 2022-0004-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 Safety Inspection Program*

July 14, 2023

### Objective

The objective of this evaluation was to assess the compliance and internal controls of the Architect of the Capitol's (AOC's) Safety Self-Inspection Program in accordance with AOC policies and procedures and with applicable federal laws and regulations.

### Findings

Based on our evaluation, we found that overall, the AOC's Safety Self-Inspection Program was in compliance with AOC policies and procedures and with applicable federal laws and regulations, and that internal controls over the program were generally sufficient. However, we found:

- The safety self-inspection checklist completion and reporting process is not consistent across AOC organizations;
- Improved guidance is needed regarding how to report other agencies' findings;
- The self-inspection checklists may benefit from the inclusion of items related to hazardous materials;
- AOC organizations' lists of physical areas to self-inspect may be incomplete, and
- AOC organizations are required to complete self-inspections, though not

### *Findings (Cont'd)*

all parties receive training on how to conduct self-inspections.

### Recommendations

We recommend that:

- 1) The Office of Safety and Code Compliance (SCC) issue guidance to the AOC's organizations to complete all elements of the self-inspection checklists (e.g., no blank responses or unchecked boxes).
- 2) The SCC issue guidance instructing the AOC's organizations to report all self-inspection findings, including those resolved during the self-inspection process, in a centralized and consistent manner, and for the SCC to analyze this data for proactive safety and compliance issue identification and management.
- 3) The SCC update its WebTMA Inspection Findings Module Quick Guide to: 1) document how to categorize non-AOC findings that are the responsibility of other agencies (e.g., U.S. Capitol Police), 2) reiterate that the SCC is responsible for both coordinating findings remediation with other agencies and defining the processes it will use to remediate findings and 3) provide the SCC's contact information. SCC should ensure that each AOC organization acknowledges receipt and understanding of the process for documenting and reporting other agencies' findings.
- 4) The SCC obtain an understanding of escape hood respirators to ensure that the Senate and House Sergeants at Arms regularly inspect respirators and ready them for use by AOC employees and others in emergency situations.



# Results in Brief

## *Evaluation of the Architect of the Capitol's Safety Inspection Program*

- 5) The SCC, in its next update to the self-inspection checklists, consider adding steps to address applicable items related to hazardous materials, including hazard communication.
- 6) The SCC develop guidance for how AOC organizations should develop a complete list of self-inspection areas, including guidance for shared spaces.
- 7) AOC organizations review their lists of physical areas to self-inspect to validate they are complete and in line with updated guidance from the SCC. In addition, AOC organizations should report validation review results to SCC during ongoing and regular intervals.
- 8) The SCC require all AOC employees performing self-inspections to complete standardized self-inspection training. The SCC should also consider requiring periodic refresher training to maintain readiness and awareness.

## **Management Comments**

The AOC provided comments on July 5, 2023, see Appendix C. In its Management Comments, the AOC concurred with all eight recommendations. Please see the Recommendations Table on the following page for the status of the recommendations.

## *Recommendations Table*

Responsible Entity <sup>1</sup>	Recommendations Resolved	Recommendations Unresolved	Recommendations Closed
SCC	R1, R2, R3, R4, R5, R6 and R8		
OA OCAO OCE OCFO OCO OCSO	R7		

The following categories are used to describe agency management’s 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.

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<sup>1</sup> OA → Office of the Architect  
OCAO → Office of the Chief Administrative Officer  
OCE → Office of the Chief Engineer  
OCFO → Office of the Chief Financial Officer  
OCO → Office of the Chief of Operations  
OCSO → Office of the Chief Security Officer  
SCC → Office of Safety and Code Compliance



# INSPECTOR GENERAL

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DATE: July 14, 2023  
TO: Chere Rexroat, RA  
Acting Architect of the Capitol  
FROM: Christopher P. Failla, CIG *C. Failla*  
Inspector General  
SUBJECT: Evaluation of the Architect of the Capitol's (AOC's) Safety Inspection Program (Project No. 2022-0004-IE-P)

Please see the attached final report for our evaluation of the AOC's Safety Self-Inspection Program. We determined that, overall, the AOC's Safety Self-Inspection Program was in compliance with AOC policies and procedures and with applicable federal laws and regulations, as well as that internal controls over the program were generally sufficient; however, we concluded that: 1) the safety self-inspection checklist completion and reporting process is not consistent across AOC organizations, 2) improved guidance is needed regarding how to report other agencies' findings, 3) the self-inspection checklists may benefit from the inclusion of items related to hazardous materials, 4) AOC organizations' lists of physical areas to self-inspect may be incomplete and 5) AOC organizations are required to complete self-inspections, though not all parties receive training on how to conduct self-inspections.

In your response to our official draft report (see Appendix C), you concurred with all eight recommendations. Based on your responses to Recommendations 1 through 8, we feel the proposed corrective actions address our recommendations. The status of the recommendations 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 Audrey Cree, Evaluator at 202.631.2682 or Audrey.Cree@aoc.gov, or Chico Bennett, Assistant Inspector General for Inspections & Evaluations at 202.394.2391 or Chico.Bennett@aoc.gov.

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# INTRODUCTION

## Objective

This report presents the results of our evaluation of the Architect of the Capitol's (AOC's) Safety Self-Inspection Program. The objective of this evaluation was to assess the compliance and internal controls of the AOC's Safety Self-Inspection Program in accordance with AOC policies and procedures and with applicable federal laws and regulations.

## Background

The AOC's Office of Safety and Code Compliance (SCC) is responsible for leading the AOC's efforts to provide a world-class safety culture, reduce injuries and incidents and ensure that the agency complies with safety, fire and environmental regulations. The SCC establishes safety, environmental and fire prevention and protection policy, oversees code and industry standard compliance and conducts oversight.

In February 2021, the SCC's Director, together with the AOC's Chief of Operations (Acting), issued a memorandum to the AOC's operational jurisdictions, supporting offices and C-suite offices<sup>2</sup> instructing them to start developing self-inspection programs. One of the reasons for implementing the self-inspections programs was that during the biennial inspection for the 115<sup>th</sup> Congress (i.e., January 3, 2017, to January 3, 2019), Office of Congressional Workplace Rights (OCWR)<sup>3</sup> inspectors identified a total of 4,167 hazards across the Capitol campus, 2,939 of which they attributed to the AOC. This total represented a 56 percent increase over the number of findings observed during the biennial inspection for the 114<sup>th</sup> Congress. The memorandum stated:

In order to provide a safe and compliant work environment and address this increase in hazards, each jurisdiction/office is responsible for implementing a robust self-inspection program that formalizes the process for self-identifying and self-correcting hazards and risks. The purpose of self-inspections is not only to consistently identify and remedy deficiencies, but to also identify and repair the root-cause(s) for hazards to prevent their reoccurrence.

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<sup>2</sup> The AOC's nine operational jurisdictions include: 1) Capitol Building; 2) Capitol Grounds and Arboretum; 3) Capitol Power Plant; 4) House Office Buildings; 5) Library Buildings and Grounds; 6) Senate Office Buildings; 7) Supreme Court Buildings and Grounds; 8) U.S. Botanic Garden; and 9) U.S. Capitol Visitor Center. In addition to the jurisdictions, the AOC is made up of various supporting offices as well as C-suite offices (e.g., the Office of the Chief Engineer).

<sup>3</sup> The mission of the OCWR is to advance workplace rights, safety and health and accessibility in the legislative branch of the federal government. The OCWR, formerly known as the Office of Compliance, was established to ensure the integrity of the Congressional Accountability Act of 1995 (CAA) through programs of dispute resolution, education and enforcement. These programs assist Members of Congress, employing offices, employees and the visiting public in understanding the 14 workplace and accessibility laws incorporated in the CAA, which includes certain provisions of the Occupational Safety and Health Act.

The AOC's jurisdictions and offices have been working to implement their self-inspection programs over the past two years, and the process is still ongoing. To assist with the implementation, the SCC developed three self-inspection checklists: Facility, Office and Outdoor. The SCC did not intend for these checklists to be all-encompassing (i.e., address all safety standards); instead, the checklists are designed to help the jurisdictions and offices focus on the AOC's top areas of concern. The Facility checklist is the most widely used across AOC organizations.

The AOC's organizations generally follow the same process for conducting self-inspections. They usually perform self-inspections either quarterly or annually, depending on the type of area.<sup>4</sup> Specifically, the following area types receive quarterly self-inspections: shops (e.g., woodworking shop), areas where routine maintenance occurs (e.g., mechanical spaces, electrical utility rooms) and outside areas where employees perform work and/or where the public has access. The following area types receive annual self-inspections: employee offices, public access areas and corridors. The offices of Congress members and their staff are not part of the AOC's Safety Self-Inspection Program. According to the SCC, the occupants of these offices perform their own self-inspections not under the purview of the AOC.

The process for performing self-inspections begins when a jurisdiction safety professional (e.g., a Safety and Occupational Health Specialist) assigns the self-inspection to the responsible party using WebTMA, the AOC's work order system. WebTMA includes two modules used during the safety self-inspection process: 1) the General Inspections Module and 2) the Inspection Findings Module (IFM). The General Inspections Module includes an electronic version of the Facility checklist. Employees performing self-inspections may fill out paper checklists, which are subsequently entered into the General Inspections Module, or they may access the General Inspections Module directly using a tablet or a mobile device. The WebTMA General Inspections Module automatically generates a work order to remediate any findings observed, and the jurisdiction or office must remediate the findings within a certain amount of time, depending on the severity of the finding. Any findings entered into the WebTMA IFM do not automatically generate work orders, so jurisdiction/office safety personnel must manually accept each finding as a work order or project. The SCC uses the WebTMA IFM to track findings across the AOC as a whole.

We obtained an understanding of the AOC's overall Safety Self-Inspection Program; then, per instruction from the AOC Office of the Inspector General (OIG), we focused our evaluation on the following five AOC jurisdictions: Capitol Building, Capitol Power Plant, House Office Buildings, Senate Office Buildings and U.S. Capitol Visitor Center (CVC). The AOC OIG also identified some specific buildings / areas within the jurisdictions for review.

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<sup>4</sup> The Capitol Power Plant jurisdiction performs monthly self-inspections of all its areas except its tunnels, which receive annual inspections.

As part of our evaluation, we reviewed Safety Self-Inspection Program documentation and criteria, interviewed members of the SCC and the select jurisdictions who were familiar with the AOC Safety Self-Inspection Program, and performed on-site inspections.

## Review of Internal Controls

We evaluated the AOC’s internal controls over its Safety Self-Inspection Program. Although we determined that the controls over the program were generally sufficient, we found that: 1) the safety self-inspection checklist completion and reporting process is not consistent across AOC organizations, 2) improved guidance is needed regarding how to report other agencies’ findings, 3) the self-inspection checklists may benefit from the inclusion of items related to hazardous materials, 4) AOC organizations’ lists of physical areas to self-inspect may be incomplete and 5) AOC organizations are required to complete self-inspections, though not all parties receive training on how to conduct self-inspections.

## Criteria

To assess the compliance and internal controls of the AOC’s Safety Self-Inspection Program in accordance with AOC policies and procedures and with applicable federal laws and regulations, we relied upon relevant criteria from the sources identified below.

The following criteria relate to Finding 1:

- Architect of the Capitol, Office of Safety and Code Compliance. “Implementation of the Architect of the Capitol’s Self-Inspection Program” Memorandum (February 2021):

*The purpose of self-inspections is not only to consistently identify and remedy deficiencies, but to also identify and repair the root-cause(s) for hazards to prevent their reoccurrence.*

*Provide training for all employees regarding any observations made day-to-day and direct staff to use the WebTMA Inspection Findings Module (IFM) for documenting findings. This will allow data comparisons and analyses across the agency.*

- Architect of the Capitol, Office of Safety and Code Compliance. “Implementing a Self-Inspection Program” Guidelines (February 2021):

*The goals of self-inspection programs are to 1) identify hazards and non-compliant environmental conditions, 2) correct them, 3) document them and look at the data to identify*

*root causes for their existence and 4) prevent future occurrences.*

*The IFM compiles the data from inspections in a central location, allowing dashboard tracking of identified hazards and repairs, as well as analysis to identify root causes for preventative measures.*

The following criterion relates to Finding 2:

- Architect of the Capitol, Office of Safety and Code Compliance. “Implementing a Self-Inspection Program” Guidelines (February 2021):

*The actions outlined in this document provide a template for implementing a self-inspection program...*

***1. Identify/assign staff with defined roles and responsibilities.***

*Each jurisdiction/office needs to clarify self-inspection expectations and roles. For offices inside buildings under another jurisdiction, the occupying office is responsible for annually inspecting their work space and storage areas. Specify which staff will be tasked to:*

...

*g. Provide the list of findings created by non-AOC entities to the Office of Safety and Code Compliance (SCC). The SCC will communicate them to non-AOC entities for correction and to prevent reoccurrence.*

The following criteria relate to Finding 3:

- Occupational Safety and Health Administration. Standard 1910.1200, Hazard Communication:

*(a)(1) The purpose of this section is to ensure that the hazards of all chemicals produced or imported are classified, and that information concerning the classified hazards is transmitted to employers and employees. The requirements of this section are intended to be consistent with the provisions of the United Nations Globally Harmonized System of Classification and Labelling of Chemicals, Revision 3. The transmittal of information is to be accomplished by means of comprehensive hazard communication programs, which are to include container labeling and other forms of warning, safety data sheets and employee training.*

- Occupational Safety and Health Administration. “Top 10 Most Frequently Cited Standards for Fiscal Year 2021”:

*Far too many preventable injuries, illnesses, and deaths occur in the workplace that are related to these top 10 cited standards.*

*4. Hazard Communication, general industry (29 CFR 1910.1200)*

The following criteria relate to Finding 4:

- Architect of the Capitol, Office of Safety and Code Compliance. “Implementation of the Architect of the Capitol’s Self-Inspection Program” Memorandum (February 2021):

*Recommended and minimum required frequency of inspection:*

- *Quarterly inspections for shops, plant operations, and similar industrial areas*
- *Annual inspections of office and public access areas*

- Architect of the Capitol, Office of Safety and Code Compliance. “Areas that require Quarterly/Annual Safety Self-Inspection” Email (December 2021):

*[H]ere are the areas that must be inspected quarterly or annually as part of the AOC Safety Self-Inspection program.*

*Inspect Quarterly*

- *All shops, plant operations, and other areas where employees perform work (not to include office areas) or areas where routine maintenance occurs, such as the following: mechanical spaces, elevator machinery rooms and pits, electrical utility rooms, cafeterias, kitchens, loading docks, garages, pump rooms, communications centers/hubs, telecommunication closets, stairwells, attics, utility tunnels, and storage areas*
- *All outside areas where employees work and/or the public accesses*

*Inspect Annually*

- *All employee offices, public access areas, and corridors (not to include stairwells or utility tunnels)*

*Areas excluded from annual/quarterly inspection requirement:*

- *Areas that are accessed infrequently (less than once a year)*
- *Non-congressional areas (such as judicial branch offices)*
- *Areas that are outside of jurisdictional control*

- *Areas that pose a high-risk to employees (permit-required confined spaces, areas that require fall protection, etc.)*

The following criteria relate to Finding 5:

- Architect of the Capitol, Office of Safety and Code Compliance. “Implementation of the Architect of the Capitol’s Self-Inspection Program” Memorandum (February 2021):

*Each jurisdiction/office shall perform the following actions and develop a self-inspection framework:*

...

*2. Provide training for all employees regarding any observations made day-to-day and direct staff to use the WebTMA Inspection Findings Module (IFM) for documenting findings. This will allow data comparisons and analyses across the agency.*

- *Coordinate with Office of the SCC to provide training for WebTMA and associated IFM module.*

- Architect of the Capitol, Office of Safety and Code Compliance. “Implementing a Self-Inspection Program” Guidelines (February 2021):

*The actions outlined in this document provide a template for implementing a self-inspection program.*

...

***2. Provide training for assigned staff on how to conduct inspections and enter data into WebTMA Inspection Finding Module (IFM)***

*A 4-hour training class is available through the SCC for groups of employees, with advance notice and planning. The course includes an overview and explanation of the self-inspection checklist with subparts and photographic examples, a live site visit to a mechanical area within a jurisdiction/office to observe and find checklist item deficiencies, and a how-to quick guide on entering findings into the WebTMA IFM to create work orders.*

- Architect of the Capitol. FY 2022 Performance and Accountability Report, dated November 16, 2022:

*Risk #6 (The risk that the AOC fails to provide a physically safe work environment), Risk Response:*

*To improve safety and accessibility, the AOC will focus on training and self-inspections, ensuring that jurisdictions have corrective action plans for ADA and inspection findings, monitoring closure rates and tracking and reporting performances quarterly.*

- Government Accountability Office. Report No. GAO-06-379, “Workplace Safety and Health: OSHA Could Improve Federal Agencies’ Safety Programs with a More Strategic Approach to Its Oversight,” dated April 21, 2006:

*Six Components of a Sound Safety Program, Education and training, Supporting Activities:*

- *Provide general awareness training to all employees so that they can recognize hazards and risks; learn procedures for reporting job-related fatalities, injuries, illnesses, incidents, and hazards...*
- *Provide targeted training to specified groups of employees because of the jobs they hold, the hazards they face, or their role in the program (agency-level training).*

## Evaluation Results

We determined that, overall, the AOC’s Safety Self-Inspection Program was in compliance with AOC policies and procedures and with applicable federal laws and regulations, as well as that internal controls over the program were generally sufficient; however, we concluded that: 1) the safety self-inspection checklist completion and reporting process is not consistent across AOC organizations, 2) improved guidance is needed regarding how to report other agencies’ findings, 3) the self-inspection checklists may benefit from the inclusion of items related to hazardous materials, 4) AOC organizations’ lists of physical areas to self-inspect may be incomplete and 5) AOC organizations are required to complete self-inspections, though not all parties receive training on how to conduct self-inspections.

On February 1 through 2, 2023, we performed on-site inspections with a safety subject matter expert (SME) at each of the five selected AOC jurisdictions:

- Capitol Building
- Capitol Power Plant
- House Office Buildings
- Senate Office Buildings
- U.S. Capitol Visitor Center (CVC)

At each of these jurisdictions, we attempted to inspect one area that is currently part of the Safety Self-Inspection Program and one area that is not currently part of the program. The purpose of the on-site inspections was to 1) assess the inspection and abatement of

select higher-risk hazards<sup>5</sup> that pose the greatest threat of fatalities and injuries to employees and building occupants, and 2) assess the usefulness, appropriateness and sufficiency of the SCC- and jurisdiction-developed self-inspection checklists. Although we identified several findings during our inspections, our safety SME determined that none represented serious hazards. We communicated these findings to jurisdiction personnel during the inspections and afterwards via email follow-up. Aside from the potential inclusion of hazardous materials items (see Finding 3), we found the self-inspections checklists to be useful, appropriate and sufficient. Overall, our safety SME noted that the areas we inspected were exceptionally clean and orderly.

In late summer/early fall 2022, there were reports of a rat infestation at the U.S. House of Representatives Child Care Center, located in the O’Neill House Office Building.<sup>6</sup> As a result, we included the Child Care Center in our on-site inspections. On February 1, 2023, we inspected Fire Control Room O1B11, which shares a wall with the Child Care Center. Although we noted evidence of other pests (i.e., insects), we did not observe any signs of a rat infestation in the Fire Control Room. On February 2, 2023, we inspected Mechanical Room O1A3/4, which is inside the Child Care Center. We noted the presence of a rat trap, but again did not observe any signs of a rat infestation. One of our House Office Building jurisdiction escorts (a building inspector) stated that there had been no recent signs of a rat infestation, adding that a pest control contractor<sup>7</sup> checks the rat bait boxes outside of the building on a weekly basis.

During our evaluation, we found:

- The safety self-inspection checklist completion and reporting process is not consistent across AOC organizations. Specifically, we determined that the in-scope jurisdictions (see Footnote 11 in Finding 1) do not complete the self-inspection checklists in a consistent manner. Moreover, these jurisdictions do not consistently report findings that they were able to resolve during the self-inspections.
- Improved guidance is needed regarding how to report other agencies’ findings. The AOC’s organizations are prohibited from remediating findings within their spaces if the issues are the responsibility of other agencies (e.g., findings related

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<sup>5</sup> Areas of focus, some of which overlapped with areas included in the self-inspection checklists, included:

- Asbestos
- Lockout-tagout
- Electrical (including arc flash incidents/abatement)
- Egress
- Rodent abatement, mitigation and follow-on activities (specifically as they relate to a previously reported rat infestation at the O’Neill House Office Building’s Child Care Center)

<sup>6</sup> Taylor, S. (2022, August 31). *Photos show rat infestation at US House of Representatives Child Care Center*. 7News (WJLA). <https://wjla.com/features/i-team/rat-rodent-infestation-us-house-representatives-child-care-center-congress-capitol-hill-dc-pests-dear-white-staffers-hrccc>

<sup>7</sup> The pest control contractor’s scope of work targets rats both inside and outside the O’Neill House Office Building, as well as the other House Office Buildings. Via a task order off an existing Office of the Attending Physician contract, all AOC organizations can procure services from the pest control contractor.

to the blue U.S. Capitol Police piping / cabling that runs throughout the U.S. Capitol Complex). The SCC's safety self-inspection implementation guidance directs AOC organizations to provide a list of findings related to non-AOC entities (e.g., U.S. Capitol Police) to the SCC for remediation; however, some of the jurisdictions we visited were not aware of the method for reporting other agencies' findings.

- The self-inspection checklists may benefit from the inclusion of items related to hazardous materials (HAZMAT), including hazard communication (HAZCOM).<sup>8</sup> HAZCOM ranked fourth in the Occupational Safety and Health Administration's (OSHA's)<sup>9</sup> most recent "Top 10 Most Frequently Cited Standards,"<sup>10</sup> which OSHA compiles based on its inspections of worksites for all industries. Although some of the SCC's self-inspection checklist items touch on HAZMAT, they may be too specific to result in a finding during a self-inspection. Additionally, not all of the SCC's self-inspection checklists include items to address HAZCOM.
- AOC organizations' lists of physical areas to self-inspect may be incomplete. Based on our on-site inspections and interviews with AOC safety personnel, we determined there is a risk that AOC organizations' lists of physical areas to self-inspect may have unintentionally omitted some areas within the organizations that are subject to the self-inspection program.
- AOC organizations are required to complete self-inspections, though not all parties receive training on how to conduct self-inspections. Specifically, we noted that AOC employees tasked with conducting or implementing the self-inspection process have not consistently received training on how to complete the self-inspection reviews. Per the SCC, self-inspection training is currently mandatory for: 1) employees who are new to the agency, and 2) employees who were recently (i.e., since 2019) assigned to perform safety inspections. Other employees who have been performing inspections since before the self-inspection program began in February 2021 were grandfathered in and were not required to complete self-inspection training.

Although we concluded that the AOC's Safety Self-Inspection Program was in compliance with AOC policies and procedures and with applicable federal laws and regulations, as well as that internal controls over the program were generally sufficient, it is essential that the SCC and AOC organizations continue to refine the self-inspection process to ensure the safety of the AOC's employees, stakeholders, tenants and visitors.

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<sup>8</sup> HAZCOM is intended to ensure that the hazards of all chemicals produced or imported are classified and that information concerning the classified hazards is transmitted to employers and employees.

<sup>9</sup> Per the Congressional Accountability Act of 1995, only certain provisions of the Occupational Safety and Health Act apply to the AOC as a legislative branch agency.

<sup>10</sup> Occupational Safety and Health Administration. (n.d.). *Top 10 Most Frequently Cited Standards for Fiscal Year 2021 (Oct. 1, 2020, to Sept. 30, 2021)*. <https://www.osha.gov/top10citedstandards>

As such, we made eight recommendations for improving the AOC's Safety Self-Inspection Program.

## Finding 1

### The Safety Self-Inspection Checklist Completion and Reporting Process Is Not Consistent Across AOC Organizations

We found that the AOC's self-inspection program checklist completion and reporting process is not consistent across AOC organizations. Specifically, we found that the in-scope jurisdictions do not complete the self-inspection checklists in a consistent manner, and do not consistently report findings that were abated during self-inspections.

This occurred because the guidance the SCC provided the organizations for implementation of self-inspection:

- allowed the AOC organizations to implement the self-inspection program in their own ways
- does not address standards for reporting the results of the self-inspection checklists
- does not address how to track the abatement of findings during self-inspections

As a result, failing to consistently fill out the self-inspection spreadsheet may increase the chance that the self-inspection is not completed in its entirety. Additionally, if there are repeat findings that are being abated during self-inspections, and not reported, the prevalence of the issue may not be known, leaving the AOC unable to proactively address the root cause of the issue.

We determined that the AOC's self-inspection program checklist completion and reporting process is not consistent across AOC organizations (i.e., jurisdictions, supporting offices and C-suite offices). Specifically, we found that the in-scope jurisdictions<sup>11</sup> do not complete the self-inspection checklists in a consistent manner. Moreover, these jurisdictions do not consistently report findings that they were able to resolve during self-inspections.

The AOC's system for submitting work order requests (i.e., requests for repairs, such as a broken door handle) is known as WebTMA. The SCC developed the IFM within

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<sup>11</sup> Our evaluation focused on the following AOC jurisdictions: Capitol Building, Capitol Power Plant, House Office Buildings, Senate Office Buildings and CVC. The AOC OIG also identified some specific buildings within the jurisdictions for review.

WebTMA for the purposes of: 1) recording and tracking internal and external safety, fire, environmental and accessibility findings (including ad hoc findings unrelated to the safety self-inspection program), and 2) translating findings directly into work orders.

Based on our review of jurisdictions' completed self-inspection checklists, we determined that inspectors do not complete the checklists consistently, either between jurisdictions or within the same jurisdiction. For example, one jurisdiction told inspectors that, to save time while using the WebTMA mobile application, the inspectors do not need to select a drop-down response indicating whether each checklist item passed inspection (e.g., "Is there storage in stairwells?"). The result is a blank self-inspection checklist, which the jurisdiction uses to indicate there were no findings. However, another self-inspection checklist with no findings from the same jurisdiction was filled out completely with check marks, also indicating that there were no findings.

Per the SCC, jurisdictions are able to track findings that they resolved during a self-inspection by using the WebTMA IFM application to create the finding and then selecting the box labeled "Already Addressed." However, the jurisdictions generally do not create findings for issues that they resolved during self-inspections (e.g., moving cardboard boxes that were blocking a fire exit door). Although we found that one of the in-scope jurisdictions manually tracks the findings it resolves during self-inspections using an Excel spreadsheet, the other jurisdictions do not currently formally track or report this information. (Some inspectors may make informal notes in WebTMA regarding findings that they were able to resolve in the field.)

The SCC provided the AOC organizations with self-inspection implementation guidance in February 2021. However, this guidance:

- Allows the AOC organizations to implement and customize the self-inspection program to meet their individual organizational needs.
- Does not provide detailed procedures / standards for reporting the results of the self-inspection checklists.<sup>12</sup>
- Does not address how to track findings that are resolved during self-inspections.

Although the SCC's February 2021 self-inspection implementation memorandum directs AOC staff to use the WebTMA IFM application to document findings, it does not include detailed procedures / standards for doing so, leading to inconsistent completion and reporting of the self-inspection checklists.

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<sup>12</sup> The SCC offered self-inspection training, which includes reviewing the self-inspection checklists; however, this training was optional.

## Conclusion

Not consistently filling out the self-inspection checklists may increase the chance that jurisdictions and offices do not fully complete their self-inspections. For example, we performed an inspection on February 2, 2023, using the Facility self-inspection checklist. One step on the checklist required us to review the expiration dates for the contents of the first-aid kit. When we performed this step, we identified expired items in one first-aid kit, including items that had been expired for more than a year. We reviewed the jurisdiction's most recent completed self-inspection checklist for the same space, which was dated January 16, 2023, and noted that the checklist in WebTMA was blank. The inspector had left a note stating, "Looks good. No violations." If the inspector had been required to affirmatively answer each step on the checklist, it might have increased the chance that they would have identified the expired items.<sup>13</sup> Requiring that AOC organizations report the results of their self-inspections in a consistent manner will help ensure that the organizations consistently complete inspections in their entirety.

As noted in the SCC's self-inspection implementation guidelines, two of the program's goals are to document findings and to use that data to identify root causes and prevent future occurrences. If AOC organizations do not report all findings identified during the self-inspection process, it limits the AOC's ability to achieve these program goals. Specifically, as noted above, the in-scope jurisdictions do not currently report findings resolved during self-inspections; as a result, the SCC has incomplete data available. For example, in the event that multiple AOC organizations are resolving the same or similar findings during their self-inspections, the SCC may not be aware of the prevalence of the issue if the organizations do not report the findings. Although the organizations may be able to resolve these findings during the self-inspections, the AOC will be unable to proactively address the root cause of the issue and will therefore be unable to fulfill the intent of the self-inspection program.

## Recommendations

### *Recommendation 1*

We recommend that the Office of Safety and Code Compliance (SCC) issue guidance to the Architect of the Capitol's organizations to complete all elements of the self-inspection checklists (e.g., no blank responses or unchecked boxes).

### *Recommendation 1 – AOC Comment*

Concur. The AOC is developing a policy memorandum to replace the inspection guidance in Chapter E of the safety manual [Order 10-1, Chapter E - Risk Management].

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<sup>13</sup> We recognize that identifying expired items in a first-aid kit during our review does not guarantee that these expired items were present during the jurisdiction's self-inspection. However, the fact that the items expired prior to the jurisdiction's self-inspection date and the jurisdiction noted no findings during the self-inspection means it is very likely that these items were present, and that the jurisdiction did not identify them as expired.

The update directs jurisdictions to complete all elements of the self-inspection checklists in the WebTMA General Inspection Module and to check all boxes on the inspection checklist. This policy memorandum is expected to be issued by February 2, 2024.

***Recommendation 1 – OIG Comment***

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

***Recommendation 2***

We recommend that the Office of Safety and Code Compliance (SCC) issue guidance instructing the Architect of the Capitol’s organizations to report all self-inspection findings, including those resolved during the self-inspection process, in a centralized and consistent manner, and for the SCC to analyze this data for proactive safety and compliance issue identification and management.

***Recommendation 2 – AOC Comment***

Concur. The policy memorandum in progress, referenced under the response to Recommendation 1, includes instructions for inspectors to report hazard(s) identified and remediated during the self-inspection in the WebTMA General Inspection Module, to create a work order, and to close the work order to indicate that the hazard was fixed during the inspection. This will capture data regarding hazards fixed immediately and will support analysis and proactive prevention.

***Recommendation 2 – OIG Comment***

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

## Finding 2

### Improved Guidance Is Needed Regarding How to Report Other Agencies' Findings

We found that the AOC's organizations are prohibited from remediating some findings within their spaces.

This occurred because although the SCC has provided guidance on how to report findings related to other entities outside of the AOC, there appears to be insufficient training on these procedures, specifically: 1) how to flag findings that are the responsibility of other agencies; and 2) how organizations should report these findings.

As a result, if organizations' self-inspection personnel do not have a clear understanding of the process for flagging and reporting other agencies' findings in their spaces, it could cause the findings to go unresolved for an extended period of time and possibly result in safety incidents occurring in the spaces.

The AOC's organizations are prohibited from remediating findings within their spaces if the issues are the responsibility of other agencies (e.g., findings related to the blue U.S. Capitol Police piping / cabling that runs throughout the U.S. Capitol campus). The SCC's implementation guidance for self-inspections directs AOC organizations to provide the SCC with a list of any findings related to non-AOC entities (e.g., U.S. Capitol Police); The SCC will then communicate the issues to the non-AOC entities for correction. However, during our on-site inspections, we noted that some of the jurisdictions we visited were not aware of the method for reporting other agencies' findings. For example, one jurisdiction mentioned identifying a point of contact at the other agency and waiting for the other agency to remediate the findings, rather than reporting the findings to the SCC.

Although the SCC has provided guidance on how to report findings related to other agencies, it does not appear to have provided sufficient training on these procedures, particularly: 1) how to flag findings that are the responsibility of other agencies, and 2) how AOC organizations should report these findings. The SCC stated that it is possible to categorize non-AOC findings in WebTMA as belonging to other agencies and that it has trained staff to do so. However, the SCC has not documented this process in the WebTMA IFM Quick Guide. When we discussed this finding with the SCC, it noted that it plans to update the guide to include more information on this process.

Additionally, we identified safety-related items in AOC-controlled areas that are the responsibility of other agencies. For example, escape hood respirators<sup>14</sup> are the responsibility of the Senate and House Sergeants at Arms and covered under the AOC's Emergency Management Program. These respirators could be critical to the safety of AOC employees and others in emergency situations. During our on-site inspections, we noted that the seal on one of the escape hood respirator boxes was broken. When we inquired with the on-site AOC jurisdiction personnel, the SCC and the AOC Office of the Chief Security Officer, they were unable to provide an explanation for the broken seal. Because these escape hood respirators are present throughout AOC-controlled spaces and affect AOC employees, the SCC should obtain an understanding of how the Senate and House Sergeants at Arms inspect these escape hood respirators and ready them for use, should AOC employees and others need them.

## Conclusion

If the AOC organizations' self-inspection personnel do not have a clear understanding of the process for flagging and reporting other agencies' findings in their spaces, these findings could go unresolved for an extended period of time and could possibly result in safety incidents.

If the SCC does not obtain an understanding of the process for inspecting and readying the escape hood respirators and assurance that the Senate and House Sergeants at Arms have done so, the escape hood respirators may not be available for use by AOC employees and others in emergency situations.

## Recommendations

### *Recommendation 3*

We recommend that the Office of Safety and Code Compliance (SCC) update its WebTMA Inspection Findings Module Quick Guide to: 1) document how to categorize non-Architect of the Capitol (AOC) findings that are the responsibility of other agencies (e.g., U.S. Capitol Police), 2) reiterate that the SCC is responsible for both coordinating findings remediation with other agencies and defining the processes it will use to remediate findings and 3) provide the SCC's contact information. The SCC should ensure that each AOC organization acknowledges receipt and understanding of the process for documenting and reporting other agencies' findings.

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<sup>14</sup> Escape hood respirators are used for emergency egress and escape in a Chemical, Biological, Radiological and Nuclear environment.

***Recommendation 3 – AOC Comment***

Concur. The suggested updates to WebTMA's Inspection Findings Module Quick Guide are in progress and expected to be complete by October 20, 2023.

***Recommendation 3 – OIG Comment***

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

***Recommendation 4***

We recommend that the Office of Safety and Code Compliance (SCC) obtain an understanding of escape hood respirators to ensure that the Senate and House Sergeants at Arms regularly inspect the respirators and ready them for use by Architect of the Capitol employees and others in emergency situations.

***Recommendation 4 – AOC Comment***

Concur. The SCC will reach out to the Sergeants at Arms to obtain this information by August 2023.

***Recommendation 4 – OIG Comment***

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

## Finding 3

### Self-Inspection Checklists May Benefit from the Inclusion of Items Related to Hazardous Materials

We found that the AOC's self-inspection program may benefit from adding steps to applicable self-inspection checklists to address compliance with HAZMAT standards, including HAZCOM.

This occurred because the SCC designed the self-inspection checklists to focus on the AOC's top areas of concern, which did not explicitly include HAZMAT / HAZCOM.

As a result, not including some general items regarding HAZMAT / HAZCOM may have the following potential effects:

- Increased risk for injuries / serious bodily harm.
- Increased risk for non-compliance with safety standards.

The AOC's self-inspection program may benefit from adding steps to applicable self-inspection checklists to address compliance with HAZMAT standards, including HAZCOM.

To assist the AOC's organizations with implementing their self-inspection programs, the SCC has currently developed three self-inspection checklists: Facility, Office and Outdoor. The SCC did not intend for these checklists to be all-encompassing (i.e., address all safety standards); instead, the checklists are designed to help the jurisdictions and offices focus on the AOC's top areas of concern.

HAZCOM ranked fourth in OSHA's most recent "Top 10 Most Frequently Cited Standards" (for fiscal year 2021; i.e., October 1, 2020, to September 30, 2021). OSHA compiles this list based on its inspections of worksites for all industries.

AOC Safety Manual (2011), Chapter G – Hazardous Materials, covers safety standards related to HAZMAT issues, including a section dedicated to HAZCOM. Moreover, the SCC's self-inspection checklists do include some HAZMAT- and HAZCOM-related items. For example, the Office checklist has a step for the

inspector to determine: “As applicable, are Safety Data Sheets (SDS)<sup>15</sup> available for chemicals used in the workplace?” However, the SCC did not include a similar step on the Facility checklist. Additionally, per AOC Safety Manual (2011), Chapter G – Hazardous Materials, the AOC’s organizations perform Hazard Communication and Chemical Safety audits.

Although some self-inspection checklist items touch on HAZMAT, they may be too specific to result in a finding during a self-inspection. For example, the Facility checklist includes the following item: “Does a mechanical, electrical, or boiler room contain storage of combustible material?” During our on-site inspection in a heating, ventilation and air conditioning (HVAC) equipment room on February 2, 2023, we observed combustible materials (i.e., cardboard) on top of the storage cage where the AOC stores welding gas cylinders. Per OSHA Standard 1910.253(b)(2)(ii), “Inside of buildings, cylinders shall be stored in a well-protected, well-ventilated, dry location, at least 20 feet (6.1 m) from highly combustible materials such as oil or excelsior.”<sup>16</sup> However, because this observation occurred in an HVAC equipment room rather than a mechanical, electrical or boiler room as specified on the checklist, self-inspection personnel may not identify this finding based on the checklist questions.

Additionally, we inspected 12 areas to which the Facility self-inspection checklist applied and found that SDSs were present in many of these areas. As noted above, the Facility checklist does not include steps to ensure that the SDSs are readily available and up to date. These SDSs provide critical guidance on chemicals and are an important element of HAZCOM. Furthermore, the AOC Safety Manual (2011) addresses the proper storage of these chemicals; however, the self-inspection checklists do not consistently include items related to this issue.

The SCC designed the self-inspection checklists to focus on the AOC’s top areas of concern, which did not explicitly include HAZMAT / HAZCOM. Additionally, the SCC noted that other employees, oftentimes jurisdiction safety specialists, who are trained in HAZCOM conduct HAZCOM-related reviews (e.g., jurisdictions performing Hazard Communication and Chemical Safety audits).

## Conclusion

The SCC developed the self-inspection checklists to focus on the AOC’s top areas of concern, and the decision to not address all HAZMAT / HAZCOM-related issues on each checklist does not make the program non-compliant. However, not including some general items related to HAZMAT / HAZCOM may have the following potential effects:

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<sup>15</sup> SDSs include information such as the properties of each chemical; the physical, health and environmental health hazards; protective measures and safety precautions for handling, storing and transporting the chemical.

<sup>16</sup> This OSHA standard is also cited in the *AOC Safety Manual* (2011).

- Increased risk for injuries and serious bodily harm.
- Increased risk for non-compliance with safety standards.

## **Recommendation**

### ***Recommendation 5***

We recommend the Office of Safety and Code Compliance, in its next update to the self-inspection checklists, consider adding steps to address applicable items related to hazardous materials, including hazard communication.

### ***Recommendation 5 – AOC Comment***

Concur. An update to the self-inspection checklist is not planned at this time. However, this recommendation is noted and is under consideration.

### ***Recommendation 5 – OIG Comment***

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

## Finding 4

### AOC Organizations' Lists of Physical Areas to Self-Inspect May Be Incomplete

We found that there is a risk that AOC organizations' lists of physical areas to self-inspect may unintentionally not include all areas in an organization that are subject to the self-inspection program.

This occurred because there is insufficient guidance from the SCC regarding how AOC organizations should develop a complete list of physical areas to self-inspect.

As a result, if AOC organizations' lists of physical areas to self-inspect are incomplete, potential effects include:

- Safety hazards could go unnoticed, resulting in injuries / serious bodily harm.
- The self-inspection reporting results will be incomplete.

We determined there is a risk that AOC organizations' (i.e., jurisdictions, supporting offices and C-suite offices) lists of physical areas to self-inspect may have unintentionally omitted some areas within the organizations that are subject to the self-inspection program.

As part of our evaluation, we conducted on-site inspections at five jurisdictions. At each of these jurisdictions, we attempted to inspect one area that is currently part of the self-inspection program and one area that is not currently part of the program. During one site visit, we inspected a fire control room that was supposed to be part of the self-inspection program and that jurisdiction personnel identified as such during the visit. However, when we subsequently requested the fire control room's most recently completed self-inspection checklist, the jurisdiction determined that the room was not assigned to a specific trade and therefore had not been included in the self-inspections. This uncertainty regarding whether areas are included in the self-inspection program raises questions about the completeness of the AOC organizations' lists of physical areas to self-inspect currently included in the self-inspection program.

During another on-site inspection, a jurisdiction safety professional expressed concerns that organizations may not have included all of the areas in the organization that should be self-inspected when they developed the initial inventories of areas for self-inspection.

Similarly, another safety professional noted concerns about self-inspecting shared spaces. For example, it is generally clear who would perform the self-inspection for a woodworking shop (i.e., the workers assigned to the shop). However, it is much less clear who would perform the self-inspection for a shared space (e.g., a hallway).

In its February 2021 “Implementation of the Architect of the Capitol’s Self-Inspection Program” memorandum, the SCC noted the following types of areas for self-inspections: 1) shops, plant operations and similar industrial areas; 2) office areas and 3) public access areas. A December 2021 follow-up email from the SCC further clarified its initial guidance by expanding upon the list of areas that should receive quarterly self-inspections. However, none of the self-inspection implementation guidance appears to include instructions regarding how AOC organizations should develop a complete list of physical areas to self-inspect.

## Conclusion

If the lists that AOC organizations use to identify physical areas for self-inspections are incomplete, potential effects could include:

- Safety hazards could go unnoticed, resulting in injuries and serious bodily harm.
- Self-inspection reporting results may be incomplete.

## Recommendations

### *Recommendation 6*

We recommend that the Office of Safety and Code Compliance develop guidance for how Architect of the Capitol organizations should develop a complete list of self-inspection areas, including guidance for shared spaces.

### *Recommendation 6 – AOC Comment*

Concur. The policy memorandum in progress, referenced under the response to Recommendation 1, also includes instructions for jurisdictions to identify self-inspection areas.

### *Recommendation 6 – OIG Comment*

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

### *Recommendation 7*

We recommend that Architect of the Capitol (AOC) organizations review their lists of physical areas to self-inspect to validate they are complete and in line with updated guidance from the Office of Safety and Code Compliance. In addition, AOC

organizations should report validation review results to the SCC during ongoing and regular intervals.

***Recommendation 7 – AOC Comment***

Concur. AOC jurisdictions are updating their inventories. This is expected to be complete by February 2, 2024.

***Recommendation 7 – OIG Comment***

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

## Finding 5

### **AOC Organizations Are Required to Complete Self-Inspections, Though Not All Parties Receive Training on How to Conduct Self-Inspections**

We found that AOC employees within the organizations tasked with conducting or implementing the self-inspection process have not consistently received training on completing the self-inspection reviews.

This occurred because the SCC does not require all AOC employees performing self-inspections to complete training.

As a result, a lack of mandatory, standardized training for those completing self-inspections could have the following potential effects:

- Failure to note hazardous conditions.
- Inconsistent and/or incomplete findings data, resulting in the SCC's inability to perform meaningful agency-wide analysis of findings to identify trends and root causes.
- Grandfathered in inspectors that never received self-inspections training could perform self-inspections incorrectly or inconsistently.

AOC employees tasked with conducting or implementing the self-inspection process have not consistently received training on how to complete the self-inspection reviews. Per the SCC, self-inspection training is currently mandatory for: 1) employees who are new to the agency, and 2) employees who were recently (i.e., since 2019) assigned to perform safety inspections. Other employees who have been performing inspections since before the self-inspection program began in February 2021 were grandfathered into the program and were not required to complete self-inspection training.

When the SCC launched the self-inspection program in February 2021, it offered self-inspection training (via a third-party training company) to the AOC's organizations, but few of the organizations accepted. For example, only three of the AOC's nine operational jurisdictions<sup>17</sup> accepted the training invitation—House Office

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<sup>17</sup> The AOC's nine operational jurisdictions include: 1) Capitol Building, 2) Capitol Grounds and Arboretum, 3) Capitol Power Plant, 4) House Office Buildings, 5) Library Buildings and Grounds, 6) Senate Office Buildings, 7) Supreme Court Buildings and Grounds, 8) U.S. Botanic Garden and 9) CVC.

Building, Senate Office Building and U.S. Botanic Garden. The SCC eventually provided the self-inspection training slides to the AOC organizations so they could conduct their own training sessions (e.g., one-on-one training).

The SCC does not require all AOC employees performing self-inspections to complete training. We interviewed five jurisdictions, three of which had declined to attend the self-inspection training that the SCC provided, and inquired as to why the jurisdictions did not accept the training invitation or found it difficult to attend the training. Their reasons included the following:

- Timing
- Could not commit to the amount of time allotted
- Inspector availability
- Multiple shifts to coordinate around
- Training offered during the COVID-19 pandemic or at a time when the number of positive cases was high

## Conclusion

We did not review the qualifications of the employees completing the self-inspections and are not asserting that anyone involved in the program is unqualified. However, we did determine that numerous individuals are responsible for performing the inspections. For example, the Capitol Building and CVC jurisdictions estimated that 43 supervisors perform self-inspections, the Capitol Power Plant jurisdiction estimated that 30 to 40 employees perform self-inspections and the Senate Office Buildings jurisdiction estimated that 50 to 60 employees perform self-inspections. Given the large number of individuals involved in the process, a lack of mandatory, standardized training for personnel completing self-inspections could have the following potential effects:

- Failure to note hazardous conditions.
- Inconsistent and/or incomplete findings data, resulting in the SCC being unable to perform meaningful agency-wide analysis of findings to identify trends and root causes.
- Incorrect or inconsistent self-inspections performed by inspectors who were grandfathered into the program and never received self-inspection training.
- Incorrect or inconsistent self-inspections performed by inspectors who did not attend the SCC's self-inspection training and only reviewed the training slides.

## Recommendation

### *Recommendation 8*

We recommend that the Office of Safety and Code Compliance (SCC) require all Architect of the Capitol employees performing self-inspections to complete

standardized self-inspection training. The SCC should also consider requiring periodic refresher training to maintain readiness and awareness.

***Recommendation 8 – AOC Comment***

Concur. The policy memorandum in progress, referenced under the response to Recommendation 1, contains language indicating that self-inspection training is required for all employees who perform inspections. The memorandum will also include conditions for periodic refresher training.

***Recommendation 8 – OIG Comment***

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

COTTON & COMPANY ASSURANCE AND ADVISORY LLC



Jason Boberg, CPA, CFE  
Partner  
July 13, 2023

## APPENDIX A

### Scope and Methodology

The scope of this evaluation was the AOC’s safety inspection program covering fiscal years 2020 through 2022. We conducted this evaluation in Washington, D.C., from September 2022 through March 2023, in accordance with CIGIE *Quality Standards for Inspection and Evaluation* (December 2020). Those standards require that we plan and perform the evaluation to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our evaluation objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our evaluation objectives.

The AOC OIG self-initiated this report. Our objective for this evaluation was to assess the compliance and internal controls of the AOC Safety Self-Inspection Program in accordance with AOC policies and procedures and with applicable federal laws and regulations.

During our evaluation, we reviewed the SCC’s documented policies and procedures for implementing a self-inspection program, as well as applicable federal laws and regulations. We also discussed the ongoing implementation of the Safety Self-Inspection Program with those parties responsible for monitoring and completing safety self-inspections. With the assistance of a safety subject matter expert, we conducted a total of 13 on-site inspections at five AOC jurisdictions to: 1) assess the inspection and abatement of select higher-risk hazards that pose the greatest threat of fatalities and injuries to employees and building occupants, and 2) assess the usefulness, appropriateness and sufficiency of the SCC- and jurisdiction-developed self-inspection checklists.

### Use of Computer-Processed Data

We did not use a material amount of computer-processed data to perform this evaluation.

### Prior Coverage

During the last five years, the AOC OIG issued reports on its evaluations of the AOC’s: 1) tree maintenance plan, and 2) emergency preparedness posture.

#### ***AOC OIG***

Evaluation Report No. 2020-0003-IE-P, “Evaluation of the Architect of the Capitol’s Tree Maintenance Program,” dated February 4, 2021:

*On April 18, 2017, an employee from the Capitol Grounds and Arboretum (CGA) jurisdiction’s Maintenance Division was killed by a falling tree limb while*

*performing work for the AOC. In response to this incident, the Office of Congressional Workplace Rights (OCWR) conducted an investigation into the AOC's urban tree management practices. OCWR's investigation draft report contained two findings of violations of the General Duty clause of the Occupational Safety and Health Act (OSHA): one for specific trees posing an imminent danger and one based on deficiencies in the AOC's tree management practices. The AOC OIG performed an evaluation to determine if the OCWR-directed improvements to AOC processes for tree inspection and safety-related issues were appropriately implemented and maintained, and if they effectively addressed safety hazards from trees located on the U.S. Capitol campus. The AOC OIG found that the CGA jurisdiction had no formal tracking system for training in conjunction with individualized training requirements, and supervisors were not tracking staff training events required to maintain professional certifications.*

Evaluation Report No. 2020-0002-IE-P, "Evaluation of the Architect of the Capitol's Emergency Preparedness Posture," dated February 5, 2021:

*The AOC OIG's 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 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 OIG found that the AOC emergency incident drills, exercises and training were generally effective with minor gaps in policy, training preparation and exercise evaluation activities. The AOC OIG also noted 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 OIG also found that:*

- 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; and*
- The AOC organizational EARPs were not consistently updated and aligned with the AOC Base EARP in policy structure and guidance.*

# APPENDIX B

## Notification Letter



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: September 06, 2022

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's) Safety Inspection Program (2022-0004-IE-P)

This is to notify you that the AOC Office of Inspector General is initiating an evaluation of the AOC's Safety Inspection Program. Our objective is to assess the compliance and internal controls of the AOC Safety Inspection Program in accordance with AOC policies, procedures and applicable federal laws and regulations. This review will also include physical inspections of select in-scope buildings, offices or meeting spaces. We plan to use external subject matter experts to support us in this effort.

We will contact the appropriate AOC offices to schedule an entrance conference in the upcoming weeks. If you have any questions, please contact Audrey Cree at [audrey.cree@aoc.gov](mailto:audrey.cree@aoc.gov) or 202.631.2682, or Chico Bennett at [chico.bennett@aoc.gov](mailto:chico.bennett@aoc.gov) or 202.394.2391.

Distribution List:

Peter Bahm, Chief of Staff  
Patricia Williams, Director, Office of Safety and Code Compliance  
Jason Baltimore, General Counsel  
Mary Jean Pajak, Deputy Chief of Staff

# APPENDIX C

## Management Comments

 <p><b>ARCHITECT OF THE CAPITOL</b></p>	<p><b>Architect of the Capitol</b> U.S. Capitol, Room SB-16 Washington, DC 20515 202.228.1793 www.aoc.gov</p>	<p>United States Government <b>MEMORANDUM</b></p>
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DATE: July 5, 2023

TO: Christopher P. Failla  
Inspector General

FROM: Chere Rexroat, RA  
Acting Architect of the Capitol 

SUBJECT: Evaluation of the Architect of the Capitol's (AOC) Safety Inspection Program Official Draft Evaluation Report 2022-0004-IE-P, Office of Inspector General (OIG) report dated May 26, 2023

Thank you for the opportunity to review and comment on the OIG's evaluation draft of the subject report. The AOC provides the following response:

**Recommendation 1**

The Office of Safety and Code Compliance (SCC) issue guidance to the AOC's organizations to complete all elements of the self-inspection checklists (e.g., no blank responses or unchecked boxes).

**Response 1**

Concur. The AOC is developing a policy memorandum to replace the inspection guidance in Chapter E of the safety manual [Order 10-1, Chapter E – Risk Management]. The update directs jurisdictions to complete all elements of the self-inspection checklists in the WebTMA General Inspection Module and to check *all* boxes on the inspection checklist. This policy memorandum is expected to be issued by February 2, 2024.

**Recommendation 2**

SCC issue guidance instructing the AOC's organizations to report all self-inspection findings, including those resolved during the self-inspection process, in a centralized and consistent manner, and for SCC to analyze this data for proactive safety and compliance issue identification and management.

**Response 2**

Concur. The policy memorandum in progress, referenced under the response to Recommendation 1, includes instructions for inspectors to report hazard(s) identified and remediated during the self-inspection in the WebTMA General Inspection Module, to create a work order, and to close the work order to indicate that the hazard was fixed during the

inspection. This will capture data regarding hazards fixed immediately and will support analysis and proactive prevention.

**Recommendation 3**

SCC update its WebTMA Inspection Findings Module Quick Guide to: 1) document how to categorize non-AOC findings that are the responsibility of other agencies (e.g., U.S. Capitol Police), 2) reiterate that SCC is responsible for both coordinating findings remediation with other agencies and defining the processes it will use to remediate findings and 3) provide SCC's contact information. SCC should ensure that each AOC organization acknowledges receipt and understanding of the process for documenting and reporting other agencies' findings.

**Response 3**

Concur. The suggested updates to WebTMA's Inspection Findings Module Quick Guide are in progress and expected to be complete by October 20, 2023.

**Recommendation 4**

SCC obtain an understanding of escape hood respirators to ensure that the Senate and House Sergeants at Arms regularly inspect respirators and ready them for use by AOC employees and others in emergency situations.

**Response 4**

Concur. The SCC will reach out to the Sergeants at Arms to obtain this information by August 2023.

**Recommendation 5**

SCC, in its next update to the self-inspection checklists, consider adding steps to address applicable items related to hazardous materials, including hazard communication.

**Response 5**

Concur. An update to the self-inspection checklist is not planned at this time. However, this recommendation is noted and is under consideration.

**Recommendation 6**

SCC develop guidance for how AOC organizations should develop a complete list of self-inspection areas, including guidance for shared spaces.

**Response 6**

Concur. The policy memorandum in progress, referenced under the response to Recommendation 1, also includes instructions for jurisdictions to identify self-inspection areas.

**Recommendation 7**

AOC organizations review their lists of physical areas to self-inspect to validate they are complete and in line with updated guidance from SCC. In addition, AOC organizations should report validation review results to SCC during ongoing and regular intervals.

**Response 7**

Concur. AOC jurisdictions are updating their inventories. This is expected to be complete by February 2, 2024.

**Recommendation 8**

SCC require all AOC employees performing self-inspections to complete standardized self-inspection training. SCC should also consider requiring periodic refresher training to maintain readiness and awareness.

**Response 8**

Concur. The policy memorandum in progress, referenced under the response to Recommendation 1, contains language indicating that self-inspection training is required for all employees who perform inspections. The memorandum will also include conditions for periodic refresher training.

Please do not hesitate to contact Patricia Williams at 202.226.4701 or Danezza Quintero at 202.674.0260 if you have questions concerning this response.

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## **ACRONYMS AND ABBREVIATIONS**

AOC	Architect of the Capitol
CAA	Congressional Accountability Act of 1995
CAP	Corrective Action Plan
CGA	Capitol Grounds and Arboretum
CVC	Capitol Visitor Center
EARP	Emergency Action Response Plan
GAO	Government Accountability Office
HAZCOM	Hazard Communication
HAZMAT	Hazardous Materials
HVAC	Heating, Ventilation and Air Conditioning
IFM	Inspection Findings Module
OA	Office of the Architect
OCAO	Office of the Chief Administrative Officer
OCE	Office of the Chief Engineer
OCFO	Office of the Chief Financial Officer
OCO	Office of the Chief of Operations
OCSO	Office of the Chief Security Officer
OCWR	Office of Congressional Workplace Rights
OIG	Office of Inspector General
OSHA	Occupational Safety and Health Administration
SCC	Office of Safety and Code Compliance
SDS	Safety Data Sheet
SME	Subject Matter Expert



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