

January 2004

ARCHITECT OF THE CAPITOL

Status Report on Implementation of Management Review Recommendations



G A O

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Highlights of [GAO-04-299](#), a report to Congressional Committees

Why GAO Did This Study

The Office of the Architect of the Capitol (AOC) plays an important role in supporting the effective functioning of Congress and its neighboring institutions. In January 2003, GAO conducted a comprehensive management review of AOC's operations and made 35 recommendations to help AOC establish a strategic management and accountability framework, improve its management infrastructure and internal control, and address long-standing concerns. In February 2003, the Conference Report mandated GAO to monitor progress being made on the implementation of the 35 management review recommendations.

What GAO Recommends

GAO recommends that AOC strengthen agencywide communications with employees and congressional stakeholders.

GAO also recommends that AOC further improve its management infrastructure internal controls in the management of IT by planning for and implementing mature investment management and enterprise architecture (EA) practices.

GAO provided a draft of this report to the Architect of the Capitol in December 2003 for his review and comment. The Architect generally agreed with our findings, although there are some areas of disagreement in IT, worker safety, and recycling.

www.gao.gov/cgi-bin/getrpt?GAO-04-299.

To view the full product, including the scope and methodology, click on the link above. For more information, contact J. Christopher Mihm, 202-512-6806 or mihmj@gao.gov.

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What GAO Found

As discussed in GAO's January 2003 report, many of AOC's management problems were long-standing and its organizational transformation would take time to fully accomplish. Not surprisingly, AOC's efforts in addressing these initial management review recommendations is very much a work in progress. Initial steps are being taken, but a great deal more needs to be done. Moreover, greater effort will have to be made if more timely improvements are to occur. Sustained commitment and assertive involvement of AOC's leadership is key to addressing AOC's long-standing weaknesses and instilling lasting change.

AOC is taking the first steps in the development of its management and accountability framework, such as improving planning and organizational alignment through its draft strategic plan. AOC is also strengthening individual accountability for organizational goals through its senior executive performance management systems, but more progress can be made by aligning its employee performance management system with mission-critical goals. AOC needs to take additional steps to strengthen agencywide communications by providing opportunities to gather employee feedback sooner than fiscal year 2005 and by conducting a pilot of its congressional protocols.

AOC is making some progress in improving its management infrastructure and internal control. AOC is addressing initial concerns about the lack of consistent human capital policies and procedures. Also, AOC has developed three broad-based action plans to achieve its strategy of institutionalizing financial management best practices. However, while efforts on individual action items associated with the three action plans have begun, many are not scheduled for completion until fiscal years 2006 and 2007. Much work remains to address unplanned action items and complete ongoing efforts in improving financial management. AOC is developing a new IT portfolio management process or investment framework, which it plans to implement in fiscal year 2004 and is also taking steps to develop and use EA. However, while AOC is generally implementing the kind of IT management reforms recommended, GAO makes additional recommendations to ensure that mature investment management and EA processes are developed and implemented.

Finally, AOC is addressing GAO's concern about worker safety by developing a hazard assessment and control policy, but this policy is not expected to be fully implemented in all jurisdictions until May 2006. Until AOC completes this policy implementation and its subsequent analysis in all jurisdictions, it will not be able to develop a comprehensive picture of AOC hazards. AOC is also taking steps to establish a project priority framework for better project management and accountability. Also, AOC has made some progress toward adopting a more strategic approach to recycling taking steps to clarify the mission of the program and establishing goals as part of its environmental program plan.

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Abbreviations

AOC	Architect of the Capitol
BCA	Building Condition Assessments
CFO	Chief Financial Officer
CIO	Chief Information Officer
COO	Chief Operating Officer
EA	Enterprise Architecture
EAC	Employee Advisory Council
FMA	Facility Management Assistant
GC	General Contractor
GPRA	Government Performance and Results Act
GSA	General Services Administration
HRMD	Human Resources Management Division
IT	Information Technology
JHA	Job Hazard Analysis
JOSH	Jurisdiction Occupational Safety and Health
NAS	National Academy of Sciences
OAP	Office of the Attending Physician
OCFO	Office of the Chief Financial Officer
ODC	Office of Design and Construction
OIRM	Office of Information Resource Management
OSH	Occupational Safety and Health
OSHA	Occupational Safety and Health Administration
PCES	Performance Communication Evaluation System
PIC	Project Information Center
PHS	Public Health Service
PRP	Performance Review Process
SED	Safety and Environmental Division
SHEC	Safety, Health and Environmental Council
WFPM	Office of Workforce Planning and Management

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United States General Accounting Office
Washington, D.C. 20548

January 30, 2004

The Honorable Ben Nighthorse Campbell
Chairman
The Honorable Richard J. Durbin
Ranking Minority Member
Subcommittee on Legislative Branch
Committee on Appropriations
United States Senate

The Honorable Jack Kingston
Chairman
The Honorable James P. Moran
Ranking Minority Member
Subcommittee on Legislative
Committee on Appropriations
House of Representatives

The Honorable Trent Lott
Chairman
The Honorable Christopher J. Dodd
Ranking Minority Member
Committee on Rules and Administration
United States Senate

In January 2003, we issued a management review of the Office of the Architect of the Capitol (AOC) that contained 35 recommendations to assist AOC in establishing a strategic management and accountability framework to transform its organization.¹ One of the most important issues raised in our January 2003 report was the need for Congress to create a Chief Operating Officer (COO) position to serve as the central leadership point to improve AOC's executive decision-making capacity and accountability. Congress accepted this suggestion. The Architect of the Capitol appointed the first COO on July 28, 2003.² As the first of our reports on AOC's implementation of the recommendations contained in our

¹U.S. General Accounting Office, *Architect of the Capitol: Management and Accountability Framework Needed for Organizational Transformation*, GAO-03-231 (Washington, D.C.: Jan. 17, 2003).

²Section 1203 of Division H, Title I, Pub. L. No. 108-7, Feb. 20, 2003 (Consolidated Appropriations Resolution, 2003).

January 2003 report, this status report will provide the Architect and the agency's new COO with information that can assist them in elevating, integrating, and institutionalizing attention and accountability for certain key management functions and leading transformational change within AOC.

The Conference Report accompanying the fiscal year 2003 Legislative Branch Appropriations Act mandated GAO to monitor the implementation of the recommendations of our January 2003 report.³ This report discusses the progress AOC has made in establishing its strategic management and accountability framework, instituting management infrastructure and controls, and addressing long-standing program issues. As such, this report does not directly address issues associated with major AOC projects, such as the Capitol Visitor Center and the Capitol Power Plant. Rather, the January 2003 report and this status report concern the establishment of AOC's strategic management and accountability framework and the management infrastructure and internal control AOC needs to have in place to be successful in all its efforts, including its major projects. Our January 2003 report concluded that AOC needs to improve its internal control, which is synonymous with management control, and is integral to any organization. Internal control is comprised of the plans, methods, and procedures used to meet missions, goals, and objectives, and that help safeguard assets and prevent and detect errors and fraud. (For a detailed assessment of AOC's progress addressing each of our 35 management review recommendations, as well as an expanded explanation of the basis for our additional recommendations, see appendixes I through VII.)

Results in Brief

As we discussed in our January 2003 report, many of AOC's management problems have been longstanding, and its organizational transformation would take years to fully accomplish. Not surprisingly, therefore, AOC's progress in addressing our initial recommendations remains very much a work in progress. Initial steps are being taken but a great deal more needs to be done. Moreover, greater effort will have to be made if more timely improvements are to occur. Sustained commitment and assertive involvement of AOC's leadership are key to addressing long-standing weaknesses and instilling lasting change.

³H.R. Conf. Rep. No. 108-10, at 1225 (2003).

AOC is taking the first steps in the development of its strategic management and accountability framework and addressing the concerns we identified in our January 2003 report, such as improving planning and organizational alignment through the development of its strategic plan. This framework and the accompanying draft plans provide a basis for AOC's ongoing effort to reassess its organizational structure to ensure that it is aligned to meet its goals, as well as provide high quality—and accountable—products and services to its clients and customers.

AOC is also strengthening individual accountability for organizational goals through its senior executive performance management systems, but more progress can be made with aligning employee performance management systems with agency strategic goals. On the other hand, a key component of a successful transformation is ongoing communication with customers, stakeholders, and employees; without effective communications, transforming AOC will be difficult. In that regard, we are making additional recommendations that AOC can take to strengthen agencywide communications by providing opportunities to gather employee feedback sooner than is currently planned and conduct a pilot of its agency congressional protocols. (For details on the progress of the development of AOC's strategic management framework, see appendix I.)

At the same time, AOC is taking the first steps towards improving its management infrastructure and internal control. AOC is addressing our concerns about the lack of consistent human capital policies and procedures by drafting its absence and leave policy, providing guidelines for premium pay eligibility, and completing its policy and procedures for administering pay flexibilities. (See appendix II for details on the progress of AOC's implementation of the recommendations we made in strategic human capital management.) In addition, AOC has developed three broad-based action plans that are intended to accomplish its goal of institutionalizing financial management best practices that support the effective delivery of programs and services. These action plans, if properly carried out, represent a reasonable basis for achieving AOC's goal of institutionalizing financial management best practices that support the effective delivery of programs and services. However, while efforts have begun to implement individual action items associated with the three action plans, none of the individual action items has been completed, and many are not scheduled for completion until fiscal years 2006 and 2007. Also, planning for certain action items has not yet begun, and for some is not scheduled to begin until mid-fiscal year 2004. While AOC has made progress since our January 2003 report, much work remains to address

unplanned action items and complete ongoing planning and implementation efforts. (See appendix III for details on the progress of the implementation of the recommendation we made in financial management.)

As part of its efforts to adopt a strategic, agencywide approach to leveraging information technology (IT) to advance strategic agency goals, AOC is developing an IT investment management process, which it plans to implement in fiscal year 2004, and is also taking steps to develop and use an enterprise architecture (EA), or modernization blueprint, to guide and constrain its IT investments. These and other IT management improvements demonstrate AOC's commitment to implementing the kind of IT management reforms that are embodied in our recommendations. However, AOC has much to do before it fully implements our recommendations, and we are making additional recommendations to better ensure that its investment management and EA efforts are successful. (See appendix IV for details on the progress of the implementation of the recommendations we made concerning information technology management.)

Finally, AOC is also making some progress in its efforts to institutionalize accountability concerning such long-standing issues as worker safety, project management, and recycling. AOC is addressing our concern about a lack of clearly defined and documented policies and procedures for reporting hazards by developing a hazard assessment and control policy, but the policy is not expected to be fully implemented until May 2006. Until AOC completes the implementation of this policy and its subsequent analysis across all jurisdictions, it will not be able to develop a comprehensive picture of AOC hazards. (See appendix V for details on the progress of the implementation of the recommendations we made on worker safety.) AOC is also taking steps to establish a framework for better project management and accountability by establishing a process to assign project priorities based on clearly defined, well-documented, consistently applied, and transparent criteria. (See appendix VI for details on the progress of the implementation of the recommendations we made in project management.) In addition, AOC has made some progress toward adopting a more strategic approach to its recycling program by taking steps to clarify the mission of the recycling program and establish program goals as part of its environmental program plan, as we recommended in our January 2003 report. (See appendix VII for details on the progress of the implementation of the recommendations we made on recycling.)

The Architect generally agreed with the findings of our report, although there are some areas of disagreement in information technology, worker safety, and recycling. His written response is reprinted in app. VIII.

On December 17, 2003, we provided the Architect with our draft report for his review and comment. The Architect generally agreed with the findings of our report, although there are some disagreements in the areas of information technology, worker safety, and recycling issues. His written comments and our response, which includes our comments on the concerns raised by the Architect, are reprinted in app. VIII.

Background

AOC is responsible for the maintenance, renovation, and new construction of all buildings within the Capitol Hill complex. Organizationally, AOC is made up of a centralized staff that performs administrative functions and “jurisdictions” that handle their own day-to-day operations, such as the Capitol building, the House and Senate office buildings, the Library of Congress, and the Supreme Court, and support the operation of Congress and its neighboring institutions. The historic nature and high-profile use of many of these buildings creates a complex environment in which to carry out this mission. AOC must perform its duties in an environment that requires balancing the divergent needs of congressional leadership, committees, individual members of Congress, congressional staffs, and the visiting public. The challenges of operating in this environment were compounded by the events of September 11, 2001, and the resulting need for increased security and safety.

Objective, Scope, and Methodology

The Conference Report on the Legislative Branch Appropriations Act, 2003, directed us to monitor and evaluate AOC’s progress in implementing its management plan that addressed the recommendations contained in our January 2003 report. Accordingly, our objective for this report was to assess the progress AOC is making in addressing our findings and implementing our recommendations since the issuance of our January 2003 report. In this regard, this report addresses the recommendations we made in our January 2003 report, which concerned the areas of strategic planning and management, human capital, financial management, information technology, worker safety, project management, and recycling.

To address our objective, we collected from AOC documentation of the organization’s implementation of our recommendations, which we used to

assess the progress made in addressing the issues underlying these recommendations. For example, we reviewed documents such as AOC's draft strategic and performance plans, draft communications plan, IT investment framework, centralized IT management policy, initial versions of EA products, occupational safety and health program plan, master safety plan, project management evaluation and screening matrix, and pollution prevention planning initiative, among others. We also reviewed documentation to see that policies had been changed and meetings had taken place. We also interviewed AOC officials to determine the status of the organization's progress on our recommendations. In addition, we also continue to meet regularly with the COO to discuss the status of improvement efforts underway at AOC and other issues of mutual interest and concern. We performed our work in Washington, D.C., from July 2003 through November 2003 in accordance with generally accepted government auditing standards.

AOC Has Begun Establishing a Strategic Management and Accountability Framework, but Communications with Employees and Stakeholders Can Be Improved

In our January 2003 report, we stated that to better serve Congress, AOC needed to build its capability to define goals, set priorities, ensure followthrough, monitor progress, and establish accountability for results to achieve its agenda for organizational transformation. We made 11 recommendations that would help AOC establish a management and accountability framework to lead and execute its organizational transformation. To adopt the elements of the management and accountability framework—strategic planning, organizational alignment, communications, performance measurement, and strategic human capital management—and build on efforts under way at AOC, we recommended that the Architect of the Capitol

- improve strategic planning and organizational alignment by involving key congressional and other external stakeholders in AOC's strategic planning efforts and in any organizational changes that may result from these efforts;
- strengthen accountability for results by developing annual goals, measuring performance, and strategically managing human capital to support achieving those goals and measures, such as creating a line of sight by linking AOC's senior executive and employee performance management system; and
- develop a comprehensive strategy to improve internal and external communications by completing the development of congressional

protocols with stakeholder involvement and continuing to regularly measure customer satisfaction AOC-wide, among other strategies, such as providing opportunities for employee feedback.

AOC is taking the first steps towards establishing our recommended strategic management and accountability framework. For example, AOC is making important progress in improving strategic planning and organizational alignment by issuing draft strategic and performance plans, though both are still subject to revision and approval by AOC's new COO.⁴ Specifically, in March 2003, AOC issued its draft strategic plan for fiscal years 2003-2007, which outlines four strategic focus areas and corresponding strategic goals, and a draft performance plan for fiscal years 2003-2007 with a particular focus on fiscal years 2003-2004, which provides the specific action plans and milestones for achieving the goals and objectives in the draft strategic plan. This framework and the accompanying draft plans provide a basis for AOC's ongoing effort to reassess its organizational structure to ensure that it is aligned to meet its goals, as well as create and administer high quality—and accountable—products and services.

Many of the action plans and milestone dates that AOC has outlined in its draft performance plan are scheduled to occur over the next several years. Because AOC's organizational transformation agenda is a long-term process, it is especially important that AOC leadership closely monitor the interim activities, action plans, and milestones outlined in its draft performance plan to ensure that it meets intended deadlines and completes its transformation. As we noted in our January 2003 report, sustained top leadership attention is essential to overcome an organization's natural resistance to change, marshal the resources needed to implement the change, and build and maintain the organizationwide commitment to new ways of doing business.

In addition, AOC is also involving key congressional stakeholders, as we recommended, in the development of its agency draft strategic plan and is requesting input on the strategic direction of the agency. AOC's high-level summary of the stakeholder reaction it received demonstrates the value of

⁴At the time of our review, the COO had not approved the agency's draft strategic and draft performance plans. We received notification that the COO had approved and finalized AOC's strategic and performance plans on January 13, 2004. Therefore, throughout our report, we refer to the strategic and performance plans as draft because at the time of our review, these documents were not yet approved.

such outreach. The need for a strong and continuing communications strategy, an augmented fire safety strategy, and creating a “living” planning and improvement approach that becomes part of AOC’s culture, were among the important issues raised by stakeholders. Building on its strategic planning efforts, it is important that AOC continues to involve key congressional, as well as other stakeholders, in its strategic planning process, and keeps them informed of any operational and organizational changes resulting from this planning process.

In addition, AOC is making progress in strengthening individual accountability for organizational goals—creating a line of sight—by linking its senior executive performance management system, known as the Performance Review Process (PRP), with its draft agency strategic goals, as we also recommended. However, AOC has not made as much progress in linking its employee performance management system, known as the Performance Communication Evaluation System (PCES) to its agency strategic goals. We have reported that high performing organizations align performance expectations of top leadership with goals and then cascade those expectations down to lower levels.⁵ According to the Director of the AOC Human Resource Management Division (HRMD), to align PCES with PRP, AOC plans to first consolidate its multiple jurisdictional rating cycles into one cycle and then expects to incorporate the agency’s strategic goals into PCES by January 2005. While consolidating the multiple jurisdictional employee performance management cycles may be helpful in the administration of its performance reviews, AOC does not need to wait for this consolidation of performance review cycles to integrate its strategic goals into PCES. By linking both its senior executive and employee performance management systems to agency strategic goals, AOC can improve the strategic management of its human capital and help achieve these goals.

Furthermore, AOC is progressing in establishing a communications strategy and has developed its first agencywide communications plan, as recommended in our January 2003 report, and included conducting employee focus groups or surveys as part of that plan. According to the Deputy Chief of Staff, funds to conduct AOC’s employee focus groups or surveys were requested after the fiscal year 2004 budget submission in

⁵U.S. General Accounting Office, *Results-Oriented Cultures: Creating a Clear Linkage between Individual Performance and Organizational Success*, GAO-03-488 (Washington, D.C.: Mar. 14, 2003).

early December 2002. Therefore, AOC plans to conduct its employee focus groups or surveys in fiscal year 2005. Our own experiences at GAO have shown that obtaining employee views, such as through focus groups, need not be a resource intensive effort and that in any case, the benefits often far exceed the incremental costs. We recently reported that because people are the drivers of any organizational transformation, it is vital to monitor their attitudes.⁶ As such, AOC employees need to see that AOC top leadership not only listens to their concerns, but also takes action and makes appropriate adjustments to the transformation in a visible and timely way. Because of the importance of considering employee views during an organizational transformation, we recommend that AOC not wait until fiscal year 2005 to conduct its planned employee focus groups or surveys to gather feedback.

Moreover, as we recommended, AOC completed the development of its congressional protocols on June 30, 2003, to strengthen communications with key stakeholders and plans to meet with congressional stakeholders to discuss these protocols and issue final protocols by March 31, 2004. As stated in our January 2003 report, the purpose of agency protocols is to help create a basic understanding between AOC and its stakeholders of how AOC's efforts and resources can be targeted at the highest priorities. Protocols also foster transparency about how decisions and tradeoffs can be made and services deployed given the competing demands that confront AOC, and how those demands and resources require careful and continuous balancing. According to AOC officials, although the development of its congressional protocols is complete, implementing these protocols may be difficult because of stakeholder concerns about their potential effect on decreasing levels of service. In our January 2003 report, we noted that we had worked closely with Congress on the development of our own congressional protocols, along with careful pilot testing, and then implemented our final protocols in 1999. AOC needs to discuss with its stakeholders how the use of these protocols will help AOC balance immediate needs with the achievement of overall agency strategic goals. A pilot test would provide AOC and its customers an opportunity to test the application of the protocols to the various types of customer needs AOC confronts and to revise those protocols based on feedback obtained during the pilot.

⁶U.S. General Accounting Office, *Results-Oriented Cultures: Implementation Steps to Assist Mergers and Organizational Transformations*, GAO-03-669 (Washington, D.C.: Jul. 2, 2003).

Recommendations for Future Action

To further progress in developing its strategic management and accountability framework and improve communications agencywide, we recommend that the Architect of the Capitol take the following actions

- gather and analyze employee feedback from focus groups or surveys before fiscal year 2005, as well as communicate how it is taking actions to address any identified employee concerns
- conduct a pilot of AOC congressional protocols in one or more of its jurisdictions to determine how well protocols would work in addressing customer requests for service, while balancing the demands of multiple requests with the strategic plan and corresponding project priorities of the agency.

Progress Is Being Made in Establishing Management Infrastructure and Internal Control, but Considerable Work Remains Before Effective Information Technology Management Capability Will Be in Place

In our January 2003 report, we made nine recommendations to help AOC improve its management infrastructure and internal control to support its organizational transformation initiative. In particular, we stated effective internal control also could help AOC manage change and cope with shifting environments and evolving demands and priorities. We found that AOC would need to further develop and consistently apply transparent human capital policies and procedures to help encourage trust in management. Additionally, we stated that AOC must continue improving its approach to financial management to support effective and efficient program management by developing and implementing effective budget formulation and execution policies and procedures that govern capital projects and operating activities AOC-wide. We also noted that AOC needed to adopt an agencywide approach to information technology management to position itself to optimize the contribution of information technology to agency mission performance. Specifically, we recommended that AOC

- strengthen and consistently implement its human capital policies, procedures, and processes, such as developing a consistent agencywide leave policy, assessing ways in which AOC management could better gather and analyze data on employee relations issues, and establishing a direct reporting relationship between the Ombudsperson and the Architect;
- continue to improve AOC's approach to financial management by developing strategies to institutionalize financial management practices

that will support budgeting, financial, and program management at AOC; and

- adopt an agencywide approach to information technology management by establishing appropriate leadership and developing the policies, procedures, and tools needed to effectively and efficiently manage information technology resources across the agency.

AOC is taking the first steps towards improving its management infrastructure and internal control, though in some cases, additional steps need to be taken to fully address the findings of our January 2003 report. For example, AOC is making important progress in addressing our recommendation to develop and implement agencywide human capital policies and procedures by (1) drafting its employee absence and leave policy, still pending review and approval by the Architect, (2) providing guidelines to its workforce for determining eligibility for Sunday premium pay, and (3) completing its policy and procedures for administering pay flexibilities. The issuance of these policies is important to addressing the concerns raised by AOC employees when we conducted employee focus groups as part of our January 2003 report. AOC's HRMD director told us that managers and supervisors are now being held accountable through its employee performance management systems for the consistent application of human capital policies and procedures, such as leave granting, overtime, and giving employee awards. As part of its management and oversight responsibilities of human capital policies, it is important that AOC senior management and HRMD continually monitor whether supervisors and managers are fairly administering the policies concerning leave, rewards, and recognition. AOC could also use information gathered during employee focus groups, employee satisfaction surveys, and informal feedback from employees to monitor employee views on the administration of these policies.

Furthermore, as we recommended, AOC has developed and begun to implement strategies designed to institutionalize financial management best practices. The Office of the Chief Financial Officer (OCFO) has established three broad-based action plans to improve financial management practices at AOC: (1) build a foundation of financial control and accountability, (2) assess the financial management organization's current role in meeting mission objectives and organize financial management to add value, and (3) improve forward-looking analysis, train managers to understand how to use financial information, and improve the partnership between financial management and operations. These action

plans, if properly carried out, represent a reasonable basis for achieving AOC's goal of institutionalizing financial management best practices that support the effective delivery of programs and services. However, while AOC has established three action plans to address our recommendation and begun efforts to implement them, none of the individual action items associated with the three action plans has been completed, and many are not scheduled for completion until fiscal years 2006 and 2007. Furthermore, planning for certain items has not yet begun, and for some is not scheduled to begin until mid-fiscal year 2004. While AOC has made progress since our January 2003 report, much work remains to address unplanned action items and complete ongoing planning and implementation efforts.

AOC is also beginning to address its IT investment management challenges. We found when preparing our January 2003 report that AOC did not have an agencywide, portfolio-based approach to investment management. Thus, we recommended that AOC develop a detailed plan to guide the development and implementation of such an approach, focusing first on controlling existing projects and establishing the management structures to implement the portfolio-based project selection process. Such an approach helps an organization measure the progress of existing projects and continually assess proposed and ongoing projects as an integrated and competing set of investment options.

In response, AOC is developing a new IT portfolio management process, referred to as its investment framework, which it plans to implement in fiscal year 2004. AOC's IT policy, signed by the Architect, states that the framework is to provide an effective means to select projects that best support the agency's mission. A draft version of the framework, completed in October 2003, is organized along a "select, control, and evaluate" model. To execute the select, control, and evaluate processes, the framework specifies four management structures—an architecture and standards committee, a project management board, a business systems modernization office, and an investment review board, with AOC defining the memberships of each of these entities. In January 2004, AOC stated that it has begun using the framework to control all fiscal year 2004 investments. An agency official also told us that AOC intends to fully implement the framework by May 2004.

AOC's actions partially address our recommendation. Specifically, we recommended that the agency focus first on detailing and implementing processes to control existing investments and that efforts to develop and implement these processes be guided by a detailed plan. Although AOC

states that it has revised its project investment review board to include key senior agency leaders, it has not focused first on controlling existing IT investments. For AOC to implement effective IT investment management processes, it is important that it follow our previous recommendation on establishing a foundation for its investment management framework. In building on this foundation, AOC needs to take additional steps to help it execute the more mature investment management processes provided for in our investment management guide.⁷

Moreover, AOC is taking steps to develop and use an EA. We recommended that AOC develop, implement, and maintain an EA, starting with developing an architecture policy, establishing executive oversight, and designating a chief enterprise architect. Our experience with federal agencies has shown that attempting to modernize IT environments without an EA to guide and constrain investments often results in systems that are duplicative, not well integrated, unnecessarily costly to maintain and interface, and ineffective in supporting mission goals. The development, implementation, and maintenance of architectures are recognized hallmarks of successful private and public organizations that effectively exploited IT in meeting their mission goals. In contrast, we reported in our January 2003 report that AOC did not have an EA or the management foundation needed to successfully develop one.

In response to our recommendation, AOC has issued an EA policy and assigned the Office of Information Resource Management (OIRM) responsibility for developing and maintaining the architecture. AOC has also assigned responsibility for guiding and approving EA development to the agency's senior policy committee, which is composed of representatives from across the agency. AOC has committed to hire a chief enterprise architect and will request funds to do so in its fiscal year 2005 budget. AOC has also established a unit to provide technical and managerial support, selected a framework to guide development, and has prepared initial versions of its existing and target architectures and a plan for migrating from its existing to its target states. The agency states that the Deputy Chief of Staff has recently approved these products.

⁷U.S. General Accounting Office, *Information Technology Investment Management: A Framework for Assessing and Improving Process Maturity, Version 1*, GAO/AIMD-10.1.23 (Washington, D.C.: May 2000).

Despite these steps, much work remains to satisfy our January 2003 recommendation aimed at establishing the management foundation for developing and using an EA. For example, the agency has not yet hired a chief enterprise architect and has not ensured that adequate resources are devoted to the program, that architecture environments are described in terms of performance and security, and that metrics are used to measure EA progress. In addition to addressing these architecture management foundational needs, AOC will need to take additional steps to implement those architecture management practices associated with effectively completing, maintaining, and implementing an EA that are defined in our architecture management guide.⁸

Improving AOC's organizational internal control will help to support its overall management infrastructure, and AOC is doing so by issuing consistent agencywide human capital policies and procedures. AOC is also improving its overall approach to financial management by developing action plans and beginning to implement these plans to institutionalize sound financial management practices. AOC has also recognized that adopting a corporate approach to IT management is a key enabler of its strategy for organizational improvement, and it has demonstrated its commitment to do so. However, until AOC completes and implements plans for improvement that are consistent with all our recommendations, it will be challenged in its ability to optimize the contribution of IT to agency mission performance.

Recommendations for Future Action

We recommend that to further its progress in the management of its information technology, the Architect of the Capitol

- plan for and implement those practices in our IT investment management guide associated with corporate, portfolio-based investment decision making, such as (1) implementing criteria to select investments that will best support the organization's strategic goals, objectives, and mission, (2) using these criteria to consistently analyze and prioritize all IT investments, (3) ensuring that the optimal investment portfolio with manageable risks and returns is selected and funded, and (4) overseeing each investment within the portfolio to

⁸U.S. General Accounting Office, *Information Technology: A Framework for Assessing and Improving Enterprise Architecture Management*, GAO-03-584G (Washington, D.C.: April 2003).

ensure that it achieves its cost, benefit, schedule, and risk expectations; and

- plan for and implement the practices in our architecture management guide associated with leveraging an EA for organizational transformation, such as (1) ensuring that adequate resources are devoted to the program (funding, people, tools, and technology), (2) ensuring that the architecture describes both the “as is” and the “to be” environments in terms of performance, (3) ensuring that architecture business, performance, information and data, applications and services, and technology descriptions address security, and (4) ensuring that metrics are used to measure EA progress, quality, compliance, and return on investment.

AOC is Beginning to Address Long-standing Issues in Worker Safety, Project Management, and Recycling

In our January 2003 report, we made 15 recommendations to help AOC address long-standing program issues, worker safety, project management, and recycling. We noted that both the strategic management and accountability framework and improving management infrastructure and other internal controls that support AOC’s transformation cut across the agency’s programs and influence its performance in all areas critical to achieving its mission, especially program areas of long-standing concern to AOC’s employees and congressional stakeholders. We stated that the Architect declared safety his number one priority; nonetheless, relating safety to other pressing priorities and developing a clear strategy for how working safely will become the cultural norm, was still a work in progress at the AOC. Similarly, we reported that AOC had adopted industry best practices for project management, but implementation was uneven and could benefit from stronger leadership and improvements in performance and financial management, priority setting, communication, and strategic management of human capital. Finally, although AOC had recently made improvements to the House and Senate recycling programs, contamination of recycled materials remained high, and the goals for the overall program remained unclear. Specifically, we recommended that the Architect of the Capitol

- improve the overall approach to worker safety in identifying performance measures, clearly defining policies and procedures for reporting hazards, establishing a consistent system for conducting investigations and followup, establishing a safety training curriculum, assigning clear responsibility for tracking worker safety employee training, clarifying the role of the Office of the Attending Physician

(OAP) in helping AOC to meet its safety goals, and establishing a senior management work group to routinely discuss worker compensation issues;

- improve its overall approach to project management by developing a Capitol Hill complex master plan and completing building condition assessments, developing a transparent process to prioritize agency capital projects, developing tools to effectively communicate priorities and progress of projects, clearly defining project-management-related measures, and aligning project management staff and resources with mission-critical goals; and
- improve its overall approach to its recycling program by developing a clear mission and goals, developing a performance measurement system to support accomplishing its recycling program, and examining the roles, responsibilities, and accountability of its recycling program staff.

AOC is making progress in addressing long-standing areas of concern, though much remains to be done. For example, to address our concern regarding the lack of clearly defined and documented policies and procedures for reporting hazards, AOC has plans to develop a Hazard Assessment and Control policy, but it is not expected to be fully implemented across all jurisdictions until May 2006. As a key component in developing this, AOC (1) plans to identify hazards associated with specific job tasks or Job Hazard Analysis (JHA),⁹ (2) has created a schedule for completing each JHA, and (3) contracted with the Public Health Service to identify hazards associated with job tasks in each jurisdiction. According to AOC officials, the JHA process has been completed for two jurisdictions, the Senate office buildings and the Construction Management Division. While a majority of the jurisdictions await full development and implementation of the Hazard Assessment and Control policy, each jurisdiction continues to rely upon its own hazard reporting processes. Also, AOC has established a plan and initiated actions to improve the reporting of hazards, though the development and implementation of agencywide policy and procedures for hazard reporting is expected to take

⁹AOC's Occupational Safety and Health Program Plan splits the development and implementation of the Hazard Assessment and Control policy into two segments, one dealing with completion of the JHA and the other dealing with implementation of the operational aspects of this policy. The time frames we cite here apply to the operational segment of the policy. The JHA segment is scheduled to be fully implemented by the end of calendar year 2004.

years to complete due to the time needed to develop and fully implement this safety policy. Until AOC completes the implementation of this policy and subsequent analysis across all jurisdictions, it will not be able to develop a comprehensive picture of AOC hazards. Additionally, until AOC completes the system-wide process for investigating incidents across all jurisdictions, it will not be able to develop a comprehensive picture of AOC incidents, including their causes.

Additionally, AOC continues to recognize the importance of a disciplined project management process and is taking steps to establish a framework for better project management and accountability. For example, as we recommended, AOC has developed a process to assign project priorities that is based on clearly defined, well-documented, consistently applied, and transparent criteria. According to the Office of Design and Construction Acting Chief, in February 2003, AOC worked with a consultant to develop evaluation criteria to set the prioritization of building projects. For prioritization purposes, each project is evaluated in five areas, (1) preservation, (2) impact on mission, (3) economic impact, (4) safety, and (5) security; and assigned a score, based on a 100-point scale, in each area. AOC also developed a matrix to provide criteria and guidance on how to evaluate and score the projects in each of the five areas. AOC has created a clearly defined, well-documented, and transparent process for evaluating and prioritizing projects. While determining the priority of projects will always be somewhat subjective, AOC has developed a reasonable approach using a matrix to help raters score projects in five areas. The matrix provides clear guidance when scoring projects in each of the five rating areas. Since the evaluation criteria have not yet been used to determine which projects will be submitted for funding, it remains to be seen if it will be consistently applied. Using this matrix and documenting the factors used in making the priority decisions should help AOC support its capital improvement program.

AOC has also made some progress toward adopting a more strategic approach to its recycling program. For example, consistent with our recommendations, AOC is taking steps to clarify the mission of the recycling program and establish program goals as part of its environmental program plan. In its March 2003 draft strategic plan, AOC states that it plans to develop a long-range environmental program plan that will establish program mission, vision, goals, and measures.¹⁰ The draft strategic plan also states that this environmental program plan would include clarifying the mission, goals, and measures of the recycling

program—a component of pollution prevention. Although, according to its draft performance plan, AOC is a few months behind its schedule, AOC officials told us that work has begun on both of these projects—the baseline assessment and waste stream analysis—and both projects will be substantially completed by the end of 2003. These AOC officials also advised us that the results of the baseline assessment and waste stream analysis would provide a basis for establishing program priorities and measuring progress. The draft performance plan also provides for stakeholder participation in this process both before and after the actual environmental program planning process occurs, but this has not yet taken place. According to AOC’s draft performance plan, stakeholder involvement is scheduled to begin in the second quarter of fiscal year 2004, after completion of the baseline assessment and waste stream analysis. AOC is taking the first steps needed to developing its recycling program mission and goals within the broader context of an environmental program plan, which is reasonable and consistent with our recommendation.

Concluding Observations

We noted in our January 2003 report that organizational transformation does not come quickly or easily and the changes under way at AOC would require a long-term, concerted effort. We stated that by drawing on the full potential of its top leadership and management team, AOC could begin to take immediate steps on a number of the concerns described in our January 2003 report, although we recognized that AOC would be able to implement some of these actions more quickly than others. Although we have found that AOC is addressing each of our 35 original recommendations either through its planning efforts or actions it has initiated; a great deal more needs to be done. Moreover, greater effort will have to be made if more timely improvements are to occur. Sustained commitment and assertive involvement on behalf of AOC leadership will be vital to ensure that it completes the many action plans and reaches its milestones during the next several years to achieve its organizational transformation.

¹⁰According to the AOC draft strategic plan, the environmental program plan, to be completed in 2004, will address a wide spectrum of environmental management initiatives including environmentally sensitive planning and design, compliance with applicable provisions of environmental regulations (such as clean air, clean water, and solid waste disposal), and pollution prevention.

As AOC works to establish its strategic management and accountability framework, improve its management infrastructure, and address long-standing areas of concern, it must continue to demonstrate that progress is being made on each of our recommendations to help it sustain the momentum needed to accomplish its organizational transformation, particularly in improving communications with employees and stakeholders and improving its management of information technology.

Agency Comments

We provided a draft of this report on December 17, 2003 to the Architect of the Capitol for his review and comment. We received written comments from the Architect on January 20, 2004. In response to our draft, the Architect generally agreed with our findings, although there are some areas of disagreement. Most of the comments were technical changes based on information that was either not provided to us during our review or related to activities that occurred outside the timeframe of our review. We will assess these activities as part of our future semi-annual reviews. Where appropriate, we have revised our draft report in response to AOC's comments.

In his written comments, the Architect disagreed with our characterization or assessment of progress in the areas of information technology, worker safety, and recycling. Regarding information technology, we reported that AOC had taken a number of steps to strengthen investment selection processes but had not focused on controlling its existing IT investments, as we had recommended. In response, the Architect stated that AOC was now controlling existing investments, noting several steps the agency had taken to do so. While we do not question whether the agency has taken the steps it cited, our position is that those steps either relate to investment selection rather than investment control, as defined in our investment framework, or the steps were missing necessary details describing how the investment control function was being performed. Thus, we believe that AOC still needs to focus on investment control.

Regarding worker safety, the AOC commented that GAO did not fully capture the progress that has been made in creating an effective worker safety and health program. We believe, however, that the information we present in the report is an accurate portrayal of the information we collected during the period of our review. New information brought forth in the AOC's comments to our draft will be considered during the next semi-annual review.

Regarding recycling issues, the Architect states that although the contaminated materials had resulted in limited revenue generation, the recycling contractor separated the contaminated material from the recyclable material, and thus waste reduction did occur. We believe that the language contained in our January 2003 report about the level of waste reduction the AOC had achieved through its recycling efforts is accurate as stated.

The Architect's written comments and our response are reprinted in app. VIII.

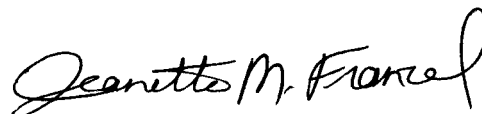
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Strategic Management

Our January 2003 report contained 11 recommendations to help the Office of the Architect of the Capitol (AOC) establish its strategic management and accountability framework in the areas of strategic planning and organizational alignment, communications, development of congressional protocols by involving stakeholders, accountability reporting through annual performance planning and reporting, customer satisfaction, performance measurement, strategic human capital management, and establishing action-oriented implementation goals. This appendix describes AOC's progress to date in addressing each of these recommendations. We provide a brief review of findings that led to each recommendation, report the actions that AOC has taken to implement the recommendation, and provide our analysis of whether AOC's actions address the underlying issues that caused us to make the recommendation in our January 2003 report. We also make additional recommendations to assist AOC in improving its communications with employees and stakeholders.

Recommendation: Improve strategic planning and organizational alignment by involving key congressional and other external stakeholders in AOC's strategic planning efforts and in any organizational changes that may result from these efforts.

Successful organizations ensure that their strategic planning fully considers the interests and expectations of Congress and other stakeholders. In moving forward with its strategic planning efforts, it will be critical that AOC fully engage key congressional and other stakeholders in further developing and implementing its strategic plan, as well as revisions, to provide a strong foundation for any organizational or operating changes that may be needed to implement the plan. Key congressional and other stakeholder involvement will be especially important for AOC to help it ensure that its efforts and resources are targeted at the highest priorities.

Actions Taken by AOC: In March 2003, AOC issued a draft strategic plan¹ for fiscal years 2003 through 2007 that contained AOC's four strategic focus areas and corresponding strategic goals described in table 1. AOC also issued a draft performance plan² outlining the specific actions and milestones to reach for achieving the goals and objectives established in

¹The Architect of the Capitol, *Draft Strategic Plan, FY 2003—2007*, (Washington, D.C.: March 7, 2003).

the draft strategic plan. The draft strategic plan is to become operational through the annual performance planning process, which translates strategic goals into objectives, action plans, milestones, and performance measures. AOC has developed an overall approach to managing organizational performance that includes strategic planning, annual planning and accountability reporting, and assessment of AOC's performance based on meeting agencywide milestones and measures. AOC staff plans to meet with stakeholders to discuss its plan. The draft strategic plan will be the cornerstone of this process.

As stated in its draft strategic plan, AOC plans to update the strategic plan every two years, annually produce a performance plan and performance report, along with action plans supplemented by more detailed functional plans developed along the same planning time line (fiscal years 2003-2007). In its draft performance plan and based on the strategic focus areas in table 1, AOC has developed corresponding strategic objectives, action plans, milestones, and target dates to help the agency achieve its strategic goals and monitor its progress.

Table 1: AOC's Strategic Focus Areas and Strategic Goals

Strategic Focus Area	Strategic Goal
Facilities Management	Maintain and preserve the National Treasures entrusted to our care by providing timely and quality facilities management and related support services.
Project Management	Enhance the National Treasures by planning and delivering timely and quality projects.
Human Capital	Attract, develop and retain diverse, satisfied and highly motivated employees with the skills, talents, and knowledge necessary to support the agency's mission.
Organizational Excellence	Provide the highest quality services to our clients through improved business programs, processes, and systems.

Source: March 2003 AOC Draft Strategic Plan.

In addition, AOC is also involving key congressional stakeholders, as we recommended, in the development of its agency draft strategic plan and is requesting input on the strategic direction of the agency. According to

²The Architect of the Capitol, *Draft Performance Plan, Achieving AOC's Strategic Goals and Objectives*, (Washington, D.C.: March 7, 2003).

AOC's Deputy Chief of Staff, as of May 2003, the Architect and other senior AOC officials have met with 16 stakeholders, such as Members of Congress, committee staff, and other legislative agency staff members, and have scheduled seven meetings with additional stakeholders to discuss the agency's draft strategic plan to obtain stakeholder input. During these meetings, AOC officials reviewed with stakeholders its mission, vision, and core values and the four strategic focus areas along with their corresponding strategic goals. AOC officials also asked stakeholders to comment on: (1) the positive actions they would like to see the agency continue or expand, (2) the areas needing improvement or missing entirely, (3) ways that AOC could improve its relationship with the stakeholder, and (4) criteria used by the stakeholder to judge AOC's performance.

The need for a strong and continuing communications strategy, an augmented fire safety strategy, and creating a "living" planning and improvement approach that becomes part of AOC's culture, were among the important issues raised by congressional stakeholders. AOC planned to incorporate the feedback received from stakeholder meetings into its agency strategic and performance plans by December 31, 2003.

GAO Analysis: AOC is making progress in addressing our recommendation by improving its strategic planning process and providing more specificity to its strategic goals and objectives, along with developing milestone dates and activities to assist the agency in monitoring its progress. AOC is also involving key congressional stakeholders in the development of its draft agency strategic plan and asking for input on the strategic direction of the agency. AOC's high-level summary of the stakeholder reaction it received demonstrates the value of such outreach. Building on these efforts, it is important that AOC continue to involve key congressional, as well as other stakeholders, in the strategic planning process and keep them informed of any operational and organizational changes resulting from this planning process.

Recommendation: Develop comprehensive strategy to improve internal and external communications by providing opportunities for routine employee input and feedback.

We reported that AOC could (1) strengthen its internal communications by developing a communications strategy that would help AOC's line employees understand the connection between what they do on a day-to-day basis, AOC's strategic goals, and their individual performance expectations, and (2) seek employee feedback and develop goals for

improvement. We also stated that one way of implementing such a communication strategy is to conduct routine employee feedback surveys and/or focus groups. As part of our January 2003 report, we used focus groups to gather employee and supervisor perceptions about working at AOC. These focus groups generated a wealth of valuable information to AOC on employees' views on a range of issues including perceptions of supervisory favoritism and inconsistency in the way that supervisors applied awards, overtime, and leave policies. AOC noted that the use of employee focus groups or surveys is one strategy it plans to use to help achieve its human capital strategic goal of attracting, developing, and retaining diverse, satisfied, and highly motivated employees.

Actions Taken by AOC: AOC published its draft agencywide *Strategic Communications Plan, 2003-2007* on August 29, 2003, and planned to obtain comments from its key congressional stakeholders to complete this plan by December 31, 2003. The draft communications plan recognizes that communicating with employees, stakeholders, and other customers is critical to achieving AOC's strategic goals and contains three strategies: (1) educating employees on the agency strategic plan and the change process AOC will use to achieve its strategic goals, (2) communicating the agency strategic plan's goals and agency accomplishments with congressional and external audiences, (3) continuing to expand communications initiatives by considering the development of correspondence policies and guidelines, a media contact policy, and other directives to assure a clear line of communication and a consistent message. AOC has developed strategies to communicate with each of its identified customers and stakeholders, including AOC employees, congressional and other public officials, and the visiting public, dignitaries, other federal agencies, historians, and others. In its communications plan, AOC has also noted that it will be important to track the effectiveness and impact of communications initiatives by conducting employee feedback surveys, employee focus groups, stakeholder and client surveys and meetings, tracking word of mouth comments, and correspondence.

According to its draft strategic communications plan, AOC plans to initiate several actions to implement this communication strategy. AOC plans to:

- publish more frequently the agency's employee newsletter, *Shop Talk*, increasing the number of issues per year from four to six and to feature more stories about AOC's strategic plan,

- conduct employee feedback sessions and/or focus groups every two years,
- conduct employee site tours of major AOC projects, such as the Capitol Visitor Center in fall 2003, and
- explore sending taped video messages or webcasts from the Architect to employees.

Additionally, according to the Deputy Chief of Staff, AOC will follow up on the Architect's commitment, stated in his May 23, 2002 memorandum to employees, to conduct employee focus groups, beginning in fiscal year 2005. According to AOC's Deputy Chief of Staff, the need to conduct an employee focus group was identified as part of AOC's draft performance plan. However, the Deputy Chief of Staff stated that funds to conduct AOC's employee focus groups or surveys were requested after the fiscal year 2004 budget submission in early December 2002. Therefore, AOC plans to conduct its employee focus groups or surveys in fiscal year 2005, with the final analysis of these focus groups to be issued in fiscal year 2005.

AOC also plans to communicate with congressional stakeholders and other public officials by continuing to publish its *Highlights Report* and begin producing an annual financial report and a quarterly capital project report to congressional leaders and key staff, as well as conducting continuous outreach to congressional press secretaries.

GAO Analysis: AOC is partially addressing our recommendation. The development of its draft agencywide strategic communications plan is a positive step towards improving and coordinating communication with its internal and external audiences. Because people are the drivers of any organizational transformation, it is vital to monitor their attitudes.³ However, it is most important for employees to see that top leadership not only listens to their concerns, but also takes action and makes appropriate adjustments to the transformation in a visible and timely way. However, AOC does not plan to hold employee focus groups until fiscal year 2005, even though it is important that AOC leadership obtain employee feedback on its transformation in a timely manner. While AOC cites budget

³U.S. General Accounting Office, *Results-Oriented Cultures: Implementation Steps to Assist Mergers and Organizational Transformations*, GAO-03-669 (Washington, D.C.: July 2, 2003).

limitations as preventing them from conducting employee focus groups or surveys earlier than fiscal year 2005, our own experience at GAO when we obtained employee views, such as through focus groups, showed us it need not be a resource intensive effort. In any case, the benefits often far exceed the incremental costs.

Additional Recommendation: We recommend to the Architect of the Capitol that AOC gather and analyze employee feedback from focus groups or surveys before fiscal year 2005, as well as communicate how it is taking actions to address any identified employee concerns.

Recommendation: Develop a comprehensive strategy to improve internal and external communications by completing the development of congressional protocols by involving stakeholders.

In our January 2003 report, we noted that AOC drafted an initial set of congressional protocols that would help ensure that AOC deals with its congressional customers using clearly defined, consistently applied, and transparent policies and procedures. At that time, AOC noted that these protocols needed to be made consistent with the approach for AOC's draft strategic plan, finalized, and distributed. We also stated that AOC must continually involve its stakeholders in the development of these protocols.

Actions Taken by AOC: AOC completed its draft congressional protocols on June 30, 2003 and plans to meet with congressional stakeholders in the subsequent few months to discuss these protocols. AOC officials stated that it may be challenging to implement these congressional protocols because the agency's clients have become accustomed to receiving immediate service and using an informal means of interacting with AOC staff when requesting such services. AOC plans to issue its final protocols by March 31, 2004.

GAO Analysis: AOC is partially addressing our recommendation. The purpose of agency protocols is to help create a basic understanding between AOC and its stakeholders about how AOC's efforts and resources can be targeted at the highest priorities, as well as transparency about how decisions and tradeoffs can be made and services deployed given the competing demands that confront AOC, and how those demands and resources require careful and continuous balancing. AOC needs to discuss with its stakeholders how the use of these protocols will help AOC to balance immediate customer needs with the achievement of overall agency strategic goals. In our January 2003 report, we noted that we had worked

closely with Congress on the development of our own congressional protocols, along with careful pilot testing, and then implemented our final protocols in 1999. A pilot test would provide AOC and its customers an opportunity to test the application of the protocols to the various types of customer needs the AOC confronts and to revise those protocols based on feedback obtained during the pilot.

Additional Recommendation: We recommend that AOC conduct a pilot of its congressional protocols in one or more of its jurisdictions to determine how well its protocols would work in addressing customer requests for service, while balancing the need of multiple requests with the strategic plan and corresponding project priorities of the agency.

Recommendation: Develop a comprehensive strategy to improve internal and external communications by improving accountability reporting through annual performance planning and reporting.

In our January 2003 report, we noted that AOC could adopt the reporting elements of the 1993 Government Performance and Results Act (GPRA) to strengthen accountability and transparency by annually reporting program performance and financial information. This is consistent with the approach that we have taken with our own performance planning and accountability reporting. Such results-oriented accountability reporting would help AOC communicate what it has accomplished, as well as its plans for continued progress, to its external stakeholders.

Actions Taken by AOC: According to AOC's draft strategic plan, the agency plans to produce an annual performance plan at the beginning of each fiscal year that outlines the specific actions, associated milestones, and performance measures planned for the upcoming fiscal year. In addition, as stated in the AOC draft strategic plan, this plan is scheduled to be updated every 2 years, and at the end of each fiscal year, AOC will publish an annual performance report that outlines progress towards meeting agency goals, as well as the individual performance measures. AOC also plans to integrate its performance reporting cycle into the budget cycle, so that congressional appropriators and other key stakeholders can use the information for planning and resource decisions. In addition, AOC plans to provide an annual financial report to congressional leaders and key staff.

AOC also plans to monitor its progress against the measures and achievements of milestones through monthly assessment meetings with

agency senior executives and senior management team. AOC held its first assessment meeting on June 23, 2003, to gather its progress on milestones to date. According to the draft performance plan, AOC had planned to report progress to stakeholders on September 30, 2003. However, according to AOC officials, because the draft strategic and performance plans had not yet been approved by the Chief Operating Officer (COO), and thus the milestone activities were also not approved, a September 30 meeting was not held with stakeholders.

GAO Analysis: AOC is making progress in addressing our recommendation. According to the AOC draft strategic and performance plans, AOC is committed to implementing a strategic management framework including issuing a strategic plan every 2 years, developing an annual performance plan, and an annual performance report that discusses how AOC is progressing on meeting its goals, as well as mid-year status briefings. Meeting with congressional and other stakeholders to discuss progress on the accomplishment of its milestones periodically is an important part of establishing an annual reporting structure, as well as communicating effectively with stakeholders to help AOC build its management and accountability framework. Once the agency draft strategic and performance plans are approved, AOC will be in a position to hold its mid-year status briefings as indicated in its annual performance plan.

Recommendation: Develop a comprehensive strategy to improve internal and communications by continuing to regularly measure customer satisfaction AOC-wide.

In our January 2003 report, we reported that in June 2002, AOC made a concerted effort to gather the views of some of its clients through a building services customer satisfaction survey for the Senate, House Capitol building, and Library of Congress and planned to continue conducting this survey annually. The purpose of the survey was to obtain valuable feedback from AOC customers about the services received. We recommended that AOC's continuing efforts to routinely measure customer satisfaction AOC-wide with both its congressional customers as well as other customers, such as visitors to the Capitol Hill complex, would help AOC identify its service quality strengths, performance gaps, and improvement opportunities.

Actions Taken by AOC: According to documents we reviewed, as a result of conducting the June 2002 building services customer survey, AOC

reported back to each jurisdiction in March 2003 the actions it had taken to improve building services. In June 2003, AOC administered its second building services customer satisfaction survey for the Senate, House, Capitol building, and Library of Congress jurisdictions. According to its draft performance plan and letters accompanying the second customer satisfaction survey, AOC expected to report the final results of this second building services customer satisfaction survey in December 31, 2003. The Architect also stated in these letters that AOC will use the results of these customer satisfaction surveys to identify service improvement initiatives and priorities for action that will be incorporated into the AOC business plan, as well as monitor the quality of AOC services and the progress of improvement initiatives. According to the Deputy Chief of Staff, AOC is planning to conduct its customer survey annually.

GAO Analysis: AOC has fulfilled our recommendation because it has taken actions based on the 2002 customer satisfaction survey, continues to measure customer satisfaction in 2003, and plans to conduct an annual customer survey.

Recommendation: Strengthen performance measurement and strategic human capital management by developing annual goals and measuring performance.

Measuring performance enables an organization to track its progress in achieving its goals, gives managers crucial information on which to guide their organizational and management decisions, creates powerful incentives to influence organizational and individual behavior, and helps to assure accountability. Developing annual performance goals that provide a connection between the long-term strategic goals in the strategic plan and the day-to-day activities of managers and staff members will help AOC establish a management and accountability framework and reporting system that is needed for organizational transformation.

Actions Taken by AOC: According to its draft strategic plan, AOC's performance measurement approach is to adopt specific strategies and practices to move towards business decision making that is supported by performance data, using both qualitative and quantitative performance measures to demonstrate progress towards achievement of its strategic goals and objectives. AOC has identified a number of high-level agencywide performance measures to monitor and evaluate the success of its work corresponding to its four strategic focus areas: facilities management, project management, human capital, and organizational excellence. AOC

plans to adopt specific strategies and practices to move towards decision-making that is supported by performance data, using both qualitative and quantitative performance measures to demonstrate progress towards its strategic goals and objectives. According to AOC's draft strategic plan, the performance measures to be developed will serve as the basis for the annual performance goals that connect its strategic goals to the day-to-day work of AOC employees. The high-level agencywide measurement areas used to monitor AOC's success, and for which AOC leaders will be held accountable, have been identified as follows: client satisfaction, employee satisfaction, projects on-time, projects on-budget, project quality, facility maintenance, asset preservation, employee safety, clean audit, recycling, and budget execution. According to the AOC draft strategic plan, the targets will establish standards for desired performance on each measure. However, the specific metrics and the methodology to obtain data for each of these areas, as well as the targets for each measure, have not yet been developed. In July 2003, AOC hired a management analyst to help create more specific program-level measures, corresponding to agency-level performance measures described previously, that will form the basis of an agencywide performance measurement system.

GAO Analysis: AOC is making progress in addressing our recommendation. AOC has begun to institutionalize important elements of its strategic management and accountability framework by developing annual goals and issuing its strategic and performance plans. As such, AOC has taken its first steps towards identifying high-level agencywide measures and has committed to creating a more specific performance measurement system to help the agency track its own progress in meeting its strategic goals and keeping key stakeholders informed. The creation of a performance measurement system will be essential to helping AOC track and report on its agencywide performance measures. Our analyses in Appendixes V, VI, and VII that assess AOC's key program issues, worker safety, project management, and recycling cite the lack of specific performance measures as continuing critical issues for AOC to address.

Recommendation: Strengthen performance measurement and strategic human capital management by creating a line of sight by linking AOC's senior executive and employee performance management systems to mission-critical goals.

Effective performance management systems can be strategic tools for organizations to drive internal change and achieve external results. These systems align individual performance expectations with organizational

goals.⁴ High performing organizations align performance expectations of top leadership with goals and then cascade those expectations down to lower levels. In our January 2003 report, we noted that AOC had instructed its senior executives to incorporate the agency's draft strategic or mission-critical goals and responsibilities into their performance requirements, which describe how an individual's work contributes to organizational goals and results. We recommended that AOC align its employee performance management system, Performance Communication Evaluation System (PCES), with its senior executive performance management system, Performance Review Process (PRP), to strengthen individual accountability for organizational goals.

Actions Taken by AOC: As of July 1, 2003, AOC reported that it completed its PRP. Each senior executive is to be held accountable for the following four performance requirements: leadership and management, customer satisfaction, safety, and human capital management. Senior executives are to identify the critical actions that pertain to these performance requirements and support the achievement of specific milestones as outlined in the agency's draft performance plan.

AOC's director of the AOC Human Resources Management Division (HRMD) told us that when the recently appointed COO completes and reviews the strategic plan and the agency's strategic goals, AOC will be able to incorporate these strategic goals into PRP and subsequently link these goals into PCES. This is to be completed by January 2005. According to the HRMD director, to align PCES with PRP, AOC will need to coordinate its multiple rating cycles into one cycle. The Senior Policy Committee met on June 24, 2003, to discuss coordinating the performance rating cycles and agreed to implement one standard performance rating cycle beginning in January 2005 from January 1 to December 31 of each year.

GAO Analysis: AOC is making progress in addressing our recommendation. AOC is working to create the line of sight needed to link senior executive performance with agency strategic goals by identifying performance requirements for senior executives that are intended to contribute to the achievement of the agency's draft strategic plan. While consolidating the jurisdictional employee performance management cycles

⁴U.S. General Accounting Office, *Results-Oriented Cultures: Creating a Clear Linkage between Individual Performance and Organizational Success*, GAO-03-488 (Washington, D.C.: Mar. 14, 2003).

would be helpful in the administration of performance reviews at AOC, AOC need not wait for this consolidation to make important progress in integrating its strategic goals into PCES. As AOC's performance management effort moves forward, it will be important that AOC adopt additional performance management practices that leading organizations have used to enhance performance and ensure accountability.⁵

Recommendation: Strengthen performance measurement and strategic human capital management by establishing agencywide core and technical competencies and holding employees accountable for these competencies as a part of the performance management system.

In our January 2003 report, we recommended that AOC consider developing core and technical competencies as the basis for its performance management systems. Agencywide core and technical competencies can serve as guidance for employees as they strive to meet organizational expectations. The core competencies should be derived from AOC's strategic plan and workforce planning efforts and reflect AOC's core values. All employees should be held accountable for achieving core competencies as AOC moves to transform its culture. We also suggested that as AOC develops a cadre of managerial and professional employees, the development of specific technical competencies can assist the agency in creating and developing a successful leadership and managerial team.

Actions Taken by AOC: AOC's HRMD director told us that AOC is creating a leadership development program that identifies competencies for senior executives and agency managers. In addition, this draft leadership program will identify training to match those competencies and provide alternative training options to meet the program requirements. According to the HRMD director, in September 2003, this draft leadership development program was submitted for management consideration by the Senior Policy Committee and is still pending approval. The Director also told us that the identification of competencies for all employees in a defined framework would begin after the Office of Workforce Planning and Management (WFPM) is established.⁶ AOC is also revising existing competencies for shop supervisors. According to the HRMD director, she will be working with the heads of the Office of Design and Construction

⁵See U.S. GAO-03-488.

and the Procurement Division in fall 2003 to identify technical competencies for project managers and contracting officers, respectively.

GAO Analysis: AOC is making progress in addressing our recommendation. AOC is taking the initial steps towards establishing competencies for its senior managers and also developing the training opportunities to help its managers achieve those competencies. Given the designated organizational purpose of WFPM, it is appropriate that AOC plans to use this office to help assess the competencies needed for employees, as we noted in our January 2003 report that competencies can help form the basis for an organization's selection, promotion, training, performance management, and succession planning initiatives—all traditional functions of a strategic workforce planning approach. We have found that successful organizations include human capital professionals acting together with agency leaders and line managers to develop strategic and program plans to accomplish agency goals.⁷ Through this joint action, agency and human capital leaders and their staffs share accountability for successfully integrating strategic human capital approaches into the planning and decision-making of the agency. As WFPM is established, it is important that AOC adopt such an approach.

AOC is also making progress towards the development of technical competencies by working with its respective offices in developing competencies for its project managers and contracting officers. However, it is important that AOC continue the development of both its technical and core competencies for all employees and ensure that these competencies are tied to the agency's strategic plan. Part of the typical competency development process is the validation phase, which allows employees an opportunity to validate the accuracy of the defined competencies. This validation process is critical to capturing the competencies accurately and also gaining employee ownership and acceptance of the competencies for incorporation into the performance management system.

⁶According to AOC, the purpose of the Office of Workforce Planning and Management is to oversee and conduct such organizationwide functions as workforce planning and analysis, succession planning, organizational staffing, staff resource allocation, and to review organizational structure and alignment of functions.

⁷U.S. General Accounting Office, *Human Capital: Selected Agency Actions to Integrate Human Capital Approaches to Attain Mission Results*, GAO-03-446 (Washington, D.C.: Apr. 11, 2003).

Recommendation: Strengthen performance measurement and strategic human capital management by developing the capacity to collect and analyze workforce data.

Collecting and analyzing data are fundamental building blocks for measuring the effectiveness of human capital approaches in support of the mission and goals of an agency. The ability to collect and analyze data will greatly enhance AOC's ability to acquire, develop, and retain talent, while allowing it to effectively plan for the needs of its workforce. AOC needs to develop a fact-based, comprehensive approach to the collection and analysis of accurate and reliable information across a range of human capital activities.

Actions Taken by AOC: AOC has created WFPM as described above, but has not yet established the ability to collect and analyze workforce data. According to the HRMD director, AOC does not plan to purchase any system until WFPM is staffed, although AOC has been reviewing possible vendor systems designed to help it collect workforce data.

GAO Analysis: AOC's plans are addressing our recommendations. However, until the office is established and additional actions are undertaken, we cannot fully assess its actions in response to this recommendation. Moreover, AOC does not need to wait until it contracts with a vendor to begin to identify and establish reliable data sources and collection methods that will help to support its workforce planning and management process. Early development of reliable data provides a baseline that an agency can use to identify current workforce problems. Regular updating of the data enables agencies to plan for improvements, manage changes in the programs and workforce, and track the effects of changes on achieving program goals. To ensure a data-driven, performance-oriented approach to human capital management, senior agency officials, including both program leaders and human capital leaders, can provide oversight and accountability for the integration and alignment of the agencies' human capital approaches. As shown in figure 1, federal agencies collect and analyze a variety of information to support their specific workforce planning efforts.

Figure 1: Examples of Workforce Data That Are Collected and Analyzed by Other Federal Agencies

- Actual and projected attrition rates (including retirements) showing how many people have left the agency in the past and the estimated number who will leave in the future
- Exit surveys or interviews with departing employees to better understand the reasons that people leave
- Knowledge, skills, and experiences of current workforce
- Size and shape of the workforce including information such as, the distribution of employees by pay level and ratio of managers to employees
- Dispersal of performance appraisal ratings, such as the mean, mode, and standard deviation of scores
- Number of performance awards and their distribution among divisions and offices
- Total human capital cost in dollars and as a percentage of the total operating budget
- Average period required to fill vacancies, and trends over time
- Acceptance rates among job candidates to whom positions are offered
- Costs of promotion, grade increase, and within-grade increases

Source: Compiled from previous GAO reports.

Recommendation: Strengthen performance measurement and strategic human capital management by identifying current and future workforce needs and developing strategies to fill gaps.

AOC can benefit from strategically identifying its current and future workforce needs and then creating strategies to fill any gaps. Workforce planning efforts linked to strategic program goals and objectives can help the organization better identify needs such as ensuring a diverse labor force, succession planning for scarce skill sets, and other competencies needed in the workforce.

Actions Taken by AOC: In our January 2003 report, we stated that AOC recognized the need to strategically plan for its workforce and had requested funding for four positions in its fiscal year 2003 budget to create an organization and workforce management team reporting to the Deputy Chief of Staff within the Office of the Architect. According to AOC officials, AOC hired the Director of WFPM and filled one staff position on October 7, 2003 and is recruiting for the remaining workforce planning and management analyst positions. The Deputy Chief of Staff told us that the

COO would work collaboratively with WFPM to focus on the assessment of AOC's skill mix, resource needs, and succession planning for the agency.

GAO Analysis: AOC's plans are addressing our recommendations, but until the office is established and additional actions are undertaken, we cannot fully assess its action in response to this recommendation. It is encouraging that AOC is working to establish this office that will allow the agency to conduct workforce planning and analysis. As AOC's workforce planning efforts move forward, AOC will naturally need to develop an approach that best meets its organizational needs. Our work looking at strategic workforce planning suggests that there are certain principles that an organization should address irrespective of the context in which planning is done. We have issued several reports that discuss the following common core principles of workforce planning.⁸

- Involve top management, employees, and other stakeholders in developing, communicating, and implementing the strategic workforce plan,
- Determine the critical skills and competencies that will be needed to achieve future programmatic results,
- Develop strategies tailored to address gaps in number, deployment, and alignment of human capital approaches that enable and sustain the contributions of all critical skills and competencies,
- Build the capability needed to address administrative, educational, and other requirements important to support workforce strategies, and
- Monitor and evaluate the agency's progress towards its human capital goals and the contribution that human capital results have made towards achieving programmatic goals.

Recommendation: Establish action-oriented implementation goals over the long term and a time line with milestone dates to track the

⁸See U.S. General Accounting Office, *Human Capital: Key Principles for Effective Strategic Workforce Planning*, GAO-04-39, (Washington, D.C.: Dec. 11, 2003); *Government Printing Office: Advancing GPO's Transformation Effort through Strategic Human Capital Management*, GAO-04-85 (Washington, D.C.: Oct. 20, 2003); *Tax Administration: Workforce Planning Needs Further Development for IRS's Taxpayer Education and Communication Unit*, GAO-03-711 (Washington, D.C.: May 30, 2003).

organization's progress towards achieving those implementation goals

Our January 2003 report stated that AOC faces many challenges as it transforms to become a more results-oriented, matrixed, client-focused, and proactive organization. Making such fundamental changes in AOC's culture will require a long-term, concerted effort. We also noted that our recommendations covered a broad landscape of issues confronting AOC, such as strategic planning, communications, strategic human capital, financial management, information technology, as well as long-standing issues in worker safety, project management, and recycling. Establishing a strategic management and accountability framework and developing management infrastructure and internal controls would help AOC achieve its organizational transformation. Thus, it was important to craft a comprehensive and integrated approach addressing AOC's challenges and setting appropriate priorities, even though by necessity it would have to be phased in over time.

Therefore, we recommended that it was essential AOC work with key congressional and other stakeholders to establish action-oriented, implementation goals over the long term, and a time line with milestone dates to track the organization's progress towards achieving those implementation goals. We also suggested to Congress that it consider ways in which to elevate, integrate, and institutionalize accountability for addressing management issues and leading organizational transformation at AOC; one option was to create a statutory COO or similar position for AOC to improve its executive decision-making capacity and accountability.

Actions Taken by AOC: In the legislation that mandated we undertake a general management review of the AOC, Congress also required that AOC respond to our review by preparing a management improvement plan addressing our study.⁹ To satisfy this congressional requirement to create a management improvement plan addressing our management review recommendations and our specific recommendation that AOC create action-oriented implementation goals and a time line with milestone dates to track AOC's progress towards achieving its goals, AOC issued its draft performance plan in March 2003 for fiscal years 2003-2007 with a particular emphasis on fiscal years 2003-2004. This draft performance plan includes

⁹See Section 129(d) of Pub. L. No. 107-68, Nov. 12, 2001 and corresponding reports, Sen. Rep. No. 107-37 at 28,29 (2001) and H.R. Conf. Rep. No. 107-148 at 72 (2001).

specific action plans developed along the same planning time line as the AOC draft strategic plan, as well as the tactical-level actions, performance targets, and milestone dates necessary to carry out agency-level strategies to achieve its mission-critical goals. In the 2003 Legislative Branch Appropriations Act,¹⁰ Congress created the COO position at AOC, and the Architect of the Capitol appointed its first COO, who began on July 28, 2003.

GAO Analysis: AOC has fulfilled our recommendation by issuing its draft performance plan, which establishes action-oriented implementation goals over the long term and a time line with milestone dates to track the organization's progress towards achieving those implementation goals. The implementation of these two recommendations in tandem (1) the creation of AOC's management improvement plan and (2) the appointment of the COO position to help AOC elevate, integrate, and institutionalize accountability for addressing management issues and leading its transformation, allow AOC to address issues across the agency's programs and influence performance in all areas critical to achieving its mission. Moving forward, it is critical that AOC complete its draft performance plan and then use it as a basis for managing the agency, provide progress reports to Congress, and assure AOC's accountability.

¹⁰Section 1203 of Division H, Title I, Pub. L. No. 108-7, Feb. 20, 2003, (The Consolidated Appropriations Resolution, 2003).

Strategic Human Capital Management

We made three recommendations in our January 2003 report to help the Office of the Architect of the Capitol (AOC) improve its management infrastructure and internal controls by strengthening its human capital policies, procedures, and processes by developing a consistent agencywide leave policy, comprehensively collecting and analyzing data from its employee relations offices, and establishing a direct reporting relationship between the Ombudsperson and the Architect. This appendix describes AOC's progress to date in addressing each of these recommendations. We provide a brief review of why we made each recommendation, report the actions that AOC has taken to implement the recommendation, and provide our analysis of whether AOC's actions address the underlying issues that caused us to make the recommendation in our January 2003 report.

Recommendation: Strengthen AOC's human capital policies, procedures, and processes by continuing to develop and implement agencywide human capital policies and procedures and holding management and employees accountable for following these policies and procedures.

Effective organizations establish clear and consistent human capital policies with clearly stated expectations for both employees and supervisors and ensure that there is accountability for following these procedures accordingly. As mentioned, we conducted focus groups as part of our management review and found that a majority of the focus group participants perceived that AOC's supervisors applied awards, overtime, and leave policies inconsistently and suspected supervisory favoritism in making these decisions. Some focus group participants stated that supervisors determined on their own when an employee was entitled to sick or annual leave and inconsistently decided when some employees could take off time from work. Further, a majority of focus group participants felt that the Architect's Awards Program was not applied consistently across jurisdictions and shifts for all employees.

Actions Taken by AOC: Since our January 2003 report, AOC has drafted an agencywide absence and leave policy to "assure consistent treatment of employees through the establishment of uniform procedures for the administration of leave."¹ This policy covers most types of employee leave, such as annual, sick, family and medical, and absence without pay. In September 2003, AOC submitted its draft leave policy to the Architect for

¹See *AOC Human Resources Manual*, Order 630-1, Absence and Leave, July 1, 2003.

his review and approval. AOC has submitted its policy and procedures for administering various pay flexibilities, such as recruitment bonuses and retention allowances, superior qualification appointments, and pre-employment travel expense reimbursements to the AOC Office of Employment Counsel for review. On June 15, 2003, AOC issued its final guidelines to supervisors and employees for determining when employees are eligible to receive Sunday premium pay.²

In our January 2003 report, we reported that, in March 2002, AOC had issued a policy containing responsibilities and procedures for administering its employee rewards and recognition program. The Human Resources Management Division (HRMD) director told us that managers and supervisors are held accountable for the consistent application of the human capital policies and procedures, such as granting leave, overtime, and employee awards in the Performance Communication Evaluation System (PCES) within the performance requirement of Supervision and Management.

GAO Analysis: AOC is making progress in addressing our recommendation of developing and implementing agencywide human capital policies and procedures by issuing an absence and leave policy, providing guidelines to its workforce for determining eligibility for Sunday premium pay, and completing its policy and procedures for administering pay flexibilities. AOC must continue to hold management and employees accountable for following these policies and procedures through the performance requirements in its performance management systems. As part of its management and oversight responsibilities of human capital policies, it is important that AOC senior management and HRMD continually monitor whether supervisors and managers are fairly administering the policies concerning leave, rewards, and recognition. AOC could use information gathered during employee focus groups, employee satisfaction surveys, and informal feedback from employees to monitor employee views on the administration of these policies.

Recommendation: Strengthen AOC's human capital policies, procedures, and processes by assessing ways in which AOC management could better gather and analyze data from the various

²See *Pay Under the Architect's Wage System*, Chapter 532, "Determining Eligibility for Sunday Premium Pay," June 15, 2003.

employee relations offices and employee advisory council while maintaining employee confidentiality.

AOC has a number of offices, such as the Equal Employment Opportunity and Conciliation Program Office, the Office of the Ombudsperson, as well as an employee group, the Employee Advisory Council (EAC) formerly known as the Architect's Work Team, whose function is to interact directly with employees and can gather information regarding employee concerns. In addition to the roles that these offices fill in resolving the concerns of individual employees, each of these offices can also be a valuable source for identifying general issues of agencywide employee concerns. During our management review, we found that it was not clear whether there was a coordinated approach to track patterns of agencywide employee relations issues among these offices and EAC. If this information could be collected and analyzed by AOC's senior managers, it could be useful for alerting management to issues affecting employee relations. We also noted that an agencywide tracking method needed to be balanced to maintain employee confidentiality.

Actions Taken by AOC: According to the Deputy Chief of Staff and HRMD director, there is a new objective in the AOC *Human Capital Plan*, issued in December 2003 that allows for additional input into the policy development review process from employee groups, such as EAC. In addition, the HRMD director told us that in August and October 2003 representatives from the Offices of Labor Relations, Equal Employment Opportunity and Conciliation Program, Human Resources, and the Office of Employment Counsel met to discuss how to best shape information on possible trends in employee relations issues among employees. According to the HRMD director, this discussion centered on how to best share information among these offices and what will be done with the information when a trend is noted. AOC plans to establish a defined process for a trial period on how best to share and examine employee relations data and then reevaluate this process.

GAO Analysis: AOC is making progress in addressing our recommendation by holding meetings with the program offices that can provide employee relations data and assessments of employee concerns at the agency and by including an objective in its *Human Capital Plan* to solicit additional feedback from its EAC. It is important that AOC continue holding these meetings to discuss ways in which it can systematically gather and analyze information about general employee concerns, while

maintaining employee confidentiality, and regularly bring these concerns to the attention of senior management.

Recommendation: Establish a direct reporting relationship between the Ombudsperson and the Architect consistent with professional standards.

Our January 2003 report assessed the ombudsperson position at AOC to determine whether it adhered to the standards of practice for ombudspersons established by professional organizations, including embracing the core principles of independence, neutrality, and confidentiality. We found that the AOC Ombudsperson reported to the Administrative Assistant to the Architect of the Capitol or his or her authorized designate, but not directly to the Architect. The Ombudsman Association Standards of Practice define independence as functioning independently of line management with the ombudsman reporting to the highest authority in an organization. Furthermore, the American Bar Association's ombudsman standards for independence state that the ombudsman's office must be and appear to be free from interference in order to be credible and effective.³ We recommended that if the AOC Ombudsperson were to directly report to the Architect and not through another senior manager, the core principle of independence would be strengthened.

Actions Taken by AOC: The Deputy Chief of Staff told us that in the future the Ombudsperson and Architect would have a direct reporting relationship and plan to meet directly to discuss the Ombudsperson's monthly status reports, though these meetings have not yet taken place. He also told us in November 2003 that the current contract with the AOC Ombudsperson expired September 30, 2003, and AOC is hiring another contractor for the position and expects to fill the position in the next few months. AOC officials also stated that the Architect may choose to share the Ombudsperson's monthly report findings with the Chief Operating Officer and other selected senior managers in AOC, such as the Chief of Staff or her Deputy, as a followup to the Ombudsperson's report.

GAO Analysis: AOC is making progress in addressing our recommendation to adhere to the standard of independence for the office

³U.S. General Accounting Office, *Human Capital: The Role of Ombudsmen in Dispute Resolution*, GAO-01-466 (Washington, D.C.: Apr. 13, 2001).

of an ombudsman, though these meetings have not yet taken place. We recommended that AOC establish a direct reporting relationship between the Ombudsperson and the Architect to be consistent with professional standards, which suggests that the Ombudsperson report directly with the highest authority in the agency, in this case the Architect. It is appropriate for the Architect to also include the Chief Operating Officer, as another one of the highest authorities in the agency, during these monthly status meetings. According to the Ombudsman Association's model job description under reporting guidelines for an organizational ombudsman, "the ombudsman function is independent of and separate from the human resource and other existing administrative structures... and typically reports directly to the chief executive officer or chief operating officer, with access to the board of directors, if applicable." It is also appropriate for the Architect to share the Ombudsperson's report with selected senior managers in the organization. According to Ombudsman Association standards, the ombudsman "may prepare periodic reports, either verbally or in writing, on organizational trends and activities based on anonymous aggregate data. These reports may also identify patterns or problem areas in the organization's policies and practices and may recommend revisions or improvements, and may assess the climate of the organization and can be communicated in a general way to the organization's senior management."

Financial Management

In our January 2003 report, we made one recommendation to help the Office of the Architect of the Capitol (AOC) continue to improve its financial management by institutionalizing sound financial management practices. This appendix describes AOC's progress to date in addressing our recommendation. We provide a brief review of why we made this recommendation, report the actions that AOC has taken to implement the recommendation, and provide our analysis of whether AOC's actions address the underlying issues that caused us to make the recommendation in our January 2003 report.

Recommendation: Continue to improve AOC's approach to financial management by developing strategies to institutionalize financial management practices that will support budgeting, financial, and program management at AOC.

In our January 2003 report, we noted that AOC's Chief Financial Officer (CFO) had adopted our executive guide on world-class financial management as a road map for improving financial management. According to the CFO, the financial management component of AOC's March 2003 draft performance plan presents AOC's proposed actions, in response to our January 2003 recommendation, to institutionalize financial management best practices that support the effective delivery of programs and services. Specifically, the Office of the Chief Financial Officer (OCFO) has established three broad-based action plans to respond to this recommendation:

- build a foundation of financial control and accountability,
- assess the financial management organization's current role in meeting mission objectives and organize financial management to add value, and
- improve forward-looking analysis, train managers in understanding how to use financial information, and improve the partnership between financial management and operations.

Build a foundation of financial control and accountability.

A foundation of financial control and accountability provides a system of checks and balances and needed assurances that transactions are appropriately recorded and reported, assets are protected, established policies and procedures are followed, and resources are used economically and efficiently for the purposes intended. In this regard, this action plan

involves leveraging audit resources and the financial statement audit process to issue auditable financial statements, developing an approach for assessing and improving internal controls, and establishing inventory management and control procedures to ensure accurate and useful information. The plan also includes developing accurate operating and capital budget requests and related plans to properly evaluate the execution of programs, as well as processes and procedures needed to prepare financial and performance reports for major programs and business segments.

Actions Taken by AOC: OCFO reports that planning for the issuance of auditable financial statements has been completed, and implementation is underway to issue an audited balance sheet for fiscal year 2003 and a complete set of audited financial statements for subsequent fiscal years. AOC has established an audit committee to oversee the audits and has hired an external auditor to perform the initial audit and report on related internal control issues. In addition, OCFO reports that values have been established for property, plant, and equipment, and that reconciliation procedures have been developed for all major accounts. Various additional actions are planned by OCFO to support the fiscal year 2003 audit of the balance sheet, including an automated close of the accounting records and automated extraction of the financial statements. Current completion dates are mid-fiscal year 2004 for issuance of the fiscal year 2003 financial statements (including an audited balance sheet) and mid-fiscal year 2006 to receive an unqualified audit opinion on the complete set of fiscal year 2005 financial statements.

About internal controls, OCFO reports that policies and procedures have been developed for all major activities of the Accounting and Budget Division, including guidance on funds control administration. Key controls will be reviewed as part of the fiscal year 2003 financial statement audit. AOC plans to respond to the auditor's report on internal controls and issue a policy statement on internal controls by September 30, 2004.

Concerning inventory management and control procedures, OCFO reports that AOC has implemented an inventory accounting policy, developed interim policies and procedures for inventory management and control, and received bids for the purchase of a new inventory control system. AOC plans to implement its new inventory system during fiscal year 2004.

About budgeting, OCFO reports that AOC has implemented operating and capital budget processes for the development of the fiscal year 2005 budget

estimates submission to Congress. These processes include (1) a new capital planning program that standardizes and prioritizes capital project submissions, (2) a budget screening process that incorporates comparisons of prior-year spending trends for recurring programs, (3) a stakeholder review that examines all budgets to the lowest (suballotment) level, and (4) final review and approval by the Architect. AOC's current planned date for having a budget approved as submitted is September 30, 2007.

With regard to financial reports for major programs and business segments, OCFO reports that coding needed to facilitate the preparation of jurisdiction financial reports has been completed. AOC plans to generate automated financial reports for fiscal year 2003 and quarterly financial reports starting in fiscal year 2004. Actions needed to develop and issue annual performance reports for major programs and business segments, however, are not as far along. OCFO reports that planning is expected to begin in mid-fiscal year 2004, once AOC's performance plan is finalized. Currently, OCFO projects that it will issue the initial annual performance report in fiscal year 2007.

Assess the financial management organization's current role in meeting mission objectives and organize financial management to add value.

A financial management organization that meets its mission objectives and adds value does so by providing products and services that directly support strategic decision making and improving overall performance. To build such an organization, this action plan calls for revising OCFO's internal operating plan, developing a long-term workforce strategy to ensure that financial managers have necessary data analysis skills, and benchmarking OCFO processes against industry leaders and other federal agencies to facilitate reengineering of costly, inefficient processes.

Actions Taken by AOC: According to OCFO, planning has begun on the revision of the OCFO internal operating plan, which is currently scheduled for completion by the end of fiscal year 2004. By mid-fiscal year 2004, OCFO plans to begin developing long-term workforce strategies to ensure that AOC financial managers have appropriate financial analysis skills and to start reviewing and benchmarking financial transactions and processes as a basis for streamlining and reengineering financial processes. AOC plans to complete both of these action items by the end of fiscal year 2005.

OCFO plans to issue a report on benchmarking efforts that will be used, beginning in fiscal year 2006, to eliminate, streamline, and reengineer

costly and inefficient financial processes. Financial process changes are expected to be ongoing at the end of fiscal year 2007, the cut-off date for the 5-year performance plan.

Improve forward-looking analysis, train managers in understanding how to use financial information, and improve the partnership between financial management and operations.

Equipping managers with the skills and capabilities needed to effectively use financial information in prospective analysis improves the opportunity for meaningful partnerships between financial management and operations. To this end, this action plan seeks to establish a link between financial management and operations that helps to provide meaningful information for managing and measuring cost and performance. Specifically, this plan involves

- integrating AOC's financial and operating systems to facilitate annual program reviews,
- training managers to use financial information to improve operational planning and decision-making,
- implementing a cost accounting system for financial reporting,
- placing financial managers in jurisdictions,
- stabilizing financial management system upgrades, and
- developing a long-term operating plan.

Actions Taken by AOC: OCFO reports that planning has begun to (1) integrate financial and operating systems to equip decision-makers with relevant information and tools to perform ad hoc analysis, (2) establish expectations and procedures for conducting annual program reviews, (3) train managers to use financial information to improve operational planning and decision-making, and (4) acquire and install a cost accounting system for financial reporting.

Once financial and operating systems are integrated and expectations and procedures for the annual reviews are established, OCFO will be able to conduct its first annual program review. The review is currently planned for fiscal year 2004; however, due to potential key system integration

issues, OCFO is currently considering rescheduling the review for fiscal year 2006.

OCFO reports that many financial and procurement managers in the jurisdictions and central office have been trained in appropriations law, with further appropriations law training planned as an ongoing program. Additionally, OCFO anticipates that planning for other training can begin in mid-fiscal year 2004, with courses conducted later in the fiscal year. Letters of authority to properly trained managers authorizing them to conduct various financial activities are currently scheduled for distribution by the end of fiscal year 2004.

AOC acquisition and installation of a cost accounting system is currently scheduled for September 30, 2005; however, according to OCFO, this step needs to be moved to fiscal year 2006 because AOC has requested fiscal year 2005 funding for determining how it should perform cost allocation, and for support in system set-up and testing.

OCFO reports that planning has been completed on efforts to establish financial managers in jurisdictions, and the hiring of the first group of these managers is underway with completion expected by the end of fiscal year 2006.

With regard to financial management systems, OCFO reports that AOC continues to make progress in implementing major phases of its financial management system implementation plan, with the contracting module and inventory system—the final two phases—planned for production operations in October 2004. AOC's upgrade of the financial management system is also scheduled for October 2004, with future upgrades of major releases scheduled annually.

While plans are underway to revise OCFO's existing internal operating plan, as discussed previously, efforts have not yet begun to develop and issue a long-term operating plan. Completion of the long-term plan is currently scheduled for September 30, 2007.

GAO Analysis: Since January 2003, AOC has made progress in addressing our recommendation. It has developed and begun to implement three broad-based action plans that are intended to accomplish AOC's goal of institutionalizing financial management best practices that support the effective delivery of programs and services. These action plans, if properly carried out, represent a reasonable basis for achieving AOC's goal.

However, none of the individual action items associated with the three action plans has been completed, and many are not scheduled for completion until fiscal years 2006 and 2007. Furthermore, planning for certain items has not yet begun, and for some is not scheduled to begin until mid-fiscal year 2004. With regard to the length of time needed to complete individual action items, AOC management noted that they represent a measured approach to improving financial management while the agency's other processes and systems mature. While AOC has made progress since our January 2003 report, much work remains in beginning to address unplanned action items and complete ongoing planning and implementation efforts.

OCFO has made progress in planning and implementing actions designed to build a foundation of control and accountability. These efforts, most of which are associated with preparing AOC's first auditable financial statements, are well underway. OCFO also reports progress in planning and implementing action items related to improving the partnership between financial management and operations. However, OCFO reports only limited progress on efforts to assess the role of AOC's financial management organization in meeting mission objectives and to organize financial management so that it adds value to the organization. The CFO and his management team must ensure that proper planning begins where needed and ongoing planning and implementation is completed to achieve the goal of institutionalizing financial management best practices. In addition, because many completion dates are not scheduled until fiscal years 2006 and 2007, the use of interim dates by AOC for monitoring progress would be beneficial. We will continue to monitor and evaluate OCFO's progress in carrying out the actions needed to achieve this goal and to fully address our recommendation.

Information Technology

In our January 2003 report, we made five recommendations to help the Office of the Architect of the Capitol (AOC) adopt an agencywide approach to IT management. These recommendations are (1) establishing a chief information officer position, (2) developing and implementing effective investment management processes, (3) developing, implementing, and maintaining an enterprise architecture, (4) defining and implementing effective systems development and acquisition processes, and (5) establishing an effective information security program. This appendix describes AOC's progress to date in addressing each of our recommendations. It also provides a brief explanation of why we made each recommendation, describes the actions that AOC has taken to implement each recommendation, and provides our analysis of whether AOC's actions address the underlying issues that caused us to make the recommendation in our January 2003 report. It also provides additional recommendations relative to investment management and enterprise architecture management.

Recommendation: Establish a chief information officer or comparable senior executive, with the responsibility, authority, and adequate resources for managing IT across the agency, who is a full participant in AOC's senior decision-making processes and has clearly defined roles, responsibilities, and accountabilities.

Our research of private- and public-sector organizations that effectively manage IT shows that these organizations have adopted an agencywide management approach under the leadership of a chief information officer, or comparable senior executive, who has the responsibility and authority for managing IT across the agency. AOC had a decentralized approach to management and spending in which each organizational component controlled its IT assets.

Actions Taken by AOC: AOC has issued a centralized IT management policy¹ that assigns the OIRM director responsibility and authority for managing IT across the agency and makes the director a key participant in executive decision making, serving as the principal advisor to the Architect in applying IT to improve business processes. Also, the director's roles and responsibilities include controlling the AOC IT budget and chairing the IT Project Management Board, which is the project oversight body for OIRM

¹Architect of the Capitol, *Centralized Oversight of Information Technology*, Order 8-1-1, May 30, 2003.

projects. The director is organizationally positioned to report to the agency's Deputy Chief of Staff, who is a member of AOC's senior policy committee and also the chairman of the investment review board, which is the approval body for new IT investments beginning in fiscal year 2004. The director's roles, responsibilities, and accountabilities also include overseeing and guiding the development, management, and use of IT throughout the agency.

GAO Analysis: AOC has fulfilled our recommendation. First, AOC has established a senior executive (the OIRM director) with the responsibility, authority, and resources for managing IT across the agency. Second, by having the OIRM director's supervisor chair the investment review board and sit on the senior policy committee, and by giving the IT director budget control, the agency has made the director a participant in senior decision-making. Third, AOC has defined in its IT policy the director's roles, responsibilities, and accountabilities.

Recommendation: Develop and implement IT investment management processes with the full support and participation of AOC's senior leadership. Specifically, the Architect must develop a plan for developing and implementing the investment management processes, as appropriate, that are outlined in our IT investment management guide.² At a minimum, the plan should specify measurable tasks, goals, time frames, and resources required to develop and implement the processes. The Architect should focus first on the management processes associated with controlling existing projects and establishing the management structures to effectively implement an IT management process.

On the basis of research of private- and public-sector organizations that effectively manage their IT investments, our IT investment management guide outlines a corporate, portfolio-based approach to investment decision making. This approach requires that a sound investment management process be able to (1) measure the progress of existing projects and (2) continually assess proposed and ongoing projects as an integrated and competing set of investment options. AOC had not satisfied

²U.S. General Accounting Office, *Information Technology Investment Management: A Framework for Assessing and Improving Process Maturity, Version 1*, GAO/AIMD-10.1.23 (Washington, D.C.: May 2000).

the components of either of these two major steps and, as a result, did not have an agencywide, portfolio-based approach to investment management.

Actions Taken by AOC: AOC is developing a new IT portfolio management process—called an investment framework—and plans to implement it in fiscal year 2004. AOC’s IT policy, signed by the Architect, states the framework is to provide an effective means to select projects that best support the agency’s mission. The current version of the framework, completed in October 2003, is organized along a “select, control, and evaluate” model. In January 2004, AOC stated that it has begun using the framework to control existing IT investments, using part of the framework—the process used to score proposed investments’ value and risk—on all fiscal year 2004 investments. An agency official told us that AOC intends to fully implement the framework by May 2004. To execute the select, control, and evaluate processes, the framework specifies four management structures—an architecture and standards committee, a project management board, a business systems modernization office, and an investment review board, and AOC has defined the memberships of each.

GAO Analysis: AOC is partially addressing our recommendation. AOC’s draft investment management framework focuses on investment selection. However, consistent with our IT investment management guide, we recommended that the agency focus first on detailing and implementing processes to control existing investments and that efforts to develop and implement these processes be guided by a detailed plan. AOC does not have a documented plan, with the associated tasks, goals, time frames, and resources needed to implement the framework. Also, the agency has not focused first on controlling existing IT investments. According to our guide, to control existing investments, AOC should be (1) operating an IT investment board responsible for controlling investments that includes both senior IT and business representatives, (2) providing effective oversight for ongoing IT projects throughout all phases of their life cycle, (3) identifying, tracking, and managing IT resources; and (4) ensuring that each IT project supports the organization’s business needs. In January 2004, AOC stated that it has begun operating its project investment review board that has recently been revised to include senior agency leaders (e.g., chief financial officer and superintendents). AOC’s framework addresses project oversight but does not specify how it will identify, track, and manage IT resources or ensure that projects support agency business needs. Further, although it intends to fully implement its IT investment management process by May 2004, AOC does not have a plan to do so that

focuses on controlling existing IT projects and fully defining and implementing more mature investment management processes. Having such a plan would be consistent with our IT investment management guide and our recommendation for having a road map for achieving needed investment management maturity progression.

Additional Recommendation: We reiterate our recommendation that AOC develop and implement a plan that is consistent with our IT investment management guide and thus focus first on the practices associated with controlling existing IT investments. We also recommend that AOC plan for and implement those practices in our IT investment management guide associated with corporate, portfolio-based investment decision-making, such as (1) implementing criteria to select investments that will best support the organization's strategic goals, objectives, and mission, (2) using these criteria to consistently analyze and prioritize all IT investments, (3) ensuring that the optimal investment portfolio with manageable risks and returns is selected and funded, and (4) overseeing each investment within the portfolio to ensure that it achieves its cost, benefit, schedule, and risk expectations.

Recommendation: Develop, implement, and maintain an enterprise architecture (EA) to guide and constrain IT projects throughout AOC. The Architect should implement the practices, as appropriate, as outlined in the Chief Information Officer Council's architecture management guide.³ As a first step, the Architect should establish the management structure for developing, implementing, and maintaining an EA by implementing the following actions:

- **developing an agencywide policy statement providing a clear mandate for developing, implementing, and maintaining the architecture;**
- **establishing an executive body composed of stakeholders from AOC mission-critical program offices to guide the strategy for developing the EA and ensure agency support and resources for it; and**

³Chief Information Officers Council, *A Practical Guide to Federal Enterprise Architecture*, version 1.0 (Washington, D.C.: February 2001).

- **designating an individual who serves as a chief enterprise architect to develop policy, lead the development of the EA, and manage it as a formal program.**

Our experience with federal agencies has shown that attempting to modernize IT environments without an EA to guide and constrain investments often results in systems that are duplicative, not well integrated, unnecessarily costly to maintain and interface, and ineffective in supporting mission goals. The development, implementation, and maintenance of architectures are recognized hallmarks of successful private and public organizations that effectively exploited IT in meeting their mission goals. At the time of our initial review, AOC did not have an EA or the management foundation needed to successfully develop one.

Actions Taken by AOC: AOC's centralized IT policy commits to developing, implementing, and maintaining an EA and gives OIRM responsibility for developing and maintaining it. AOC has also assigned responsibility for guiding EA development and approving it to the agency's senior policy committee, which is composed of representatives from across the agency. According to the AOC Deputy Chief of Staff and the OIRM director, a chief enterprise architect position was requested, but not approved, in the fiscal year 2004 budget request, but the position has been included in the fiscal year 2005 budget request. In the interim, AOC has established a business systems modernization office in OIRM to provide technical and managerial support for architectural development. The agency also reports it has selected an architecture framework, the federal EA framework; hired a consultant to provide an architecture methodology and perform EA development work, and selected an automated tool to support development. Thus far, AOC has initiated activities to develop EA products, including completing the initial version of the existing, "as is," and the target, "to be," architectures—as well as a plan that will map out the transition from the "as is" to the "to be," in September 2003. AOC reports that the Deputy Chief of Staff has since approved these products. The agency also stated that it has developed a detailed plan addressing resource needs for its EA effort, although we have not yet received a copy of the plan. AOC's goal is to implement the target architecture by September 30, 2009.

GAO Analysis: AOC is partially addressing our recommendation. AOC has issued a policy on developing, implementing, and maintaining an EA; established an executive board to oversee EA development, and assigned responsibility to develop, implement, and maintain the architecture to

AOC's Chief Technology Officer until a chief enterprise architect is hired. Thus, AOC has largely implemented our recommendations for launching the architecture effort but needs to execute the next steps toward completing, implementing, and maintaining an EA as detailed in our guide.⁴

Additional Recommendation: We recommend that AOC complete ongoing steps associated with developing its EA and implement additional steps to complete, maintain, and implement the architecture. In particular, we recommend that AOC plan for and implement the practices in our architecture management guide associated with leveraging an EA for organizational transformation, such as (1) ensuring that adequate resources are devoted to the program (funding, people, tools, and technology), (2) ensuring that the architecture describes both the “as is” and the “to be” environments in terms of performance, (3) ensuring that architecture business, performance, information and data, applications and services, and technology descriptions address security; and (4) ensuring that metrics are used to measure EA progress, quality, compliance, and return on investment.

Recommendation: Require disciplined and rigorous processes for managing the development and acquisition of IT systems and implement the processes throughout AOC. Specifically, these processes should include the following:

- **quality assurance processes, including developing a quality assurance plan and identifying applicable process and product standards that will be used in developing and assessing project processes and products;**
- **configuration management processes, including establishing a repository or configuration management system to maintain and control configuration management items;**
- **risk management processes, including developing a project risk management plan, identifying and prioritizing potential problems, implementing risk mitigation strategies, as required, and tracking and reporting progress against the plans; and**

⁴U.S. General Accounting Office, *Information Technology: A Framework for Assessing and Improving Enterprise Architecture Management*, GAO-03-584G (Washington, D.C.: April 2003).

- **contract tracking and oversight processes, including developing a plan for tracking contractor activities, measuring contractor performance and conducting periodic reviews, and conducting internal reviews of tracking and oversight activities.**

Our experience with federal agencies has shown that not having and following rigorous and disciplined development and acquisition processes can lead to systems that do not perform as intended, are delivered late, and cost more than planned. OIRM's existing information system life-cycle guidance defined some of the key development and acquisition processes, but did not address either risk management or contract tracking and oversight, and only partly addressed quality assurance and configuration management. Moreover, these processes had not been adopted and implemented agencywide.

Actions Taken by AOC: AOC awarded a contract in June 2003 to develop a new agencywide information systems life-cycle methodology that is to incorporate processes consistent with the Software Engineering Institute's Capability Maturity Model[®] Integration.⁵ The contract requires delivery of the methodology by January 31, 2004. OIRM plans to pilot test the new life-cycle processes, obtain feedback from these tests, and refine the processes as necessary before issuing guidance and beginning implementation as an AOC-wide standard starting March 31, 2004.

GAO Analysis: AOC is making progress in addressing our recommendation. By contracting for a new life-cycle methodology consistent with the Software Engineering Institute's Capability Maturity Model[®] Integration, AOC has taken action aimed at defining disciplined and rigorous processes for managing the development and acquisition of IT systems, including quality assurance, configuration management, contract tracking and oversight, and risk management. AOC still needs to ensure that it obtains a well-defined set of processes and that these processes are in fact implemented by March 31, 2004, as planned.

Recommendation: Establish and implement an information security program. Specifically, the Architect should establish an information security program by taking the following steps:

⁵ Carnegie Mellon Software Engineering Institute, *Capability Maturity Model[®] Integration (CMMISM)*, version 1.1 (March 2002).

- **designate a security officer and provide him or her with the authority and resources to implement an agencywide security program;**
- **develop and implement policy and guidance to perform risk assessments continually;**
- **use the results of the risk assessments to develop and implement appropriate controls;**
- **develop policies for security training and awareness and provide the training; and**
- **monitor and evaluate policy and control effectiveness.**

Our research of private- and public-sector organizations⁶ recognized as having strong information security programs shows that their programs include (1) establishing a central focal point with appropriate resources, (2) continually assessing business risks, (3) implementing and maintaining policies and controls, (4) promoting awareness, and (5) monitoring and evaluating policy and control effectiveness. Although AOC had taken important steps to establish an information security program, much remains to be done, including hiring an information security officer and an information security specialist, before this program satisfies recognized best practices.

Actions Taken by AOC: AOC has filled its information security officer position and, on May 30, 2003, issued a policy⁷ that gives this official the responsibility and authority to establish and implement an agencywide information security program. According to AOC, most of the necessary security resources (staff) were in place to begin the program as of October 9, 2003, and the agency has since filled the remaining position with contract resources. Further, AOC has drafted two additional policies, one mandating periodic risk assessments to determine information system vulnerabilities

⁶U.S. General Accounting Office, *Executive Guide: Information Security Management, Learning from Leading Organizations*, GAO/AIMD-98-68 (Washington, D.C.: May 1998).

⁷Architect of the Capitol, *Authority Policy and Responsibility of the Chief Information Security Officer*; Order 7-1-1, May 30, 2003.

and use the results to institute appropriate controls,⁸ and another mandating security awareness and training for all AOC system users.⁹ According to AOC, issuance of these policies is scheduled for March 31, 2004, and the agency plans to begin awareness training by April 2004. In addition, the agency stated that its comprehensive IT security plan is being revised and estimates that this work will be completed in June 2004. Also, AOC plans to contract out the development of audit and review procedures to monitor and evaluate policy and program effectiveness; use AOC, contractor, and inspector general staff to conduct risk assessments and audits; and contract for an independent security audit of AOC systems by September 30, 2004.

GAO Analysis: AOC is making progress in addressing our recommendation. AOC has laid some of the foundation for establishing an effective security program, such as designating an information security officer and giving this official the authority to implement an agencywide security program; but work remains to first define and then execute this program. The key is for AOC to follow through on stated commitments to provide proper resources for the program, finalize its security policies, define processes for implementing the policies, and implement them.

⁸Architect of the Capitol, *IT Security Risk Management Policy*, Order 7-2-2, July 31, 2003 (Draft).

⁹Architect of the Capitol, *INFOSEC Training, Education, and Awareness Policy*, Order 7-1-3, July 31, 2003 (Draft).

Worker Safety

In our January 2003 report, we made seven recommendations to help the Office of the Architect of the Capitol (AOC) improve its overall approach to worker safety by identifying performance measures, clearly defining policies and procedures for reporting hazards, establishing a consistent system for conducting investigations and followup, establishing a safety training curriculum, assigning clear responsibility for tracking worker safety employee training, clarifying the role of the Office of the Attending Physician (OAP) in helping AOC to meet its safety goals, and establishing a senior management work group to routinely discuss worker compensation issues. This appendix describes AOC's progress to date in addressing each of our recommendations. We provide a brief review of why we made each recommendation, report the actions that AOC has taken to implement the recommendation, and provide our analysis of whether AOC's actions address the underlying issues that caused us to make the recommendation in our January 2003 report.

Recommendation: Identify performance measures for safety goals and objectives, including measures for how AOC will implement the 43 specialized safety programs¹ and how superintendents and employees will be held accountable for achieving results.

At the time of our management review, 15 of AOC's 43 safety policies had been written and approved by the Architect. However, the standard operating procedures for these policies had not been approved, and several jurisdictions were using separate standard operating procedures that were unique to each jurisdiction. In addition, AOC had not yet developed performance measures or interim milestones that could be used to assess the implementation of these policies. Finally, AOC had not fully linked senior manager and employee performance with the achievement of its safety goals.

Actions Taken by AOC: According to AOC officials and documents we reviewed, a number of steps have been taken to address this recommendation. First, the number of safety policies has been reduced from 43 to 34 to better reflect the type of activities conducted at AOC. Second, AOC has drafted an Occupational Safety and Health Program (OSH) Plan, which establishes the objectives, actions, and milestones necessary to achieve the agency's safety and health goals. One objective is to establish additional policies and procedures to ensure AOC complies

¹The safety programs are now referred to as safety policies.

with Occupational Safety and Health Administration (OSHA) regulations and protects employee health. Third, within the draft OSH plan, AOC has created a schedule for developing and implementing all 34 safety policies. Fourth, AOC is creating a standard template that identifies the critical elements, such as the tools and training requirements, for each policy. AOC is using the standard template to help ensure that the safety policies are consistently implemented across the 11 jurisdictions. Fifth, AOC has identified broader program goals that demonstrate its commitment to worker safety. AOC is establishing performance measures for each of the 34 safety policies to demonstrate progress toward the safety program goals and objectives. In addition, AOC has requested increases in the jurisdictional training budget for AOC employees. Finally, AOC is using a safety performance requirement within its PRP, senior employee performance management system, and its PCES, employee performance management system, to hold all senior managers and employees accountable for safety results.

GAO Analysis: AOC is making progress in addressing our recommendation. The draft OSH plan recognizes that implementation of AOC's 34 safety policies will require an agencywide cultural transition that will take a number of years of focused commitment to attain, including additional resource commitments. While implementation of all 34 safety policies had been targeted for completion by fiscal year 2005, this date has been extended to fiscal year 2007.² As of the beginning of fiscal year 2004, no safety policy has been fully implemented.

The draft OSH plan identifies performance measures for some safety and health objectives. For example, the draft OSH plan indicates a performance measure for the objective "enhance employee awareness of and involvement in all aspects of safety and health" and includes publicizing the minutes from monthly meetings of jurisdictions to discuss safety and health. However, this performance measure is not fully developed or results oriented. To its credit, the draft OSH plan does indicate that performance measures for many of the 34 safety policies will

²According to the Occupational Safety and Health Program Plan, policy development is an extensive and iterative process of regulatory research, best practice review, integration with existing AOC policies and practices, stakeholder input, and management approval.

be determined as each policy is developed, though many of the safety policies will not be developed for a number of years.³

Implementation of the 34 safety policies, even under the extended time frame, could be jeopardized according to AOC officials, if the increased staff and funding needs to accomplish the plan are not met. Four of the five jurisdictional superintendents we interviewed said they would need additional staff to fully implement the safety policies. In addition, both jurisdictional and central AOC officials said the jurisdictional training budgets would need to be increased to meet the training objectives established in the draft Occupational Safety and Health Program Plan. Moreover, one AOC jurisdictional official stated that if the request for additional staff members were not approved, the implementation plan would likely be delayed beyond fiscal year 2007. To the extent that AOC establishes a sound business case for additional staff and funding, having the appropriate resources in place to implement the safety policies will help AOC meet its time frames.

AOC has been unable to meet the original targeted time frame (fiscal year 2005) due to the need to revise the methodology for developing the safety policies.⁴ This was mainly due, according to AOC officials, to insufficient staff resources in the jurisdictions, as well as the need for consistency across jurisdictions. Specifically, AOC headquarters is developing a standard template for jurisdictions to use rather than relying upon jurisdictions to create their own standard operating procedures for each safety policy. While two of the safety policy standard templates have been drafted, neither has been released because the agency needs to make the procedures more user friendly for front-line employees.

Although AOC has stated it intends to link performance measures to each of the 34 safety policies, the data needed to successfully identify individual measures have not been collected. In addition, training needs identified in the draft OSH plan are dependent upon approval of additional funding

³In responding to our draft report, AOC officials noted that a key indicator was not mentioned -- the Injury and Illness rate. The Injury and Illness rate measures job related injuries and illnesses per 100 employees as recorded under the Federal Employees Compensation Act program. In addition, AOC officials indicated that this rate was 7.87 in FY 2003, representing a 56 percent reduction from AOC's FY 2000 rate. Within the scope of this assignment, we did not independently verify this rate.

⁴See footnote 34.

requests, if negative service effects are to be avoided, according to AOC. Moreover, AOC officials stated the updated time frame for full implementation of the safety policies may need to be further extended to meet the training commitments identified in the draft OSH plan.

AOC's efforts to further develop and use performance management systems to help clarify accountability for safety results is an encouraging sign. However, the system for evaluating front-line employees does not yet contain specific objective standards and criteria for evaluating individuals on safety issues. Including these would help ensure that employees will be encouraged to report hazards, that supervisors will take those reports seriously, and that senior managers will be accountable for acting on these reports.

Recommendation: Establish clearly defined and documented policies and procedures for reporting hazards similar to those that apply to injury and illness reporting.

During our management review, we found that although AOC had a number of mechanisms for involving employees in its safety program and encouraged employees to report injuries and hazards, AOC lacked a hazard reporting mechanism and moreover, some employees were hesitant to report hazards to management because they were not sure how seriously their supervisors would treat these reports. As a result, AOC could not ensure that there was a complete reporting of hazards.

Actions Taken by AOC: First, AOC plans to develop a Hazard Assessment and Control policy, one of its 34 safety policies, beginning October 2003 through June 2004 and fully implement the policy by May 2006. Second, as a key component in developing its Hazard Assessment and Control policy, AOC plans to identify hazards associated with specific job tasks. AOC calls this task a Job Hazard Analysis (JHA).⁵ AOC has created a schedule for completing each JHA. In addition, AOC has contracted with the Department of Health and Human Services Public Health Service (PHS) to identify hazards associated with job tasks in each jurisdiction. For all

⁵AOC's Occupational Safety and Health Program Plan splits the development and implementation of the Hazard Assessment and Control policy into two segments, one dealing with the completion of JHA and the other dealing with implementation of the operational aspects of this policy. The time frames we cite here apply to the operational segment of the policy. The JHA segment is scheduled to be fully implemented by the end of calendar year 2004.

potentially hazardous conditions identified, the job hazard analysis will include appropriate use of personal protective equipment, medical surveillance, training, and engineering controls. According to AOC officials, the JHA process has been completed for two jurisdictions—the Senate and the Construction Management Division. Lastly, while a majority of the jurisdictions awaits full development and implementation of the Hazard Assessment and Control policy and the Facility Management Assistant (FMA) system, jurisdictions continue to rely upon their own hazard reporting processes. The FMA system will (1) track and analyze the number and types of hazards and (2) identify follow-up corrective actions to ameliorate hazards. In addition, AOC plans to expand the capacity of the FMA system by purchasing an incident investigation module. This will allow AOC to track the investigation of incidents following injuries, illnesses, fatalities, and near misses. The FMA system is commercially available and contains a suite of software components. AOC officials reported that these processes vary across jurisdictions and involve formal reporting procedures and mechanisms, such as submission of standard forms for reporting hazards, as well as informal measures, such as e-mail messages and periodic employee meetings. In addition, AOC officials discuss hazards as well as other safety and health issues at meetings convened by AOC employee and managerial committees.

GAO Analysis: AOC is making progress in addressing our recommendation. While AOC has established a plan and initiated actions to improve reporting of hazards, the development and implementation of AOC-wide policy and procedures for hazard reporting is expected to take years to complete due to the time needed to develop and fully implement this safety policy. Notably, the Hazard Assessment and Control policy is not expected to be fully implemented until 2006.

AOC has made some strides in its efforts to initiate a comprehensive survey of hazards. Until AOC completes the implementation of this policy and subsequent analysis across all jurisdictions, it will not be able to develop a comprehensive picture of AOC hazards. Additionally, until AOC completes the system-wide process for investigating incidents across all jurisdictions, it will not be able to develop a comprehensive picture of AOC incidents, including their causes.

Recommendation: Establish a consistent AOC-wide system for conducting investigations and follow-up.

During our management review, we found that although AOC had a number of mechanisms to obtain employee involvement and encourage employees to report incidents, accidents, and illnesses, the existing control mechanisms could not ensure that all reports were treated consistently across AOC. As a result, AOC could not ensure that there was a complete investigation of incidents, accidents, and illnesses.

Actions Taken by AOC: AOC plans to develop an incident reporting policy, one of its 34 safety policies, to be fully implemented by May 2005. A key component of this policy is an incident investigation module. The module is expected to track—in electronic form—data on injuries, near misses, and property damage following an incident. AOC officials told us they expect to purchase the module, as well as complete the policies and procedures pertaining to incident reporting, by March 2004. Beginning in March 2004, AOC plans to have one jurisdiction test the incident reporting policy.

As mentioned previously, the incident investigation module will be a component of AOC's integrated FMA system. Pending development of the incident investigation module of the FMA system, jurisdictions will continue to rely upon their own incident investigation methods. These processes vary across jurisdictions and include formal reporting procedures and mechanisms, such as submission of standard forms for reporting injuries and illnesses, safety hotlines, and accident investigation teams.

GAO Analysis: AOC is making progress in addressing our recommendation. While AOC has established a plan and initiated actions to improve the reporting of incidents, the development and implementation of AOC-wide policy and procedures for incident reporting is expected to take at least a year to complete due to the need to fully develop a reporting system that will track incidents. Until this occurs, jurisdictions will continue to use separate systems for identifying and reporting incidents. Additionally, until AOC completes the systemwide process for investigating incidents, it will not be able to develop a comprehensive picture of AOC incidents, including their causes, across all jurisdictions. While the system takes an extended time to develop, important information positioning the agency to develop proactive strategies to avoid incidents is left untapped. Moreover, central office safety staff will be able to view cross-jurisdictional data. However, officials in two of the five jurisdictions we interviewed said they could benefit from increased access to incident data from other

jurisdictions, beyond the limited information currently provided by central office safety staff.

Finally AOC does not, at this time, have a definitive strategy to integrate the FMA system with the system to generate work orders to correct identified hazards. The lack of a hazard identification work order generation link could lead to a missed opportunity to strategically manage hazard reporting and the identification of abatement actions. Furthermore, some jurisdiction officials told us that having separate systems for reporting and abatement creates more work for them. Having separate systems could discourage use of the FMA system, thereby defeating its purpose. However, a senior AOC official stated that further linkages between these separate systems are possible as part of AOC's EA efforts.

Recommendation: Establish a safety training curriculum that fully supports all of the goals of the safety program and further evaluate the effectiveness of the training provided.

During our management review, we found that although AOC uses a compliance-based approach to providing safety training, it would benefit from targeting its safety awareness training to better motivate employees at all levels to incorporate safety into all aspects of their work.

Actions Taken by AOC: According to AOC documents we reviewed and officials we interviewed, the agency has developed a Safety Training Plan to provide guidance to all managers and employees to properly identify and select training courses to ensure compliance with policy requirements. The plan contains a training matrix that lists the training for each safety policy with a training requirement, including the list of courses, frequency of training, and target audiences (e.g., employees working in the electrical and masonry shops) for each safety policy. The plan states that it is not intended to replace or supercede specific training requirements that are delineated in individual safety policies. In some cases, the course content is specifically tailored to an individual jurisdiction and target audience, which will assist supervisors and participants with relating the training to their work environment. However, such tailoring has not been completed for all courses. In addition, AOC uses formal methods to evaluate training, such as a participant evaluation form, as well as informal methods, such as following up with participants' supervisors to obtain feedback on training sessions. Also, Safety Policy Managers audit courses and provide feedback to course designers and instructors. Finally, the fiscal year 2005 training budget request will include funds for additional staff that AOC believes are

necessary to support front-line work while employees fulfill their training requirements.

GAO Analysis: AOC is making progress in addressing our recommendation. While AOC has taken some concrete steps to change the culture of workplace safety through training, measures to assess the actual effectiveness of these training courses on employee behavior have not been developed. A senior AOC official also recognized the need to better evaluate AOC's training system. AOC officials believe that if the agency's fiscal year 2005 budget request for additional staff is not met, then (1) the timeline for all employees meeting their training requirements, as identified in the draft OSH plan, may need to be extended or (2) AOC could experience a loss in productivity while employees receive training. Finally, the FMA system, which will be used to track and identify corrective actions for hazards and incidents, will not be aligned to the training system to help identify and target training needs to address high-risk areas.

Recommendation: Assign clear responsibility for tracking and recording training received by AOC employees, including maintaining an inventory of employees' certifications and licenses.

During our management review, we found that the procedures and responsibilities for monitoring training requirements for the safety program were not well defined. In addition, AOC safety and HRMD officials had not established a systematic process to identify training needs for individual employees to help ensure the safety program's success.

Actions Taken by AOC: Although senior officials in the jurisdictions are responsible for monitoring employee training needs, they cannot access HRMD's database of AOC-sponsored training courses and employees training attendance. According to AOC officials we interviewed, some jurisdictions continue to track training information on their own, which may create inconsistencies in reporting and lead to duplicative record-keeping. In addition, we found that although AOC's draft Safety Master Plan⁶ noted that an electronic reminder tool—called a tickler—would be added to HRMD's training database to identify training needs for individual employees, it has yet to be developed. A senior AOC official told us that funds have currently been made available to research the requirements

⁶AOC changed the title of its worker safety plan from Safety Master Plan to Occupational Safety and Health Program Plan.

needed to develop the electronic reminder tool—now referred to as a data management system. The official stated that the data management system will track whether requirements in training, licensing, certifications, and medical surveillance for employees have been met. AOC expects this system to be operational by fiscal year 2005. AOC indicated that as part of its effort to integrate agency goals and multiple data systems under its EA plan, it intends at some point to develop an agencywide system that will identify employees' training needs, including certification and licensing requirements.

GAO Analysis: AOC is making progress in addressing our recommendation. Procedures and responsibilities for monitoring training requirements for the safety program, while beginning to move in the right direction, remain poorly defined. Although HRMD's database tracks and records employee training, including training to meet licensing and certification requirements, the database (1) does not proactively identify training needed to maintain employees' licensing and certification requirements and (2) is not accessible to the jurisdictions. As a result, several jurisdictions had created and continue to use separate systems to track employee training and maintain certification and licensure requirements. Although AOC plans to address employee training requirement gaps through the development of its EA plan, it has yet to take any substantial steps to do so.

Recommendation: Clarify and explore the possibility of expanding the role of the Office of the Attending Physician (OAP) in helping AOC meet its safety goals, consistent with the broad responsibilities laid out in the 1998 Memorandum of Understanding between AOC and OAP.

During our management review, we found that although OAP provides important health and safety assistance to AOC, such as conducting OSHA-mandated medical examinations on employees exposed to hazardous substances, the role of OAP could be more clearly defined and expanded. In particular, the 1998 Memorandum of Understanding between OAP and AOC allows a broader role for OAP in several areas, such as providing trend information on the results of medical examinations.

Actions Taken by AOC: Over the past 6 months, an OAP representative has been attending AOC's Safety, Health and Environmental Council (SHEC) and Jurisdiction Occupational Safety and Health (JOSH) meetings and has been involved in reviewing and commenting on AOC's

development of 34 safety policies, particularly the policy concerning medical examinations required for employees exposed to known hazards. In addition, OAP has been reviewing recommendations for injured employees who are attempting to return to work on “light-duty.”

GAO Analysis: AOC is making progress in addressing our recommendation. While AOC has taken worthwhile steps to involve OAP in the development of safety policies and the discussion of safety issues, it has not identified or pursued other key areas where OAP could play a significant role in enhancing efforts to ensure worker safety. For example, AOC has not taken any concrete steps to obtain data or analyses from OAP medical examinations that might identify health-related trends. While AOC officials told us that confidentiality issues might interfere with such efforts, no steps have been taken to address and overcome this concern.

Recommendation: Establish a senior management work group that will routinely discuss workers’ compensation cases and costs, and develop strategies to reduce these injuries and costs.

A senior management work group would provide staff in HRMD, the central office, and the jurisdictions with a forum to discuss new and ongoing claims and facilitate the exchange of information to further control workers’ compensation costs. At the time of our last review, HRMD used injury data primarily for processing workers’ compensation costs, and central staff did not systematically analyze the data. Jurisdiction staff, on the other hand, did not routinely receive data on costs associated with injuries.

Actions Taken by AOC: Rather than create a separate work group, AOC officials discuss workers’ compensation costs at the SHEC meetings. SHEC meetings are held each quarter and participants include senior managers from HRMD, the central office, and the jurisdictions, as well as JOSH representatives, an OAP representative, and a senior council member. During the meeting, HRMD and its Workers’ Compensation Program Unit provide relevant data on workers’ compensation issues, including discussions on best practices that can be used to lower workers’ compensation costs.

GAO Analysis: AOC is making progress in addressing our recommendation, which was intended to ensure that senior management and other key stakeholders routinely discuss data on workers’ compensation. AOC plans to develop new approaches to reduce workers’

compensation costs based upon these discussions. However, no solutions or new approaches to address workers' compensation costs have thus far been developed.

Project Management

In our January 2003 report, we made five recommendations to help the Office of the Architect of the Capitol (AOC) improve its overall approach to project management by developing a Capitol Hill complex master plan and completing building condition assessments, developing a transparent process to prioritize agency capital projects, developing tools to effectively communicate priorities and progress of projects, clearly defining project-management-related measures, and aligning project management staff and resources with mission-critical goals. This appendix describes AOC's progress to date in addressing each of our recommendations. We provide a brief review of why we made each recommendation, report the actions that AOC has taken to implement the recommendation, and provide our analysis of whether AOC's actions address the underlying issues that caused us to make the recommendation in our January 2003 report.

Recommendation: Develop a Capitol Hill complex master plan and complete condition assessments of all buildings and facilities under the jurisdiction of AOC.

Master planning is necessary to help AOC establish long-term priorities, but progress has been slow. In July 2001, the Senate Committee on Appropriations expressed concern that AOC needed to develop a master plan for the Capitol Hill complex. Over a year later the National Academy of Sciences (NAS) held a planning workshop for AOC to determine the scope of a Capitol Hill complex master plan. A key component of a master plan is building condition assessments (BCA), which are systematic evaluations of an organization's assets. When conducted, BCAs must be carried out consistently across all jurisdictions to help ensure that all assets are evaluated in the same manner and that AOC-wide priorities can be set. We reported in our January 2003 report that AOC had recently formed a condition assessment team to develop a detailed statement of work for conducting BCAs.

Actions Taken by AOC: According to the Acting Chief for AOC Office of Design and Construction (ODC), AOC received the NAS report in June 2003 and is developing the requirements for the Capitol Hill complex master plan.¹ The NAS study provided guidance on developing a scope of services for a master plan. Based on more detailed work that AOC has done in

¹National Research Council of the National Academies, *Working in Olmsted's Shadow: Guidance for Developing a Scope of Services for the Update of the Master Plan for the U.S. Capitol and Grounds* (Washington, D.C.: The National Academies Press, 2003).

developing the scope for the master plan, AOC revised its schedule to show the consultant being selected in February 2004 and the final master plan being completed in December 2006.

AOC's Acting Chief of ODC said that AOC is completing the statement of work for the BCAs. He said that AOC plans to award BCA contracts for its three largest jurisdictions—the House, Capitol, and Senate—in 2003. According to AOC, the statements of work for the Capitol and Senate BCAs have now been completed, and it expected to award the contracts in December 2003. These building assessments are expected to take about one year to complete. The Acting Chief of ODC said that the BCAs for the other buildings under AOC management would be awarded in fiscal years 2004 and 2005.

GAO Analysis: AOC is making progress in addressing our recommendation, although, in its March 7, 2003, draft performance plan, AOC showed that it planned to publish the final Capitol Hill complex master plan on April 1, 2006. In addition, the current schedule shows the final plan being completed 8 months later in December 2006. AOC's schedule shows that most of the additional time, 6 months, was added so AOC can obtain and incorporate comments and finalize the plan.

Completion of the BCAs is also behind the tentative schedule developed in March 2003. The first BCAs were to be completed March 31, 2004. But since not all BCA contracts are expected to be awarded until December 2003, and the work is expected to take about 1 year, it appears that the initial BCAs for the three largest jurisdictions will not be completed until the fall of 2004. Completion of the other BCAs will depend on when funding is received. Since the BCAs are a key component of the master plan, AOC will need to push to get these completed as soon as possible so they can be integrated into the master plan. It is important to recognize that once the BCAs are completed they should be updated on a regular schedule.

Recommendation: Develop a process for assigning project priorities that is based on clearly defined, well documented, consistently applied, and transparent criteria.

During our management review, the lack of a transparent process to prioritize projects was identified as a major weakness at AOC. Priorities were determined on the subjective decisions made by jurisdiction officials and not on predefined criteria. The only day-to-day prioritization that was used was a "hot projects" list. Projects were subjectively placed on this list

based on time sensitivity and high dollar volume; however, the process for placing projects onto this list was neither formal nor consistently applied. We reported in our January 2003 report that AOC lacked a process that can communicate, both internally and externally, the trade-offs in prioritizing one project over another or how individual projects fit within a broader AOC framework.

Actions Taken by AOC: According to the ODC Acting Chief, in February 2003, AOC worked with a consultant to develop evaluation criteria to prioritize building projects. For prioritization purposes, each project is evaluated in five areas and assigned a score, based on a 100-point scale, in each area. The areas that building projects are evaluated in are

1. preservation—preservation of historic or legacy buildings and the importance of the Architect's stewardship role,
2. impact on mission—impact on mission/client urgency/ accommodating new or changed mission,
3. economic impact—payback, cost savings, or cost avoidance,
4. safety—fire and life safety and other code, regulatory, or statutory requirements,
5. security—physical security.

In working with its consultant, AOC developed a matrix to provide criteria and guidance on how to evaluate and score the projects in each of the defined areas. For example, when evaluating a project in the area of preservation, 80 points may be given to a project that includes the preservation of a highly significant historical feature, while only 20 points may be given to a project with less historical significance. Projects are ranked based on the total number of points they receive in all five areas. These criteria were developed after the fiscal year 2005 projects were submitted for the proposed budget, but according to the AOC Deputy Director of Engineering, they then applied this criteria to prioritize those projects. The prioritized list of projects was then shared with the superintendents who validated the results of the prioritization. For the fiscal year 2005 projects, the prioritization was not used to determine which projects would be included in the budget request, but only the order in which they would be done. He said that in the future, when the prioritization is used to determine which projects would be submitted for

funding, there may be more discussion about why projects were scored in a particular way.

GAO Analysis: AOC is making progress in addressing this recommendation. AOC has created a clearly defined, well-documented, and transparent process for evaluating and prioritizing projects. While determining the priority of projects will always be somewhat subjective, AOC has developed a reasonable approach using a matrix to help raters score projects in five areas. The matrix provides clear guidance and specifies issues to consider when scoring projects in each of the five rating areas. Since the evaluation criteria have not yet been used to determine which projects will be submitted for funding, it remains to be seen if they will be consistently applied. Using this matrix and documenting the factors used in making the priority decisions should help AOC support its capital improvement program.

Recommendation: Develop tools to effectively communicate priorities and progress of projects, as a part of a broader communication strategy.

At the time of our management review, AOC lacked the tools to communicate its priorities internally to staff and externally to clients and provide details on how related projects are linked to one another. AOC officials said that the Project Information Center (PIC) system, the database of all project-related information, was used to prioritize work and ascertain the progress of projects, but it was not capable of producing a unified document that shows schedules of active projects, their interrelationships, and required staff. Without a resource-loaded project master-planning capability, it is difficult to determine the effect of priority changes and to quantify project manager staffing requirements. In addition, the information in PIC was not consistently updated nor was it systematically reviewed to determine its accuracy. While AOC used the PIC system to prepare a quarterly capital projects report that provided the status of all ongoing capital projects, the report did not highlight projects that were behind schedule, over budget, or otherwise of interest to clients.

Actions Taken by AOC: AOC has worked to improve the capabilities of its PIC system and the format of its quarterly report on capital projects. AOC has improved the capabilities of PIC by adding links to the financial management system and building/project drawings. According to AOC officials, AOC has identified a software package capable of producing a unified schedule that shows staff resources and a purchase order has been

issued for the software and supporting consulting to accomplish proper installation of the application.

To improve the accuracy and timeliness of PIC data, the Director of the Technical Support Division told us that AOC has verbally and in writing reemphasized the importance of timely and accurate data. He also said that two people review the data monthly looking for inaccuracies and missing data.

AOC has revised the quarterly report format to make it more user friendly. The quarterly report is color coded so the user can quickly identify those projects that are behind schedule or need additional funding. The report also includes summary information and highlights projects of particular interest for reasons such as not being on schedule or requiring additional funding. The report also discusses the resolution of issues related to projects highlighted in the previous report.

GAO Analysis: AOC is making progress in addressing our recommendation. It is encouraging that AOC has made improvements to PIC, but AOC will continue to have difficulty managing schedules and workload until it is able to produce a unified schedule to show the status of the projects and the responsible project managers. We did not verify the accuracy of the PIC data but the Director of the Technical Support Division said that they are focusing on improving data accuracy and completeness.

While the usefulness of the quarterly report has improved, our analysis shows that the project schedule charts can still be confusing. For example, the “work on schedule” bar on the chart shows that the work is on schedule when it has not yet begun, which can make it appear that a large percentage of AOC’s projects is on schedule when actually projects have not yet begun. It would also be helpful if the individual project summaries indicated when a project’s schedule has been changed and why the schedule was changed. In addition, the report indicates when additional project funding is being requested, but it is not always clear if the requested funding is for cost overruns or if the funding request was planned and is for a new phase of the project.

Recommendation: Define project-management-related performance measures to achieve mission-critical strategic and annual performance goals.

During our management review, we found that AOC needed to work with its stakeholders to determine its long-term strategic goals and annual performance goals for project management. The development of annual performance goals that provide a connection between long-term goals and day-to-day activities would enable AOC to track its progress, provide critical information for decision-making and foster individual accountability.

Actions Taken by AOC: AOC's draft strategic plan and draft performance plan identify some measures and processes that will be used to monitor and evaluate AOC's success. The measures identified in the draft strategic plan are (1) projects executed and delivered on time and on budget and (2) client satisfaction. In June 2003, AOC defined uniform operating procedures for conducting customer satisfaction surveys. As defined in these procedures, the purpose of such a customer satisfaction survey is to assess the gap between the services provided by AOC and the needs of its customers. These procedures generically apply to the process of developing, administering, and managing the data from any customer satisfaction survey.

AOC's draft performance plan also identified the following new assessments (1) evaluation of design teams' performance, (2) evaluation of architects', engineers' (A/E), and general contractors' (GC) performance, and (3) post-occupancy evaluations of buildings to evaluate design and standards performance over time. In July 2003, AOC issued operating procedures for conducting project design satisfaction surveys. The purpose of these surveys is to provide internal customers an open platform to express appreciation or concern about their design activity. According to the procedures, the surveys will be done on an ad hoc basis upon completion of a design project. According to an AOC official in the Office of the Administrative Assistant, the draft survey is being reviewed within AOC.

As part of the AOC's Design and Construction Office ongoing best practices initiative, it had hired a consultant to evaluate five recently completed construction projects to identify lessons learned that could be applied to other projects. Key participants in the projects were surveyed about how the projects performed in the following areas (1) organization/teamwork, (2) planning process, (3) design process, (4) procurement process, and (5) construction process. The consultant reported on "why projects went right," identified areas for improvement, and made recommendations in each of the areas. According to the report, upgrades were recommended to

AOC project manager's manual and standards and these recommendations were incorporated into the project manager training held in the spring 2003.

GAO Analysis: AOC is making progress in addressing our recommendation. While AOC's draft strategic plan has identified types of performance measures, it has yet to formally define specific measurable performance goals. The Acting Chief for ODC told us that he believes that the performance goal for this division is for all projects to be delivered on time and on budget, but this is not specifically written as a goal. In addition, clarity is needed for how and when a project's schedule and budget benchmarks are established and when they can be changed. For example, if a project's schedule is based on receiving funding during the current year, yet it does not receive the funding until the next year, we understand that AOC will change the project's schedule benchmark. It is not clear that this decision is documented in the project summary in the quarterly report to Congress.

As part of obtaining stakeholder input for project management, AOC's draft performance plan identifies a number of surveys that will be used to monitor and evaluate projects. While AOC has developed procedures for conducting the project design satisfaction surveys, the actual survey, which was tentatively scheduled to be ready on June 30, 2003, is still being finalized within AOC. The A/E and GC surveys are not scheduled to be ready for distribution until spring 2004, and the process for developing post-occupancy evaluations will not be completed until fall 2005.

The lessons learned report that sought feedback from stakeholders and participants on five recently completed projects to make specific recommendations on how to improve performance on future projects is also an important development.

Recommendation: Align project management staff and resources with AOC's mission-critical goals.

At the time of our management review, AOC recognized that the current approach of assigning mostly architects and engineers as project managers was ineffective. Project managers said that they were being asked to wear "too many hats," which often distracted them from their primary duty of managing projects. AOC officials responsible for project management had proposed the creation of a new and independent Project Management Division. However, we noted that such realignment must support the

agency meeting its mission-critical goals and objectives and would require a determination as to which individuals have the skills to be dedicated project managers and who would supervise the project managers. We also reported that AOC had not developed project management-specific technical competencies and defining these competencies would be important for ensuring that the right people are employed in the right positions and that they are routinely held accountable for their work. We noted that as a next step, AOC could also identify and implement training programs that are linked to the core and technical competencies required of project managers.

Actions Taken by AOC: ODC has begun to make some organizational changes that are awaiting approval by the COO. These changes include the creation of a Project Management Division, which is currently staffed by a director and three project managers. AOC is hiring five additional project managers using position descriptions specifying the duties and knowledge required for the position. The project manager's duties include providing life-cycle project management expertise and coordination from the planning stage through post-occupancy evaluation. AOC will also be providing all project managers with training based on AOC's new project management manual. Project managers are expected to be dedicated to a project for its duration and will report to the Director of Project Management. They will be responsible for multidisciplinary capital improvement projects with budgets of \$250,000 or more, while projects budgeted at less than \$250,000 or involving a single discipline, such as lighting retrofits, will continue to be managed by architects or engineers.

The new Director of Project Management has systematically determined the number of project managers needed by estimating the length of time it takes to perform each task defined in AOC's project management guide. This enabled him to determine how many projects one project manager should be able to manage concurrently.

The Director of AOC's HRMD told us that she is working with ODC to identify competencies for project managers to help ensure that project managers have the skills needed to effectively perform their jobs.

GAO Analysis: AOC is making progress in addressing our recommendation. While the new organization chart for AOC's ODC is still pending approval by the COO, AOC is creating a Project Management Division led at the director level with attendant dedicated project manager positions. It is also important that AOC is using a systematic approach to

determine project workload and develop a request for additional project manager positions. AOC's systematic approach may help justify AOC's need for additional project managers and manage expectations of its stakeholders for projects based on the number of available project managers. However, as noted, AOC still does not have the capability of producing a unified schedule showing staff resources, which will make it difficult to manage staffing levels. AOC is taking the first steps to ensure that the right people are employed in the right positions by starting to identify competencies for its project management staff, creating position descriptions based on those competencies, and using those position descriptions as a basis for recruiting and hiring staff.

Recycling

In our January 2003 report, we made three recommendations to help the Office of the Architect of the Capitol (AOC) improve its overall approach to its recycling program by developing a clear mission and goals, developing a performance measurement system to support accomplishing its recycling program, and examining the roles and responsibilities of its recycling program staff. This appendix describes AOC's progress to date in addressing each of our recommendations. We provide a brief review of why we made each recommendation, report the actions that AOC has taken to implement the recommendation, and provide our analysis of whether AOC's actions address the underlying issues that caused us to make the recommendation in our January 2003 report.

Recommendation: Develop a clear mission and goals for AOC's recycling program with input from key congressional stakeholders as part of its proposed environmental master plan. AOC may want to establish reasonable goals based on the total waste stream—information it plans to obtain as part of its long-term environmental management plan—that could potentially be recycled.

During our management review, we found that AOC had established neither a clear mission statement nor goals for its recycling program. Various program-related documents made indirect references to two different missions for the program. One mission was to reduce the total amount of solid waste sent to landfills, and the other mission was to generate as much revenue as possible from the sale of its recyclable materials to a recycling contractor. Similarly, we found that AOC had not established any measurable goals for its recycling programs. The absence of AOC recycling goals did not allow measures to be linked to a desired level of performance, and thus AOC could not demonstrate the extent to which performance is achieved. We also stated that establishing meaningful goals would require collection of certain other information, including information obtained from a waste stream analysis.

We concluded that the high levels of contamination present in the materials collected in both the Senate and House recycling programs had not allowed AOC to achieve either substantial waste reduction or revenue generation

it might have otherwise achieved.¹ By clarifying the mission of the program, AOC could design recycling programs to achieve better results. We also suggested that, consistent with the communications strategy we discussed in our January 2003 report, AOC should involve its congressional stakeholders in the process of developing the mission statement for its recycling programs. We recommended that AOC develop a clear mission and goals for its recycling program with input from key congressional stakeholders as part of its proposed environmental master plan.

Actions Taken by AOC: In its March 2003 draft strategic plan, AOC states that it plans to develop a long-range environmental program plan that will establish program mission, vision, goals, and measures.² The strategic plan also states that this environmental program plan would include clarifying the mission, goals, and measures of the recycling program—a component of pollution prevention. Although, according to its performance plan, AOC is a few months behind its scheduled time frame for this work. AOC has begun work on both of these projects—the baseline assessment and waste stream analysis—and AOC program officials told us that both projects will be substantially completed by the end of 2003. These AOC officials also advised us that the results of this baseline assessment and waste stream analysis would provide a basis for establishing program priorities and measuring progress. The performance plan also provides for stakeholder participation in this process both before and after the actual environmental program planning process occurs; but this has not yet taken place. According to AOC's performance plan, stakeholder involvement is scheduled to begin in the second quarter of fiscal year 2004, after completion of the baseline assessment and waste stream analysis.

GAO Analysis: AOC is making progress in addressing our recommendation by taking the first steps toward developing a mission and goals for its recycling program. Collecting information through its baseline assessment and waste stream analysis will provide the factual information

¹Contamination occurs when potentially recyclable materials are mixed together with other categories of recyclables or wet waste. This reduces the value of the recyclable materials collected and in some cases, such as when paper is mixed with wet waste, the material may no longer be recyclable and must be sent to a landfill.

²According to the AOC draft strategic plan, the environmental program plan, to be completed in 2004, will address a wide spectrum of environmental management initiatives including environmentally sensitive planning and design, compliance with applicable provisions of environmental regulations (such as clean air, clean water, and solid waste disposal), and pollution prevention.

AOC needs as a basis for establishing those mission and goal statements. In addition, this information will be used in the development of its environmental program plan. Also, according to AOC's draft performance plan, its stakeholders will be involved both before and after actual development of the environmental program plan, scheduled to begin in the third quarter of fiscal year 2004. AOC's approach to developing its recycling program mission and goals within the broader context of an environmental program plan, as discussed in its draft strategic and performance plans, is reasonable and consistent with our recommendation.

Recommendation: Develop a performance measurement, monitoring, and evaluation system that supports accomplishing AOC's recycling mission and goals.

In our January 2003 report, we stated that as AOC revisited its program mission, goals, and design, the agency would have an opportunity to reexamine its recycling performance measurement system efforts to ensure that it had the right type of performance measures to support program monitoring and decision making. In addition, we stated that monitoring performance against goals would enable AOC program managers to identify where performance is lagging, investigate potential causes, and identify actions designed to improve performance. We also suggested that to support the accomplishment of AOC's recycling mission and goals, the performance measurement system developed should (1) show the degree to which the desired results were achieved, (2) be limited to the few vital measures needed for decision-making, (3) be responsive to multiple priorities, and (4) establish accountability for results.

Actions Taken by AOC: AOC stated in its draft strategic and performance plans that it would clarify the mission, goals, and measures of the recycling program as part of its environmental program planning process, which is scheduled to begin in the third quarter of fiscal year 2004 and is expected to be complete by the end of calendar year 2004. According to the Safety and Environmental Division (SED) director, AOC currently measures and tracks several key performance indicators, such as tonnage collected for multiple recycling streams and the quantity of material collected for recycling that does not meet specifications for reimbursement. The SED director also told us that additional action to revise existing and establish new measures is underway, including gathering and analyzing data as part of the waste stream analysis study. The results from this effort will be used to establish performance goals and additional performance measures that

are appropriate to the program. This effort is part of a broader AOC initiative to develop the environmental program plan.

According to the SED director, AOC plans to develop the environmental program plan internally with the option of obtaining consultant services if, during the course of the planning process, it finds certain expertise is needed but not available on staff. Also according to the SED director, AOC has taken steps to increase environmental staffing and contract for technical resources necessary to address a variety of environmental issues to support the development of the environmental program plan, such as a completed best management practices review, a waste stream analysis and pollution prevention planning initiative in progress, an environmental baseline assessment nearly completed, and an electronic waste recycling study. In addition, the SED director also told us that to minimize delays in obtaining consultant support, the Environmental Branch has obtained funding in the fiscal year 2004 budget to establish an environmental contract allowing AOC to more quickly procure consultant services.

GAO Analysis: AOC is making progress in addressing our recommendation. In addition to recommending that AOC develop a recycling performance measurement, monitoring, and evaluation system, our January 2003 report also suggested certain criteria and processes AOC could follow in establishing the recycling performance measures. For example, we suggested that AOC take certain steps in developing its performance measurement system, such as making sure the recycling measures developed show the degree to which the desired results were achieved and that AOC use a General Services Administration guide for federal agencies that describes the steps an agency could use to measure and monitor recycling efforts.³ However, the development of reasonable performance measures can also consider certain other sources, such as government or industry benchmarks for recycling programs as well as feedback from congressional stakeholders.

We agree that AOC should not establish performance measures until it has obtained the information it needs from the results of the environmental baseline and waste stream analysis that will help to establish the performance goals of the recycling program. Because AOC has not yet identified the performance measures it will use to assess the progress of its

³U.S. General Services Administration, *Recycling Program Desk Guide*, (Washington, D.C.: 2001).

overall environmental program plan, we cannot assess at this time whether the resulting measures will be consistent with the elements of a performance measurement system as discussed in our January 2003 report. It is important that AOC specify the steps it will take and the information sources it will use to develop its recycling program performance measures.

Recommendation: Examine the roles and responsibilities of AOC's recycling program staff to ensure that they are performing the right jobs with the necessary authority, and holding the staff accountable for achieving program and agency results through AOC's performance management system.

The roles and responsibilities of AOC's recycling program staff members have evolved in recent years, without the guidance of a clearly defined mission and goals. We reported in our January 2003 report that AOC had recently changed the responsibilities of its recycling program management positions to provide a greater focus on program planning and evaluation. However, these program managers reported that much of their time was spent on day-to-day program implementation activities, leaving little time to fulfill their expanded roles.

In addition, we found that the existing structure did not provide a clear mechanism to determine individual accountability for achieving results. Under the existing structure, jurisdictional recycling program managers are accountable only to their jurisdictional management, i.e., the Senate and House office buildings superintendents. The AOC Resource Conservation Manager, responsible for AOC-wide recycling programs, had no authority over either the jurisdictional managers or the recycling program managers in those jurisdictions. In addition, we stated in our January 2003 report that approximately 875 bargaining unit and trade union employees, such as the recycling workers and custodial staff that collect recyclable materials, were not covered by AOC's employee performance management system, PCES.

Actions Taken by AOC: AOC has created two new positions, an Environmental Branch Manager and Environmental Technician within SED that have duties and responsibilities related to the recycling program. In addition to these positions in SED, AOC has also filled a previously vacant Assistant Recycling Program Manager position within the House office-building jurisdiction. AOC officials said that these new positions would provide additional resources for improved planning and evaluation of the recycling program.

In addition, each jurisdiction reported that it evaluated respective recycling operations and made changes in staffing and organization plans, some of which have been implemented. The Senate jurisdiction examined its recycling function and determined in May 2003 that the jurisdiction's recycling staff, then assigned to one of three different organizational units, should be consolidated into one division reporting to the Recycling Program Manager. In the justification for making the change, the Superintendent for the Senate jurisdiction stated that, because of the diluted span of control and lack of accountability that existed under the present organizational structure, his jurisdiction could not achieve the desired level of program performance and execution. The Senate jurisdictional proposal also included adding four positions to the recycling collection staff. In addition, according to the Senate recycling program manager, this proposal has been submitted to AOC management and is pending approval.

Similarly, to address staffing and organization issues, management in the House jurisdiction decided to replace its part-time recycling collection staff—plagued by a high turnover rate and consequently a constant need to fill vacancies and train new staff—with full-time staff. This staffing change was accomplished using the same number of full-time equivalent positions as provided under the prior staffing plan. The House jurisdiction also implemented a pilot program to evaluate the feasibility of using the designated recycling staff to collect both recyclable materials and garbage from the House office buildings. According to the Deputy Superintendent of the House Office Buildings, based on the results of this pilot program, the House jurisdictional management decided to permanently implement the changes tested in the pilot program.

These changes, however, did not affect the supervisory and reporting relationships between the recycling program manager and the collection staff. In the House jurisdiction, the collection staff reports through line supervisors to a night House superintendent that provides direct line supervision of employees who carry out various housekeeping, janitorial, and emergency maintenance functions during nonbusiness hours. The House Recycling Program Manager has no direct authority over the collection staff, but stated that she conducts regular inspections of the recycling collection operations, including both individual office compliance with the level of source separation implemented in those offices and the collection workers' performance of their duties. She stated further that she has a good working relationship with the collection workers' direct line supervisors and reports any problems she identifies

during the course of her inspections to them. The House Deputy Superintendent affirmed the relationship between the House Recycling Program Manager and the collection workers' direct line supervisors and told us that the House jurisdiction management has no current plans to change the reporting relationship between the House Recycling Program manager and the collection staff.

The House jurisdiction does plan to take action that could provide increased accountability for achieving recycling program results. The Deputy House Superintendent told us that a recycling program element is now included in the Performance Communication Evaluation System (PCES) of the staff that directly supervise the recycling collection workers, holding them accountable for the collection of recyclables by their staff. Even with these changes, full accountability for achieving recycling program results cannot be established because, in both the Senate and House jurisdictions, the collection workers are bargaining unit and trade union employees and are not covered by PCES. According to AOC's HRMD director, AOC is currently negotiating with the unions to include these employees within PCES.

GAO Analysis: AOC is making progress in addressing our recommendation by evaluating the roles and responsibilities of its recycling program staff and increasing accountability for program results through its employee performance management system. The two positions AOC has filled should make more time available for recycling program planning and evaluation activities. The staffing and organization evaluations completed in the Senate and House jurisdictions and the actions taken by AOC as a result of those evaluations may improve the recycling programs operation in those jurisdictions.

Moreover, the proposed Senate reorganization of its reporting relationship between the recycling program manager and staff will provide more direct accountability for achieving AOC's organizational goals in its recycling program by providing a direct line of supervision between recycling program management and the staff responsible for the collection and processing of recyclable materials. Through the added element now incorporated into PCES for House recycling supervisors, AOC is working to increase accountability for achieving recycling program results.

Comments from the Architect of the Capitol

Note: GAO comments supplementing those in the report text appear at the end of this appendix.



Washington, DC 20515

January 20, 2004

Mr. J. Christopher Mihm, Director
Strategic Issues
U.S. General Accounting Office
441 G St. NW
Washington, DC 20548

Dear Mr. Mihm:

Thank you for the opportunity to comment on the U.S. General Accounting Office (GAO) January 2004 draft report "Architect of the Capitol: Status Report on Implementation of Management Review Recommendations." As your report reflects, we have been making steady progress in addressing the recommendations contained in the original report. We are committed to successfully bringing about the organizational transformation we jointly envision. As you know, we are tracking the action items for this initiative as part of our Strategic Plan and have incorporated specific milestones to address the GAO recommendations in our Performance Plan.

Our review of the draft report indicates that for the most part, it is consistent with the information we have exchanged throughout the follow-up review. Our comments and some updated information are attached. We look forward to continuing to work with you on this path of change, recognizing as you do, that this organizational transformation will take several years to fully accomplish.

Please give Hector Suarez a call (228-1205) if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan M. Hantman". The signature is written in a cursive style and is positioned above the printed name.

Alan M. Hantman, FAIA
Architect of the Capitol

Appendix VIII
Comments from the Architect of the Capitol

	Page Number(s)	Strategic Management GAO Finding(s) and AOC Response
See comment 1.	2 7 20	<p>Recommendation: The Architect of the Capitol gather and analyze employee feedback from focus groups or surveys before fiscal year 2005, as well as communicate how it is taking actions to address any identified employee concerns.</p> <p>AOC Response: Agree with recommendation. Employee survey will be completed this fiscal year. Will provide firm date as schedule is worked out.</p>
See comment 2.	6	<p>Finding: Building on its strategic planning efforts, it is important that AOC continues to involve key congressional, as well as other stakeholders, in its strategic planning process, and keeps them informed of any operational and organizational changes resulting from this planning process.</p> <p>AOC Response: Agree with recommendation. Architect and COO have incorporated congressional and other stakeholder meetings as part of their scheduled meetings. COO also has this as an action item in the COO Action Plan submitted to Congress.</p>
See comment 3.	7	<p>Finding: AOC needs to discuss with its stakeholders how the use of these protocols will help AOC to balance immediate needs with the achievement of overall agency strategic goals.</p> <p>AOC Response: We have revamped the draft protocols that were developed using the GAO model. As a result of our analysis for the process we have re-focused the protocols to ensure better tracking and prompt response to Congressional requests. We will be testing the process internally and will discuss implementation with appropriate Congressional staff.</p>
	Page Number(s)	Strategic Management of Human Capital GAO Finding(s) and AOC Response
See comment 4.	2 6 24-25	<p>Finding: AOC is also strengthening individual accountability for organizational goals through its senior executive performance management systems, but more progress can be made with aligning employee performance management systems with agency strategic goals.</p> <p>AOC Response: The AOC has developed a comprehensive approach to redesigning its Employee Performance Management System. Changes include technical content and process, linkage to the strategic plan, and consolidation to one rating cycle. While this approach requires some time for development and implementation, it will provide greater stability to the workforce by implementing one comprehensive change rather than two or three major changes to Employee Performance Management System in a 12-18 month period. Our plan incorporates employee groups to review the linkages to ensure they are understandable by the workforce and a comprehensive communication strategy to deliver the message to the workforce. The revised Employee Performance Management System, including linkages to the Strategic Plan, will be implemented within a year.</p>

Appendix VIII
Comments from the Architect of the Capitol

	Page Number(s)	Strategic Management of Human Capital GAO Finding(s) and AOC Response
See comment 5.	26-27	<p>Finding: It is important that AOC continue the development of both its technical and core competencies for all employees and ensure that these competencies are tied to the agency's Strategic Plan.</p> <p>AOC Response: With the establishment of the Office of Workforce Planning and Management (WFPM), we will be developing strategies for identifying core competencies for AOC positions. Training strategies will be developed for bridging gaps in employee competencies. This will be a joint effort between Human Resources and Workforce Planning Staffs. System requirements are currently being defined for capturing the data.</p>
See comment 6.	26-27	<p>Header: Develop the capacity to collect and analyze workforce data.</p> <p>AOC Response: Workforce Planning and Management Staff identified data sources and data collection methodologies for analyzing workforce data. This data would be imported from the National Finance Center (NFC) database and from the AVUE system (which houses critical workforce information on positions and employees). In addition, data would be collected from employees through surveys, Official Personnel Files, and interviews. We are in the process of identifying a systematic approach for analyzing data to assist with our overall workforce planning initiatives. In addition, we have purchased a statistical software system (SPSS) and will soon begin producing statistics on AOC's workforce.</p>
See comment 7.	28	<p>Finding: To date, AOC has established the function, but not yet hired the Director of OWPM or two designated workforce planning and management analysts.</p> <p>AOC Response: The Director and one staff position have been hired and are on-board. The new Director was hired on October 7, 2003, and has been recruiting for the remaining workforce planning and management analyst positions.</p>
See comment 8.	34	<p>Finding: It is important that AOC continue holding these meetings to discuss ways in which it can systematically gather and analyze information about general employee concerns, while maintaining employee confidentiality, and regularly bring these concerns to the attention of senior management.</p> <p>AOC Response: As discussed during the review, we have been holding meetings among with the staffs that address employee relations issues. These will continue. In addition we have developed a broad matrix report for the senior management staff.</p>
See comment 9.	35	<p>Recommendation: We recommended that AOC establish a direct reporting relationship between the Ombudsperson and the Architect to be consistent with professional standards, which suggests that the Ombudsperson report directly with the highest authority in the agency, in this case the Architect.</p> <p>AOC Response: We communicated our agreement to this recommendation numerous times during the review.</p>

See comment 10.

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**Financial Management
 GAO Finding(s) and AOC Response**

9 **Findings:** AOC is beginning to develop sound financial management practices. The Office of the Chief Financial Officer (OCFO) has established three broad-based action plans to improve financial management practices at AOC: (1) build a foundation of financial control and accountability, (2) assess the financial management organization's current role in meeting mission objectives and organize financial management to add value, and (3) improve forward-looking analysis, train managers to understand how to use financial information, and improve the partnership between financial management and operations.

AOC Response: We concur that we have established and taken many positive steps against three broad based plans to improve financial management. To be consistent within the GAO document, recommend that the reference state: "continue to improve AOC's approach to financial management" rather than using the word "beginning."

See comment 11.

39 **Findings:** None of the underlying action items associated with these action plans has been completed, and many are not scheduled for completion until fiscal years 2006 and 2007. Furthermore, planning for certain items has not yet begun, and for some is not scheduled to begin until mid-fiscal year 2004.

AOC Response: GAO is correct that many of our action plans are scheduled for completion in fiscal years 2006 and 2007 and it should be noted that no milestone has been missed. Our plans consider many of underlying steps that it takes for a financial organization to go beyond the audit opinion toward (1) establishing seamless systems and processes, (2) routinely generating reliable cost and performance information and analysis, (3) undertaking other value-added activities that support strategic decision making and mission performance, and (4) building a finance team that supports the agency's mission and goals. GAO points out many of our interim successes (the first ever audit of the AOC, preparing the FY05 budget in a structured method and implementing a major FMS system) we have taken in parts of its report. It would be appropriate to state this throughout the document to be consistent with Appendix III. Many steps have been taken to get to these successes – GAO should reconsider the choice of words – none and furthermore, in regards to the many steps AOC Financial team has taken to get to the noted successes as indicated in the GAO report. As for the milestone dates, we believe that a measured approach for improving financial management is prudent as our Agency's other processes and systems mature.

See comment 12.

39 **Finding:** OCFO reports that all financial managers and procurement officers in the jurisdictions and central office have been trained in appropriations law...

AOC Response: Recommend that this statement be changed to indicate, that while many of the financial managers and procurement managers have been trained in appropriation law, the program is an on-going program. This will represent the information we provided more accurately.

See comment 13.

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**Financial Management
GAO Finding(s) and AOC Response**

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Finding: According to OCFO, AOC is in the process of hiring the first group of jurisdiction finance managers. Regarding system upgrades, AOC has implemented the first phases of a plan. Implementation of the contracting module and inventory system are both planned for production operations in October 2004. AOC's upgrade of the financial management system is also scheduled for October 2004, with future upgrades of major releases scheduled annually.

AOC Response: Recommend that this statement be changed, so that the first sentence ("According to OCFO, AOC is in the process of hiring first group of jurisdiction financial managers") is placed at the end of the previous paragraph. And recommend change "AOC has implemented the first phases of a plan" to "AOC has implemented the major phases of the financial system implementation plan with the final two phases planned for October 2004" to better reflect the information we provided.

See comment 14.

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**Information Technology
GAO Finding(s) and AOC Response**

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Finding: GAO collected from AOC documentation of the organization's implementation of our recommendations, which we used to assess the progress made in addressing the issues underlying these recommendations. For example, we reviewed documents such as AOC's draft strategic and performance plans, draft communications plan, IT investment framework, centralized IT management policy, drafts of initial EA products, occupational safety and health program plan, master safety plan, project management evaluation and screening matrix, and pollution prevention planning initiative, among others, as well as documentation that policies had been changed and meetings had taken place.

AOC Response: The documents GAO reviewed were not drafts, they were fully completed version 1 documents. GAO received a hard copy of the version 1 products (baseline architecture, target architecture, program management plan, technical reference model, EA goals and objectives, EA principles, BSMO charter, and BSMO goals and objectives) after the Oct 23, 2003, exit interview. Version 1 has since been approved by the Deputy Chief of Staff.

See comment 15.

See comment 16.

Page Number(s)	Information Technology GAO Finding(s) and AOC Response
9-10	<p>Finding: AOC has not focused first on controlling existing IT investments and its project investment review board does not include key senior agency leaders. For AOC to implement effective IT investment management processes, it is important that it follow our previous recommendation on establishing a foundation for its investment management framework. In building on this foundation, AOC needs to take additional steps to help it execute the more mature investment management processes provided for in our investment management guide.</p> <p>AOC Response: AOC is focusing on controlling its existing investments. Upon completion of the pilot framework, the first step taken to implement the framework was to score and rank FY2004 projects based on the value and risk criteria identified in the framework. In addition, the four boards in the framework have been formed and are beginning to evaluate IT investments.</p>
10	<p>As part of the piloting of the investment framework, the Investment review board composition has been revised and now includes key senior agency leaders (Deputy Chief of Staff, CFO, Superintendents, Strategic Planner, Director OIRM, Management Analyst).</p> <p>Finding: The agency has not yet hired a chief enterprise architect and has not ensured that adequate resources are devoted to the program, that architecture environments are described in terms of performance and security, and that metrics are used to measure EA progress.</p> <p>AOC Response: A Chief Enterprise Architect position has been requested in the AOC's FY2005 budget. In the interim, a contractor has been working with the members of the Business Systems Modernization Office to assist with the EA effort. OIRM put together a detailed plan addressing resources.</p>

See comment 17.

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Information Technology
GAO Finding(s) and AOC Response

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Recommendation: GAO recommend that to further its progress in the management of its information technology, the Architect of the Capitol (2 recommendations)

AOC Response: Point 1 is part of the investment framework. Strategic objectives are included in the value factors used to score proposed projects (see Appendix B of the Investment Management Framework, OIRM Order 2-2). The evaluation criteria used to score and rank projects includes Value Criteria [Efficiency, Strategic Match, Client Impact, Employee Commitment, Management Information, and Requestor] as well as Risk Criteria [Organization Risk, Definitional Uncertainty, Technical Uncertainty, IS Infrastructure Risk, and External Risk (Security Risk has been incorporated since the release of the initial framework)]. Points 1-4 are addressed in the Investment Management Framework that is currently being used to score, prioritize and monitor FY2004 projects.

This is the first time that GAO has recommended following their architecture management guide (U.S. General Accounting Office, Information Technology: A Framework for Assessing and Improving Enterprise Architecture Management, GAO-03-584G Washington, D.C.: April 2003). Previous recommendations have focused on the Chief Information Officers Council, A Practical Guide to Federal Enterprise Architecture, version 1.0: Feb. 2002. This is a new requirement by GAO and as such, OIRM will need to develop a plan to map to GAO's EA framework.

See comment 18.

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Finding: The director is organizationally positioned to report to the agency's Deputy Chief of Staff (who is a member of AOC's senior policy committee) and also has been made the chairman of the investment review board, which is the approval body for new IT investments beginning in fiscal year 2004.

AOC Response: The Director of OIRM was listed as the Chair of the IRB in the October 2003 release of the investment framework. As the framework has been implemented it has been revised to name the Deputy Chief of Staff as the Chair of the IRB. The Director of OIRM now chairs the IT Project Management Board (PMB).

See comment 19.

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**Information Technology
GAO Finding(s) and AOC Response**

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Finding: Develop and implement IT investment management processes with the full support and participation of AOC's senior leadership. Specifically, the Architect must develop a plan for developing and implementing the investment management processes, as appropriate, that are outlined in our IT investment management guide. At a minimum, the plan should specify measurable tasks, goals, time frames, and resources required to develop and implement the processes. The Architect should focus first on the management processes associated with controlling existing projects and establishing the management structures to effectively implement an IT management process.

Finding: According to that official, the agency is currently testing part of the framework—the process used to score proposed investments' value and risk—on a few existing investments.

AOC Response: All existing FY2004 projects have been scored on value and risk.

AOC is focusing on controlling its existing investments. Upon completion of the pilot framework, AOC took the following steps: 1) Scored and ranked FY2004 projects based on the value and risk criteria identified in the framework. 2) Charged the PMB with measuring the progress of existing projects. In addition to the PMB, OIRM has a bi-weekly status meeting where managers review all project progress and issues. This has been in place for almost two years. 3) Formed the four boards in the framework and began to evaluate IT investments. 4) As part of the piloting of the investment framework, the Investment review board composition was revised and now includes key senior agency leaders (Deputy Chief of Staff, CFO, Superintendents, Strategic Planner, Director, OIRM, and OIRM's Management Analyst).

To directly address the four statements made in the referred GAO report paragraph, 1) AOC is operating an IT investment board that includes senior IT and business representatives, 2) OIRM is overseeing ongoing IT projects through its PMB and status meetings, 3) OIRM is in the process of gathering requirements for an automated solution to identify, track and manage resources, and 4) we are ensuring that each IT project supports the organization's business needs by interviewing stakeholders during the development of the agency's IT budget each year and also by evaluating projects on value and risk criteria that include customer needs and strategic match.

OIRM will continue to work with GAO and other agency subject matter experts in IT investment management to create a more detailed plan for implementing our investment management framework.

See comment 20.

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Information Technology
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43 **Recommendation:** We reiterate our recommendation that AOC develop and implement a plan that is consistent with our IT investment management guide and thus focus first on the practices associated with controlling existing IT investments. We also recommend that AOC plan for and implement those practices in our IT investment management guide associated with corporate, portfolio-based investment decision-making, such as (1) implementing criteria to select investments that will best support the organization's strategic goals, objectives, and mission; (2) using these criteria to consistently analyze and prioritize all IT investments; (3) ensuring that the optimal investment portfolio with manageable risks and returns is selected and funded; and (4) overseeing each investment within the portfolio to ensure that it achieves its cost, benefit, schedule, and risk expectations.

AOC Response: AOC is focusing on controlling its existing investments. Upon completion of the pilot framework, AOC took the following steps: 1) Scored and ranked FY2004 projects based on the value and risk criteria identified in the framework. 2) Charged the PMB with measuring the progress of existing projects. In addition to the PMB, OIRM has a bi-weekly status meeting where managers review all project progress and issues. This has been in place for almost two years. 3) Formed the four boards in the framework and began to evaluate IT investments. 4) As part of the piloting of the investment framework, the Investment review board composition was revised and now includes key senior agency leaders (Deputy Chief of Staff, CFO, Superintendents, Strategic Planner, Director, OIRM, and OIRM's Management Analyst).

See comment 21.

44 **Finding:** Thus far, AOC has initiated activities to develop EA products, including the existing, "as is," and the target, "to be," architectures—as well as a plan that will map out the transition from the "as is" to the "to be." Drafts of the initial version of the existing and target architectures, as well as the transition plan, were completed in September 2003, and are awaiting approval by the senior policy committee. These architecture products describe the "as is" and "to be" environments. AOC plans to implement the target architecture starting in October 2003, with an estimated completion date of September 30, 2007.

AOC Response: Version 1 of the baseline architecture, target architecture, program management plan and technical reference model were completed on schedule (September 30, 2003) and have been approved by the Deputy Chief of Staff.

The estimated completion date is now FY2008/FY2009. OIRM put together a detailed plan addressing resources. OIRM's request for FY2005 funding was not approved. The Chief Enterprise Architect position has not yet been filled but has been requested again in the FY2005 budget.

See comment 22.

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**Information Technology
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44-45

Recommendation: GAO recommends that AOC complete ongoing steps associated with developing its EA and implement additional steps to complete, maintain, and implement the architecture. In particular, we recommend that AOC plan for and implement the practices in our architecture management guide associated with leveraging an EA for organizational transformation, such as (1) ensuring that adequate resources are devoted to the program (funding, people, tools, and technology); (2) ensuring that the architecture describes both the “as is” and the “to be” environments in terms of performance; (3) ensuring that architecture business, performance, information and data, applications and services, and technology descriptions address security; and (4) ensuring that metrics are used to measure EA progress, quality, compliance, and return on investment.

AOC Response: This is the first time that GAO has recommended following their architecture management guide (U.S. General Accounting Office, Information Technology: A Framework for Assessing and Improving Enterprise Architecture Management, GAO-03-584G Washington, D.C.: April 2003). Previous recommendations have focused on the Chief Information Officers Council, A Practical Guide to Federal Enterprise Architecture, version 1.0: Feb. 2002. This is a new requirement by GAO and as such, OIRM will need to develop a plan to map to GAO’s EA framework.

See comment 23.

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Finding: AOC still needs to ensure that it obtains a well-defined set of processes and that these processes are in fact implemented by March 31, 2004, as planned.

AOC Response: When the completed methodology is delivered to AOC on January 31, 2004, a two month pilot will be used to refine the processes for their implementation as an agencywide standard on March 31, 2004.

Supporting documentation will be developed during the pilot and will include:

- Policy statements
- Standards and Practices
- Worksheets and Checklists
- Templates

See comment 24.

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**Information Technology
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46-47

Finding: Establish and implement an information security program. Specifically, the Architect should establish an information security program by taking the following steps (see bullets):

Finding: The key is for AOC to follow through on stated commitments to provide proper resources for the program, finalize its security policies, define processes for implementing the policies, and implement them.

AOC Response: 1) The needed staffing resources for this program have been provided through contract resources. 2) We are completing the review of 19 IT Security policies. Target date for issuance is March 31, 2004. 3) The comprehensive IT Security Plan is being revised. The plan will define the processes needed to implement the policies. The revised plan will include the IT Security SDLC Process. 4) Once the comprehensive plan is revised (target June 2004), we will implement the elements of the plan in a judicious and logical manner.

See comment 25.

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**Worker Safety
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Recommendation: To further progress in developing its strategic management and accountability framework and improve communications agencywide, we recommend that the Architect of the Capitol take the following actions

- gather and analyze employee feedback from focus groups or surveys before fiscal year 2005, as well as communicate how it is taking actions to address any identified employee concerns

AOC Response: The AOC is currently developing a Safety Communication Plan, with the assistance of DuPont Safety Resources. As part of the development process, a communication survey has been distributed AOC-wide, and follow-up focus groups are planned to clarify trends and issues identified. Completion of this effort is targeted for April 2004.

See comment 26-29.

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**Worker Safety
 GAO Finding(s) and AOC Response**

13 **Finding:** While a majority of the jurisdictions await full development and implementation of the Hazard Assessment and Control policy, each jurisdiction continues to rely upon its own hazard reporting processes. Until the policy is fully implemented, jurisdictions will continue to use separate systems for identifying and reporting incidents. Also, AOC has established a plan and initiated actions to improve the reporting of hazards, though the development and implementation of an agencywide policy and procedures for hazard reporting is expected to take years to complete due to the time needed to develop and fully implement this safety policy. Until AOC completes the implementation of this policy and subsequent analysis across all jurisdictions, it will not be able to develop a comprehensive picture of AOC hazards.

AOC Response: This text confuses requirements under the Hazard Assessment and Control policy and the Incident Investigation policy. It also overlooks that a major component of the Hazard Assessment and Control policy is the JHA process, which is being consistently implemented throughout the AOC – completed in five jurisdictions and underway in the remaining ones.

Also omitted from GAO consideration in this section is the recent completion of a comprehensive baseline safety and environmental assessment. The baseline assessment provides details of deficiencies identified in both operations and infrastructure. Data from this effort has been entered into the FMA data management system to allow an analysis of deficiencies by location, jurisdiction, and policy area. It also allows for prioritization of issues by risk and permits the AOC to track the status of these issues through abatement.

See comment 30.

14 **Finding:** Although, according to its draft performance plan, AOC is a few months behind its schedule, AOC officials told us that work has begun on both of these projects—the baseline assessment and waste stream analysis—and both projects will be substantially completed by the end of 2003.

AOC Response: Both were completed before December 31, 2003.

See comment 31.

14 **Finding:** The draft performance plan also provides for stakeholder participation in this process both before and after the actual environmental program planning process occurs, but this has not yet taken place.

AOC Response: The AOC has developed a schedule of activities for developing the Environmental Program Plan. The schedule includes early stakeholder input (scheduled for completion by 1/16/04) and two additional opportunities during development for stakeholder input. SFEP scheduled 10 stakeholder input sessions; the first one was held 12/12/03 and the 10th session was held on 1/15/04.

See comment 32.

See comment 33.

See comment 34.

Page Number(s)	Worker Safety GAO Finding(s) and AOC Response
49	<p>Finding: In addition, AOC has requested significant and permanent increases in the training budget for AOC employees.</p> <p>AOC Response: AOC has not determined whether the increase in the training budget is permanent. The training request is based on identified requirements. Training costs should decrease after policy implementation is complete as refresher training is less costly as compared to initial training.</p>
49	<p>Finding: As of the beginning of fiscal year 2004, no safety policy has been fully implemented.</p> <p>AOC Response: While no policy has been fully implemented AOC-wide, there has been significant progress in a number of policy areas and Jurisdictions, including, but not limited to:</p> <ul style="list-style-type: none"> • Permit Required Confined Spaces: provided training and conducted a Capitol Complex Confined Space Survey for all jurisdictions Blood borne Pathogens (BBP): A majority of AOC employees requiring training have been trained and a majority of the AOC jurisdictions have purchased BBP equipment required by the policy. • Fall Protection: A majority of AOC employees that require training have been trained. A majority of all AOC Jurisdiction have purchased fall protection equipment. A fall protection survey has been conducted in approximately 50% of all jurisdictions. • Respiratory Protection: Training and SOP have been completed in the Construction Management, House and Senate Office Buildings jurisdictions. • Scaffolding: A majority of AOC employees that need to use scaffolding equipment have been trained.
49	<p>Finding: The draft OSH plan indicates a performance measure for the objective “enhance employee awareness of and involvement in all aspects of safety and health” and includes publicizing the minutes from jurisdictions’ monthly meetings to discuss safety and health. However, this performance measure is not fully developed or results oriented.</p> <p>AOC Response: The report does not mention one of the key indicators, the official I&I rate. Since FY2000, the AOC has reduced this rate each year and, for FY2003, the rate is 7.87. This is a 56% reduction from the FY2000 rate.</p>

	Page Number(s)	Worker Safety GAO Finding(s) and AOC Response
See comment 35.	49	<p>Finding: AOC has been unable to meet the original targeted time frame (fiscal year 2005) due to the need to revise the methodology for developing a standard operating procedure template for each safety policy.</p> <p>AOC Response: The schedule could not be met due to insufficient staff resources in the Jurisdictions. The SOP Template was developed as part of the solution to reduce the manpower burden of implementation (and enhance consistency). The revision of the template played no role in the meeting the targeted timeframe.</p>
See comment 36.	50	<p>Finding: While two of the safety policy standard templates have been drafted, neither has been released because the agency needs to make the procedures more user friendly for front-line employees.</p> <p>AOC Response: The first approved SOP template was signed on 12/8/03, and several others are undergoing final review for approval.</p>
See comment 37.	51	<p>Finding: The FMA system, which is partially functional at this time.</p> <p>AOC Response: The FMA inspection module is fully functional, as it is designed as stand-alone software. We plan to add an incident investigation module and are looking at data-sharing capabilities with CAFM; however, these are additions to the system. This effort to improve system integration and overall capabilities does not correlate with the system being "partially functional".</p>
See comment 38.	51	<p>Finding: The FMA system will (1) track and analyze the number and types of hazards using JHA data.</p> <p>AOC Response: This is incorrect. JHA data is not part of the FMA System. JHA data is managed and utilized through a Microsoft Access-based program developed by PHS.</p>

See comment 39.

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**Worker Safety
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50-51

Finding: First, AOC plans to develop a Hazard Assessment and Control policy, one of its 34 safety policies, beginning October 2003 through June 2004 and fully implement the policy by May 2006. Second, as a key component in developing its Hazard Assessment and Control policy, AOC plans to identify hazards associated with specific job tasks (AOC calls this task a Job Hazard Analysis (JHA)).³⁵ AOC has created a schedule for completing each JHA. In addition, AOC has contracted with the Department of Health and Human Services' Public Health Service (PHS) to identify hazards associated with job tasks in each jurisdiction. For all potentially hazardous conditions identified, the job hazard analysis will include appropriate use of personal protective equipment, medical surveillance, training, and engineering controls. According to AOC officials, the JHA process has been completed for two jurisdictions—the Senate and the Construction Management Division. Lastly, while a majority of the jurisdictions await full development and implementation of the Hazard Assessment and Control policy and the Facility Management Assistant (FMA) system, they continue to rely upon their own hazard reporting processes. The FMA system, which is partially functional at this time, will (1) track and analyze the number and types of hazards using JHA data, (2) identify follow-up corrective actions to ameliorate hazards, and (3) track the investigation of incidents following injuries, illnesses, fatalities, and near misses. The FMA system is commercially available and contains a suite of software components. AOC officials reported that these processes vary across jurisdictions and involve formal reporting procedures and mechanisms, such as submission of standard forms for reporting hazards, as well as informal measures, such as e-mail messages and periodic employee meetings. In addition, AOC officials discuss hazards as well as other safety and health issues at meetings convened by AOC employee and managerial committees.

AOC Response: No reference to the safety and environmental baseline assessment, which identified deficiencies with our compliance with applicable OSHA regulations – both with operational issues and infrastructure issues. Jurisdictions are working to correct deficiencies.

JHAs have been completed for five jurisdictions, the Senate, Construction Management Division, Capitol, House, and Supreme Court. JHAs are well underway in the remaining jurisdictions.

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Finding: Moreover, data from the FMA system will only be viewable by central office safety staff.

AOC Response: This is incorrect. Jurisdictions also have login accounts in FMA. As clarification, they are limited to data for their own Jurisdictions; central staff has data access AOC-wide.

See Comment 40.

	Page Number(s)	Worker Safety GAO Finding(s) and AOC Response
See comment 41.	52	<p>Finding: These processes vary across jurisdictions and include formal reporting procedures and mechanisms...</p> <ul style="list-style-type: none"> • jurisdictions will continue to use separate systems for identifying and reporting incidents. • it will not be able to develop a comprehensive picture of AOC incidents, including their causes, across all jurisdictions. <p>AOC Response: The AOC currently utilizes the Workers Compensation Tracking System (WCTS), supplemented with an integrated OSHA 300 log data entry, for recording and tracking injuries and illnesses. The WCTS has been operational for years; the OSHA 300 log module has been operational since January 2003. This is a centralized system with access by both jurisdiction and central staff.</p>
See coment 42.	52	<p>Finding: AOC does not, at this time, have plans to integrate the FMA system with the system to generate work orders to correct identified hazards.</p> <p>AOC Response: This is an FY04-funded initiative. OIRM is working on this issue to establish a linkage between FMA and CAFM. However, many operational deficiencies are corrected without the use of a work order (such as employee not wearing PPE, correcting a training deficiency, etc.). Other deficiencies may be grouped together on one work order (correcting several GFCI findings with one work order). Because of these, and other, issues, this linkage will not result in automatic work order generation.</p>
See comment 43.	53	<p>Finding: AOC uses formal methods to evaluate training, such as a participant evaluation form, as well as informal methods, such as following up with participants' supervisors to obtain feedback on training sessions.</p> <p>AOC Response: SOHB safety policy managers also audit courses and provide review/feedback to HRMD T&ED. Methods include: participant evaluation forms, and audits of instruction of first offerings by Safety Specialists from the Safety, Fire and Environmental Programs, as well as informal methods mentioned above.</p>
See comment 44.	53	<p>Finding: The FMA system, which will be used to track and identify corrective actions for hazards and incidents, will not be aligned to the training system to help identify and target training needs to address high-risk areas.</p> <p>AOC Response: Practically speaking, there is limited need for alignment of these systems, as they track independent information. However, the needs analysis review to be conducted by OIRM (discussed in response to a comment on page 54) includes a review of the FMA data elements to determine what linkage, if any, is necessary.</p>

	Page Number(s)	Worker Safety GAO Finding(s) and AOC Response
See comment 45.	53	<p>Finding: Although senior officials in the jurisdictions are responsible for monitoring employee training needs, they cannot access HRMD’s database of AOC sponsored training courses and employees’ training attendance.</p> <p>AOC Response: One of the 2 pilot initiatives underway with the Library Buildings and Grounds addresses training data identified as a need by LOC management.</p>
See comment 46.	54-55	<p>Finding: AOC has not taken any concrete steps to obtain data or analyses from OAP medical examinations that might identify health-related trends. While AOC officials told us that confidentiality issues might interfere with such efforts, no steps have been taken to address and overcome this concern.</p> <p>AOC Response: The data management system, discussed above, will permit the sharing of data between AOC and OAP, subject to medical confidentiality restrictions.</p>
See comment 47.	55	<p>Finding: AOC plans to develop new approaches to reduce workers’ compensation costs based upon these discussions. However, no solutions or new approaches to address workers’ compensation costs have thus far been developed.</p> <p>AOC Response: AOC has taken action on a number of fronts, including, continued emphasis on preventing injuries and illnesses (56% reduction over 3 years), better coordination between HRMD and Jurisdiction safety specialists on questionable cases (underway and continuing to be refined), and increased emphasis on limited- and light-duty assignments.</p> <p>The main way to control workers’ compensation costs is through prevention of injuries and there are significant efforts underway to reduce injuries. In addition, AOC assertively reviews claims and, when appropriate, controverts the claim to the Department of Labor. In addition, AOC has hired investigators on a limited basis when there is reason to believe suspect circumstances exist regarding the payment of workers’ compensation benefits.</p>
See comment 48.	62	<p>Finding: AOC is taking the first steps to ensure that the right people are employed in the right positions by starting to identify competencies for its project management staff, and creating position descriptions based on those competencies and using those position descriptions as a basis for recruiting and hiring staff.</p> <p>AOC Response: Project Management staff, Procurement Division staff, and Human Resources staff are working collaboratively and have identified technical competencies for project managers and acquisition personnel. A draft program is ready for final review by senior management.</p>

See comment 49.

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**Project Management
GAO Finding(s) and AOC Response**

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Finding: AOC is making progress in addressing our recommendation, although, in its March 7, 2003, draft performance plan, AOC showed that it planned to publish the final Capitol Hill complex master plan April 1, 2006. In addition, the current schedule shows the final plan being completed 8 months later in December 2006. AOC's schedule shows that most of the additional time, 6 months, was added to the time AOC expects it to take to obtain and incorporate comments and finalize the plan. Completion of the BCAs is also behind the tentative schedule developed in March 2003. The first BCAs were to be completed March 31, 2004. But since all BCA contracts are not expected to be awarded until December 2003, and the work is expected to take about 1 year, it appears that the initial BCAs for the three largest jurisdictions will not be completed until the fall of 2004. Completion of the other BCAs will depend on when funding is received. Since the BCAs are a key component of the master plan, AOC will need to push to get these completed as soon as possible so they can be integrated into the master plan. It is important to recognize that once the BCAs are completed they should be updated on a regular schedule.

AOC Response: The original schedule in the March 7, 2003, Draft Performance Plan to which GAO refers, and against which the AOC is said to be many months behind, was developed before the Planning and Programming Division was established, before the current Division Director was hired, before division staff were hired (including the Project Manager for the plan), before a Scope of Work was developed, and before it was determined that GSA would serve as contracting agency. Following the hiring of the Planning and Programming staff, an updated schedule was developed in April 2003, and since that time, the AOC has remained on schedule. In November 2003, a determination was made by the Architect to utilize GSA as contracting agency. This decision has added approximately 2 months to those steps leading up to contract award, but through streamlining, the final completion date has remained the same.

The BCA initiative was not moving at the required pace through the spring and early summer of 2003. In early August, the Planning and Programming Division was assigned to manage these efforts. While the BCAs are a number of months behind the original schedule, they are now proceeding toward contract award in February 2004. In addition, we are still on track to receive Form 1391s as deliverables in time to include appropriate projects in the FY 2006 LICP.

See comment 50.

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**Project Management
GAO Finding(s) and AOC Response**

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Finding: According to the Director of AOC's Technical Support Division, AOC has identified software packages capable of producing a unified schedule that shows staff resources. The Director is waiting for one particular vendor to complete a software package that should produce a unified schedule and would work with AOC's current software. He is scheduled to meet with this software vendor in fall 2003 to determine if the software package can produce the unified schedule that AOC needs.

AOC Response: A more accurate statement would be: "The AOC has identified a software package capable of producing a unified schedule that shows staff resources. A Purchase Order has been issued for the software and for supporting consulting to accomplish proper installation of the application."

See comment 51.

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**Recycling
GAO Finding(s) and AOC Response**

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Findings: GAO concluded that the high levels of contamination present in the materials collected in both the Senate and House recycling programs had not allowed AOC to achieve either substantial waste reduction or revenue generation it might have otherwise achieved.

AOC Response: The above is not accurate. Off-spec material is separated by the recycling contractor and the recyclable portion of this material is recycled. While it does limit revenue generation, it is recycled. Also the amount of off-spec material generated by the Senate has dropped dramatically, and the degree to which House off-spec material is contaminated (although still off-spec) has also declined significantly.

See comment 52.

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Findings: The Senate jurisdictional proposal also included adding four positions to the recycling collection staff. According to the Senate recycling program manager, this proposal has been submitted to AOC management and is pending approval.

AOC Response: The four new positions have been filled.

GAO Comments

1. AOC agrees with our recommendation and agrees to take appropriate follow-up actions.
2. AOC agrees with this finding and agrees to take appropriate follow-up actions.
3. See comment 1.
4. AOC plans are consistent with our findings and have provided additional information on its recent plans and actions that we will assess in our subsequent semi-annual reviews.
5. See comment 4.
6. See comment 4.
7. The text has been modified to reflect AOC's response.
8. See comment 1.
9. See comment 4.
10. AOC's comments concerning our draft report's treatment of AOC's action on our financial management recommendation were technical in nature, and, as appropriate, changes were made to the final report.
11. See comment 10.
12. See comment 10.
13. See comment 10.
14. We have modified our report to reflect AOC's position that the cited documents are not draft.
15. We agree with AOC's comment, and state in our report that AOC's first step to implementing the framework was to score and rank projects for fiscal year 2004. However, this scoring and ranking of projects for the upcoming fiscal year are project selection, not control, practices. Further, while we do not question AOC's statement in its comments that its investment management boards are beginning to evaluate IT investments,

AOC's comments did not address what these evaluations entail; and, our review showed that AOC's IT investment management framework does not specify how the agency will identify, track, and manage IT resources or ensure that projects support agency business needs, both of which are key IT investment control activities. Therefore, our position remains that AOC is focusing first on selecting, rather than controlling, investments.

We support AOC's cited recent revision to the composition of its investment review board, and have recognized AOC's statement in our report. We look forward to receiving a revision of the board's charter reflecting this membership change.

16. We agree that a chief enterprise architect position has been requested in AOC's fiscal year 2005 budget, and that it has been using contractor assistance in developing an enterprise architecture. Our report recognizes both of these facts. Also, while we do not question AOC's statement that it has developed a detailed plan addressing resources, we have not received a copy of this plan.

17. We agree that AOC's IT investment framework contains the evaluation criteria specified in AOC's comment. However, our recommendation is for the agency to implement practices in our IT investment management guide associated with a corporate portfolio-based investment management process for controlling and selecting all proposed and ongoing IT investments. As discussed in comment 15, AOC has thus far focused on selecting among proposed new investments, to the exclusion of ongoing projects, and it has yet to define how it is controlling ongoing projects.

We agree that our previous recommendation did not reference our architecture management maturity guide, but rather the Chief Information Officer's Council practical guide. However, our maturity guide is based on the content of the practical guide, arranging this content into a series of five maturity levels. Further, our previous recommendation was intended to provide AOC with the basis for taking the first step toward architecture management maturity, and coincides with the first stage of our maturity framework. Our new recommendations build on and complement our previous recommendation, and thus we agree that AOC will need to evolve its architecture plans to progress beyond this initial step.

18. We have modified our report to reflect this clarification.

19. We do not question that AOC has taken the eight steps it cites since completing its IT investment framework, but do not agree that the agency has focused on controlling its existing investments for the following reasons. With respect to step 1, AOC's scoring and ranking of then proposed fiscal year 2004 projects are project selection, not control, practices. Regarding steps 2 and 3, while we do not question AOC's statements that it has assigned its project management board responsibility for measuring project progress and that its investment management boards are beginning to evaluate IT investments, AOC's comments did not address the extent of these project reviews. Our review showed that AOC's IT investment management framework does not specify how the agency will identify, track, and manage IT resources, a key IT investment control activity. With respect to the biweekly status meetings that AOC states have been occurring for almost two years, we reported in 2003 that the agency had not developed the processes needed to manage and oversee all AOC existing projects.¹ Concerning step 4, we support AOC's cited recent revision to the composition of its investment review board, and have recognized AOC's statement in our report.

With regard to the fifth step cited by AOC, we do not question that AOC is operating its IT investment board, but it is important to note that the AOC IT investment framework describes the project management board as the control and oversight board for ongoing investments. Concerning step 6, the nature and extent of AOC cited oversight of ongoing projects is unknown because AOC's comments did not address what is entailed in the project management board and the biweekly status meetings, and the framework does not specify how the agency will identify, track, and manage IT projects. Regarding step 7, we support the use of tools to identify, track and manage IT resources. Concerning the last step AOC cited, we view the interviewing of stakeholders as a positive step toward ensuring that each IT project supports the organization's business needs.

20. See comments 15 and 19.

21. As mentioned in comment 14, we have modified our report to reflect AOC's position that the architecture products are not draft and have been approved by the Deputy Chief of Staff. We have also recognized the

¹U.S. General Accounting Office, *Architect of the Capitol: Management and Accountability Framework Needed for Organizational Transformation*, GAO-03-231 (Washington, D.C.: Jan. 17, 2003).

statement that a detailed resource plan has been developed, as well as the revised date for implementing the architecture. Our report already addressed the status of the additional funding request.

22. See comment 17.

23. We do not question these statements and note that our report already includes this information.

24. We have modified our report to reflect the recent steps AOC's comments state that it has taken to begin establishing and implementing an information security program.

25. The Safety Communication Plan was not raised during interviews with AOC officials. AOC has provided additional information that we will assess in our subsequent semi-annual reviews.

26. The text has been modified to reflect AOC's response.

27. Our report does not overlook the Job Hazard Analysis (JHA) process within the Hazard Assessment and Control Policy and states that the JHA process is, in fact, a key component of this policy. During our data collection period, AOC had only completed a JHA in two jurisdictions. AOC has provided additional information that we will assess in our subsequent semi-annual reviews.

28. The baseline safety and environmental assessment mentioned by AOC was not brought forth during our data collection and analysis period. However, we do recognize in the draft that the Hazard Assessment and Control policy will identify hazards associated with job tasks, as well as identify corrective actions taken to abate these hazards.

29. This comment refers to the recycling appendix. These actions were taken outside the timeframe of our review and will be assessed in our subsequent semi-annual reviews.

30. See comment 29.

31. Information provided by AOC officials during our data collection period was that they had requested significant and permanent increases in their training budget. The text has been modified to reflect AOC's response.

32. AOC's response does not change our assessment that no safety policy has been fully implemented. New information provided to us was not raised during our review period and therefore will be assessed in subsequent semi-annual reviews.

33. We continue to believe that the performance measure identified in the report for the objective "enhance employee awareness of and involvement in all aspects of safety and health"—publication of meeting minutes—is not results oriented. A good metric to assess employee awareness would necessarily be based upon employee responses. In fact, AOC recognized that its performance measures in assessing its safety policies are immature. The text has been modified to include the AOC's Injury and Illness rate for FY2003.

34. The text has been modified to clarify the need for extending the original time frame to implement the safety policies.

35. These actions were taken outside the timeframe of our review and will be assessed in our subsequent semi-annual reviews.

36. The text has been modified to clarify the added functions AOC may purchase for the FMA system in order to expand its capabilities.

37. The text has been modified to reflect the current uses of the FMA system.

38. See comment 28.

39. During our data collection period, the AOC had completed a JHA in two jurisdictions. These actions were taken outside the timeframe of our review and will be assessed in our subsequent semi-annual reviews.

40. The text has been modified in order to clarify FMA system access issues.

41. Our finding focuses on the need to report illnesses and injuries among jurisdictions in a comprehensive and consistent manner. Indeed, through its development of its Incident Investigation Module, AOC underscores the

need for such a reporting system that tracks data across jurisdictions. We acknowledge that AOC has a Workers Compensation Tracking System for recording and tracking injuries and illnesses.

42. These actions were taken outside the timeframe of our review and will be assessed in our subsequent semi-annual reviews. The text has been modified to clarify AOC's current initiatives in this area.

43. The text has been modified to include additional methods used to evaluate training.

44. We encourage the AOC to move strategically towards an integrated system that links identification of hazards with employee training needs.

45. We encourage the AOC to strategically identify data access issues related to employee training records.

46. During our review, AOC management informed us that medical information obtained from Office of the Attending Physician (OAP) exams were not being shared with AOC officials because of confidentiality issues. The sharing of these data, while addressing confidentiality issues, could benefit AOC in its efforts to identify and combat health-related trends among AOC employees.

47. AOC's response does not indicate that the Safety, Health and Environmental Council (SHEC) have identified strategies to reduce workers' compensation costs. We continue to believe that the SHEC offers opportunities to identify strategies to address this issue.

48. We reported this information in our strategic human capital management and project management appendixes in our discussion of competencies.

49. In August 2003, AOC provided us with an update to their original schedule for the Master Plan. We compared this updated schedule to the original schedule in the March 2003 draft performance plan and used this information for our analysis. AOC did not provide us with any other schedule information against which to analyze their progress. Therefore, we presented the information made available to us as of November 2003.

50. We have made the appropriate change in the text.

51. While we recognize that the recycling contractor separates the material collected from AOC and recycles the recyclable portion, it is also true that office paper including both white (high grade) paper and mixed grade (both white and colored office paper) that is contaminated with wet waste (primarily food and beverage waste) can no longer be recycled and must be sent to a landfill.

52. In addition to stating that the Senate jurisdiction proposal included adding four positions to the recycling collection staff, we also stated in our draft that the proposal recommended consolidating the recycling positions into one organizational unit to address the diluted span of control and lack of accountability that existed under the present organizational structure. AOC did not comment on whether it had approved the proposed reorganization. Increasing accountability for obtaining recycling goals was the principal point of our discussion and increasing staff without changing the organizational structure would not improve accountability.

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