



INSPECTOR GENERAL

September 5, 2023

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

Report No. OIG-FLD-2023-01

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

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

September 5, 2023

Objective

Our objective was to determine whether the Architect of the Capitol (AOC) implemented corrective actions to address recommendations in the August 2019 Office of Inspector General (OIG) report, *Evaluation of the AOC's Inventory Accountability and Controls* (2018-0002-IE-P). The evaluation found that the AOC (1) lacked defined internal controls for non-consumable property valued below \$1,500, (2) lacked policies and procedures to report, track or replace mission critical non-consumable property valued below \$1,500, (3) jurisdictions did not have full-time property management personnel and (4) jurisdictions lacked adequate and dedicated storage facilities.

This evaluation followed up on the four findings and the six recommendations made for improvements to the AOC's personal property management program.

Findings

Based on our follow-up evaluation, we found the following:

- The AOC can strengthen internal controls over personal property.
- Inadequate storage space remains an issue.
- APOs did not have issues performing property management responsibilities as a collateral duty.

Recommendations

We recommend that:

1. The AOC update and revise AOC Order 34-45 (Personal Property Manual) to (1) establish a dollar threshold for accountable property, (2) the greatest extent possible, ensure mission critical non-consumable property is consistently defined across AOC jurisdictions, (3) provide guidance on how to identify, document and track mission critical non-consumable and non-accountable property, (4) provide clear directions on administrative controls and (5) develop and enforce additional inventory and accountability procedures for accountable and non-accountable property to reduce the risk of mismanagement and lost property in accordance with federal best practices.
2. The AOC research and implement federal government best practices for acquiring and maintaining adequate storage space to reduce the risk of theft.
3. The AOC conduct an organizational-wide assessment to identify disposable property and discard the property per AOC Order 34-45, Personal Property Manual, to ensure adequate storage space.

Management Comments

The AOC provided comments on August 22, 2023, see Appendix C. In its Management Comments, the AOC concurred with all three recommendations. Please see the Recommendations Table on the following page for the status of the recommendations.

Recommendations Table

Management	Recommendations Unresolved	Recommendations Resolved	Recommendations Closed
AOC		1, 2, 3	

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.



INSPECTOR GENERAL

DATE: September 5, 2023

TO: Chere Rexroat, RA
Acting Architect of the Capitol

FROM: Christopher P. Failla, CIG
Inspector General 

SUBJECT: Follow-Up Evaluation of the Architect of the Capitol's (AOC's) Inventory
Accountability and Controls
(Report No. OIG-FLD-2023-01)

Please see the attached final report for our follow-up evaluation of the Architect of the Capitol's (AOC's) Inventory Accountability and Controls, which was announced on January 12, 2023. Based on our follow-up evaluation we found that the AOC can strengthen internal controls over personal property, inadequate storage space remains an issue and Accountable Property Officers did not have issues performing property management duties as a collateral duty. We made three recommendations to improve the AOC's Personal Property Management Program.

In your response to our official draft report (see Appendix C), you concurred with all three recommendations. Based on your responses to Recommendations 1 through 3, 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.

We appreciate the courtesies extended to the staff during the evaluation. Please direct questions to Brittany Banks, Assistant Inspector General for Follow-Up at Brittany.Banks@aoc.gov or 202.436.1445.

Distribution List:

Joseph DiPietro, Acting Assistant to the Architect & Chief of Operations
Erin Dorritie, Acting Chief Financial Officer
Angela Freeman, Acting General Counsel
Teresa Bailey, Point of Contact for Chief Administrative Officer
Curtis McNeil, Risk Management Officer
Harold Honegger, Chief of Supplies, Services & Material Management Division
Percell Artis, Chief of Material Management Branch
Hajira Shariff, AOC Liaison to the OIG

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INTRODUCTION

Objective

The objective of this follow-up evaluation was to determine whether the Architect of the Capitol (AOC) implemented corrective actions to address recommendations in the August 2019 Office of Inspector General (OIG) report, Evaluation of the AOC's Inventory Accountability and Controls (2018-0002-IE-P).

Background

In September 2018, the OIG, at the request of the U.S. Senate Committee on Rules and Administration, conducted an evaluation of the AOC's inventory control and tracking policies for agency property valued at less than \$1,500. The committee's concern was that missing AOC equipment was not reported or tracked and could be easily taken and replaced without notice as long as the purchase amount was less than \$1,500. The August 2019 OIG evaluation focused on the review of purchase orders, and relevant AOC processes, policies, and procedures related to the accountability and control of non-consumable property¹ valued at less than \$1,500.

Based on the evaluation, the OIG found that the AOC (1) lacked defined internal controls for non-consumable property valued below \$1,500, (2) lacked policies and procedures to report, track or replace mission critical non-consumable property valued below \$1,500, (3) jurisdictions did not have full-time property management personnel and (4) jurisdictions lacked adequate and dedicated storage facilities. The August 2019 OIG report made three recommendations to the Chief Administrative Officer (CAO), and three recommendations to the AOC.

This evaluation follows up on the corrective actions taken by the AOC to address the four findings and the six recommendations made for improvements to the AOC's personal property management program.

The personal property management program is administered and overseen by the Supplies, Services & Material Management Division's (SSMMD's) Personal Property Management Officer (PPMO) within the Office of the Chief Administrative Officer (OCAO). The PPMO is responsible for the overall management of the personal property management program. To account for personal property, each jurisdiction's superintendent has designated and appointed in writing an Accountable Property Officer (APO) who has authority and responsibility for the property in their respective jurisdictions. In addition to the APOs, each jurisdiction's superintendent or division director designates and appoints property custodians (PCs) who are responsible for overseeing the day-to-day performance of property management functions within their custodial area.

¹ During the August 2019 OIG evaluation, the AOC defined non-consumable property as items that were under \$1,500 and could be mission critical property considered to be highly pilferable.

AOC Order 34-45, “Personal Property Manual,” dated October 15, 2020, is the principal policy that establishes internal controls and requirements for the personal property management program, and spans the personal property management lifecycle — acquisition, receipt, accountability, utilization and disposition. The Personal Property Manual applies to all AOC personnel who manage personal property.

Criteria

- AOC Order 34-45, Personal Property Manual, October 15, 2020
- Federal Personal Property Management Act of 2018 (Public Law (P.L.) 115-419), January 3, 2019 (Referenced as a best practice)

Finding 1

The AOC Can Strengthen Internal Controls Over Personal Property

In the 2019 report, the OIG found that the AOC had limited internal controls for property with an acquisition cost below \$1,500 (non-accountable property) and did not establish definitions or accountability requirements for non-consumable property. As a result, for non-consumable property, AOC jurisdictions used different accountability methods, had limited oversight and maintained inconsistent property records. These deficiencies increased the risk of theft, mismanagement, and the potential for shortage of mission critical items. Property management personnel also stated that they were not always aware of missing property until long after the property went missing, which created inefficiencies and untimely reorder.

Previous Recommendations

- We recommend that the Chief Administrative Officer update and revise AOC Order 34-45 (Personal Property Manual) and all other associated policy directives to establish internal control requirements, including standard definitions and criteria for highly pilferable and mission critical non-consumable property valued less than \$1,500.
- We recommend that the Chief Administrative Officer update and revise AOC Order 34-45 (Personal Property Manual) and all other associated policy directives to establish guidelines to document, report and track missing non-consumable property valued less than \$1,500.
- We recommend that the Chief Administrative Officer update and revise AOC Order 34-45 (Personal Property Manual) to enforce the requirement for mission critical non-consumable property valued less than \$1,500 to be recorded in the personal property management system.

Evaluation Results

Policy Updates

AOC concurred with the recommendations made in the August 2019 OIG report and implemented changes to the policy by holding a working group by the end of the 2nd quarter, fiscal year (FY) 2020. The PPMO held a two-day working group and requested

that property management personnel provide the SSMMD with a list of property that they considered pilferable or sensitive.

As a result, the Personal Property Manual was updated and revised in October 2020. Significant revisions included removing the \$1,500 property accountability threshold and adding *Appendix C: List of Pilferable and Sensitive Items That Are Accountable*. The AOC also added definitions for mission critical non-consumables and pilferable items and updated the accountable property definition to include a useful life of two years.

Our follow-up evaluation found that the updates to the Personal Property Manual and corrective actions did not fully meet the intent of the OIG's prior recommendations to remedy the limited internal controls for property with an acquisition cost below \$1,500 (non-accountable property).

- The Personal Property Manual contained some inconsistencies. For example, it defines accountable property as property with an acquisition cost that exceeds an established dollar threshold. However, the AOC removed the dollar threshold.
- The OIG recommended that the AOC update and revise policy directives to establish internal control requirements including standard definitions and criteria for highly pilferable and non-consumable property valued at less than \$1,500. AOC added the definition of mission critical non-consumable property to the Personal Property Manual's glossary, but there is no guidance on how to document, report and track mission critical non-consumable property and these terms are not mentioned anywhere else in the manual. Further, it is unclear if mission critical non-consumable property is considered accountable property and if it should be tracked in the personal property management system.
- The AOC did not update and revise the Personal Property Manual to establish guidelines to document, report and track missing non-consumable property valued less than \$1,500. The dollar threshold was removed.
- The AOC did not update and revise the Personal Property Manual to enforce the requirement for mission critical non-consumable property valued less than \$1,500 to be recorded in the personal property management system. The dollar threshold was removed.

Accountability Determination

Accountable property is not consistently defined or standardized at the AOC (see Table 1). Jurisdiction APOs, determine what property is accountable. The OIG recognizes that each jurisdiction's mission is different; however, too much subjectivity could lead to inventory tracking and accountability inefficiencies. Based on interviews with five jurisdiction APOs, different factors are used to determine what constitutes accountable property. Some APOs continue to use the \$1,500 threshold while others mentioned that they consider if the property is critical to the mission. Additionally, none of the APOs

mentioned that they consider useful life as a factor to determine accountability. If APO’s are only using the \$1,500 threshold, the risk remains that mission critical non-consumable property is not adequately documented and tracked.

The current Personal Property Manual requires personnel to only record accountable property in the personal property management system. This means that some mission critical non-consumable property valued under \$1,500 is considered non-accountable in some jurisdictions. Non-accountable property is not required to be reported or tracked in the property management system. This distinction makes it difficult to hold employees accountable for lost or missing property.

Table 1: Appendix C: List of Pilferable and Sensitive Items That Are Accountable.

Jurisdiction	Property
Supreme Court Building and Grounds	Benders, grounds equipment, measuring meters/devices, demolition equipment, drain equipment.
Capitol Grounds and Arboretum	Outdoor lawn equipment and snow removal equipment, demolition equipment, TVs, outdoor maintenance equipment
House Office Buildings	Indoor maintenance equipment.
Capitol Building	Plumbing equipment, outdoor snow removal, various IT equipment that has been purchased by this jurisdiction (laptops, iPads).
Library Buildings and Grounds	Power tools, generators, power washers, outdoor lawn equipment, various IT equipment that has been purchased by this jurisdiction (laptops, iPads).
U.S. Botanic Garden	Pressure washers, industrial vacuums, power tools, outdoor lawn equipment, various IT equipment that has been purchased by this jurisdiction (laptops, iPads).
Construction	Lasers, benders, generators, chop saws, sewer cameras
Capitol Power Plant	Appliances, power tools, electronics.
Senate Office Buildings	Items listed on their Accountable Valuation list are adequate.

Administrative Controls

The August 2019 OIG report stated that the previous version of the Personal Property Manual provided vague language about what type of non-consumable property required administrative controls. The current Personal Property Manual states that controlled

property (non-accountable property) may require some administrative controls and may need to be recorded in the property management system. Again, we found that the Personal Property Manual provides vague language about what type of property requires administrative control; does not define what administrative controls are necessary or how staff should implement the controls. The Personal Property Manual does provide a few examples of controlled property and an example of a control activity but does not give specific details and guidance to ensure consistency.

Further, it is unclear from the Personal Property Manual whether mission critical non-consumable property is considered controlled property or administratively controlled property (see Table 2 for AOC definitions). The lack of clear and consistent guidance puts the agency at risk for mismanagement.

Table 2: AOC Order 34-45, October 2020, Personal Property Manual, Definitions

Term	Definition
Accountable Property	The Personal Property Manual classifies “accountable personal property” as property with an acquisition cost that is on the Accountable Property Valuation Report, capitalized personal property with an acquisition cost of \$25,000 or more and sensitive personal property.
Mission Critical Non-Consumables:	Classified as any item that is essential to the business operation or to an organization. Property that is not easily discarded, items that are used frequently. Non-consumable may include components of sets, kits and outfits.
Controlled Property	Non-accountable personal property that is not subject to the same treatment as accountable personal property, but still requires administrative controls over its use.
Administratively Controlled Property	Property that is not recorded as sensitive, which is subject to reasonable controls relative to property values. At a minimum, consumable property (supplies and spare parts) should have a double entry noting what was received and to whom it was issued. Note: This is also known as Controlled Property.

Missing Property

In the August 2019 report, the OIG found that property management personnel conducted infrequent inventory inspections and had limited oversight for non-consumable property which created the opportunity for mismanagement of AOC property. For example,

- Some jurisdiction PCs conducted inventory checks for non-consumable property when time permitted while others relied on the shop supervisors to submit inventory updates.
- Some property management personnel stated that when property went missing, they were often not notified until long after the property was gone or there was a request for replacement, which created untimely reorder for property.
- Some AOC jurisdictions performed physical spot checks of non-consumable inventory and used sign in/sign out logs for daily accountability of non-consumable property.

Based on our interviews with the five jurisdiction APOs, the majority acknowledged that their jurisdiction did not have additional accountability procedures other than the AOC's annual physical inventory. We reviewed the AOC's Board of Survey² results from FY 2019–2022 and confirmed that property was reported missing as a result of performing the annual physical inventory. In some cases, there was no documentation or months had passed since the item was last accounted for or seen.

The Personal Property Manual does not require personal property management staff to account for property outside of its annual physical inventory. To improve the management of Federal personal property, Congress passed The Federal Personal Property Management Act of 2018 (P.L. 115-419) (Federal Personal Property Act or the Act)³. The Act requires executive branch agencies to conduct, on a regular basis, an inventory and assessment of their accountable personal property and on an annual basis, conduct an inventory and assessment of capitalized personal property. AOC jurisdictions with large volumes of property may miss the opportunity to identify and report missing or lost property if they are only required to conduct inventory once a year.

At a minimum, the SSMMD should require property management personnel to use sign-in/sign-out procedures for AOC property to increase accountability and to prevent unauthorized use of inventory, theft and lost property. More effective monitoring and tracking could greatly reduce these negative consequences.

² The AOC Personal Property Manual, page 65, defines the Board of Survey as a standing committee of three to five senior members, appointed by the Chief Operating Officer that are responsible for investigating incidents of lost, damaged or destroyed personal property with AOC.

³ Legislative branches are not required to follow requirements in The Federal Personal Property Management Act of 2018; however, these requirements are a best practice and applicable for setting internal controls.

Recommendation

Recommendation 1

We recommend that the Architect of the Capitol (AOC) update and revise AOC Order 34-45 (Personal Property Manual) to (1) establish a dollar threshold for accountable property, (2) the greatest extent possible, ensure mission critical non-consumable property is consistently defined across AOC jurisdictions, (3) provide guidance on how to identify, document and track mission critical non-consumable and non-accountable property, (4) provide clear directions on administrative controls and (5) develop and enforce additional inventory and accountability procedures for accountable and non-accountable property to reduce the risk of mismanagement and lost property in accordance with federal best practices.

Recommendation 1 – AOC Comment

Concur. To reduce the risk of mismanagement and lost property, the AOC will review, edit and update Order 34-45. The updates will clarify dollar thresholds for accountable property; ensure mission-critical, non-consumable property is consistently defined; provide guidance on how to identify and track mission-critical property, provide clear direction, and develop additional inventory and accountability procedures for accountable and nonaccountable property to reduce the risk of mismanagement and lost property. Anticipated completion by third quarter 2024.

Recommendation 1 – OIG Comment

We reviewed the management comment and recognize the AOC's concurrence with the recommendation. AOC's actions appear to be responsive to the recommendation. Therefore, the recommendation is considered resolved but open. The recommendation will be closed upon completion and verification of the proposed actions.

Finding 2

Inadequate Storage Space Remains an Issue

The August 2019 report found that some AOC jurisdictions lacked sufficient and dedicated storage for property and equipment because: (1) the AOC is limited by the amount of internal and external facility space across the Capitol campus and (2) some jurisdictions' work activities and projects are not local to their respective jurisdictions' space while supporting AOC operations. As a result, some jurisdictions used inventory storage practices that may have increased the probability for loss of AOC property. For example, property management personnel stated that property is sometimes stored in hallways and will sometimes go missing or get mixed in with another jurisdiction's inventory.

Previous Recommendations

- We recommend that the Architect of the Capitol (AOC) review all existing allocated and assigned storage space across each jurisdiction and reallocate and reassign facility space based on the need of the jurisdictions.
- We recommend that the Architect of the Capitol (AOC) complete a cost estimate and assess the feasibility of building a consolidated and centralized AOC inventory control center.

Evaluation Results

The AOC concurred with the previous recommendations and initially stated that actions were subject to the availability of funding. Based on input from the AOC jurisdictions during the two-day working group, the agency did not reallocate and reassign facility space nor complete a cost estimate or feasibility study related to a new centralized inventory control center. In its Notice of Final Action, the AOC stated that there was not any room at the jurisdiction level for reallocating existing storage space to other jurisdictions and most jurisdictions would not benefit from a consolidated inventory center because they have sufficient space in existing storerooms for required materials. During the follow up evaluation, the PPMO and property management specialist (PMS) stated a consolidated and centralized AOC inventory control center is a good idea but is not feasible due to limited land and facility space on and around the Capitol complex. We asked the PPMO and PMS if budget requests were made for an organizational assessment or cost estimate, but they were not aware of any.

Four of five jurisdiction APOs we interviewed stated that storage space is still an issue. For example, some stated that there is not enough space, and some property is stored in

back hallways or attics. Another APO noted that if disposable property was removed it would give the jurisdiction more space. If the AOC does not adequately secure its property, it increases the risk of theft and waste of taxpayer money.

Recommendations

Recommendation 2

We recommend that the Architect of the Capitol (AOC) research and implement federal government best practices for acquiring and maintaining adequate storage space to reduce the risk of theft.

Recommendation 2 – AOC Comment

Concur. The AOC will research best practices for acquiring and maintaining adequate storage to reduce the risk of theft. Additionally, the AOC will review Order 34-45 and make edits and updates as necessary to clarify the disposition of property, which in turn could increase storage space and reduce the risk of theft. Anticipated completion by third quarter 2024.

Recommendation 2 – OIG Comment

We reviewed the management comment and recognize the AOC's concurrence with the recommendation. AOC's actions appear to be responsive to the recommendation. Therefore, the recommendation is considered resolved but open. The recommendation will be closed upon completion and verification of the proposed actions.

Recommendation 3

We recommend that the Architect of the Capitol (AOC) conduct an organizational-wide assessment to identify disposable property and discard the property per AOC Order 34-45 (Personal Property Manual) to ensure adequate storage space.

Recommendation 3 – AOC Comment

Concur. The AOC will assess, identify and discard disposable property agencywide in accordance with Order 34-45. This effort could provide additional storage space. Anticipated completion by third quarter 2024.

Recommendation 3 – OIG Comment

We reviewed the management comment and recognize the AOC's concurrence with the recommendation. AOC's actions appear to be responsive to the recommendation. Therefore, the recommendation is considered resolved but open. The recommendation will be closed upon completion and verification of the proposed actions.

Finding 3

APOs Did Not Have Issues Performing Property Management Responsibilities as a Collateral Duty

The August 2019 report found that property management oversight was inadequate as the accountable property officers and other related personal property management staff (i.e., PCs) within each jurisdiction were designated as collateral assignments to employees' respective job functions. This occurred because the Personal Property Manual only directs jurisdiction Superintendents to appoint designated property management personnel in writing and not assign the role as a full-time duty; and property management personnel are performing multiple duties in addition to their property management responsibilities.

Previous Recommendation

- We recommend that the Architect of the Capitol direct an organizational assessment to determine the feasibility of creating full-time Accountable Property Officer positions that strictly deal with property management.

Evaluation Results

The AOC concurred with the previous recommendation but did not take corrective action. In its Notice of Final Action to the previous recommendations, the AOC stated that the majority of APO positional duties do not focus solely on property and inventory and in most cases, there wouldn't be enough work for the position to focus solely on those tasks. During our follow up evaluation, the PPMO stated that it would benefit the agency to create full-time positions under the SSMMD, however, the PPMO does not have the authority to implement the recommendation.

In general, the five jurisdiction APOs we interviewed stated there were no issues performing collateral duties related to the appointment. We observed that some annual inventories were submitted late but did not find sufficient evidence to recommend that the AOC create full-time APO positions.

Observation

AOC's Inventory Records

During our review we observed the AOC did not maintain complete annual inventory records to ensure auditability. The Personal Property Manual states property records must exist to provide auditable, paper-trail support to account for AOC personal property. Additionally, the Personal Property Manual requires APOs and PCs to sign and provide the PPMO a 100 Percent Inventory Completion Letter and an Accountable Property Valuation Report as part of completing their annual inventory.

During our review of the FY 2019-2022 annual inventory records, we observed that the Accountable Property Valuation Report was included for only 17 out of the 73 annual inventory records (see Table 3). This occurred because the PPMO only maintained records of the 100 Percent Inventory Completion Memorandum due to its perceived importance and because it seemed redundant to keep both documents. The PPMO stated that the SSMMD office conducts unannounced audits of all the jurisdictions and divisions every September. We requested documentation for the unannounced audits, but the PPMO did not maintain documentation.

We did not request annual inventory completion records from individual APOs as part of our evaluation scope. However, we did advise the PPMO, as the individual responsible for the oversight of the AOC's personal property management program, to maintain complete and auditable records of the AOC's annual inventory results for future OIG audits and evaluations and in accordance with the AOC's Personal Property Manual. Accessibility, Auditability and Records Retention, and Waste and Accountability persist as AOC OIG Management Opportunities and Performance Challenges across all AOC programs and operations.

Table 3: Annual Inventory Records for FYs 2019-2022

FY	Annual Inventory Records included an Accountable Property Valuation Report	Annual Inventory Records did not include an Accountable Property Valuation Report	Total APO Jurisdiction Submissions
2019	6	14	20
2020	3	15	18
2021	5	13	18
2022	3	14	17
Total	17	56	73

We also found that six out of 10 reports of survey provided during FYs 2019-2022 were missing information required to be documented on AOC Form 0801 — Report of Survey per the Personal Property Manual. Specifically, the estimated values of 18 property items were left blank. The estimated value is important if a PC is held accountable or if it is determined that an employee will have to repay a portion of the value of the lost, damaged, or destroyed property back to the agency. Inadequate documentation hinders the agency's ability to conduct thorough investigations for lost and missing property and hold employees accountable.

APPENDIX A

Scope and Methodology

We conducted this evaluation from January 2023 through July 2023 in accordance with the Council of the Inspectors General on Integrity and Efficiency’s Quality Standards for Inspection and Evaluation (also known as the Blue Book).⁴ 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 follow-up evaluation was self-initiated by the AOC OIG and was included in our FY 2021-2023 Work Plan. The objective of this follow-up evaluation was to determine whether the AOC implemented corrective actions to address recommendations in the March 2019 OIG report, Evaluation of the AOC’s Inventory Accountability and Controls (2018-0002-IE-P).

To address our evaluation objective, we reviewed relevant AOC policies and procedures, interviewed AOC staff and followed up on the implementation of prior recommendations to the AOC.

Use of Computer-Processed Data

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

Prior Coverage

Prior OIG report relevant to this follow-up evaluation include: Evaluation of the AOC’s Inventory Accountability and Controls (2018-0002-IE-P); Theft of AOC Property — Substantiated (2018-0021-INVI-P), (2018-0023-INVI-P), (2019-0004-INVI-P), (2020-0001-INVI-P), (2021-0012, INVI-P), (2022-0002-INVI-P), and (2022-0018-INVI-P).

⁴ Quality Standards for Inspection and Evaluation (Blue Book), Counsel of Inspectors General for Integrity and Efficiency, December 2020.

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: January 12, 2023

TO: J. Brett Blanton
Architect of the Capitol

FROM: Christopher P. Failla, CIG 
Inspector General

SUBJECT: Announcement for Follow-up Evaluation of the Architect of the Capitol's (AOC's) Inventory Accountability and Controls (2023-0001-FLD-P)

This is to notify you that the Office of Inspector General (OIG) is initiating a follow-up evaluation of the AOC's Response to the 2019 OIG report, Evaluation of the AOC's Inventory Accountability and Controls (2018-0002-IE-P). Our objective is to determine whether the AOC implemented corrective actions to address recommendations in the 2019 OIG report.

Please provide an Agency point of contact for this follow-up evaluation. We will contact the appropriate AOC offices to schedule an entrance conference in the upcoming weeks. If you have any questions, please contact Brittany Banks, Assistant Inspector General for Follow-Up, at 202.436.1445 or Brittany.Banks@aoc.gov.

Distribution List:

Peter Bahm, Chief of Staff
Mary Jean Pajak, Deputy Chief of Staff
Mark Reed, Acting Chief of Operations
William O'Donnell, Chief Administrative Officer
Jason Baltimore, General Counsel

APPENDIX C

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: August 29, 2023

TO: Christopher P. Failla
Inspector General

FROM: Chere Rexroat, RA *CR*
Acting Architect of the Capitol

SUBJECT: Office of Inspector General (OIG) Report on Inventory and Accountability and Controls (2018) – OIG Follow-Up Division

Thank you for the recommendations identified in the final draft report. The Architect of the Capitol (AOC) concurs with these recommendations and provides the following responses.

Recommendation 1: We recommend that the Architect of the Capitol (AOC) update and revise AOC Order 34-45 (Personal Property Manual) to (1) establish a dollar threshold for accountable property, (2) the greatest extent possible, ensure mission critical non-consumable property is consistently defined across AOC jurisdictions, (3) provide guidance on how to identify, document and track mission critical non-consumable and non-accountable property, (4) provide clear directions on administrative controls and (5) develop and enforce additional inventory and accountability procedures for accountable and non-accountable property to reduce the risk of mismanagement and lost property in accordance with federal best practices.

Agency Response: The AOC concurs with this recommendation. To reduce the risk of mismanagement and lost property, the AOC will review, edit and update Order 34-45. Updates will: clarify dollar thresholds for accountable property; ensure mission-critical, nonconsumable property is consistently defined; provide guidance on how to identify and track mission-critical, property; provide clear direction, and develop additional inventory and accountability procedures for accountable and nonaccountable property to reduce the risk of mismanagement and lost property.

Completion Date: Anticipated completion by third quarter 2024.

Recommendation 2: We recommend that the Architect of the Capitol (AOC) research and implement federal government best practices for acquiring and maintaining adequate storage space to reduce the risk of theft.

Agency Response: The AOC concurs with this recommendation. The AOC will research best practices for acquiring and maintaining adequate storage to reduce the risk of theft. Additionally, the AOC will review Order 34-45 and make edits and updates as necessary to clarify the disposition of property, which in turn could increase storage space and reduce the risk of theft.

APPENDIX C

Management Comments

Completion Date: Anticipated completion by third quarter 2024.

Recommendation 3: We recommend that the Architect of the Capitol (AOC) conduct an organizational-wide assessment to identify disposable property and discard the property per AOC Order 34-45 (Personal Property Manual) to ensure adequate storage space.

Agency Response: The AOC concurs with this recommendation. The AOC will assess, identify and discard disposable property agencywide in accordance with Order 34-45. This effort could provide additional storage space.

Completion Date: Anticipated completion by third quarter 2024.

Distribution List:

Chere Rexroat, Acting Architect of the Capitol

Angela Freeman, Acting General Counsel

Teresa Bailey, Chief Human Capital Officer and POC for the Chief Administrative Officer

Harold Honegger, Chief, Supplies, Services and Materials Management Division

Brian Kohler, Director Business Services

Percell Artis, Personal Property Manager

Hajira Shariff, AOC Liaison to the OIG

Doc. No. 230809-02-01

ACRONYMS AND ABBREVIATIONS

AOC	Architect of the Capitol
APO	Accountable Property Officer
CAO	Chief Administrative Officer
FY	Fiscal Year
OCAO	Office of the Chief Administrative Officer
OIG	Office of Inspector General
PC	Property Custodian
PMS	Property Management Specialist
PPMO	Personal Property Management Officer
SSMMD	Supplies, Services and Material Management Division



INSPECTOR GENERAL
499 S. CAPITOL ST, SW
SUITE 518
WASHINGTON, DC 20515
www.aoc.gov