

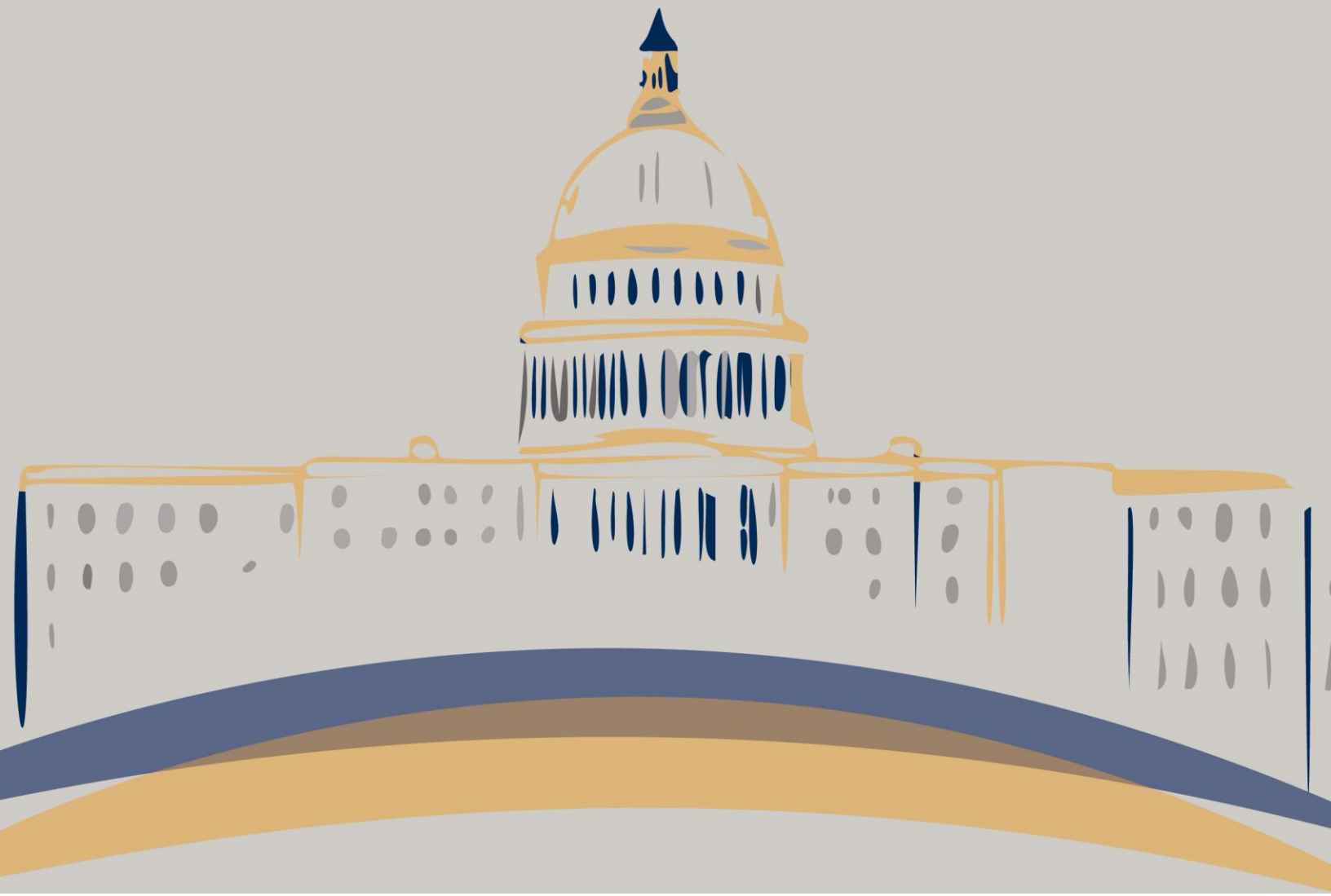


Architect of the Capitol

Office of Inspector General

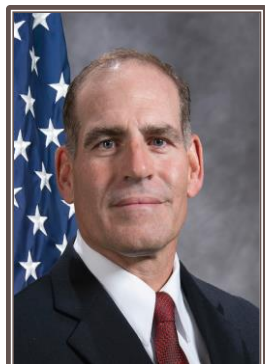
Work Plan

Fiscal Year 2025





Message from the Inspector General



I am pleased to present the Office of Inspector General (OIG) annual Work Plan for Fiscal Year (FY) 2025. This publication describes the audits, inspections, evaluations and follow-up activities planned in support of the OIG's vision and mission. These activities will advance our oversight agenda for the Architect of the Capitol (AOC).

The AOC OIG is dedicated to delivering timely, independent, impactful and high-quality work products that promote accountability, efficiency and effectiveness; working with stakeholders to hold accountable those who engage in fraud, waste and abuse; communicating effectively to support informed decision-making and effect positive change; and increasing collaboration to increase the benefits of the OIG's work.

The AOC OIG's goal is to ensure that our work strengthens accountability and integrity and promotes positive change within the AOC.

The AOC OIG uses several criteria to identify the activities to focus on each year, including:

- AOC OIG goals and objectives
- Management Opportunities and Performance Challenges facing the AOC
- Stakeholder priorities promoting efficiency and effectiveness in the execution of AOC programs and operations
- Results from organizational risk assessments
- Congressional mandates
- Availability of resources and expertise

This work plan will evolve, as necessary, to ensure that the OIG oversight operations remain relevant, timely and responsive to the priorities of the AOC and Congress.

We look forward to continuing to work with the AOC and the Congress in meeting our goals and fulfilling our mission.

Christopher P. Failla, CIG, CFE

Inspector General



MISSION

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

VISION

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

RISE VALUES

Respect — We treat one another with civility and kindness, so that we honor the value and dignity of all people.

Integrity — We demonstrate honesty, ethics and reliability, so that we earn trust and do what is right.

Safety — We are governed by the foundation of safety always, so that we can feel safe, make safe and be safe.

Empowerment — We are one team seeking better ways to do our work, so that we all contribute to the success of the AOC.

REPORT FRAUD, WASTE AND ABUSE



Confidential Toll-Free Hotline: 877.489.8583



OIG Website & Hotline Report: <https://aocoig.oversight.gov/>



X: [@aocoig](https://twitter.com/aocoig)



Email: hotline@aac-oig.org



Visit: Fairchild Building, Ste. 518, 499 South Capitol St. SW, Washington, DC 20515

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OVERSIGHT RESPONSIBILITIES AND ORGANIZATION

Permanent authority for the care and maintenance of the United States Capitol by the AOC derives from Section 1811 of Title 2 of the United States Code. The AOC is responsible for the maintenance, operation, development, and preservation of more than 18.4 million square feet of buildings and more than 570 acres of grounds. This includes the U.S. Capitol, House and Senate office buildings, the U.S. Capitol Visitor Center, the Library of Congress, the Supreme Court of the United States, the U.S. Botanic Garden, the Capitol Power Plant and other facilities. The AOC also provides professional expertise regarding the preservation of architectural and artistic elements entrusted to its care and provides recommendations concerning design, construction and maintenance of the facilities and grounds. The AOC is also responsible for the upkeep and improvement of the U.S. Capitol Grounds and the support of the quadrennial inaugural ceremonies and other ceremonies held on the Capitol campus.

The AOC OIG's mandate is broad and comprehensive, involving oversight of the full scope of AOC programs and operations, including more than 2,400 employees, and funded via annual appropriations of approximately \$1.13 billion.

The AOC Inspector General (IG) Act of 2007, 2 U.S.C. § 1808, established the OIG as an independent, objective office within the AOC and applies certain sections of the IG Act of 1978, as amended, that detail the IG's duties and authorities and establishes employee protections from retaliation for contacting the OIG or participating in OIG activities. The IG reports to and is under the general supervision of the Architect of the Capitol. The OIG's duties are to:

1. Conduct, supervise and coordinate audits and investigations relating to AOC programs and operations.
2. Review existing and proposed legislation and regulations that impact AOC programs and operations and comment in the Semiannual Report regarding the impact on the economy and efficiency or the prevention and detection of fraud and abuse of such legislation and regulations.
3. Recommend policies for AOC activities to promote economy and efficiency or prevent and detect fraud and abuse in its programs and operations.
4. Provide a means of keeping the AOC and Congress fully and currently informed about problems and deficiencies relating to the administration of AOC programs and operations and the need for and progress of corrective action. This is generally done by issuing a Semiannual Report to the Architect of the Capitol and Congress.

OIG WORK PLANNING PROCESS

The AOC OIG assesses relative risks in the programs for which it has oversight authority and does so to identify areas most in need of attention and, accordingly, to set priorities for the sequence and proportion of resources to be allocated. The OIG uses a strategic planning process that carefully considers current and emerging agency programs, operations, risks and management challenges. As part of its triennial strategic planning process, the OIG engaged an independent third-party (Kearney & Company, P.C. (Kearney)) to conduct an organizational risk assessment, as well as review and evaluate all AOC jurisdictions and Capitol Construction and Operations (CCO) offices/divisions, each with its own specific program responsibilities, to identify and rank any significant risk areas and their overall effect on the risk profile for the AOC. The following enterprise-wide risk observations have been arranged in order of risk priority (Table 1).

Table 1. Summary of AOC-wide FY23 Risk Assessment Observations in Brief

Risk Domain	AOC-Wide Risk Observations
Internal Control Risk	<ul style="list-style-type: none"> • Leadership turnover and its impact upon the resiliency of the AOC's policies, procedures, and processes, as well as the effectiveness of the AOC succession plan. • Financial leadership turnover and its impact upon the AOC financial reporting and financial management procedures and protocols. • Documented policies, procedures, and processes not reflecting realigned roles, responsibilities and protocols under AOC reorganization. • Split of contracting offices under AOC reorganization has resulted in increased operational, communication and potential compliance challenges.
Stakeholder/Oversight Risk	<ul style="list-style-type: none"> • Communication and expectation challenges continue to be experienced between oversight stakeholders and jurisdictions. • Lack of sufficient resources and personnel to effectively respond to oversight stakeholder expectations.
Strategic Risk	<ul style="list-style-type: none"> • Financial planning uncertainty, due to possible budget constraints, and its impact on AOC mission service-level capability. • Lack of realized benefits and efficiencies by stakeholders and management personnel from AOC reorganization.
Cybersecurity and Critical Infrastructure Risk	<ul style="list-style-type: none"> • Physical security awareness is not engrained in AOC's organizational culture and processes. • Inconsistent physical security awareness and sharing of threat assessment information across the AOC office and jurisdiction leadership. • Lack of centralized emergency management and required participation by all offices and jurisdictions.
Human Capital Risk	<ul style="list-style-type: none"> • Attraction and retention of AOC's skilled trade workforce in a highly competitive environment with commercial organizations and other Government agencies. • AOC's workplace reputation and culture negatively impact employee recruitment and retention for the organization. • Lack of sufficient resources and personnel to support recruitment and meet current Human Resource demands from within AOC.

Risk Domain	AOC-Wide Risk Observations
	<ul style="list-style-type: none"> Employee recruitment and retention constraints by the AOC's current wage/grade system, a time-to-hire process that is longer than the market norm, and the newly issued AOC Return to Office policy. The AOC University does not include training for all office/jurisdiction skillsets despite the university receiving general favorable feedback from the offices and jurisdictions. Despite a strong U.S. Capitol Police presence, certain jurisdiction employees work under heightened security concerns from possible external threats (e.g., unattended packages) due to the respective jurisdiction's mission to engage with the public. These workplace safety concerns have resulted in an adverse impact on some staff when an incident has occurred and possible increased risk of AOC's Employee Assistance Program not effectively meeting the needs of the staff.
Program/Project Risk	<ul style="list-style-type: none"> The current design and construction resource capacity is not serving the AOC in an appropriate manner to ensure sustainable success. The Office of Chief Engineer (OCE) and jurisdiction personnel report resource constraints. Keeping up with the project workload is a challenge, as it impacts client satisfaction and AOC reputation and trust.
Legal/Compliance Risk	<ul style="list-style-type: none"> Inconsistent third-party provider compliance audit/reviews. Inconsistent compliance with the established document control process.

For a complete definition of each risk domain please see [Table 5: Risk Domains Defined.](#)

RISK ASSESSMENT OBJECTIVES AND APPROACH

The overall objective of the consulting engagement was to plan and conduct an independent organizational risk assessment to identify and assess the nature of AOC's programs and operations, along with their performance measures and anticipated outcomes, scope and dollar magnitude, staffing and budgetary trends, perceived vulnerabilities and inherent risks. As part of the assessment, Kearney defined risks as events or occurrences that would prevent the AOC from meeting its operational, financial, legal, and compliance objectives. We evaluated the risks based on potential impact, probability, and velocity of occurrence to provide a consistent framework to compare results entity-wide and across jurisdictions.

The risk assessment conducted by Kearney, as well as the risk assessment model, included the following areas within the AOC:

- Risk areas broken out by jurisdiction
- Risk areas common across all jurisdictions
- Risk factors and ranking scheme with a description on how to apply the risk factor
- Overall risk for the AOC as a whole

This work plan identifies the projects, priorities and initiatives that will support the AOC OIG's ability to achieve its goals and objectives through fiscal year 2024 by:

- Providing independent products and services that promote integrity and positive change
- Engaging stakeholders to conduct effective oversight and addressing AOC priorities and challenges
- Strengthening the AOC OIG's workforce and internal operations

Work planning is a dynamic process, and adjustments are made throughout the year to meet priorities, stakeholder expectations and to anticipate and respond to emerging issues with the resources available. The projects and plans presented in this work plan are contingent upon availability of funds, budget decisions, and priorities and are, therefore, subject to revision.

COMPLIANCE PROCESS

Implementing recommendations issued by the AOC OIG to correct problems and vulnerabilities identified during an audit, inspection, evaluation or other review is one of the most important effects of the AOC OIG's oversight activities. After a final report is issued, each entity assigned with corrective action must respond in writing to the formal recommendations in the published report. When AOC management agrees to implement a recommendation, it is considered resolved. A recommendation is closed once the AOC OIG determines that the recommended action has been completed based on AOC-supplied documentation that the root cause or condition has been corrected to meet the criteria. Benefits of implemented recommendations include improved physical and information security, stronger management and internal controls and accountability, more efficient programs and operations, and monetary benefits from questioned costs and funds that can be put to better use.

The AOC OIG also carries out follow-up reviews, which generally are conducted for six to 36 months following the completion of an audit, inspection or evaluation or other OIG review with noted recommendations. The follow-up process reviews the implementation of recommendations in the original report to determine whether all necessary corrective actions were implemented, as reported. Recommendations that have not been implemented are reissued in the follow-up report, along with recommendations on additional problems and vulnerabilities identified during the follow-up.

WORK PLANS BY DIVISION

Audits Division

The Audits Division (AUD) is responsible for conducting audits and program and performance assessments of the management and financial operations of the AOC, including their financial statements, construction projects and operations, information security, internal operations and external activities funded by the AOC. Many of the projects that AUD performs each year focus on high-risk management challenges within the AOC to include construction management. Because of limited resources, AUD generally focuses its work on high-cost programs, key management challenges and vital operations that will provide AOC managers with information that can assist them in identifying additional risk areas and making sound operational decisions. In addition to performing discretionary work, AUD uses a significant amount of its resources to fulfill mandatory requirements, such as the annual financial statement and construction audits, or to respond to congressional and AOC requests.

Table 2. Fiscal Year 2025 Audits Division

Audits, Assessments and Reviews	Title	Objective	AOC Jurisdiction	Risk Category
	<i>Audit of FY25 Financial Statements</i>	Our objective is to assess AOC Financial Statements as of and for the year ending September 30, 2025.	OCFO	Internal Control
	<i>Audit of Cannon House Office Building Renewal (CHOB) Project's Contract Closeout</i>	Our objective is to perform a cost reconciliation of the CHOB Project Construction Manager as Constructor's billed amounts compared to contractual amounts and verify compliance with all contractual obligations.	OCE/HOB	Internal Control/ Program & Project
	<i>CHOB Project Capstone Report</i>	Our objective is to review and analyze the results of the CHOB Project reports issued in fiscal years 2019 through 2025 to identify project challenges, lessons learned and effective practices to be used as a tool for future projects of a similar size and complexity.	OCE/HOB	Internal Control/ Program & Project
	<i>Review of the AOC's Multimillion-Dollar Construction Project Change Orders (Semiannual review)</i>	Our objective is to determine whether the change orders for multimillion-dollar construction projects were reasonable, authorized, supported and complied with contract requirements.	OCE	Internal Control/ Program & Project

Peer Review	Title	Objective	AOC Jurisdiction	Risk Category
	<i>Research Project of AOC's Cost Estimating Group</i>	Our objective is to gather information on the efficiency and effectiveness of the Office of Chief Engineer's Cost Estimating Group.	OCE	Internal Control
	<i>Conduct External Peer Review of AmeriCorps OIG</i>	Our objective is to review the AmeriCorps OIG's system of quality control.	OIG	Legal and Compliance

Inspections and Evaluations Division

The Inspections and Evaluations Division (I&E) conducts independent and objective assessments of AOC programs and operations. These management and programmatic evaluations are intended to provide insight into issues of concern to the AOC, Congress and the American public. I&E blends multidisciplinary analytic skills to:

- Analyze patterns, policies and practices contributing to waste and abuse of funds and resources under AOC control
- Develop reports with a focus on thematic and systemic issues
- Proactively examine resource management and management controls
- Conduct special reviews

Table 3. Fiscal Year 2025 Inspections and Evaluations Division

Inspections and Evaluations	Title	Objective	AOC Jurisdiction	Risk Category
	<i>Evaluation of AOC's Reorganization/ Transformation</i>	Our objective is to assess the effectiveness and efficiency of the AOC's reorganization initiatives and activities in accordance with AOC transformation milestones, planning activities and strategic initiatives. This evaluation will scope select AOC jurisdictions and organizations.	AOC	Strategic
	<i>Evaluation of AOC's Outside Employment Program (Special Review or Evaluation)</i>	Our objective is to assess the AOC's Outside Employment Program practices and activities and determine the extent to which adequate internal controls are in place and if vulnerabilities exist for fraud, waste and abuse.	AOC	Internal Control/Program & Project
	<i>Research Project of AOC's Environmental Program</i>	Our objective is to determine if the AOC has developed and implemented a comprehensive framework for identifying, adopting and integrating continuous improvement in environmental sustainability program areas, to include the establishment of measurable targets, best practices and compliance with applicable laws and regulations.	AOC	Internal Control/Program & Project
	<i>Research Project (Subject Matter to be Determined)</i>	Our research projects serve as a tool to gather information for future projects and determine whether a particular area warrants an evaluation or in-depth review.	AOC	Various

	Title	Objective	AOC Jurisdiction	Risk Category
Peer Review	<i>Receive an External I&E Peer Review from U.S. Agency for International Development (USAID) OIG</i>	The USAID OIG will review the Inspection and Evaluation system of quality control for the AOC OIG.	OIG	Legal and Compliance

Follow-Up Division

The Follow-Up Division (FLD) conducts independent, and objective follow-up evaluations of corrective actions and recommendations implemented by AOC management from previous AOC OIG audits, evaluations and investigations. These evaluations assess whether the AOC's corrective actions are complete, efficient, effective and address the original condition. Follow-up and monitoring implementation is a shared responsibility between OIG and AOC management. Therefore, the results aim to provide insight on the impact of OIG's work and AOC's efforts to improve AOC operations. These evaluations further assist AOC OIG competencies, standards and capabilities as a continuous learning organization.

Table 4. Fiscal Year 2025 Follow-Up Division

Title	Objective	AOC Jurisdiction	Risk Category
<i>Follow-up Evaluation of AOC's Emergency Preparedness Posture</i>	Our objective is to determine whether AOC implemented corrective actions to address recommendations in the 2021 OIG report, Evaluation of the AOC's Emergency Preparedness Posture.	OCSO/SCC	Human Capital/Critical Infrastructure
<i>Follow-up Evaluation of U.S. Capitol Building Window Installation, Preservation and Repair</i>	Our objective is to determine whether AOC implemented corrective actions to address recommendations in the 2022 OIG report, Flash Report Series — U.S. Capitol Building Window Installation, Preservation and Repair: Before and After January 6, 2021.	AOC	Human Capital/Critical Infrastructure
<i>Follow-up Evaluation of the AOC's Tree Maintenance Program</i>	Our objective is to determine whether AOC implemented corrective actions to address recommendations in the 2021 OIG report, Evaluation of the Architect of the Capitol's Tree Maintenance Program.	CGA	Compliance
<i>Research Project (Subject Matter to be Determined)</i>	Our research projects serve as a tool to gather information for future projects and determine whether a particular area warrants follow-up.	AOC	Various

Investigations Division

The Investigations Division (INV) conducts investigations of criminal, civil and administrative violations related to AOC programs and operations. Investigations are typically informed by: AOC OIG Hotline, internal referrals, AOC management or employees, other OIGs, other Federal law enforcement agencies, Congress or the public. Criminal and civil investigations are referred to the Department of Justice or other entity for prosecution. INV may also refer cases to the AOC, Office of Congressional Workplace Rights or other agencies for action deemed appropriate.

To enhance the OIG's oversight capability, the AOC OIG will continue a proactive and risk-based approach to identify potential vulnerabilities. This capability allows the AOC OIG to conduct strategic planning and identify work plan priorities more effectively.

FRAUD AWARENESS

Fraud is any intentional deception designed to deprive the AOC unlawfully of something of value or to secure from the AOC a benefit, privilege, allowance, or consideration to which he/she is not entitled. Such practices include, but are not limited to, the offer, payment, or acceptance of bribes or gratuities; making false statements; submitting false claims; using false weights or measures; evading or corrupting inspectors or other officials; deceit either by suppressing the truth or misrepresenting material facts; altering or substituting materials; falsifying records and books of accounts; arranging for secret profits, kickbacks, or commissions; and conspiring to use any of these devices. The term also includes conflict of interest cases, criminal irregularities and the unauthorized disclosure of official information relating to procurement and disposal matters.

By statute, the OIG is charged with fraud prevention and detection. To meet this mandate, INV works with other divisions to identify and refer systemic weaknesses and vulnerabilities to fraud, waste and abuse in AOC programs and operations, and recommend corrective actions to AOC managers. INV participates in OIG outreach programs by overseeing the fraud awareness training program to educate AOC employees and training classes on potential indicators of fraud.

The AOC OIG maintains an annual training requirement via AOC Learn for all AOC employees on the following:

- How to identify fraud, waste and abuse
- Role in preventing and reporting fraud, waste and abuse
- Examples of common fraud types like:
 - Contract fraud
 - Workers' compensation fraud
 - Time and attendance fraud

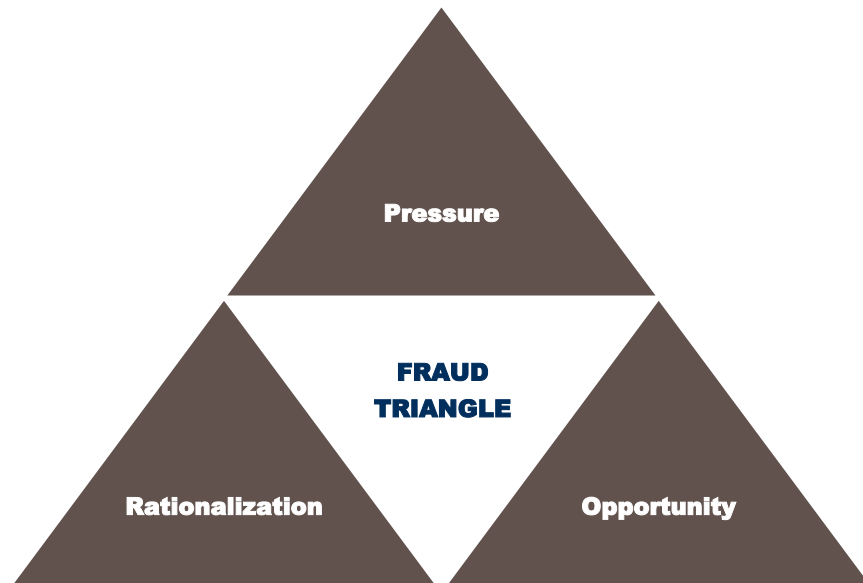
FRAUD TRIANGLE

The fraud triangle is a framework used to explain the reason behind an individual's decision to commit fraud. The fraud triangle consists of three components: Pressure, Opportunity and Rationalization.

- Pressure: financial or non-financial issues that may provide incentive to commit fraud such as high medical bills, past-due accounts, addiction to alcohol or gambling, unrealistic work expectations
- Opportunity: ability to commit fraud such as access to assets and/or information
- Rationalization: employee's self-justification that their fraudulent actions are reasonable or permissible

The fraud triangle framework can also be used to support a risk-based approach to the AOC OIG planning. For example, pressure can be expressed in terms of internal control risk or stakeholder and oversight risk, whereby an employee could feel burdened or pressured to achieve a certain goal or task to a certain standard. Opportunity can be expressed in terms of the effects of risk such as program and project risk or human capital risk that creates gaps between what should be and what is, whereby an employee could take advantage of certain loopholes. Rationalization is the justification an employee gives themselves to follow through with any fraudulent act. The AOC OIG uses this framework and others for project planning. It is imperative that employees understand risk and fraud in their daily work to effectively report to the AOC OIG when conditions are not typical.

Figure 1. Fraud Triangle



AOC OIG HOTLINE

INV maintains the AOC OIG Hotline, a confidential channel for complaints concerning violations of law or policy, fraud waste and abuse. Complaints to the AOC OIG Hotline have generated successful investigations resulting in criminal, civil and administrative actions. Report allegations of fraud, waste or abuse to the OIG by phone, fax, email or letter to:

Phone: 202.593.1948

Hotline: 877.489.8583 (Toll Free)

Fax: 202.593.0055

Email: Hotline@aac-oig.org

Web: <https://aacoig.oversight.gov/form/oig-hotline-confidential-report>

Mail: Architect of the Capitol Office of Inspector General

499 South Capitol St., SW, Suite 518

Washington, DC 20515



APPENDIX A: RISK DOMAINS

Table 5: Risk Domains Defined

Risk Domain	Definition
Strategic Risk	Risk that the AOC and/or a jurisdiction would not meet its mission objectives from the pursuit of an unsuccessful business plan. Strategic risk can result from making poor business decisions, substandard execution of decisions, inadequate resource allocation, or a failure to respond well to changes in the business environment.
Program/Project Risk	Risk that a potential outcome that causes an AOC and/or jurisdiction program to fail to meet a goal. Program/project risk is related to individual project risks with a focus on risks that have cross-project impact. For example, integration risks between projects are commonly tracked at the program management level.
Human Capital Risk	Risk that the AOC's workforce will not achieve strategic business goals and objectives and result in a negative impact to the AOC. Human capital risk can result from ineffective workforce planning, ineffective recruitment, employee turnover, absenteeism, workplace performance issues, accident/injury, legal/compliance issues, fraud, lack of professional competence, and/or gaps in leadership.
Stakeholder/Oversight Risk	Risk that may arise due to actions taken by Congress or other key policy makers that could potentially impact business operations, the achievement of the AOC's strategic and tactical objectives, or existing statutory and regulatory authorities. Examples include debt ceiling impasses, Government closures, etc.
Internal Control Risk	The risk of direct or indirect loss arising from inadequate or failed internal processes, people, and systems or external events. It can cause financial loss, reputational loss, loss of competitive position, or regulatory sanctions.
Cybersecurity and Critical Infrastructure Risk	Risk that could expose the AOC to exploitation of vulnerabilities to compromise the confidentiality, integrity, or availability of the information being processed, stored, or transmitted by its information systems.
Legal and Compliance Risk	Risk of failing to comply with applicable laws and regulations and the risk of failing to detect and report activities that are not compliant with statutory, regulatory, or organizational requirements. Compliance risk can be caused by a lack of awareness or ignorance of the pertinence of applicable statutes and regulations to operations and practices.

APPENDIX B: RISK DOMAIN HEATMAP

Figure 2 Figure 2 is a heatmap of emerging risk assessments by AOC risk domain.

Figure 2. Emerging Risk Assessment Heat Map by AOC Risk Domain

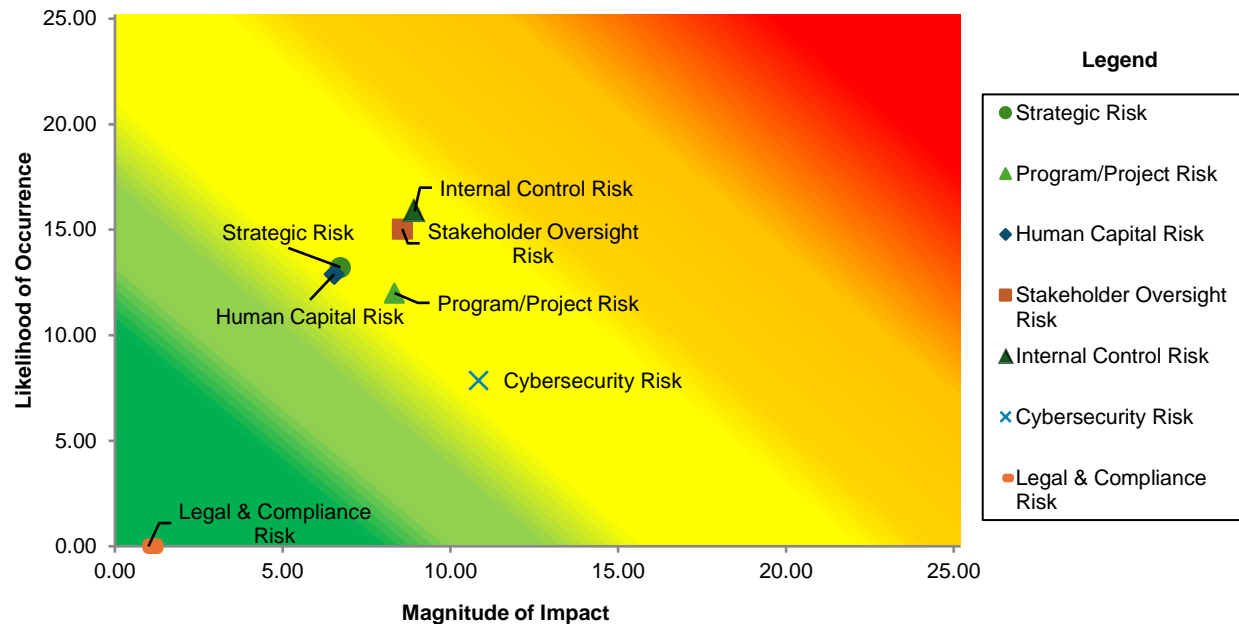


Table 6. Reading the AOC Risk Domain Heatmap: Magnitude of Impact

1. Incidental	2. Minor	3. Moderate	4. Major	5. Extreme
Results in no expected damage to the agency/jurisdiction/office.	Results in minor damage to the agency/jurisdiction/office.	Results in noticeable but not significant damage to the agency/jurisdiction/office.	Results in significant damage to the agency/jurisdiction/office.	Results in major damage to the agency/jurisdiction/office.

Table 7. Reading the AOC Risk Domain Heatmap: Likelihood of Occurrence

1. Rare/Remote	2. Unlikely	3. Possible	4. Likely	5. Frequent
Will most likely not occur (<10% chance of occurrence).	Will likely not occur (10% to 40% chance of occurrence).	Moderate chance to occur (40% to 70% chance of occurrence).	Will likely occur (70% to 90% chance of occurrence).	Highly likely to occur (>90% chance of occurrence).

ABBREVIATIONS

AOC	Architect of the Capitol
AUD	Audits Division
CHOB	Cannon House Office Building Renewal
CCO	Capitol Construction and Operations
CIGIE	Council of Inspectors General for Integrity and Efficiency
CO	Contracting Officer
COR	Contracting Officer's Representative
FEVS	Federal Employee Viewpoint Survey
FISMA	Federal Information Security Management Act
FLD	Follow-Up Division
FY	fiscal year
I&E	Inspections and Evaluations
IG	Inspector General
INV	Investigations Division
OCAO	Office of Chief Administrative Officer
OCE	Office of Chief Engineer
OCFO	Office of Chief Financial Officer
OIG	Office of Inspector General
TBD	to be determined



Architect of the Capitol

Office of Inspector General

**Help Fight Against
Fraud • Waste • Abuse**

Don't accept it—do something about it!