Architect of the Capitol

Combating Fraud, Waste, Abuse & Mismanagement · Architect of the Capitol

The Architect of the Capitol Human Capital Management Program Evaluation

2023-0003-IE-P

August 29, 2024

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OF THE **CAPITOL**

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Results in Brief

The Architect of the Capitol
Human Capital Management Program Evaluation

AUGUST 29, 2024

OBJECTIVE

The objective of this evaluation was to assess the efficiency, effectiveness, and internal controls of Architect of the Capitol (AOC) Human Capital Management Program (HCMP) activities and operations in accordance with AOC policies, procedures, transformation milestones, human capital strategy (HCS), and applicable federal laws and regulations. Our review of these items focused primarily on the applicability to *Hiring, Retention, Turnover*, and *Quality Step Increases (QSIs).* This evaluation was consistent with our 2022 and 2023 agency Management Challenges that listed Human Capital Management as a Management Opportunity and Performance Challenge*.*

This evaluation of the AOC's HCMP was included in the Office of Inspector General's (OIG) Fiscal Year 2024 Audit and Evaluation Plan and was prioritized at the request of Acting Architect Chere Rexroat.

FINDINGS

Based on our review of human capital policy communication, maintenance, and implementation across the agency and its impact on the primary evaluation objective areas, we found that the Human Capital Management Division (HCMD) employs structured procedures for creating and disseminating AOC policy. We also noted that

HCMD met five of its seven applicable Key Performance Indicators (KPIs) for FY 2023, including "Time to Fill – Direct Hire Positions," "Time to Fill – Competitive Positions," "Internal Promotion Rate," "Voluntary Turnover Rate," and "Career Ladder & Detail Positions." However, based on our evaluation, we found deficiencies within the Human Capital Management activities, operations and internal controls (control environment, control activities, information, communication and monitoring) as noted in four comprehensive findings.[1] Specifically, we found:

1. Communication, maintenance, and implementation of human capital policies were deficient

2. HCM operational inefficiencies within the agency

3. Gaps in policy guidance and processes, and deficiencies in oversight procedures

4. Noncompliance with HCMD-owned policies, both at the division and jurisdiction levels

RECOMMENDATIONS

We made twelve recommendations to address the identified areas of improvement. We recommend the Chief Administrative Officer perform the following:

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[1] Comprehensive Findings – During our evaluation, we note a total of thirty-eight preliminary findings, issues and/or observations consolidated into four comprehensive findings.

Results in Brief Continued

1. **Ensure consistent communication and collaboration between parties responsible for policy ownership and maintenance.** Review and assess the human capital policy management roles and responsibilities to identify opportunities for improvement in human capital policy management and oversight. Enhance or develop and implement specific measures to foster consistent communication and collaboration between HCMD and the Policy and special Programs Division.

2. **Execute a timely and consistent policy review process.** Per AOC Order 4-1, Issuing AOC Policy, effectively execute the process to verify the assignment of policies to the appropriate Office of Primary Responsibility within the AOC Policy Library, particularly following any transfers or changes in ownership between offices/jurisdictions.

3. **Enhance policy governance framework over the jurisdictions.** Review and assess policy governance framework over the jurisdictions to identify opportunities to improve policy governance, standards and communication. Enhance or develop and implement a comprehensive policy governance framework across all jurisdictions.

4. **Develop an effective review process of Standard Form 52[2] forms.** Establish a review process that effectively addresses any inconsistencies or manual input errors encountered during preparation and submission of Standard Form 52 forms.

5. **Implement data management procedures for systems and databases used to track vacant positions across the agency.** Establish data management protocols, incorporating routine review and reconciliation of employee data, alongside procedures for data entry and updates.

6. **Update the "Feedback to Non-Selected Internal Candidates Interviewed Form."** Revise the "Feedback to Non-Selected Internal Candidates Interviewed Form" to incorporate explicit criteria and pertinent evidence validating that feedback was extended to interviewed, non-selected internal candidates for vacant positions.

7. **Establish clear processes and defined timelines for conducting exit interviews.**

8. **Retire or update outdated or unclear policies to align with current regulations and agency objectives**. Review and assess AOC Order 4-1, Issuing AOC Policy, protocols for update and retirement of outdated policies and identify opportunities to improve policy protocol activities. Enhance or develop and implement protocol measures to affect timely updates to older policies and the prompt retirement or revision of outdated or unclear policies, ensuring continuous alignment with regulatory requirements and organizational objectives.

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[2] Standard Form (SF) 52 is federal, government-wide form used to process requests for personnel actions.

Results in Brief Continued

9. **Identify any related policies requiring an update.** Ensure all interrelated policies are tracked to facilitate the identification of those potentially impacted by the update of a single policy.

10. **Practice timely reporting of exit interview survey results to management.** Practice timely reporting of the exit interview survey program to ensure its results are analyzed consistently and effectively. This includes defining timelines for reporting results to upper management and ensuring prompt action on identified issues.

11. **Implement and sustain a centralized repository of all telework application packages across the agency.** This includes establishing a regular review process of the repository to sustain its integrity and ensure consistency, fairness, and policy compliance.

12. **Review and align the process and policies associated with QSIs.**

MANAGEMENT COMMENTS

AOC was provided the opportunity to comment in response to this report.

AOC provided comments on August 19, 2024 (refer to Appendix C). In its comments, AOC management agreed with the deficiencies we found in human capital policy communication, maintenance, and implementation across the agency and its impact on the areas of *Hiring, Retention, Turnover*, and *QSIs* within Human Capital Management activities, operations and internal controls. The agency demonstrated its agreement with such deficiencies through its concurrence with all twelve recommendations.

Please refer to the Recommendations Table on the following page.

RECOMMENDATIONS TABLE

Management	Recommendation Required Comment
Chief Administrative Officer	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12

Management	Recommendations Unresolved	Recommendations Resolved	Recommendations Closed
Chief Administrative Officer	None	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12	None

The following categories are used to describe agency management's comments to individual recommendations:
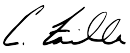
- **Open Unresolved:** Management has not agreed to implement the recommendation or has not proposed actions that will address the recommendation.
- **Open Resolved:** Management agreed to implement the recommendation or has proposed actions that will address the underlying finding that generated the recommendation.
- **Closed:** OIG verified that the agreed upon corrective actions were implemented.

Inspector General

DATE: August 29, 2024

TO: Thomas E. Austin, PE, CCM, PMP
Architect of the Capitol

FROM: Christopher P. Failla, CIG, CFE
Inspector General

SUBJECT: The Architect of the Capitol (AOC) Human Capital Management Program Evaluation
(2023-0003-IE-P)

The AOC Office of Inspector General (OIG) is transmitting Sikich's evaluation of the AOC's Human Capital Management Program (2023-0003-IE-P). Under contract AOCSSB22A0007 monitored by my officer, Sikich, an independent public accounting firm, performed the evaluation in accordance with the Council of the Inspectors General on Integrity and Efficiency's (CIGIE's) Quality Standards for Inspection and Evaluation (Blue Book), December 2020.

Our report concluded that the AOC should enhance its policies and procedures related to human capital management, as well as its oversight of policy communications. Furthermore, we determined that there were operational inefficacies in the implementation of AOC's human capital management program. This report contains four findings and twelve recommendations to improve the efficiency, effectiveness, and internal controls for the AOC's human capital management program.

In response to our official draft report (Appendix C), you concurred with our findings and recommendations. We feel the proposed corrective actions address our recommendations. However, 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 decision.

We appreciate the courtesies extended to the staff during the evaluation. Please direct questions to Audrey Cree, Evaluator, at 202.631.2682 or audrey.cree@aoc.gov.

Distribution List:

Hajira Shariff, OIG Liaison
Patrick Briggs, Chief of Staff
Michele Chin, Acting Deputy Chief of Operations
Telora Dean, Chief Administrative Officer
Teresa Bailey, Chief Human Capital Officer
Angela Freeman, General Counsel

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INTRODUCTION

Objective

The objective of this evaluation was to assess the efficiency, effectiveness, and internal controls of Architect of the Capitol (AOC) Human Capital Management Program (HCMP) activities[3] and operations in accordance with AOC policies, procedures, transformation milestones, human capital strategy (HCS), and applicable federal laws and regulations.

The AOC Office of Inspector General (OIG) contracted with Sikich CPA LLC ("Sikich") (formerly known as Cotton & Company Assurance and Advisory, LLC) to conduct an evaluation of the AOC's HCMP.

Prior to this evaluation, the AOC OIG identified and shared the following allegations/complaints surrounding the areas impacting the evaluation objective based on management challenges, risk assessment results and investigations referrals:

- Delays to locality pay adjustments for teleworking AOC employees

- Misinformation provided to AOC employees by management regarding employee benefits

- Delays to the disbursement of Quality Step Increases (QSIs) or bonuses to AOC employees

- The circumvention of the competitive hiring process and background checks through the conversion of temporary hires to full-time staff

- The use of underqualified resources from other AOC jurisdictions to review HCM processes

Overall, to achieve the evaluation objective through our all-encompassing understanding of the agency, our evaluation was based upon the review of human capital policies, their communication, maintenance, and implementation across the agency, and their impact on the following four primary evaluation objective areas: ***Hiring, Retention, Turnover*** and ***QSIs.***

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[3] Human Capital Management is all-encompassing area. Several factors, including but not limited to known allegations of waste, abuse, and mismanagement within the HCMP (specific to staff retention pre-pandemic/post-pandemic, implementation of plans, and recruitment/hiring), area of concerns identified by the OIG, pre and post implementation of the HCS program, and best practices identified by the Government Accountability Office (GAO) and other published guidance were considered.

Background

The Architect of the Capitol (AOC)

AOC's leadership structure, as depicted in the organization chart, includes a group of five executives with agencywide responsibility and authority to focus on operational performance, manage enterprise risk, and maintain strong accountability. These Functional Chief positions are joined by senior leaders in the Office of the Architect and jurisdiction heads.
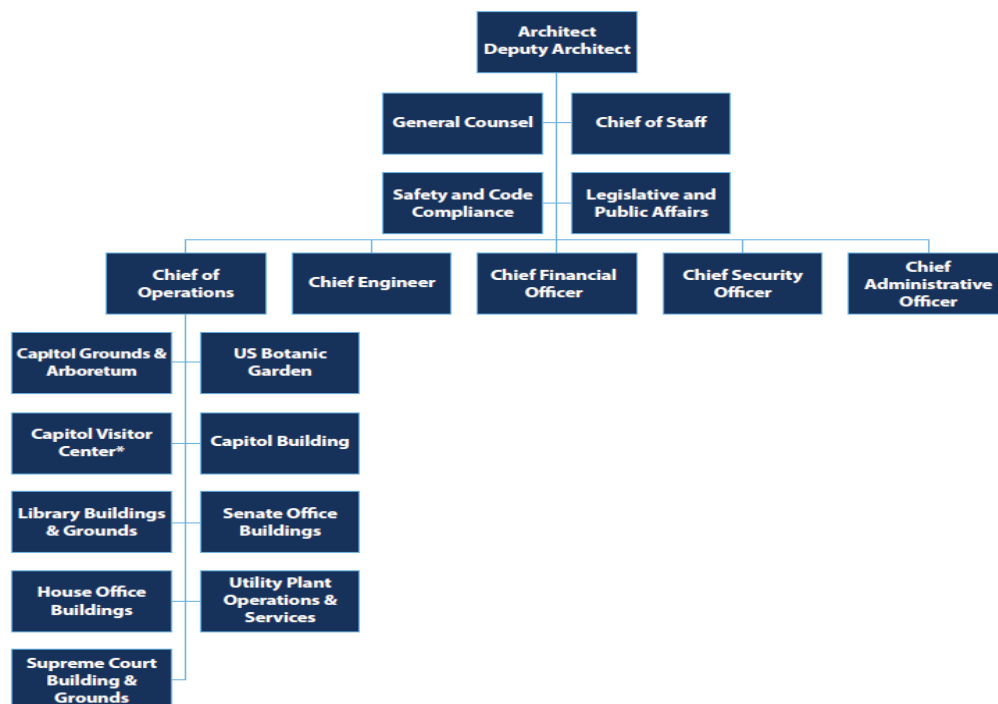
The Human Capital Management Division

The Human Capital Management Division (HCMD) is part of the Office of the Chief Administrative Officer (OCAO). As part of this office, HCMD is a collaborative and strategic partner that supports the AOC's strategic goals by directly supporting AOC leaders and employees who carry out the agency's mission of service to Congress, the Supreme Court and the American public.

Responsible for the leadership of the agency's human capital organization is the Chief Human Capital Officer (CHCO), who oversees the development and implementation of effective HCS programs, policies and services that support and enhance organizational performance and empower the AOC's workforce. As a key senior advisor to the Architect and the Chief Administrative Officer (CAO), the CHCO addresses a broad range of evolving and emerging managerial, organizational, and employee issues on an enterprise-wide basis. To develop and implement human capital efforts within the agency, HCMD utilizes six branches and five major programs.

- HCMD Branches:
    1. Employee Benefits and Services Branch
    2. Employee and Labor Relations Branch
    3. Employee Programs Branch
    4. Payroll and Processing Branch
    5. Talent Acquisition and Classification Branch
    6. Training and Employee Development Branch[4]

- HCMD Major Programs:
    1. Employee Assistance Program
    2. Executive Resources Program
    3. Human Resources Data Analytics Program
    4. Human Resources Information Systems Program
    5. Workforce Planning Program

The Policy and Special Programs Division

Also under the umbrella of the OCAO is the Policy and Special Programs (PSP) Division, which holds the primary responsibility for the management and coordination of all AOC policies published on the agency's intranet (Compass).[5] The PSP division is mainly driven by the decisions of the agency's senior leadership, direction from congressional oversight, public laws or report language accompanying legislation to manage and coordinate all policies.

All policies maintained by the PSP Division must be followed by exempt and non-exempt employees alike.[6] However, there are some policies that are only for senior executives, in which case, such policies would not apply to non-exempt employees. In addition, AOC policies will take precedence over policies and procedures issued at the jurisdictional or lower levels.

The Policy Creation and Revision Process

Policy creation and revision is essential to ensure internal controls are in place and staff are held accountable to those controls. Regarding human capital management, HCMD and the PSP Division have a coordinated role in the policy creation and revision process. HCMD, led by the CHCO, the Deputy CHCO, and the chiefs of the various HCMD branches (when applicable), develops and revises human capital policies based on new laws and regulations, as directed by leadership, or in alignment with emerging trends. Once HCMD has developed a draft policy, it is provided to the Office of General Counsel (OGC) to ensure legal compliance. After coordination

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[4] Since the publication of AOC's Human Capital Strategic Plan for FY 2022-FY 2026, the Training and Employee Development Branch has since been dissolved under HCMD and became AOC University in November 2022.

[5] AOC policies are maintained on the AOC intranet, also known as Compass. Within Compass, icons on the main page are used to distinguish the different types of policies within the AOC Policy Library by their Office of Primary Responsibility.

[6] Through our review, we noted instances where HCM policies outline that the provisions of a Collective Bargaining Agreement (CBA) take precedence over the provisions of the policy for employees who fall under the CBA.

with the OGC, the draft policy is then presented to C-Suite and Chief of Operations (ChOps) leaders for review, discussion and consensus.

Next, the draft policy is redirected to the PSP Division, which coordinates a 30-day comment period where feedback on the draft policy is fielded from AOC's offices and jurisdictions via the Policy Review Group.[7] Following the close of the comment period, the draft policy is returned to HCMD for evaluation of the feedback received during the comment period. Feedback endorsed by HCMD is incorporated as adjustments to the draft policy, while feedback opposed by HCMD is declined, annotated with a comment and responded to accordingly. After HCMD addresses the comments, the PSP Division will alert commenters to examine HCMD's responses to their feedback, assess the acceptances and rejections by HCMD, and potentially request reconsideration for feedback dismissed by HCMD.

After all feedback has been resolved, the draft policy is subsequently placed into the Policy Management Request Process (PMR), where it undergoes approval from various parties, including:

- The Office of Primary Responsibility (OPR) for human capital policies (i.e., the CHCO)

- The PSP Division

- The OGC

- The OIG

- The Office of Legislative and Public Affairs

After obtaining signatures from these parties, the policy is subsequently submitted to the Human Capital Management Division, Employee Labor and Relations Branch (HCMD/ELRB) to determine if union notification is required. If so, HCMD/ELRB coordinates with the relevant unions, particularly in cases involving changes to employment conditions.

To finalize the PMR process, HCMD will examine any outstanding comments and propose or incorporate any recommended changes to the policy. Once the PMR process is complete, the policy transitions to the Correspondence Management Review phase. Here, the policy undergoes the final steps to attain official status, including securing signatures from the agency head and distributing the finalized policy organization-wide through the following channels:

- HR Liaison Group Meetings attended by the HR Liaisons at each jurisdiction, which act as the Points of Contact (POCs) for HCMD.

- Administrative and Management Meetings attended by most administrative staff.

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[7] According to AOC Order 4-1, Issuing AOC Policy. "The Policy Review Group is a standard email group maintained by the Policy and Special Programs (PSP) Division that includes personnel from offices/jurisdictions across the AOC. Staff may be added or removed from this group as needed."

- Office Hours, which is a form of meeting that was born as a result of the COVID pandemic.

- Announcement of the policy via Compass

Once draft policies are approved and signed by the agency head, the PSP Division is responsible for posting these policies on Compass for all AOC employees to confer and abide by.

Review of Internal Controls

This evaluation included a review of the internal controls in AOC's HCMP policies and procedures that were in effect during fiscal years (FYs) 2018 through 2023. It also included a benchmarking review of other legislative branch agency policies pertaining to staffing and telework to ensure general alignment with best practices and Office of Personnel Management (OPM) guidance. Although legislative branch agencies are not required to comply with OPM guidance for its programs and operations, AOC is by law[8] required to "establish and maintain a personnel management system that incorporates fundamental principles that exist in other modern personnel systems." Our review of AOC and other legislative branch agency policies showed alliance with key principles and practices as promoted by OPM. However, although these policies were in compliance with fundamental principles of modern personnel management, the leeway given to legislative agencies to depart from OPM practices can create vulnerabilities that require consistent oversight to ensure the spirit and intent of equitable human capital management practices are fulfilled.

This evaluation also included an assessment of past allegations of waste, abuse, and mismanagement within the HCMP. We determined that there are deficiencies within the Human Capital Management (HCM) internal controls (control environment, control activities, information, communication, and monitoring). As a result, the lack of updated and consistent internal controls creates the potential for process gaps and vulnerabilities within the AOC human capital management framework (e.g., operational inefficiencies, employee dissatisfaction, high turnover, misinformation and policy alignment).

Criteria

We examined the initial documentation received from the AOC and utilized the insight gained from discussions with AOC OIG to identify the criteria applicable to the evaluation. We determined that, to achieve the objectives of this evaluation effectively, our assessment must be tailored to evaluate the AOC's adherence to the following elements:

- Laws and regulations applicable to the operation of the AOC HCMP

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[8] 2 U.S.C. § 1831, Architect of the Capitol Human Resources Act.

- AOC's policies, procedures, and other applicable requirements associated with the HCMP that were established and effective during the scope period

- AOC's FY 2022 - FY 2026 Human Capital Strategic Plan

- Allegations of waste, abuse, and mismanagement within the HCMP specific to pre-pandemic and post-pandemic staff retention, implementation of plans, recruitment and hiring

- Other relevant documents

EVALUATION RESULTS

Based on our review of human capital policy communication, maintenance, and implementation across the agency and its impact on the primary evaluation objective areas of *Hiring, Retention, Turnover,* and *QSIs* in our evaluation, we found that HCMD employs structured procedures for creating and disseminating AOC policy, specifically through AOC Order 4-1, Issuing AOC Policy.

However, we also found a total of thirty-eight preliminary findings, issues and/or observations. The AOC's HCMD was provided an opportunity to respond to the preliminary findings, issues/observations and/or to present additional information for review. Our final evaluation of AOC's Human Capital Management Program resulted in four comprehensive findings and twelve recommendations in the areas of greatest need. Specifically, we found:

1. Communication, maintenance, and implementation of human capital policies were deficient

2. HCM operational inefficiencies within the agency

3. Gaps in policy guidance and processes, and deficiencies in oversight procedures

4. Noncompliance with HCMD-owned policies, both at the jurisdiction and division levels

In addition to our findings relating to the primary evaluation objective areas of *Hiring, Retention, Turnover, and QSIs*, we also performed an analysis of the following HCMD Key Performance Indicators (KPIs) for FY 2022 and FY 2023:[9]

- Time to Fill - Direct Hire Positions

- Time to Fill - Competitive Positions

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[9] HCMD's KPIs were identified according to the Human Capital Strategic Plan for FY 2022-2026. For FYs 2022 and 2023, some KPIs were not applicable to our analysis, as AOC was either awaiting agency decision, establishing a baseline, or collecting baseline data for the KPI. Therefore, such KPIs were excluded from our evaluation, and only those that were applicable were included.

- Internal Promotion Rate

- Voluntary Turnover Rate

- Average Cost per Hire - Competitive Positions

- Employee Engagement (FEVS)[10]

- Training Availability Satisfaction[11]

- Architect's Mobility Program Positions

- Career Ladder & Detail Positions

HCMD utilizes its KPIs to measure and monitor performance and progress toward HCS goals, specifically those relating to acquisition, engagement, retention, and development. Using KPIs also helps the division to assess the potential need for course correction to meet such goals.

For FY 2022, HCMD was able to achieve the target for three of the five applicable KPIs, specifically "Time to Fill - Competitive Positions," "Internal Promotion Rate" and "Voluntary Turnover Rate."

HCMD exhibited improvement the following year as well, as the division met the target for five of its seven applicable KPIs for FY 2023, including "Time to Fill - Direct Hire Positions," "Time to Fill - Competitive Positions," "Internal Promotion Rate," "Voluntary Turnover Rate," and Career Ladder & Detail Positions." For all FY 2022 and FY 2023 KPIs, both those achieved and fallen short, HCMD was also able to provide supporting documentation, demonstrating appropriate tracking of their metrics.

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[10] According to the Human Capital Strategic Plan for FY 2022-2026, this KPI is awaiting agency decision.

[11] According to the Human Capital Strategic Plan for FY 2022-2026, this KPI is awaiting agency decision.

FINDING 1

Communication, Maintenance, and Implementation of Human Capital Policies were Deficient

Based on our assessment, we identified three instances where the communication, maintenance, and implementation of human capital policies within the AOC Policy Library[12] and across the AOC's jurisdictions were deficient. These deficiencies could present various HCM risks to the agency's effectiveness, efficiency and overall performance in managing human capital. The following section outlines these three instances.

HCMD-owned Policies within the AOC Policy Library Are Maintained and Updated by a Different Division

According to Principle 14 of the Government Accountability Office's (GAO's) *Standards for Internal Control in the Federal Government*, "management should internally communicate the necessary quality information to achieve the entity's objectives," and such communication must be made throughout the entity and through appropriate methods.[13] Using this principle, we evaluated whether the most current versions of policies are maintained and made available to AOC employees.

We determined that HCMD does not typically maintain historical data, particularly regarding policy revision frequency. Instead, this responsibility falls under the purview of the PSP Division. Consequently, while HCMD serves as the OPR for these policies, it seems that the PSP Division oversees the maintenance of their historical data. This observation indicates an elevated risk of miscommunication regarding the management of HCMD-owned policies.

In light of our observation, HCMD recognized the finding and confirmed that the PSP Division is responsible for maintaining HCMD-owned policies. Nonetheless, we assert that any potential breakdowns in communication concerning human capital policies between these divisions could give rise to various risks in managing the agency's effectiveness, efficiency and overall performance in HCM.

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[12] The AOC Policy Library, found on Compass, is where employees can access a collection of up-to-date policies and procedures and other related controlled documents from across AOC.

[13] United States Government Accountability Office Standards for Internal Control in the Federal Government, September 2014, Section 14.01.

HCMD-owned Policies within the AOC Policy Library Were Not Maintained and Updated in a Timely Manner

According to Principle 12 of the GAO's *Standards for Internal Control in the Federal Government,* "management should implement control activities through policies," and a periodic review of such control activities should be performed.[14] Using this principle, we evaluated whether HCMD-owned policies within the AOC Policy Library are maintained and updated in a timely manner, as this would be a strong indication that periodic reviews of polices are performed.

All AOC policies, which include orders, policy memorandums (PMs), memorandums (MEs), forms and other standard operating procedures, can be found in two places: either individually within the AOC Policy Library or compiled within the AOC Human Resources Policy Volumes 1 and 2, which are also housed in the AOC Policy Library.

To ensure completeness of the AOC Policy Library, we compared the policies listed in the AOC Human Resources Policy Volumes 1 and 2 to the individual policies posted in the AOC Policy Library that denote HCMD as the OPR. Through this comparison, we made the following observations:

- We identified four HCMD-owned policies listed in the AOC Policy Library that were not included in AOC Human Resources Policy Volumes 1 and 2.[15] Upon inquiry, we learned that these volumes were compiled in response to Congressional Oversight requests in 2019-2020 and were not intended to be updated with new or revised policies, as all HR policies were available online. AOC Human Resources Policy Volumes 1 and 2 have since been removed from the AOC Policy Library; this action occurred during our evaluation and following our inquiry. Given that these outdated volumes were previously accessible in the AOC Policy Library, we inferred a potential lack of maintenance of the library, which could lead to confusion among AOC employees relying on the library for guidance.

- We identified nine HCMD-owned policies within the AOC Policy Library that were initially attributed to HCMD as the OPR.[16] However, our subsequent inquiry disclosed that these

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[14] United States Government Accountability Office Standards for Internal Control in the Federal Government, September 2014, Section 12.01.

[15] AOC Order 315-1, Probationary Period Policy; AOC Order 575, Relocation Incentives; AOC ME 731-2, Suitability Determinations and Identification Badge Requests for Supreme Court (SC) Modernization Contract Employees; and AOC ME 731-3, Suitability Determinations and Identification Badge Requests for Capitol Power Plant (CPP) Contract Employees.

[16] The following seven orders and PMs were listed in the AOC Policy Library as being owned by HCMD but are currently owned by the Diversity, Inclusion, and Dispute Resolution Office: AOC Order 591-1, Uniform Policy; AOC Order 24-2, Architect of the Capitol Workplace Anti-Harassment Policy; AOC PM 24-2, Anti-Harassment and Anti-Retaliation; AOC PM 24-2B, Diversity and Inclusion; AOC PM 24-2C, Equal Employment Opportunity; AOC PM 24-5, Reasonable Accommodation; and AOC Order 24-5, Reasonable Accommodation in Employment Policy and Procedures. Likewise, the following two MEs were listed in the AOC Policy Library as being owned by HCMD but are currently owned by the Office of the Chief Security Officer: AOC ME 731-2, Suitability Determinations and

policies had been reassigned to various offices, thus relieving HCMD of their ownership. As a result, we found that the representation of HCMD-owned policies in the AOC Policy Library may be incomplete and not updated under the correct OPR.

In response to these observations, HCMD acknowledged the necessity to update the AOC Policy Library. The division stated that a significant overhaul of the AOC Policy Library, along with the electronic HR Manual, is currently in progress.

We also identified instances where HCMD-owned policies shared identical "Order" numbers, with some designated as PMs and others as AOC Orders (i.e., AOC Order 451-1 and AOC PM 451-1). In response to this observation, HCMD and the PSP Division explained the following:

- A PM can act as stop-gap measure or short fix used to make changes to certain sections or parts of its corresponding AOC Order until the entire AOC Order can be updated.

- A PM can be used as a placeholder for an AOC Order that does not yet exist, or if there is information that only needs the length of a PM to be addressed rather than a lengthier AOC Order.

- In both instances, the PM should contain a reference to a corresponding AOC Order, if applicable. This reference denotes which section of the AOC Order the PM is revising or adding information.

To ensure AOC employees are aware of the specific sections modified or updated within the AOC Order through its corresponding PM, we evaluated eleven PMs available in the AOC Policy Library currently owned by HCMD, or ones previously owned by HCMD but for the changes in ownership previously noted. Through this, we found that in four of the eleven PMs,[17] there was no reference to a corresponding AOC Order number, as previously explained. However, for each of these four PMs, we identified an AOC Order within the AOC Policy Library that could have been referenced based on its order number.[18] Consequently, we inferred that there might be discrepancies in the alignment between a PM and its corresponding AOC Order during preparation.

Identification Badge Requests for Supreme Court (SC) Modernization Contract Employees; and AOC ME 731-3, Suitability Determinations and Identification Badge Requests for Capitol Power Plant (CPP) Contract Employees.

[17] AOC PM 24-2, Anti-Harassment, Anti-Retaliation; AOC PM 24-2B, Diversity and Inclusion; AOC PM 24-2C, Equal Employment Opportunity; AOC PM 900-6, Policy Memorandum Regarding Smoking in the AOC Workplace.

[18] For each of the four PMs mentioned, the following AOC Order was identified as having a similar order number, entailing it could have been used as a reference within each PM:

1. AOC PM 24-2, AOC PM 24-2B, and AOC PM 24-2C all share similar numbering with AOC Order 24-2, Architect of the Capitol Workplace Anti-Harassment Policy.

2. AOC PM 900-6 shares similar numbering with AOC Order 900-1, Drug and Alcohol-Free Workplace Policy. While AOC PM 900-6 and AOC Order 900-1 do not have the exact same order numbers, AOC Order 900-1 was found as a reference within AOC PM 900-4 (refer to footnote 19). As such, both AOC PM 900-4 and AOC PM 900-6 appear to be within the same series of policies as AOC Order 900-1.

HCMD-owned Policies Were Not Administered Consistently at the Jurisdiction Level

According to Principle 12 of the GAO's *Standards for Internal Control in the Federal Government, September 2014,* "management should implement control activities through policies," and responsibilities should be documented through such policies as well.[19] In addition, Principle 14 of these standards notes that "management should internally communicate the necessary quality information to achieve the entity's objectives," and such communication should be made throughout the entity and through appropriate methods.[20] Using these principles, we evaluated whether HCMD-owned policies are administered correctly at the jurisdiction level, to determine if the responsibilities and procedures within the policies are consistently and appropriately communicated to the jurisdiction during implementation.

To gain an understanding of the policy implementation, evaluation, maintenance, compliance and accessibility of HCMD-owned policies agency wide, we surveyed fourteen AOC jurisdictions using relevant questions and made the following observations:

- While most jurisdictions confirmed that they disseminated their policies through various channels, such as meetings or emails, and relied on supervisors to enforce the policy, a few others took additional steps in policy implementation. These additional steps included updating their jurisdiction's internal site with policy changes, discussing policy modifications during meetings, annually distributing a policy acknowledgement form to all employees, or compiling booklets containing essential AOC policies for distribution within the jurisdiction. Consequently, although each jurisdiction outlined a process for policy implementation, evaluation, and ensuring employee compliance, we found that there might be a lack of standardized guidelines across all jurisdictions to ensure consistent communication, enforcement, monitoring and reporting of policies.

- Most jurisdictions indicated that policies are stored on Compass. However, 27 percent of the jurisdictions mentioned utilizing an additional repository of policies, such as a division shared drive, a jurisdiction-specific SharePoint site or a physical employee-only area within the jurisdiction where printed copies are available. Consequently, we inferred potential disparities among jurisdictions regarding the storage of HCMD policies. This increases the risk that as new policies are enacted, some old policies will not be replaced in all locations employees access the policies.

- While jurisdictions affirmed the availability of resources for seeking policy-related clarification, the resources utilized varied among the jurisdictions. This suggests a lack of a designated, centralized resource or POC from the HCMD that jurisdictions can consistently turn to for policy-related questions. In addition, there are inadequate

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[19] United States Government Accountability Office Standards for Internal Control in the Federal Government, September 2014, Section 12.01.

[20] United States Government Accountability Office Standards for Internal Control in the Federal Government, September 2014, Section 14.01.

oversight procedures to ensure the jurisdictions refrain from using non-designated resources, which could lead to potentially inaccurate policy clarifications.

- We also asked the jurisdictions for their input on ways to improve the current processes for policy implementation, evaluation, maintenance, compliance, and accessibility processes. The most frequently mentioned recommendations are summarized as follows:

  o Obtaining additional guidance from the HCMD concerning the agencywide implementation, evaluation, maintenance, compliance and accessibility of HCMD-owned policies

  o Establishing formal processes and communication protocols for introducing new policies or implementing policy changes throughout the agency

  o Setting up a centralized POC within HCMD to assist with policy-related inquiries from all jurisdictions

  o Consolidating the oversight of the Compass site under a single jurisdiction rather than multiple OPRs

Conclusion

During our evaluation, we discovered three instances of deficiencies in the communication, maintenance, and implementation of HCMD-owned policies, affecting both the AOC Policy Library and the AOC's jurisdictions. These findings, including concerns about potential miscommunication of responsibilities between divisions, deficiencies in policy maintenance within the AOC Policy Library, and lapses while administering policies at the jurisdiction level, may stem from the following factors:

- The delegation of policy responsibilities from HCMD to other divisions

- Ambiguity regarding the roles and responsibilities of policy owners, policy maintainers, and the jurisdictions

- A lack of dedicated policy-revising personnel and an abundance of competing priorities

As a result of these factors, any lack of clear communication between HCMD and the PSP Division, inadequate upkeep of the AOC Policy Library, and inadequate policy administration at the jurisdiction level can expose the agency to risks in terms of effectiveness, efficiency and overall performance of HCM. These risks could lead to the following adverse impacts on the agency:

- ***Inconsistent Policies:*** Without clear guidance and responsibility, HCMD policies can be implemented inconsistently across different departments or locations. This can lead to confusion, frustration, and perceptions of unfair treatment among employees.

- *Legal and Compliance Risk:* Failure to properly implement and maintain policies can result in legal and compliance risks for the agency. Without oversight, the organization can be vulnerable to lawsuits, fines, and reputational damage.

- *Employee Dissatisfaction:* Inadequate policies or their inconsistent application can contribute to employee dissatisfaction. When employees perceive that policies are arbitrary or unfair, morale and motivation can decline. This can lead to higher turnover rates, reduced productivity, and difficulty attracting top talent.

- *Loss of Trust and Credibility:* A lack of guidance and responsibility over policy implementation and responsibility over HR policies can erode trust and credibility within the agency. Employees can begin to question the integrity of Human Resources processes and lose confidence in the leadership's ability to create a fair and supportive work environment.

- *Increased Conflict and Disputes:* Without consistent enforcement of policies, conflicts and disputes among employees can escalate. This can create a negative work environment characterized by tension, hostility, and decreased collaboration.

- *Impact on Organizational Culture:* Human Resources policies play a crucial role in shaping organizational culture. When policies are not effectively implemented, maintained, or communicated, it can undermine efforts to foster a positive culture based on values such as fairness, respect, and transparency.

- *Missed Opportunities for Improvement:* Effective policies can drive an agency's performance and innovation. Without proper guidance and responsibility, the agency can miss opportunities to improve processes and achieve strategic goals.

Recommendations

We recommend that the CAO undertake the following actions to rectify the potential deficiencies identified in the communication, maintenance, and implementation of human capital policies within the agency.

1. Ensure Consistent Communication and Collaboration Between Responsible Parties

Review and assess the human capital policy management roles and responsibilities to identify opportunities for improvement in human capital policy management and oversight. Enhance or develop and implement specific measures to foster consistent communication and collaboration between the Human Capital Management Division and the Policy and Special Programs Division.

Recommendation 1 – AOC Comment

AOC concurs with the recommendation and cites AOC Order 4-1, Issuing AOC Policy, as its avenue for defining clear communication and collaboration requirements between the two responsible parties, which includes providing feedback and recommendations on policy drafts, collaborating throughout the process of obtaining and reconciling feedback on draft policies from stakeholders, and notification of and follow up on outdated policies in need of updating.

Additionally, HCMD will hire a dedicated HCMD Policy Analyst who will identify opportunities for improvement and strengthen the agency's human capital policy management and oversight, further enhancing HCMD's communication and collaboration with the PSP Division as it develops new or revises draft policies.

Anticipated completion date: First quarter of Fiscal Year (FY) 2025

Recommendation 1 – OIG Comment

We recognize the AOC's concurrence with the recommendation. The 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.

2. Execute a Timely and Consistent Policy Review Process

Per AOC Order 4-1, Issuing Architect of the Capitol (AOC) Policy, effectively execute the process to verify the assignment of policies to the appropriate Office of Primary Responsibility within the AOC Policy Library, particularly following any transfers or changes in ownership between offices/jurisdictions.

Additionally, this recommendation should include a focus on ensuring that, when applicable, policy memorandums reference the original order number and section of the overarching policies to maintain alignment with their provisions.

Recommendation 2 – AOC Comment

AOC concurs with the recommendation and notes PSP Division as responsible for updating the data housed in the AOC Policy Library. The PSP Division updated ownership of policies in the fall of 2023 and has implemented an internal process to review ownership of policies annually to ensure all policies are appropriately aligned to the correct office/jurisdiction.[21]

Anticipated completion date: Completed

Recommendation 2 – OIG Comment

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[21] In their response, AOC provided a complete, current listing of OCAO policies distinguished by their OPRs, publication types, and policy names. Refer to "Attachment 1: OCAO Policies by Owning Division (As of 8/15/2024)" within Appendix C.

We recognize the AOC's concurrence with the recommendation. The 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.

3. Enhance Policy Governance Framework over the Jurisdictions

Review and assess the policy governance framework over the jurisdictions to identify opportunities to improve policy governance, standards and communication. Enhance or develop and implement a comprehensive policy governance framework across all jurisdictions.

Furthermore, this recommendation should include a focus on designating a Point of Contact at the Human Capital Management Division to handle policy-related inquiries, thereby discouraging reliance on non-designated resources and promoting adherence to policies.

Recommendation 3 – AOC Comment

AOC concurs with the recommendation. Policies are communicated via a variety of mediums, all at the agencywide, jurisdiction, and individual employee levels. HCMD is currently recruiting a dedicated Policy Analyst whose work will include proactive communication and coordination with offices/jurisdictions across the AOC to enhance the policy governance framework for human capital policies and procedures.

Anticipated completion date: First quarter of Fiscal Year (FY) 2025

Recommendation 3 – OIG Comment

We recognize the AOC's concurrence with the recommendation. The 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

HCM Operational Inefficiencies within the Agency

Our evaluation identified instances where HCMD databases, systems, and manual input processes may be causing operational inefficiencies within the AOC, potentially resulting in inaccurate and incomplete data that could impact *Hiring* and *Retention* within the agency. Among these areas of interest and observations, we have highlighted four instances that correspond to the two primary evaluation objective areas.[22]

Inconsistencies or Manual Errors with the Preparation of SF-52 forms for Temporary Promotion Extensions

According to AOC Order 335, Career Staffing Plan, Appendix B, Section 6, "If it is necessary to extend a temporary promotion beyond the expiration date, the Supervisor who initiates the request will notify the employee in writing and submit another SF-52, or an electronic equivalent, to HCMD/TAC seven days before the proposed effective date of the extension. The action requested will be 'Extension of Temporary Promotion NTE (XX days).'" To evaluate adherence with these policy provisions, we selected a sample of five employees during the scope period (FY 2018-FY 2023) who were temporarily promoted and had their temporary promotion extended one or more times. Then, we requested and reviewed the SF-52 forms associated with each sampled employee's extension(s) of temporary promotion and made the following determinations:

- One of the SF-52 forms lacked the date of request for the temporary promotion action.[23] Consequently, we were unable to ascertain whether the SF-52 form for this selected employee was submitted to HCMD/TAC within the requisite seven-day period before the proposed extension's effective date. This suggested inconsistency or manual input error in the preparation and submission process of the SF-52 form.

- We noted discrepancies in the "Action Requested" field of the SF-52 forms for our sampled employees, which deviate from the required statement "Extension of

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[22] For a list of remaining discrepancies and observations that are not mentioned under this finding, refer to Attachment A.

[23] This employee was temporarily promoted to the position of "Architect" from September 25, 2022, through December 3, 2023. Of the four SF-52 forms we received that were associated with this employee's four extensions of temporary promotion, we found that one of the SF-52 forms did not state when the action was requested. Per HCMD's explanation, we learned that the Performance and Accountability (PAR) form for this employee's extension, which is the electronic equivalent of the SF-52 form, could not be issued by the Office/Jurisdiction due to system difficulties. Therefore, we were unable to utilize the PAR to confirm the date when the temporary promotion action was requested.

Temporary Promotion NTE (XX days)" stipulated by policy.[24] As a result, we identified inconsistency or manual input error in the preparation and submission process of the SF-52 forms.

While we observed inconsistencies and manual input errors in the preparation and submission of SF-52 forms, HCMD stated that they perform quality checks of the final SF-52 forms for temporary promotions. As addressed in Attachment A,[25] we observed that jurisdictions regularly submitted SF-52 forms for temporary promotions in an untimely manner, which may have impacted HCMD's quality checks.

Work-Processing Error in the Database or System Used to Track Vacant Positions within AOC

According to AOC Order 335, Career Staffing Plan, Section 21.11.5, "When interviews are conducted to fill a position covered by this Chapter, selecting officials must offer to provide feedback to internal candidates who were interviewed but not selected for the position." To evaluate adherence with this provision, we requested a list of vacancy numbers and relative position titles for open positions at AOC in FY 2023, which we learned was generated using the Monster Talent Acquisition System. After receiving the list, we then developed our sample of eighteen open positions and requested the Vacancy Status Report of the open positions sampled, which showed that the offer to provide feedback to non-selected internal candidates was completed as required by the policy provisions.

Before commencing our testing, we conducted a comparison between our sample of eighteen positions and the data in the Vacancy Status Report to ensure its completeness. During this review, we identified discrepancies in the closing dates for three of the eighteen open positions between the list of vacancy numbers generated using the Monster Talent Acquisition System and the Vacancy Status Report.[26] These inconsistencies suggest a potential processing error

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[24] These four sampled employees have the following statements in the "Action Requested" field of their SF-52 form associated with their temporary appointment extension:

1. According to the SF-52 forms associated with each of this employee's four extensions of temporary promotion, the "action requested" was stated as "Extension of NTE Date," which did not align with the statement in the policy.
2. According to the SF-52 forms associated with each of this employee's two extensions of temporary promotion, the "action requested" was blank. Although the "Nature of Action" field on the SF-52 forms stated, "Ext of Appt NTE 06/03/2023" and "Ext of Detail NTE 10/07/2023," respectively, these forms still did not align with the statement in the policy.
3. According to the SF-52 forms associated with each of this employee's only extension of temporary promotion, the "action requested" was stated as "Extension of Temp Appt," which did not align with the statement in the policy.
4. According to the SF-52 forms associated with this employee's only extension of temporary promotion, the "action requested" was blank. Although the "Nature of Action" field on the SF-52 form states "EXT OF PROMOTION NTE 03-25-2023," this form still did not align with the statement in the policy.

[25] Refer to Attachment A, Finding 4.

[26] The closing dates for the following three open positions sampled differ between the list of vacancy numbers generated using the Monster Talent Acquisition System and the Vacancy Status Report:

within the Monster Talent Acquisition System and/or the Vacancy Status Report system, resulting in discrepancies in vacancy numbers and associated position titles between the two systems.

In response to our observation, HCMD offered insight into situations where the closure date of a vacant position could be extended. However, this does not alleviate the issue that the data in the two systems is not always consistent.

Insufficiencies in Reporting Feedback of Interviewed, Non-Selected Internal Candidates for Vacant Positions to Management

To evaluate whether selecting officials were offering feedback to internal candidates who were interviewed but not selected for vacant positions, we learned that the policy provisions of AOC Order 335, Career Staffing Plan, Section 21.11.5 are further defined by a job aid that outlines the process for offering feedback to interviewed, non-selected internal candidates. Specifically, the job aid notes that the selecting official will complete a form titled "Feedback to Non-Selected Internal Candidates Interviewed Form" and forward it to the HR Specialist at HCMD. In our examination of this form, we discovered that the "Feedback to Non-Selected Internal Candidates Interviewed Form" does not specify which candidate(s) were offered feedback. Instead, it seems that the form serves as a means for the selecting official at the jurisdiction to furnish HCMD with a general statement indicating that feedback was extended to non-selected internal candidates who were interviewed for an open position within the agency. Thus, this form does not provide details regarding which candidate(s) received feedback as well as the total number of candidates offered feedback. Therefore, it seems that the form provides inadequate evidence to assess whether the jurisdictions reported their offer to provide feedback to interviewed, non-selected internal candidates to HCMD.

Inefficient and Untimely Management of Exit Interview Survey Notices

According to AOC Order 296-4, Off-boarding Separating Employees, Section 6.3.2, Workforce Planning (HCMD) will contact departing employees to conduct an exit interview regarding their employment with the AOC. While evaluating whether HCMD was notifying separating employees of the opportunity for an exit interview survey in conjunction with these policy provisions, we determined that while a formal process for ensuring that separating employees are invited to complete an exit interview survey exists as of September 2022,[27] the process may be inefficient. Specifically, we found that this process includes different mediums available to the offices/jurisdictions for notifying the Employee Programs Branch (EPB) when an employee is

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1. CVC-2023-011, Visitor Assistant: "Close Date" per the Monster Talent Acquisition System was November 28, 2022, while "Date Closed" per Vacancy Status Report was November 7, 2022.
2. CVC-2023-010, Visitor Guide: "Close Date" per Monster Talent Acquisition System was November 28, 2022, while "Date Closed" per Vacancy Status Report was November 7, 2022.
3. AOC-2022-298, Custodial Worker: "Close Date" per Monster Talent Acquisition System was June 15, 2023, while latest "Date Closed" per Vacancy Status Report was May 5, 2023.

[27] During the evaluation, we learned that the exit interview survey program was inactive from FY 2018-FY 2021. For more information, refer to Finding 4, Noncompliance with HCMD-owned Policies, Both at the Division and Jurisdiction Levels.

voluntarily separating from the agency, which may cause inefficiencies and subsequent delays in the invitation to complete the exit interview survey. Although the EPB has made efforts to ensure that AOC offices/jurisdictions are aware of the importance of submitting employee separation notifications in a timely manner, we learned that these delays continue to occur. As a result, the inefficiency and untimeliness of this process could lead to further delays in sending exit interview invitations to all eligible employees, and consequently, HCMD might overlook chances to gather insight into the reasons why employees are departing from the agency.

Conclusion

Through our evaluation, we identified four instances of operational inefficiencies that may affect the primary evaluation objective areas of *Hiring* and *Retention* within the agency. These findings pertain to various aspects, including the manual preparation of SF-52 forms for temporary promotion extensions, the database and/or system for tracking vacant positions at AOC, the utilization of the "Feedback to Non-Selected Internal Candidates Interviewed Form" for reporting feedback to management, and the administration of exit interview survey notices. These issues could be triggered by the following factors:

- *Human Error:* Irrespective of the level of training, errors may naturally occur during the manual input of information into the agency's databases and systems.

- *Inadequate Quality Control:* Quality control functions within databases and systems are intended to catch both existing errors and prevent future ones by providing feedback to employees when data may be inputted incorrectly. However, if these quality control mechanisms are inadequate, errors may persist, and new manual input errors may go undetected. This applies not only to individual databases and systems, but also to multiple databases and systems used for interpreting the same data.

- *Lack of Clear Processes:* Ambiguous or obsolete processes can result in confusion, mistakes, and delays in task completion.

Due to these factors, the presence of incomplete and inaccurate data in the agency's databases, systems and manual input procedures can result in inefficiencies, such as the need for rework, and ultimately undermine decision-making processes. For example, inaccuracies or omissions in the systems utilized for monitoring candidates for vacant positions might lead management to overlook providing feedback to interviewed, non-selected internal candidates.

Additionally, the presence of inefficiencies and compromised decision-making within the agency can lead to frustration and demotivation among employees as time is lost resolving discrepancies, ultimately impacting productivity and retention. For example, if an interviewed, non-selected internal candidate does not receive feedback, they may become frustrated with the agency and decide to leave, thereby contributing to increased turnover rates.

Finally, without comprehending the reasons behind employee departures, the agency may overlook addressing fundamental issues that could be adversely affecting their workforce. For example, delays in the offer of an exit interview survey could leave departing employees feeling

undervalued or neglected, thereby potentially harming the agency's reputation, and hindering its ability to attract and retain top talent in the future.

Recommendations

We recommend that the Chief Administrative Officer undertake the following actions to mitigate the operational inefficiencies identified within Human Capital Management Division's databases, systems and manual input procedures.

4. Develop an Effective Review Process of Standard Form 52 Forms

Establish a review process that effectively addresses any inconsistencies or manual input errors encountered during preparation and submission of Standard Form 52 forms.

Recommendation 4 – AOC Comment

AOC concurs with the recommendation. HCMD will establish a review process to ensure that inconsistencies or manual input errors that are not aligned with the AOC Career Staffing Plan Policy are appropriately addressed either during the preparation or submission of Standard Form 52 by AOC offices and jurisdictions.

Anticipated completion date: Third quarter of FY 2025

Recommendation 4 – OIG Comment

We recognize the AOC's concurrence with the recommendation. The 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.

5. Implement Data Management Procedures for Systems and Databases Used to Track Vacant Positions

Establish data management protocols, incorporating routine review and reconciliation of employee data, alongside procedures for data entry and updates.

Recommendation 5 – AOC Comment

AOC concurs with the recommendation. HCMD will implement data management quality review procedures to ensure consistency and reconciliation of employee data involving the agency's human resources information systems and applicable reports.

Anticipated completion date: Third quarter of Fiscal Year (FY) 2025

Recommendation 5 – OIG Comment

We recognize the AOC's concurrence with the recommendation. The 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.

6. Update the "Feedback to Non-Selected Internal Candidates Interviewed Form"

Revise the "Feedback to Non-Selected Internal Candidates Interviewed Form" to incorporate explicit criteria and pertinent evidence validating that feedback was extended to interviewed, non-selected internal candidates for vacant positions.

Recommendation 6 – AOC Comment

AOC concurs with the recommendation. HCMD will revise the "Feedback to Non-Selected Internal Candidates Interviewed Form" to identify the employee names and dates on which feedback was provided or offered to internal candidates who were interviewed for vacant positions.

Anticipated completion date: Third quarter of Fiscal Year (FY) 2025

Recommendation 6 – OIG Comment

We recognize the AOC's concurrence with the recommendation. The 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.

7. Establish Clear Processes and Defined Timelines for Conducting Exit Interviews

Establish clear procedures and defined timelines for administering and conducting exit interviews with separating employees.

Recommendation 7 – AOC Comment

AOC concurs with the recommendation. HCMD will strengthen and regularly communicate the process for offering separating employees the opportunity to participate in the online exit interview survey program.

Anticipated completion date: Third quarter of FY 2025

Recommendation 7 – OIG Comment

We recognize the AOC's concurrence with the recommendation. The 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

Gaps in Policy Guidance and Processes, and Deficiencies in Oversight Procedures

Based on the results of our evaluation, we identified multiple instances where differences between policy provisions and actual processes might stem from potential gaps in the policy's guidance and deficiencies in oversight procedures. These potential gaps and deficiencies could impact the effectiveness of HCMD-owned policies within the AOC Policy Library, as well as primary evaluation objective areas such as *Hiring, Retention, Turnover, and QSIs.* In line with these primary evaluation objective areas, we have outlined the following five instances.[28]

Gaps in the Numbering of Policies Within the AOC Policy Library

To determine HCMD policy numbering scheme and ensure completeness of HCMD active policies we reviewed AOC Order 4-1, Issuing AOC Policy, effective as of September 12, 2022. This directive states that all AOC policies are assigned a policy number based on the subject. Policies also receive a secondary number indicating the policy's position within the subject series.

However, upon reviewing this policy, we observed a lack of systematic guidelines for policy sequencing updates. A structured process of this nature would ensure timely updates to older policies and prompt retirement or revision of outdated policies, thereby ensuring ongoing compliance with regulatory mandates and organizational objectives.

Gaps in the Policy Provisions for Detail Assignments and Probationary Period Service

After reviewing the provisions of AOC Order 335, Career Staffing Plan, and AOC Order 315-1, Probationary Period Policy, we identified the following specific instances where there may be gaps in HCMD's policies that could potentially result in misalignment with performed procedures, which may adversely affect the agency's hiring processes.

- AOC Order 335, Career Staffing Plan, Appendix C outlines the provisions for detail assignments at AOC, including the processes associated with their appointment and possible extension. HCMD informed us that within the procedures for appointing/extending a detail assignment, there exists a provision allowing the Office/Jurisdiction Heads to delegate authority to approve personnel actions to Approving Officials or designated staff at their discretion. However, we noted that this delegation of authority was not explicitly addressed in the policy, potentially resulting in a

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[28] For a list of remaining discrepancies and observations that are not mentioned under this finding, refer to Attachment A.

misalignment between these operational procedures and the policy itself as well as a vulnerability in HCMD's oversight protocols aimed at ensuring adherence with the policy.

In addressing this discrepancy, HCMD referred to the provisions of AOC Order 335, Career Staffing Plan, Section 9.5.1[29] as the basis for permitting the delegation of designated staff, to approve personnel actions. However, it does not explicitly outline the delegation of authority to designated staff for initiating and approving personnel actions on behalf of a supervisor.

- According to AOC Order 315-1, Probationary Period Policy, Section B, to certify the completion of a probationary period, "Supervisors and managers should complete the appropriate Certification Report to retain the employee in his/her permanent position or to propose separation of the employee." To assess proper probationary period completion at the agency, we sampled employees converted from temporary to permanent positions during the scope period (FY 2018-FY 2023) and requested the completed Certification Report for each employee sampled. We identified one sampled employee whose conversion from temporary to permanent appointment did not yield a Certification Report, therefore indicating a probationary period was not served despite being required by the provisions of the policy, specifically AOC Order 315-1, Sections 3.3.1 and 3.4.[30] However, we learned from HCMD that in practice, Section 3.4 is not intended to apply to the employee sampled. HCMD clarified that the policy provisions are meant to apply to any former AOC employee who served a probationary period during their tenure, left the agency, and then was rehired. In such cases, the rehired employee would be required to complete another probationary period due to their return to the agency. While we agree with HCMD's clarification of this provision, in practice it demonstrates a gap in the clarity of the current provisions of AOC Order 315-1 which may cause misinterpretation of the probationary period requirements, and as such, should be revised to align with the procedures practiced by HCMD.

Gaps in the Policy Provisions for Calculating Retention Incentives

As per AOC Order 575-1, Recruitment and Retention Incentives, Section 14.1, "The COO [Chief Operating Officer] may approve a retention incentive of not more than 25 percent of the employee's annual rate of basic pay (including locality pay) in effect at the beginning of the service year, multiplied by the number of years (or fractions of a year) in the service period (not to exceed four years)." Additionally, Section 14.2 states that "the Architect of the Capitol may approve a retention incentive up to 50 percent of the basic pay multiplied by the number of years of the service period (up to four years), as long as the total of all payments does not

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[29] According to AOC Order 335, Career Staffing Plan, Section 9.5.1, AOC Managers and Supervisors are responsible for "providing HCMD/TAC with official requests for personnel actions and the necessary supporting information and documentation required to recruit candidates to fill vacancies and process personnel actions in an efficient and timely manner."

[30] According to AOC Order 315-1, Probationary Period Policy, the completion of the one-year trial probationary period is required of any current employee who changes from a temporary position to a permanent position (Section 3.3.1), regardless if the employee previously completed a probationary period with the AOC or other federal agency (Section 3.4).

exceed 100 percent of the employee's annual rate of basic pay in effect at the beginning of the service period." Upon examination of these policy provisions concerning retention incentives, it became evident that the formula for calculating such incentives affords each manager the discretion to apply a different percentage. Ergo, the policy lacks guidance on selecting the permissible percentage for the retention incentive. Hence, we have identified a potential gap in the policy which may lead to inconsistencies, inequities, and potential conflicts within the agency.

Gaps in the Policy Provisions Regarding Performance Review Documentation

According to AOC Order 430-2, Performance Management for Exempt Personnel, Sections 5.2 through 7.4.3, the Executive is responsible for crafting an Individual Performance Plan (IDP), endorsing the Executive Performance Agreement (EPA) after reviewing and discussing both documents with the supervisor, and outlining individual milestones for the five mandatory Critical Elements (CEs). The completion of the performance assessment process involves the signatures of both the Rating Official (a front-line supervisor) and the Approving Official (either the COO or Architect) on the EPA. To assess compliance with these provisions, we requisitioned a roster of exempt personnel (as outlined in AOC Order 213-1, Exempt Personnel Policy, Section II) within the agency during the evaluation scope period (FY 2018-FY 2023). From this roster, we selected a sample of exempt employees and obtained their respective EPAs and Annual Performance Reviews, each containing the Executive's IDP and CEs. Based on our review, we observed the following discrepancies indicating potential gaps in the policy provisions:

- In one instance within our sample, we determined that the IDP for the period of 2021-2022 was left incomplete. However, as per the EPA, completing the IDP is labeled as "optional and highly encouraged." While this language implies that the IDP is not obligatory, we observed that AOC Order 430-2, Performance Management for Exempt Personnel, does not specify the IDP as optional. Consequently, we identified a potential misalignment between the provisions of the policy and the language used in the EPA.

  In response to our observation, HCMD did not directly address the discrepancy but reaffirmed the language outlined in the EPA.

- For three employees within our sample, we noted that their EPA, spanning either a single performance period or multiple periods, lacked final approval by the Approving Official, whether the COO or the Architect. Despite the EPA indicating that final approval from the Approving Official is "optional," it is mandated by the provisions of AOC Order 430-2, Performance Management for Exempt Personnel, as mentioned previously. As a result, we identified a potential misalignment between the requirements of the policy and the content of the EPA.

  HCMD stated that the 2022-2023 performance review cycle marked the first instance of the agency's annual performance reviews being conducted through an online system. Consequently, for EPAs within the 2022-2023 performance period, final approval by the

Approving Official is required, which aligns with the policy provisions. Conversely, regarding EPAs predating the 2022-2023 period, HCMD reiterated that final approval by the Approving Official is considered optional, as stated on the EPA. However, AOC Order 430-2, Performance Management for Exempt Personnel, does not specify final approval by the Approving Official as optional.

Gaps and Misalignment of the Policy Provisions for QSIs

To assess the alignment of AOC's practices regarding QSIs with established policies, procedures, and relevant requirements during the scope period (FY 2018-FY 2023), we requested a comprehensive list of all QSIs granted to employees within the scope period. This request encompassed details such as recommending official's name, the date QSI was approved, and the name and designation/title of the approving authority. We selected a sample of ten employees who were recipients of QSIs during the scope period and obtained documentation to substantiate the appropriate and timely approval and disbursement of their respective awards. Based on this review we made the following observations:

- For two of the ten employees in our sample, the individuals listed as both the Rating Official and Approving Official for their QSI were the same. AOC Order 451-1, Awards Policy, Section B, delegates authority to jurisdiction heads to approve "Quality Step Increases," with the additional provisions that these jurisdiction heads may also serve as the Rating Official for QSIs. As a result, we determined that the policy may lack clarity regarding segregation of duties standards, which are essential for preventing conflicts of interest and ensuring that no single individual has complete control over all facets of a critical process, thereby mitigating the risks of fraud and errors.

  In response to this discrepancy, HCMD acknowledged the possibility where the Office/Jurisdiction Head may serve as both the recommending and approving official for a QSI and indicated their intention to revise the policy to permit this dual approval authority in specific.

- As per AOC Order 451-1, Awards Policy, Section D.VII.A, "All General Schedule employees with a current 'Outstanding' rating of record are eligible to be considered for a QSI." Upon assessing adherence to this provision, we noted that five of the ten sampled employees who received a QSI during the scope period did not possess an "Outstanding" rating. Instead, they were rated as "Exceptional" or "Exceeds Standards," which deviates from the requirement outlined in the policy.

  HCMD stated that these employees received their performance rating under the new performance evaluation system introduced by AOC in October 2023. AOC PM 451-1, Regarding the Architect of the Capitol's Awards Policy, dated October 1, 2023, was issued to amend AOC Order 451-1, Awards Policy, Section D.VII.A and allow GS employees with a current "Exceptional" rating to become eligible for QSI consideration. While the utilization of the policy memorandum effectively substituted the updated policy provisions, the timing of its release resulted in gaps within the policy framework. For instance, AOC Order 430-1, Performance, Communication and Evaluation System, which came into effect on June 20, 2023, already included provisions aligned with the

new performance evaluation system mentioned by HCMD. However, at the time of the policy's production, AOC PM 451-1, Regarding the Architect of the Capitol's Awards Policy, had not yet been enacted, leading to misalignment between AOC Order 451-1, Awards Policy, and AOC Order 430-1, Performance, Communication and Evaluation System. As a result, it seems that the procedures for policy updates do not adequately consider the revision of interconnected policies, potentially resulting in disparities between policy provisions and agency procedures.

Conclusion

Through our evaluation, we identified five instances highlighting potential gaps in policy guidelines and deficiencies in oversight procedures. These discrepancies have the potential to create disparities between policy provisions and the actual processes carried out within the agency. Such inconsistencies impact the relevance and effectiveness of policies managed by HCMD within the AOC Policy Library, as well as primary evaluation objective areas within the agency, including *Hiring, Retention, Turnover* and *QSIs*. Whether pertaining to inconsistencies in the policy numbering procedures, discrepancies between procedures and policy provisions regarding detail assignments and probationary period service, a lack of guidance concerning retention incentive calculations, disparities between performance evaluation documents and policy provisions, unsegregated approval duties for QSIs, or misalignment of related policies regarding QSIs, each of these findings may stem from the following factors:

- Employees might inconsistently adhere to HMCD policies and procedures due to confusion arising from gaps in the policy or inadequately sequenced policy updates.

- Decentralized processes, where jurisdictions may execute similar procedures differently, coupled with insufficient oversight could lead to a breakdown in communication between different divisions with the agency.

- Formal processes for transitioning key position responsibilities when personnel depart or change positions, possibly due to high turnover within the agency, may not have been implemented.

These factors contribute to a situation where policies may lack relevance and effectiveness, potentially causing employees to become misaligned with the agency's trends and developments. Consequently, inefficiencies in hiring processes, employee dissatisfaction, and overall hinderances to agency operations may occur. This could create uncertainty among employees, leading to disengagement and ultimately potential turnover. Additionally, noncompliance by jurisdictions with policy provisions can lead to fines, penalties, and other legal complications.

Recommendations

We recommend that the Chief Administrative Officer undertake the following activities to address the disparities between policy provisions and actual processes, which may stem from potential gaps in policy guidance and deficiencies in oversight procedures.

8. Retire or Update Outdated or Unclear Policies to Align with Current Regulations and Agency Objectives

Review and assess AOC Order 4-1, Issuing Architect of the Capitol Policy, protocols for update and retirement of outdated policies and identify opportunities to improve policy protocol activities. Enhance or develop and implement protocol measures to affect timely updates to older policies and the prompt retirement or revision of outdated or unclear policies, ensuring continuous alignment with regulatory requirements and organizational objectives.

Recommendation 8 – AOC Comment

AOC concurs with the recommendation. AOC Order 4-1, Issuing AOC Policy, will be updated as a part of the regular policy review cycle to include updated protocols. HCMD is also hiring a Policy Analyst whose responsibilities will include coordinating with the PSP Division to ensure outdated HCMD policies are updated in a timely manner, in accordance with AOC Order 4-1, and aligned to regulatory requirements and organization objectives.

Anticipated completion date: Fourth quarter of FY 2025

Recommendation 8 – OIG Comment

We recognize the AOC's concurrence with the recommendation. The 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.

9. Identify Any Related Policies Requiring an Update

Ensure all interrelated policies are tracked to facilitate the identification of those potentially impacted by the update of a single policy.

Recommendation 9 – AOC Comment

AOC concurs with the recommendation. The AOC Policy Library has been updated to ensure that AOC Orders and related Policy Memoranda, if any, appear sequentially, and HCMD will commit resources for reviewing all HCMD policies, identifying interrelated HCMD policies and facilitating updates as needed.

Anticipated completion date: Fourth quarter of Fiscal Year (FY) 2025

Recommendation 9 – OIG Comment

We recognize the AOC's concurrence with the recommendation. The 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 4

Noncompliance with HCMD-owned Policies, Both at the Division and Jurisdiction Levels

Based on the results of our evaluation, we identified several instances of noncompliance with HCMD-owned policies at both the division and jurisdiction levels. As such, this noncompliance with the provisions of human capital policies may impede the primary evaluation areas of **Hiring, Retention, Turnover** and **QSIs** within the agency. To align these primary evaluation objective areas, we have highlighted four specific instances.[31]

Noncompliance when Conducting and Reporting Exit Interviews

After reviewing the provisions of AOC Order 296-4, Off-Boarding Separating Employees, we identified two instances suggesting potential noncompliance with policy provisions regarding exit interviews for separating employees that could affect **Retention** practices within the agency.

- According to AOC Order 296-4, Off-Boarding Separating Employees, Section 6.3.2, within HCMD, "Workforce Planning (HCMD/WP) will contact departing employees to conduct an exit interview regarding their employment with the AOC." We requested a list of separated employees during the scope period (FY 2018-FY 2023) to assess compliance with the policy provisions. However, the agency reported that the exit interview program was inactive from FY 2018-FY 2021, with no data collected during that period. We also learned that a new automated online exit interview survey was launched in September of 2022. As a result, AOC was not in compliance with policy provisions between FY 2018-FY 2021.

  In response to this discrepancy, HCMD cited the COVID-19 Pandemic Health Emergency as a factor contributing to the absence of exit interview data during this period. However, this explanation did not account for the gap in exit interview data during FY 2018 and FY 2019, as the impact of COVID-19 was primarily felt in FY 2020 and beyond.

- We examined how HCMD utilizes and reports exit interview results as required by AOC Order 296-4, Off-Boarding Separating Employees, Section 6.3.2. HCMD informed us that they synthesize the survey data, identify central themes, recommend solutions, and are scheduled to report the findings to senior management in aggregate. In support, they provided the AOC Exit Survey Data from September 2022 through February 2024 that

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[31] For a list of remaining discrepancies and observations that are not mentioned under this finding, refer to Attachment A.

was presented to senior management (C-Suite members and ChOps leaders) on March 20, 2024, and April 3, 2024, respectively, marking the first presentation since the program's relaunch in 2022 (between September 2022 and November 2022). However, this delayed reporting may impede management from making timely decisions for organizational improvements.

In response to this discrepancy, HCMD explained that they deliberately aimed for meaningful and conclusive data over a year's period, which took additional time for review, synthesis, and presentation preparation. While this decision may justify the lack of timeliness, more frequent reporting on exit survey issues could benefit AOC by enabling management to address potential concerns before they escalate.

Noncompliance with the Maintenance of Telework Application Packages

Per AOC Order 600-1, Telework Program, Effective Date February 7, 2022, Sections 7.4.3, the Office/Jurisdiction Telework Coordinator is mandated to maintain copies of "all approved and denied" telework applications for AOC employees. Similarly, Section 7.5.8 of the policy also requires the Agency Telework Coordinator to maintain copies for "all" telework application packages. To assess compliance with the maintenance of all telework applications, we requested a list of personnel with active telework agreements and their established telework locations for FY 2023. HCMD informed us that the Agency Telework Coordinator only maintains copies of approved/completed application packages in a centralized repository (e.g., the AOC Telework site), while the Office/Jurisdiction Telework Coordinators monitor, track, and retain all approved and denied application packages according to their own methods, as outlined within the policy provisions.[32] Without a centralized repository where all telework application packages, both approved and denied, are maintained, risks to the tracking of telework application packages at the agency may arise, leading to noncompliance with the policy provisions.

In addition, by centralizing the maintenance of approved and denied telework applications, the Agency Telework Coordinator would be better equipped to notice trends in telework across jurisdictions and identify any outliers impeding operations. It is also important that the responsibilities of the Office/Jurisdiction Telework Coordinator and the Agency Telework Coordinator are clarified effectively, both in policy and practice.

Noncompliance and Misalignment with the Policy Provisions Regarding the Submission and Approval of QSIs

According to AOC Order 451-1, Regarding the Architect of the Capitol's Awards Policy, Section D.VII, "To recommend a QSI, or a lump sum performance cash award, the Rating Official will submit a recommendation concurrently with the Performance Appraisal through the digital web-based performance management system." We determined that QSI approvals were not

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[32] According to AOC Order 600-1, Telework Program, Section 7.4.7, the Office/Jurisdiction Telework Coordinator is responsible for monitoring and tracking "all approved and denied telework application packages in a database such as SharePoint, Excel, or an application of their choice."

submitted through the designated digital web-based system as outlined in the policy. Instead, all awards are entered according to a different process than what is stated in the policy.[33] This misalignment suggests that HCMD's procedures for tracking QSIs and maintaining approved awards and justifications may not adhere to policy provisions.

Additionally, according to the same policy provisions, QSIs must be submitted through the digital web-based performance management system by March 31st of each year, aligning with the previous performance review cycle (April 1st- March 31st). However, updated provisions of AOC Order 430-1, Performance, Communication and Evaluation System, as of June 20, 2023, states that the performance review cycle has since changed to October 1st-September 30th. This misalignment between the two policies may result in potential noncompliance with the timing of QSI approvals.

In response to our identification of these discrepancies, HCMD acknowledged the need to update AOC Order 451-1, Regarding the Architect of the Capitol's Awards Policy, pertaining to QSIs to ensure alignment with AOC Order 430-1, Performance, Communication and Evaluation System. The policy updates are currently underway but in limited capacity due to personnel resource challenges.

Conclusion

Our evaluation identified four instances of potential noncompliance with HCMD-owned policies at both division and jurisdiction levels, impacting the primary evaluation objective areas of *Hiring, Retention, Turnover* and *QSIs*. Issues included gaps in the exit interview survey program and its reporting, risks in telework application package maintenance, and varied QSI submission processes due to policy misalignment. These findings may stem from the following factors:

- *Lack of Awareness or Understanding:* Given the agency's diverse offices and jurisdictions, effective information is essential. However, as with any institution, there is the risk of information, particularly regarding policies and procedures, being lost in communication channels. This can lead to a lack of awareness or understanding of policies across various levels of the agency, potentially resulting in noncompliance.

- *Time Pressures and Competing Priorities:* Natural business pressures, such as time management and competing priorities, may cause employees to inadvertently or deliberately violate policy provisions.

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[33] According to HCMD, "All awards entered through the award SharePoint site can be downloaded to an Excel file. This Excel file gets converted to a FESI file and is uploaded to the National Finance Center (NFC), AOC's payroll provider. QSI's cannot be placed in a FESI file as they have to be processed manually by HCMD's Payroll and Processing Branch. FESI is an acronym for Front-End System Interface, and it is used by NFC agencies to batch/transmit data to NFC for processing in NFC's Payroll/Personnel System."

- *Ambiguity and/or Complexities of Policies:* Complex or ambiguous policies at the agency may lead to misinterpretation by employees, resulting in noncompliance.

- *Lack of Oversight:* Minimal oversight of jurisdictional adherence to policy provisions can lead to noncompliance. Lack of oversight may also exacerbate existing noncompliance, allowing it to escalate.

As a result, these factors may lead to divisions and jurisdictions within the agency being noncompliant with HCMD-owned policies. This can cause internal complications, including inconsistent hiring practices, retention challenges due to uncertainty, employee disengagement leading to turnover, and potential mishandling of employee awards and incentives.

Additionally, noncompliance with HCMD-owned policies may result in external consequences, including fines, penalties and legal issues.

Lastly, delaying the reporting of exit interviews to senior management can impact decision-making and organizational improvements in several ways, including:

- *Missed Opportunities for Timely Action:* Late reporting prolongs the resolution of issues raised in exit interviews, hampering the agency's ability to address them promptly.

- *Inability to Address Root Causes:* Timely reporting facilitates the identification of underlying causes of turnover and implementing effective strategies. Delayed reporting may lead to solutions that do not address root causes.

- *Competitive Disadvantage:* Delaying action on exit interview results can disadvantage the agency competitively, as competitors addressing similar issues may attract top talent and outperform the agency over time.

Recommendations

We recommend the Chief Administrative Officer to undertake the following actions to address the noncompliance with Human Capital Management Division-owned policies across the divisions and jurisdictions.

10. Practice Timely Reporting of Exit Interview Survey Results to Management

Practice timely reporting of the exit interview survey program to ensure its results are analyzed consistently and effectively. This includes defining timelines for reporting results to upper management and ensuring prompt action on identified issues.

Recommendation 10 – AOC Comment

AOC concurs with the recommendation. HCMD will establish a regular reporting cadence of exit interview survey results to AOC senior leaders. Identified issues that have simple solutions will be addressed promptly; some of the issues may be systemic and require a longer-term strategy.

Anticipated completion date: Fourth quarter of Fiscal Year (FY) 2025

Recommendation 10 – OIG Comment

We recognize the AOC's concurrence with the recommendation. The 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.

11. Implement and Sustain a Centralized Repository of All Telework Application Packages Across the Agency

Implement a centralized repository where all telework application packages, both approved and denied, across the agency are maintained. This includes establishing a regular review process of the repository to sustain its integrity and ensure consistency, fairness and policy compliance.

Recommendation 11 – AOC Comment

AOC concurs with the recommendation. While HCMD has maintained a centralized database of all approved telework application packages, going forward, HCMD will communicate requirements for AOC Office/Jurisdiction Telework Coordinators to submit denied telework application packages for maintenance in AOC's centralized database.

Anticipated completion date: Fourth quarter of Fiscal Year (FY) 2025

Recommendation 11 – OIG Comment

We recognize the AOC's concurrence with the recommendation. The 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.

12. Review and Align the Processes and Policies Associated with Quality Step Increases

Review and align the processes for submitting, tracking and maintaining Quality Step Increase (QSI) awards with the established policy provisions to address potential noncompliance in QSI submission and approval processes.

Recommendation 12 – AOC Comment

AOC concurs with the recommendation. HCMD will automate the approval process for QSIs to ensure alignment with current applicable AOC policies.

Anticipated completion date: Fourth quarter of Fiscal Year (FY) 2025

Recommendation 12 – OIG Comment

We recognize the AOC's concurrence with the recommendation. The 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.

Sikich CPA LLC

August 29, 2024

APPENDIX A

Scope and Methodology

The scope of this evaluation was the AOC's Human Capital Management Program for the period FY 2018-FY 2023. We conducted this evaluation in Washington, D.C., from July 2023 through July 2024, in accordance with the Council of the Inspectors General on Integrity and Efficiency Quality Standards for Inspection and Evaluation (Blue Book), December 2020. Specific findings within our evaluation were supplemented by the GAO Standards for Internal Control in the Federal Government (Green Book), September 2014,[34] as well. 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 the findings and conclusions based on our evaluation objectives.

The AOC OIG self-initiated this report. Our objective for this evaluation was to assess the efficiency, effectiveness, and internal controls of the AOC Human Capital Management Program activities and operations in accordance with AOC policies, procedures, transformation milestones, human capital strategy and applicable federal laws and regulations.

To conduct this evaluation during the scope period, FY 2018-FY 2023, we adopted a risk-based methodology, concentrating on targeted elements of the Human Capital Management Program that did not cover the training area, as indicated:

- AOC policies and procedures associated with the Human Capital Management Program

- AOC's implementation status of the Human Capital Strategic Plan and associated controls

- AOC Human Capital transformation milestones

- Risk-based areas of the Human Capital Management Program identified during the planning phase of the evaluation

- AOC's adoption of Federal best practices implemented within the Executive branch

Use of Computer-Processed Data

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

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[34] Refer to Finding No. 1 for the specific Green Book provisions used.

Prior Coverage

There had been no prior coverage of the AOC's Human Capital Management Program in the preceding five years.

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: July 24, 2023

TO: Chere Rexroat, RA
Acting Architect of the Capitol

FROM: Christopher P. Failla, CIG
Inspector General

Dr. Michael J Rich, CIG, PMP, CFE, SHRM-SCP
Deputy Inspector General
For Christopher P. Failla, CIG

SUBJECT: Announcement for Evaluation of Architect of the Capitol's (AOC) Human Capital Management (2023-0003-IE-P)

This is to notify you that the Office of Inspector General (OIG) is initiating an Evaluation of AOC's Human Capital Management. Our objective for this evaluation is to assess the efficiency, effectiveness and internal controls of the AOC Human Capital Management Program activities and operations in accordance with AOC policies, procedures, transformation milestones, human capital strategy and applicable federal laws and regulations. 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 or 202.231.2682 or Chico Bennett at Chico.Bennett@aoc.gov or 202.394.2391.

Distribution List:

Teresa Bailey, (Point of Contact for Chief Administrative Officer)
Angela Freeman, Acting General Counsel
Stephen Titus, Project Executive, Liaison to the OIG

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 21, 2024

TO: Christopher P. Failla
           Inspector General

FROM: Thomas E. Austin, PE, CCM, PMP
           Architect of the Capitol

SUBJECT: The Architect of the Capitol Human Capital Management Program Evaluation
           2023-0003-IE-P

Thank you for the opportunity to review and comment on the Office of Inspector General's (OIG) official draft of the subject report. The Architect of the Capitol (AOC) provides the following response:

Recommendation 1: Ensure consistent communication and collaboration between parties responsible for policy ownership and maintenance. Review and assess the human capital policy management roles and responsibilities to identify opportunities for improvement in human capital policy management and oversight. Enhance or develop and implement specific measures to foster consistent communication and collaboration between HCMD and the Policy and Special Programs Division.

AOC Response: Concur. AOC Order 4-1, Issuing AOC Policy, defines clear communication and collaboration requirements between the Policy and Special Programs Division (PSP) and policy owners (the Human Capital Management Division [HCMD] in the case of human capital policies) for the entire lifecycle of a policy. These communication and collaboration requirements include providing feedback and recommendations on policy drafts, collaborating throughout the process of obtaining and reconciling feedback on draft policies from stakeholders, and notification of and follow up on outdated policies in need of updating. AOC Order 4-1 includes multiple requirements around communication, collaboration and maintenance between the Office of Primary Responsibility (OPR) (here, HCMD) and PSP, including:

1. HCMD submitting drafts to PSP (Section 7.7.)
2. PSP providing feedback and recommendations on drafts (Sections 7.8.4. and 7.8.8)
3. PSP providing comments to HCMD, as well as support during reconciliation and backcheck (Sections 8.1.4, 8.1.5., and 8.1.8.)
4. HCMD and PSP collaborating via Policy Management Request Process (Section 8.2.1. and 8.2.4.)
5. PSP notifying HCMD of outdated policies (11.2) and HCMD updating policies (Section 11.3)
6. HCMD and PSP coordinating to ensure policies are in correct format (Section 11.4.)

7.   PSP providing access to historical policies and data via the AOC Policy Library (Section 11.6)

HCMD will hire a dedicated HCMD Policy Analyst who will identify opportunities for improvement and strengthen the agency's human capital policy management and oversight. This role will further enhance HCMD's communication and collaboration with PSP as it develops new or revises draft policies.

Anticipated completion date: First quarter of Fiscal Year (FY) 2025

Recommendation 2: Execute a timely and consistent policy review process. Per AOC Order 4-1, Issuing AOC Policy, effectively execute the process to verify the assignment of policies to the appropriate Office of Primary Responsibility within the AOC Policy Library, particularly following any transfers or changes in ownership between offices/jurisdictions.

AOC Response: Concur. The PSP Division is responsible for updating the data housed in the AOC Policy Library. The PSP Division updated ownership of policies in the fall of 2023 and has implemented an internal process to review ownership of policies annually to ensure all policies are appropriately aligned to the correct office/jurisdiction. Refer to Attachment 1 "OCAO Policies by Owner" for more information.

Anticipated completion date: Completed

Recommendation 3: Enhance policy governance framework over the jurisdictions. Review and assess policy governance framework over the jurisdictions to identify opportunities to improve policy governance, standards and communication. Enhance or develop and implement a comprehensive policy governance framework across all jurisdictions.

AOC Response: Concur. Policies are communicated agencywide via Compass news stories and announcements in the agency's newsletter, *Blueprint.* Employees may access all policies via the central AOC Policy Library at any time. Additionally, HCMD provides briefings and Office Hours when new HCMD policies are published and during major HCMD related activities (e.g., open season for benefits). Presentations, recordings and transcripts of Office Hours are uploaded to Compass and accessible to all employees for review at any time. HCMD employees are available for questions at any time via walk-in, phone or email.

Furthermore, HCMD is currently recruiting a dedicated Policy Analyst whose work will include proactive communication and coordination with offices/jurisdictions across the AOC to enhance the policy governance framework for human capital policies and procedures.

Anticipated completion date: First quarter of Fiscal Year (FY) 2025

Recommendation 4: Develop an effective review process of Standard Form 52 forms. Establish a review process that effectively addresses any inconsistencies or manual input errors encountered during preparation and submission of Standard Form 52 forms.

AOC Response: Concur. HCMD will establish a review process to ensure that inconsistencies or manual input errors that are not aligned with the AOC Career Staffing Plan Policy are

appropriately addressed either during the preparation or submission of Standard Form 52 by AOC offices and jurisdictions.

Anticipated completion date: Third quarter of FY 2025

Recommendation 5: **Implement data management procedures for systems and databases used to track vacant positions across the agency.** Establish data management protocols, incorporating routine review and reconciliation of employee data, alongside procedures for data entry and updates.

AOC Response: Concur. HCMD will implement data management quality review procedures to ensure consistency and reconciliation of employee data involving the agency's human resources information systems and applicable reports.

Anticipated completion date: Third quarter of Fiscal Year (FY) 2025

Recommendation 6: **Update the "Feedback to Non-Selected Internal Candidates Interviewed Form."** Revise the "Feedback to Non-Selected Internal Candidates Interviewed Form" to incorporate explicit criteria and pertinent evidence validating that feedback was extended to interviewed, non-selected internal candidates for vacant positions.

AOC Response: Concur. HCMD will revise the "Feedback to Non-Selected Internal Candidates Interviewed Form" to identify the employee names and dates on which feedback was provided or offered to internal candidates who were interviewed for vacant positions.

Anticipated completion date: Third quarter of Fiscal Year (FY) 2025

Recommendation 7: **Establish clear processes and defined timelines for conducting exit interviews.**

AOC Response: Concur. HCMD will strengthen and regularly communicate the process for offering separating employees the opportunity to participate in the online exit interview survey program.

Anticipated completion date: Third quarter of FY 2025

Recommendation 8: **Retire or update outdated or unclear policies to align with current regulations and agency objectives.** Review and assess AOC Order 4-1, Issuing AOC Policy, protocols for update and retirement of outdated policies and identify opportunities to improve policy protocol activities. Enhance or develop and implement protocol measures to affect timely updates to older policies and the prompt retirement or revision of outdated or unclear policies, ensuring continuous alignment with regulatory requirements and organizational objectives.

AOC Response: Concur. AOC Order 4-1, Issuing AOC Policy, will be updated as a part of the regular policy review cycle to include updated protocols. HCMD is also hiring a Policy Analyst whose responsibilities will include ensuring outdated HCMD policies are updated in a timely manner and in accordance with AOC Order 4-1, Issuing AOC Policy. The HCMD Policy Analyst will coordinate with PSP to address the current backlog of outdated policies and ensure policies align to regulatory requirements and organization objectives.

Anticipated completion date: Fourth quarter of FY 2025

Recommendation 9: Identify any related policies requiring an update. Ensure all interrelated policies are tracked to facilitate the identification of those potentially impacted by the update of a single policy.

AOC Response: Concur. The AOC Policy Library has been updated to ensure that AOC Orders and related Policy Memoranda, if any, appear sequentially. Additionally, HCMD will commit resources for reviewing all HCMD policies, identifying interrelated HCMD policies and facilitating updates as needed.

Anticipated completion date: Fourth quarter of Fiscal Year (FY) 2025

Recommendation 10: Practice timely reporting of exit interview survey results to management. Practice timely reporting of the exit interview survey program to ensure its results are analyzed consistently and effectively. This includes defining timelines for reporting results to upper management and ensuring prompt action on identified issues.

AOC Response: Concur. HCMD will establish a regular reporting cadence of exit interview survey results to AOC senior leaders. Identified issues that have simple solutions will be addressed promptly; some of the issues may be systemic and require a longer-term strategy.

Anticipated completion date: Fourth quarter of Fiscal Year (FY) 2025

Recommendation 11: Implement and sustain a centralized repository of all telework application packages across the agency. This includes establishing a regular review process of the repository to sustain its integrity and ensure consistency, fairness, and policy compliance.

AOC Response: Concur. HCMD has maintained a centralized database of all approved telework application packages. Going forward, HCMD will communicate requirements for AOC Office/Jurisdiction Telework Coordinators to submit denied telework application packages for maintenance in AOC's centralized database.

Anticipated completion date: Fourth quarter of Fiscal Year (FY) 2025

Recommendation 12: Review and align the process and policies associated with QSIs.

AOC Response: Concur. HCMD will automate the approval process for Quality Step Increases to ensure alignment with current applicable AOC policies.

Anticipated completion date: Fourth quarter of Fiscal Year (FY) 2025

Doc. No. 240809-02-01

C-Suite	Owning Division	Publication Type	Policy Name
Office of the Chief Administrative Officer	AOC University	Order	AOC Order 410-1 Training and Employee Development
Office of the Chief Administrative Officer	AOC University	Policy Memorandum	AOC PM 410-1 Career-Broadening Training Opportunities
Office of the Chief Administrative Officer	Curator Division	Order	AOC Order 36-2 Electronic Records Management
Office of the Chief Administrative Officer	Curator Division	Order	AOC Order 36-3 Directive for the Records Management and Archives Program
Office of the Chief Administrative Officer	Curator Division	Order	AOC Order 36-4, Access to Records Maintained in the Curator's Office, Records Management Branch and Photography Branch
Office of the Chief Administrative Officer	Curator Division	Order	AOC Order 36-5 Creation and Maintenance of AOC Records
Office of the Chief Administrative Officer	Diversity, Inclusion and Dispute Resolution Office	Order	AOC Order 24-1 ADC Conciliation Program Guide
Office of the Chief Administrative Officer	Diversity, Inclusion and Dispute Resolution Office	Order	AOC Order 24-2 Workplace Anti-Harassment Policy
Office of the Chief Administrative Officer	Diversity, Inclusion and Dispute Resolution Office	Order	AOC Order 24-4 Affirmative Employment Program
Office of the Chief Administrative Officer	Diversity, Inclusion and Dispute Resolution Office	Order	AOC Order 24-5, Reasonable Accommodation in Employment
Office of the Chief Administrative Officer	Diversity, Inclusion and Dispute Resolution Office	Policy Memorandum	AOC PM 24-2 Anti Harassment, Anti Retaliation
Office of the Chief Administrative Officer	Diversity, Inclusion and Dispute Resolution Office	Policy Memorandum	AOC PM 24-28 Diversity and Inclusion
Office of the Chief Administrative Officer	Diversity, Inclusion and Dispute Resolution Office	Policy Memorandum	AOC PM 24-2C Equal Employment Opportunity
Office of the Chief Administrative Officer	Diversity, Inclusion and Dispute Resolution Office	Policy Memorandum	AOC PM 24-5 Reasonable Accommodation
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 213-1 Exempt Personnel Policy
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 213-2, Senior Rated Pay Plan
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 290-1 HCMD Delegation of Authority
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 296-4 Off-Boarding Separating Employees
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 310-1 Employment of Relatives
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 316-1 Probationary Period Policy
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 316-1 Separation of Non-Permanent (Temporary) Employees
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 335 Career Staffing Plan Policy
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 335-1 Veterans Preference Policy
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 335-4 Architects Mobility Program
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 335-5 Cooperative Education Program
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 335-7 Re-Employed Retired Annuitants Policy
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 335-8, Summer Employment
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 430-1 Performance Communication and Evaluation System
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 430-2 Performance Management for Exempt Personnel
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 430-3 Performance System for Temporary WG and WG Equivalent Employees in the Construction Division
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 451-1 Awards Policy
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 530 Pay Under the Architects Wage System
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 532-2 Hazardous Duty Pay and Environmental Differential Pay for Capitol Power Plant Utility Distribution System Policy
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 537-1 Student Loan Repayment Program
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 550-1 Overtime Policy
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 550-2 Supervisory Pay Differentials with 2018 Memo
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 560-3 Time and Attendance Policy and Procedures
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 575 Relocation Incentives
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 575-1 Recruitment and Retention Incentives
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 600-1 Telework Program
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 610 Hours of Duty
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 610-1 Alternative Work Schedule Policy
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 610-2 Community Service Policy
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 610-3 Emergency Employees Policy

Attachment 1: OCAO Policies by Owning Division (As of 8/15/24)

Office	Division	Type	Policy
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 630-1 Absence and Leave Policy
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 630-2 Family and Medical Leave Act Policy
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 752-1 Discipline
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 752-2 Standards of Conduct
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 771-1 Grievance Policy
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 792-1 Employee Assistance Program
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 810-1 Workers' Compensation Program Policy
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 900-1 Drug and Alcohol Free Workplace
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 900-2 Workplace Violence Prevention Policy
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 900-3 Transit Benefits Program Policy
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 900-5 CDL Controlled Substances and Alcohol Testing Program
Office of the Chief Administrative Officer	Human Capital Management Division	Order	AOC Order 900-7 Wellness Program Policy
Office of the Chief Administrative Officer	Human Capital Management Division	Policy Memorandum	AOC PM 630-4 Adverse Weather Policy
Office of the Chief Administrative Officer	Human Capital Management Division	Policy Memorandum	AOC PM 213-2 Updating Order 213-2 Senior-Rated Pay Plan, Awards and Annual Leave
Office of the Chief Administrative Officer	Human Capital Management Division	Policy Memorandum	AOC PM 451-1 Regarding the AOC's Awards Policy
Office of the Chief Administrative Officer	Human Capital Management Division	Policy Memorandum	AOC PM 600-1 Telework Program
Office of the Chief Administrative Officer	Human Capital Management Division	Policy Memorandum	AOC PM 900-1 Drug and Alcohol-Free Workplace
Office of the Chief Administrative Officer	Human Capital Management Division	Policy Memorandum	AOC PM 900-4 Implementation of a Pre-Employment Drug Testing Program
Office of the Chief Administrative Officer	Human Capital Management Division	Policy Memorandum	AOC PM 900-6 Smoking in the AOC Workplace
Office of the Chief Administrative Officer	Human Capital Management Division	Standard Operating Procedure	AOC SOP 900-3 Time Clocks - Standard Operating Procedure
Office of the Chief Administrative Officer	Information Technology Division	Order	AOC Order 7-1-1 Authority Policy and Responsibility of the Chief Information Security Officer
Office of the Chief Administrative Officer	Information Technology Division	Order	AOC Order 7-2-5 Accessing AOC Employee Electronic Data and Files
Office of the Chief Administrative Officer	Information Technology Division	Order	AOC Order 7-4 Information Technology Security
Office of the Chief Administrative Officer	Information Technology Division	Order	AOC Order 8-2 Information Technology Management
Office of the Chief Administrative Officer	Information Technology Division	Order	AOC Order 8-3 Information Technology Governance Charter
Office of the Chief Administrative Officer	Information Technology Division	Order	AOC Order 8-4 Accountable IT Property
Office of the Chief Administrative Officer	Information Technology Division	Order	AOC Order 8-5, AOC IT Resources and De Minimis Use
Office of the Chief Administrative Officer	Information Technology Division	Policy Memorandum	AOC PM 7-4 Artificial Intelligence Responsible Use
Office of the Chief Administrative Officer	Information Technology Division	Policy Memorandum	AOC PM 7-5 International Travel Policy Memorandum
Office of the Chief Administrative Officer	Information Technology Division	Order	AOC Order 4-36, Privacy Policy
Office of the Chief Administrative Officer	Office of the Chief Administrative Officer	Order	AOC Order 280-2 Assignment of Responsibilities and Authorities in the AOC
Office of the Chief Administrative Officer	Office of the Chief Administrative Officer	Order	AOC Order 4-22 Succession to Act as the Architect of the Capitol
Office of the Chief Administrative Officer	Office of the Chief Administrative Officer	Order	AOC Order 4-23 Central Staff Jurisdiction Occupational Safety and Health Committee
Office of the Chief Administrative Officer	Office of the Chief Administrative Officer	Order	AOC Order 591-1 Uniform Policy
Office of the Chief Administrative Officer	Office of the Chief Administrative Officer	Order	AOC Order 591-2 Uniform Committee Charter
Office of the Chief Administrative Officer	Office of the Chief Administrative Officer	Policy Memorandum	AOC PM 4-12B Succession to Act as the Architect of the Capitol
Office of the Chief Administrative Officer	Office of the Chief Administrative Officer	Policy Memorandum	AOC PM 4-17 Relationships Between Supervisors and Subordinates
Office of the Chief Administrative Officer	Office of the Chief Administrative Officer	Standard Operating Procedure	AOC SOP 4-6 Correspondence Management Record (CMR) Workflow SOP
Office of the Chief Administrative Officer	Office Services Division	Standard Operating Procedure	AOC SOP 8-1-6 Office Equipment Standards
Office of the Chief Administrative Officer	Policy and Special Programs Division	Order	AOC Order 4-3 Issuing AOC Policy
Office of the Chief Administrative Officer	Supplies, Services and Material Management Division	Order	AOC Order 34-2, Fleet Management
Office of the Chief Administrative Officer	Supplies, Services and Material Management Division	Order	AOC Order 34-3 Defense Priorities and Allocations System (DPAS)
Office of the Chief Administrative Officer	Supplies, Services and Material Management Division	Order	AOC Order 34-45, Personal Property Manual

Attachment 1

ATTACHMENT A

Below is a list of the remaining discrepancies and observations from our evaluation categorized by the primary evaluation objective areas of *Hiring, Retention, Turnover,* or *QSIs.* For corresponding conclusions and recommendations, please refer to the relevant findings within the body of the report.

Finding 2 — HCM Operational Inefficiencies within the Agency

In at least five instances, our requests to HCMD for documentation yielded either partial or ambiguous information, suggesting potential operational inefficiencies within the agency. These instances are detailed and highlighted by the documentation requested, information received, and resulting operational inefficiency in each case.

Evaluation Objective Area — Hiring

- We requested a list of positions filled through interviews during the scope period (FY 2018-FY 2023) and their associated referral lists. While we received what we believed to be the requested information, HCMD explained that the Monster Hiring Management module used for compiling the list allows manual data entry for certain fields, potentially excluding some positions. As a result, we found the received information may be incomplete due to manual processes in the module lacking adequate quality control.

- We requested a list of positions that were filled via the direct-hire method and other methods (through interviews or tentative selection made by supervisors for hard-to-fill positions) between the scope period (FY 2018-FY 2023). HCMD provided information from June 2021 onwards. HCMD explained that the Monster Onboarding System used for compiling the list was not implemented until June 2021. Consequently, historical data before this period would require an extension of time and additional effort to provide. While we agreed to this approach, we noted the data accessibility limitations.

- We requested a list of candidates who applied to open positions in FY 2023, including a field to identify internal and external candidates. However, the information received lacked this distinction. HCMD explained that the current database used for compiling this list does not readily track this distinction, and manual extraction may be time-consuming. Consequently, the database's limitations may hinder feedback to interviewed, non-selected internal candidates as required by the policy,[35] potentially impacting retention and turnover as well.

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[35] According to AOC Order 335, Career Staffing Plan, Section 21.11.5, "When interviews are conducted to fill a position covered by this Chapter, selecting officials must offer to provide feedback to internal candidates who were interviewed but not selected for the position."

- We requested the Vacancy Status Report to verify compliance by offering feedback to interviewed, non-selected internal candidates. Although we received the report, HCMD clarified our initial misinterpretation of it. However, we observed that the Vacancy Status Report lacks standardization and explanatory documentation for its fields. This ambiguity could lead to misguided processes and misinformed decisions due to inaccurate data analysis.

Evaluation Objective Area — Retention

- To assess employee participation in exit interviews, we selected a sample that included eight employees that separated from the agency after September 1, 2022, and requested documentation to confirm communication of the online exit interview survey to such employees. HCMD provided documentation supporting that the online exit interview survey was provided to two employees but was unable to provide support for the remaining six employees.[36] This suggests inadequate maintenance of documentation on exit interview survey communication to separating employees, leading to inefficient tracking of survey participation.

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[36] We initially selected a sample of eight permanent employees and ten non-permanent employees, respectively, who voluntarily separated from the agency during the scope period (FY 2018-FY 2023). However, we learned that only five of the eight permanent employees and three of the ten non-permanent employees within our samples were applicable to this testing, as their separation from the agency occurred after the launch of the new exit interview survey program on September 1, 2022, and exit interview survey data for employees who separated prior to this launch was not maintained adequately.

Finding 3 — Gaps in Policy Guidance and Processes, and Deficiencies in Oversight Procedures

Evaluation Objective Area — Hiring

- To assess the appropriateness of temporary promotions at the agency, we sampled exempt and non-exempt employees promoted during the scope period (FY 2018-FY 2023). However, we found no policy provisions governing temporary promotion to exempt positions, suggesting a potential policy gap.

  In response to our observation, HCMD cited U.S. Code and AOC Order 335, Career Staffing Plan, to support the Architect's authority on temporary promotions, but these provisions lack clarity on extending temporary promotions for exempt employees.

- During our review of temporary promotions at the agency during the scope period (FY 2018-FY 2023), we encountered ambiguity in the policy provisions that may be unclear as to whether an employee "may not be promoted to the same position for more than one year" for only the initial temporary promotion or for an aggregate of temporary promotion extensions.[37] Although no employees in our sample exceeded the one-year limit for their initial temporary promotion, one employee had a total temporary promotion tenure of 434 days through multiple extensions. This suggests a potential gap in policy provisions regarding the aggregate duration of temporary promotions.

  In response to our observation, HCMD verbally confirmed that temporary appointment extensions should not circumvent the one-year limit.

Evaluation Objective Area — Retention

- To assess proper recommendation and approval of recruitment incentives at the agency during the scope period (FY 2018-FY 2023), we examined sampled employees who received retention incentives and their recommendation forms.[38] During our testing, we noted instances where retention incentives were approved by the CAO instead of the designated authorities (i.e., the Architect or COO).[39] However, the CAO had been granted approval authority by the Architect through a memorandum.[40] Despite this authority, approval was not granted in accordance with relevant policies and forms (i.e., AOC Form 571-1, Recommendation for Recruitment and/or Retention Incentive, and

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[37] AOC Order 335, Appendix B, Section 3.

[38] AOC Form 571-1, "Recommendation for Recruitment and/or Retention Incentive".

[39] According to AOC Order 575-1, Appendix A (AOC Form 571-1), a recommendation for a recruitment and/or retention incentive must include approval from the Architect or the COO if the incentive is "up to 25% of rate of basic pay".

[40] Authority to approve retention incentives was given to the CAO through a memorandum from the Architect sent on October 19, 2022.

AOC Order 575-1, Recruitment and Retention Incentives), indicating a gap in policy provisions.

In response to our finding, we became aware of a CAO-owned policy detailing the authorities and responsibilities of the CAO.[41] Upon review, we found that the CAO's authority to approve retention incentives was not specified in this policy either, revealing gaps in the provisions of another relevant policy.

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[41] AOC Order 250-2, "Assignment of Authorities and Responsibilities in the Architect of the Capitol (AOC)."

Finding 4 — Noncompliance with HCMD-owned Policies, Both at the Division and Jurisdiction Levels

Evaluation Objective Area — Hiring

- To assess compliance with temporary promotions, we sampled exempt and non-exempt employees who experienced a temporary promotion during the scope period (FY 2018-FY 2023) and had their promotion extended one or more times. In each instance, we made the following observations for two of the four non-exempt employees sampled:

  - We did not receive the requested vacancy announcement or memorandum demonstrating competition of the sampled employees' initial temporary promotion of greater than 120 days.[42]

  - We did not receive the requested written notice to the employee associated with the extension of temporary promotion.[43]

- To evaluate compliance with policy provisions on temporary promotions, we sampled exempt and non-exempt employees who received a temporary promotion and subsequent extensions during the scope period (FY 2018-FY 2023). Our review revealed that approximately three of the four of the non-exempt employees sampled lacked timely submission by AOC offices/jurisdictions to HCMD/TAC of the SF-52 form, or electronic equivalent, for their temporary promotion extensions, indicating potential noncompliance with policy provisions. [44]

  In response to this instance of potential noncompliance, HCMD did not directly address our finding. Instead, they elaborated on the temporary promotion extension process and stressed its alignment with AOC Order 335, Career Staffing Plan.

- To assess proper probationary period completion at the agency, we sampled employees converted from temporary to permanent positions during the scope period (FY 2018-FY 2023) and requested the completed Certification Report for each employee sampled.[45]

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[42] According to AOC Order 335, Career Staffing Plan, Appendix B, Section 4, "Temporary promotions for more than 120 days, generally, must be made subject to competition."

[43] According to AOC Order 335, Career Staffing Plan, Appendix B, Section 6, "If it is necessary to extend a temporary promotion beyond the expiration date, the Supervisor who initiates the request will notify the employee in writing."

[44] According to AOC Order 335, Career Staffing Plan, Appendix B, Section 6, "If it is necessary to extend a temporary promotion beyond the expiration date, the Supervisor who initiates the request will…submit another SF-52 or an electronic equivalent, to HCMD/TAC seven days before the proposed effective date of the extension."

[45] According to AOC Order 315-1, Probationary Period Policy, Section B, to certify the completion of a probationary period, "Supervisors and managers should complete the appropriate Certification Report to retain the employee in his/her permanent position or to propose separation of the employee."

Upon further inquiry with HCMD, we learned that only five of the eight sampled employees required a completed Certification Report. However, we did not receive the Certification Reports for any of these sampled employees, as HCMD explained that they did not receive them from the respective AOC office/jurisdiction. While this statement initially suggested testing limitations, the absence of documentation stemmed from potential noncompliance within AOC offices and jurisdictions.[46]

Evaluation Objective Area — Turnover

- To assess the timeliness of an employee's Rating of Record completion during the performance review cycle, we sampled House of Office Building employees who underwent an annual performance evaluation within the FY 2023 review cycle, spanning from October 1, 2022, through September 30, 2023. After reviewing each of these employees' annual performance evaluation, we found that seven of the twenty-six sampled employees lacked a completed Rating of Record within forty-five days post rating cycle closure.[47]

  In response to this finding, HCMD detailed the parties and steps involved in the Rating of Record review and approval process. While they mentioned sending reminders to responsible parties ensure timeliness, this did not directly address the noncompliance with policy provisions we observed.

- To assess proper final review and approval of employee telework packages, we examined active telework agreements during FY 2023. Within our sample of employees, we observed that none of them had their telework package approved by the Agency Telework Coordinator, indicating noncompliance with the policy provisions.[48]

  In response to our finding, HCMD stated that all employees participating in the agency's telework program were asked to complete new telework packages as of November 6, 2023, which resulted in over 3,000 documents being submitted for review in a brief period of time. HCMD noted that this was a substantial workload for the Agency Telework Coordinator.

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[46] According to AOC Order 315-1, Probationary Period Policy, Section 8.3, the supervisor/manager at the jurisdiction must return completed Certification Reports "to the Human Capital Management Division, Payroll and Processing Branch".

[47] According to AOC Order 430-1, Performance, Communication and Evaluation System, Section 10.4.3, "The rating official will complete a Rating of Record within 45 days of the end of the rating cycle." Therefore, for the FY 2023 performance review cycle, the Rating of Record would need to be completed by November 15, 2023 (i.e., 45 days from the end of the rating cycle).

[48] According to AOC Order 600-1, Telework Program, Section 7.4.5, following the Office/Jurisdiction Telework Coordinator's verification "that all signatures and pertinent forms are included in the telework application package," the telework application package is submitted "to the Agency Telework Coordinator for final review and approval."

ACRONYMS AND ABBREVIATIONS

AOC	Architect of the Capitol
CAO	Chief Administrative Officer
CAP	Corrective Action Plan
CHCO	Chief Human Capital Officer
ChOps	Chief of Operations
COO	Chief Operating Officer
EPB	Employee Programs Branch
FY	Fiscal Year
GAO	Government Accountability Office
HCS	Human Capital Strategy
HCM	Human Capital Management
HCMD	Human Capital Management Division
HCMD/ELRB	Human Capital Management Division, Employee Labor and Relations Branch
HCMD/TAC	Human Capital Management Division, Talent Acquisition and Classification Branch (also referred to as HCMD/TAC)
HCMP	Human Capital Management Program
KPI	Key Performance Indicator
ME	Memorandum
NTE	Not-to-Exceed
OCAO	Office of the Chief Administrative Officer
OIG	Office of the Inspector General
OPR	Office of Primary Responsibility
PM	Policy Memorandum
PMR	Policy Management Request
POC	Point of Contact
PSP	Policy and Special Programs
QSI	Quality Step Increase
SF-52	Standard Form 52