Architect of the Capitol
Office of Inspector General

Follow-up Evaluation of the Architect of the Capitol's Information Technology Division Contracting Services Blanket Purchase Agreement

OIG-FLD-2026-02

September 30, 2026

ARCHITECT OF THE CAPITOL

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Results in Brief

Follow-up Evaluation of the Architect of the Capitol's Information Technology Division Contracting Services Blanket Purchase Agreement

SEPTEMBER 30, 2026

OBJECTIVE

The objective of this follow-up evaluation was to determine whether the Architect of the Capitol (AOC) effectively implemented corrective actions to address the findings and recommendations in the July 2019 Office of Inspector General (OIG) report, *Audit of the Architect of the Capitol's Information Technology Division Contracting Services Blanket Purchase Agreement* (Report No. OIG-AUD-2019-03).

The July 2019 OIG audit found that the Information Technology Division (ITD) Blanket Purchase Agreement (BPA) No. [redacted] was awarded in accordance with laws and contracting requirements; however, the BPA file lacked information and contracting officials did not properly monitor the BPA. Specifically, the OIG identified that contracting officials (1) did not include detailed supporting documentation for the Independent Government Estimate (IGE) in the BPA file; and (2) did not properly monitor Task Order No. 1 to ensure adequate oversight of contractor performance. In addition, the task order did not include all performance standards and a quality assurance plan in the Statement of Work (SOW).

OIG made eight recommendations to address the identified areas of improvement. This follow-up evaluation focused on corrective actions taken since the issuance of the July 2019 OIG report. For this follow-up evaluation, OIG selected ITD BPA No. [redacted] and associated task orders F001 and F011 for review. The BPA procured a variety of information technology services, including information assurance, network infrastructure management, engineering operations and maintenance services, application development, and support services.

FINDINGS

OIG found that the AOC implemented several corrective actions in response to the July 2019 OIG audit, including issuing IGE guidance, establishing annual Contracting Officer's Representative (COR) file audits, developing COR file documentation requirements, and issuing guidance for measurable performance standards for certain performance-based acquisitions. However, OIG also determined the following:

- ITD BPA task order contract files lacked sufficient IGE support documentation, and one task order award exceeded the IGE by 51 percent.
- Contracting Officers (CO) selected COR files for audit based on professional judgment rather than a documented, risk-based approach.

- ITD CORs interviewed were not consistently familiar with COR file documentation requirements, and one of the three COR files reviewed was missing required contract deliverables.

- AOC's guidance for developing measurable performance standards did not address SOW-based acquisitions.

RECOMMENDATIONS

OIG recommends:

1. The AOC develop, implement, and communicate standardized cost estimating policies and procedures that incorporate best practices from the Government Accountability Office's Cost Estimating and Assessment Guide (GAO-20-195G) to ensure IGEs are supported and include documentation of management review and acceptance.

2. Acquisition and Material Management Division (AMMD) develop and implement a risk-based approach for selecting COR contract files for audit and periodically assess the effectiveness of the process.

3. AMMD communicate existing guidance and provide targeted training to CORs on contract administration file documentation requirements to ensure consistency and alignment with the COR Handbook.

4. The AOC develop and communicate clear guidance to COs and CORs on the requirements for measurable performance standards and Quality Assurance Surveillance Plans under a SOW.

MANAGEMENT COMMENTS

The AOC provided comments on September 25, 2026, see Appendix C. In its Management Comments, the AOC concurred with all four recommendations. Please see the Recommendations Table on the following page for the status of the recommendations.

RECOMMENDATIONS TABLE

Management	Recommendation Required Comment
Architect of the Capitol	1 and 4
Office of the Chief Administrative Officer	2 and 3

Management	Recommendations Unresolved	Recommendations Resolved	Recommendations Closed
Architect of the Capitol	None	1 and 4	None
Office of the Chief Administrative Officer	None	2 and 3	None

The following categories are used to describe agency management's comments to individual recommendations:

- **Open Unresolved:** Management has not agreed to implement the recommendation or has not proposed actions that will address the recommendation.
- **Open Resolved:** Management agreed to implement the recommendation or has proposed actions that will address the underlying finding that generated the recommendation.
- **Closed:** OIG verified that the agreed upon corrective actions were implemented.

Inspector General

DATE: September 30, 2026

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

FROM: Luiz A. Santos, CFE, PMP
Inspector General

SUBJECT: Follow-up Evaluation of the Architect of the Capitol's Information Technology Division Contracting Services Blanket Purchase Agreement (OIG-FLD-2026-02)

Please see the attached final report for our follow-up evaluation of the Architect of the Capitol's (AOC) Information Technology Division (ITD) Contracting Services Blanket Purchase Agreement (BPA) (OIG-FLD-2026-02), which we announced on January 13, 2026. This report presents four findings and four recommendations related to AOC's corrective actions addressing contract cost estimation, Contracting Officer's Representative (COR) oversight, contract file documentation, and contractor performance monitoring.

We determined that the AOC implemented several corrective actions, including issuing Independent Government Estimate (IGE) guidance, establishing annual COR file audits, developing COR file documentation requirements, and issuing guidance for measurable performance standards for certain performance-based acquisitions. However, we also determined that (1) the ITD BPA task-order files lacked sufficient IGE support, including one award that exceeded the IGE by 51%; (2) contracting officers selected COR files for audit based on professional judgment rather than a documented, risk-based approach; (3) ITD CORs were not consistently familiar with documentation requirements, and one of three reviewed files lacked required contract deliverables; and (4) AOC guidance on measurable performance standards did not cover Statement of Work-based acquisitions.

We appreciate the courtesies extended to our staff during the evaluation. If you have any questions, please contact me at 202.593.1948 or luiz.santos@aoc.gov. Alternatively, your staff may contact Peter Sima-Eichler, Deputy Inspector General, at 202.355.5948 or peter.sima-eichler@aoc.gov or Brittany Banks, Assistant Inspector General for Follow-Up, at 202.436.1445 or brittany.banks@aoc.gov.

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INTRODUCTION

Objective

The objective of this evaluation was to determine whether the Architect of the Capitol (AOC) effectively implemented corrective actions to address the findings and recommendations in the July 2019 Office of Inspector General (OIG) report, *Audit of the Architect of the Capitol's Information Technology Division Contracting Services Blanket Purchase Agreement* (OIG-AUD-2019-03).

Background

2019 OIG Audit Report

The July 2019 OIG audit report, *Audit of the Architect of the Capitol's Information Technology Division Contracting Services Blanket Purchase Agreement* (OIG-AUD-2019-03), assessed whether the AOC awarded and monitored task order No. 1 under the Information Technology Division's (ITD's) Blanket Purchase Agreement (BPA) [redacted] in accordance with laws, regulations, policies, and contract requirements. OIG found that the BPA was awarded in accordance with laws and contracting requirements; however, the BPA file lacked information, and the Contracting Officer's Representative (COR) and Contracting Officer (CO) (also referred to as "contracting officials") did not properly monitor the BPA. Specifically, the 2019 OIG audit identified that contracting officials (1) did not include detailed supporting documentation for the Independent Government Cost Estimate (IGCE);[1] and (2) did not properly monitor task order No. 1 to ensure adequate oversight of contractor performance. In addition, the task order did not include all performance standards and a quality assurance plan in the Statement of Work (SOW).

OIG made eight recommendations to address the identified areas of improvement. This follow-up evaluation focused on corrective actions taken since the issuance of the July 2019 OIG report to improve IGE documentation, CO and COR post-award administration, and internal controls for monitoring ITD BPA task orders.

Acquisition and Material Management Division

The Acquisition and Material Management Division (AMMD), located within the AOC's Office of the Chief Administrative Officer (OCAO), is responsible for oversight and administration of purchasing. AMMD consists of the following three branches:

[1] Per the AOC Contracting Manual, IGCE is referred to as the Independent Government Estimate (IGE). IGE serves as a tool for COs to determine whether the proposed price is reasonable for a contract award.

- The Acquisition Policy Branch (APB): APB is responsible for developing and managing the AOC's acquisition policy to ensure compliance with federal mandates and regulatory guidance. APB also manages training requirements for CORs and COs and monitors them for compliance with AOC requirements for awarding, administering, and managing contracts.

- The Design & Construction Acquisition Division (DCA): DCA provides business advisory support for the AOC's architect/engineering, construction, and construction management support services. Its contracting specialists assist AOC personnel with acquisition planning and formulation of contracts. Additionally, DCA is the office of primary responsibility for AOC Order 34-1, Contracting Manual.

- The Supplies, Services & Materials Management Division (SSMMD): SSMMD oversees the AOC's procurement of supplies and services, the Personal Property Management program, the Fleet Management program, and the Purchase Card and Small Business programs at the AOC. Its contract specialists guide AOC personnel through the procurement process and assist in the development of contracting documents.

AOC Contracting Manual

The AOC Contracting Manual (Order 34-1) is AOC's primary source of acquisition policy and guidance. It contains uniform policies for the acquisition of supplies, services, construction, and related services and provides guidance to personnel in applying those policies and procedures. The manual also incorporates best practices consistent with the Federal Acquisition Regulation (FAR).[2]

The manual defines "contract administration" as the management of a contract from the time of award through its expiration and close out. The purpose of contract administration is to:

- Ensure that the contractor performs according to the contract.

- Ensure the CO does not waive any AOC rights.

- Ensure that the AOC receives the quantity and quality of the supplies, services, or construction procured in the contract.

- Develop a record of the contractor's past performance.

Contract administration responsibilities include issuing contract modifications, monitoring contract deliveries and performance, reviewing the contractor's invoices for payment, and closing out the contract. The terms and conditions of the contract are used as the guidance in performing these tasks.

[2] FAR is the primary regulation for use by all executive agencies in their acquisition of supplies and services with appropriated funds. It contains standard solicitation provisions, contract clauses, and agency FAR supplements.

COs are responsible for appointing an AOC employee as a COR on a designated contract as well as ensuring and documenting that the selected individual is trained and possesses the qualifications and experience necessary to perform COR duties.

CORs are responsible for monitoring the contractor's performance to ensure that it is in accordance with the written terms and conditions of the award. The COR must promptly notify the CO, in writing, any time a contractor's performance is not in compliance with the contract.

Information Technology Division

ITD, located within OCAO, is the primary operational information technology (IT) organization supporting the AOC's Chief Information Officer, providing IT leadership, solutions, and user support on and off the Capitol campus. ITD consists of the following four branches:

Information Technology Support Services BPA

In December 2021, the AOC awarded a 1-year BPA for IT Support Services (ITSS) ([redacted]). The BPA procured a variety of IT services, including information assurance, network infrastructure management, engineering operations and maintenance services, application development and support services, and IT service desk services. It had a funding ceiling of $25 million with a period of performance from January 3, 2022, to January 2, 2023. ITD issued 13 task orders under the BPA (Table 1). For this follow-up evaluation, OIG selected F001 and F011 for review.

Table 1: ITSS BPA [redacted] Task Order Awards

Number	Name	Original Total Amount Awarded
[redacted]	[redacted]	$5,262,694.80
[redacted]	[redacted]	$5,095,267.08
[redacted]	[redacted]	$185,933.28
[redacted]	[redacted]	$3,311,958.96
[redacted]	[redacted]	$295,473.36

Number	Name	Original Total Amount Awarded
[redacted]	[redacted]	$231,928.56
[redacted]	[redacted]	$445,929.12
[redacted]	[redacted]	$365,761.08
[redacted]	[redacted]	$1,717,612.80
[redacted]	[redacted]	$106,237.00
[redacted]	[redacted]	$246,801.05
[redacted]	[redacted]	$1,352,117.52
[redacted]	[redacted]	$40,924.96
Total:		**$18,658,639.57**

Criteria

- AOC Information Letter (IL) [redacted], Government Estimate Guidance for Contract Specialists and Requirement Developers, February 13, 2020
- AOC IL [redacted], Contract Administration File Documentation, February 21, 2020
- AOC IL [redacted], Measurable Performance Standards and Quality Assurance Surveillance Plan, February 21, 2020
- Government Accountability Office (GAO)-20-195G, Cost Estimating and Assessment Guide, March 2020[3]
- COR Review Checklist, February 2022
- AOC Order 34-1 Contracting Manual, July 14, 2022
- COR Handbook Version 1.0, April 23, 2025

[3] OIG used applicable AOC requirements as mandatory criteria and GAO guidance as a benchmark for recognized federal best practices.

- Policy Guidance and Interpretation (PGI) [redacted] – Protecting Independent Government Estimates, May 5, 2025
- AOC PGI [redacted], COR File Audits, May 6, 2025
- GAO-25-107721, Standards for Internal Control in the Federal Government, May 15, 2025
- COR Appointment Letter

FINDING 1

ITD Should Strengthen Controls for IGE Supporting Documentation

The 2019 OIG audit found that contracting officials did not include detailed supporting documentation for the IGE. As a result, the AOC could not demonstrate how cost estimates were developed or support determinations of price reasonableness.

Previous Recommendation

A.1. We recommend that the contracting officials ensure the IGE is adequately supported and documented in the contract file in accordance with AOC guidance.

The AOC concurred with the recommendation made in the 2019 OIG audit report. In the agency's Notice of Final Actions, the AOC noted that the AMMD issued IL [redacted], Government Estimate Guidance for Contract Specialists and Requirement Developers, on February 18, 2020, providing guidance on the types of estimates that are necessary for inclusion in the contract file.

Evaluation Results

AOC Issued IGE Guidance, but Task Orders Lacked IGE Supporting Documentation

OIG's follow-up evaluation found that the AOC implemented recommendation A.1 and corrective actions mentioned in the 2019 OIG audit report by issuing IL [redacted], Government Estimate Guidance for Contract Specialists and Requirement Developers. The IL improved AOC guidance by clarifying the types of estimates Contract Specialists may submit with acquisition packages and stated that the CO should reject estimates that lack supporting documentation.

The follow-up evaluation found that for the two ITSS BPA task orders reviewed, contracting officials did not include documentation in the contract files to support the task order IGEs, including the calculations, estimated hours, labor rates, assumptions, or methodology used. While the BPA COR compiled the task order IGEs to support the overall BPA IGE, the task order COR files did not include sufficient documentation to explain how the COR or other personnel developed the estimates. For task order F001, the task order COR stated that they did not prepare the IGE and did not know who prepared the IGE or where to locate the supporting documentation. After meeting with AMMD and the BPA COR, OIG could not determine who prepared the estimate. For task order F011, the task order COR explained that

the IGE was based on labor categories and rates in the BPA price list[4] multiplied by the estimated number of hours. Although this explanation described the general approach, the contract file did not contain documentation supporting the selected labor category, rate, estimated hours, or other underlying assumptions used to develop the estimate.

These discrepancies occurred because IL [redacted] does not define the minimum documentation requirements. Additionally, the AOC Contracting Manual does not specify documentation standards or expectations for how personnel should support IGEs. AMMD officials stated the CO is not responsible for reviewing or approving the IGE prior to adding it to the contract file. GAO's Cost Estimating and Assessment Guide states that a well-documented estimate should identify source data, methodologies, assumptions, and the technical baseline in sufficient detail for the estimate to be understood and replicated and include evidence of management review and acceptance.

OIG also found that while AOC guidance requires COs to ensure that the IGE is included in the requisition package, it does not assign responsibility and documentation requirements for management to review and accept the IGE. GAO's Cost Estimating and Assessment Guide[5] states that management should document its review and acceptance of the cost estimate, including recommendations for changes and feedback. The AOC's CO and ITD CORs stated that IGEs do not go through a formal review process; however, at the conclusion of OIG's fieldwork, a Supervisory Contract Specialist responsible for CO oversight, stated that IGEs go through an undocumented formal review.

Additionally, ITD CORs were not familiar with IL [redacted] or guidance requiring CORs to retain IGE supporting documentation in the COR contract file.

Task Order F001 Award Exceeded the IGE by 51 Percent

OIG's follow-up evaluation found that the AOC awarded task order F001 for approximately $5.2 million, which exceeded the IGE by approximately $1.75 million, or 51 percent (Table 2). The AOC Contracting Manual requires offices and jurisdictions to submit an IGE as part of a requisition package. The IGE is a tool COs may use to determine whether the proposed price is reasonable for a contract award.

The variance occurred because the award's monthly rates were higher than the monthly rates ITD included in the IGE. Additionally, the CO stated that the ITD COR made an error when preparing the IGE and that they did not use the IGE to determine price reasonableness. Instead, the CO determined price reasonableness by using the contractor's established GSA schedule

[4] The AOC's ITD BPA price list refers to the contractor's Federal Supply Schedule (FSS) published by the General Services Administration (GSA). The FSS program provides federal agencies with a simplified process for obtaining commercial supplies and commercial services at prices associated with volume buying. FSS records are available at http://www.gsa.gov/schedules. See FAR 8.402 https://www.acquisition.gov/far/subpart-8.4.

[5] The GAO's Cost Estimating and Assessment Guide identifies documented management review, including recommendations, changes, and acceptance of the estimate, as a sound cost-estimating practice.

rates. Because supporting documentation for task order F001 IGE was unavailable, OIG could not determine whether the IGE was based on complete and accurate assumptions, or whether the variance resulted from an error.

Table 2: Task Order F001 Comparison of IGE, Quote, and Contractor Award

IGE	Contractor Quote	Contract Award	Difference ($)	Difference (%)
$ 3,440,426	$ 5,190,057	$ 5,190,057	$ 1,749,631	51%

OIG asked CORs whether contractors were involved in developing IGEs. In response to findings from a related 2024 OIG report, *Evaluation of the Architect of the Capitol's Contracting Officer and Contracting Officer's Representative Oversight* (2023-0002-IE-P), the AOC issued PGI [redacted] – Protecting Independent Government Estimates, May 2025, to clarify restrictions on contractor involvement in IGEs. Interviewed CORs confirmed that ITD was aware of the restrictions and did not use contractors to develop IGEs.

Conclusion

The AOC improved its guidance by clarifying the types of estimates contract specialists may submit with acquisition packages and stated that the CO should reject estimates that lack supporting documentation. However, the guidance does not establish minimum documentation requirements for IGEs or require management review and acceptance of the estimate. Although ITD CORs were able to provide an explanation and support for the BPA and task order F011 IGEs, the AOC should improve its guidance for supporting documentation by incorporating appropriate practices from the GAO's Cost Estimating and Assessment Guide. Without IGE supporting documentation and review, the AOC lacks assurance that its IGEs are reliable for future-year budgeting.

Recommendation

Recommendation 1

Office of Inspector General recommends that the Architect of the Capitol develop, implement, and communicate standardized cost estimating policies and procedures that incorporate best practices from Government Accountability Office's Cost Estimating and Assessment Guide (GAO-20-195G) to ensure Independent Government Estimates are supported and include documentation of management review and acceptance.

Recommendation 1 – AOC Comment

Concur. The AOC will develop, implement, and communicate standardized cost-estimating policies and procedures that incorporate best practices from GAO-20-195G and ensure IGEs

follow an internal control process that requires management review and acceptance. Anticipated completion by September 30, 2027.

Recommendation 1 – OIG Comment

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

FINDING 2

AOC Could Strengthen COR File Audits Through a Risk-Based Approach

The 2019 OIG audit found that the CO did not review the COR records in accordance with the AOC Contracting Manual and the COR memorandum. Further, AMMD supplemental instructions and explanations regarding regular review did not align with the AOC Contracting Manual and the COR memorandum.

Previous Recommendation[6]

B.1. We recommend that the AMMD clarify in the Contracting Manual 34-1 – Section 13.1.2 COR(c) the requirements for CO's regular review of the COR records to ensure proper performance of post award administration duties.

B.2. We recommend that the AMMD clarify in the Contracting Manual 34-1 – Section 13.1.2 COR(c)(1) the usage of the COR Review Checklist by all staff to ensure proper COR performance of post award administration duties.

B.4. We recommend that the CO and COR document and maintain detailed records of COR and contractor's performance.

B.5. We recommend that the AOC establish proper internal controls to ensure the performance of CO and COR post award administration duties.

The AOC did not concur with recommendations B.1 and B.2 in the 2019 OIG audit report and did not take corrective action. In the agency's response to the final report, the AOC stated that AMMD provides clear guidance to COs regarding the regular review of COR records and usage of the COR Review Checklist.

The AOC concurred with recommendation B.4. In its Notice of Final Action, the AOC noted that IL [redacted], *Contract Administration File Documentation*, was issued on February 21, 2020, and in-house training was conducted during a branch meeting on January 30, 2020.

The AOC partially concurred with recommendation B.5. In the agency's response to the final report, AOC agreed with concerns about the need for more COR reviews. In its Notice of Final Actions, AOC indicated that Paragraph 13.1.2 (c) will be updated in the AOC Contracting Manual on July 14, 2020.

[6] This finding addresses the CO portion of recommendations B.4 and B.5.

Evaluation Results

AOC Implemented Annual COR File Audits and Use of the COR Review Checklist

OIG's follow-up evaluation found that the AOC implemented recommendation B.1, the CO portion of B.4, and the CO portion of B.5. In 2020, AOC updated its Contracting Manual to require annual COR file audits to assess performance of post-award administration duties. Additionally, in response to findings from a related 2024 OIG report, *Evaluation of the Architect of the Capitol's Contracting Officer and Contracting Officer's Representative Oversight* (2023-0002-IE-P), AOC issued PGI No. [redacted], *COR File Audits*, which requires COs to complete at least two COR file audits annually. The guidance also requires COs to download and complete a copy of the COR Review Checklist when performing COR file audits, thereby meeting the intent of recommendation B.2 despite the AOC's nonconcurrence. This measurable requirement improved consistency for conducting and documenting annual COR file audits.

OIG confirmed that the CO responsible for ITD contracts completed two COR file audits in both fiscal year (FY) 2024 and FY 2025 using the required COR Review Checklist and did not identify any deficiencies.

AOC Could Strengthen COR Files Audits Through a Risk-Based Approach

At the time of OIG's evaluation, the AOC acquisition workforce oversaw contracts valued at approximately $877.7 million. Although the AOC established a policy requiring COs to perform two COR file audits annually, the minimum level of review required equates to approximately 4.9 percent of active COR contract files. OIG found that COs do not use a documented risk-based approach to select files for review. Instead, COs selected files using their professional judgment. The selection process does not formally consider risk factors such as contract value, contract type, performance concerns, prior documentation deficiencies, or COR experience. Table 3 details the number of contracting personnel and active contracts at the time of OIG's evaluation.

Table 3: AOC Active Contracting Personnel and Contracts

Active COs	Active CORs	Active Contracts	Active Contract Value	COR Files Reviewed
38	382	1,565	$877,724,143	4.9%

Additionally, OIG's follow-up evaluation found that the CO did not select any of the 13 task orders under the ITSS BPA, which had a funding ceiling of $25 million, for review. The CO explained that the AOC only requires them to select two contracts to audit each year.

The CO did not select the ITSS BPA and its task orders because the BPA was a 1-year bridge contract.[7] The CO stated that a COR portfolio may include approximately 20-30 contracts and that workload does not permit an audit of every COR file.

Federal internal control principles support identifying and analyzing risks, designing control activities to respond to identified risks, and designing monitoring activities whose scope and frequency are commensurate with risk.[8] However, because the COs do not select files using documented risk criteria, AOC cannot demonstrate that the files audited represent the contracts presenting the greatest risk. A documented, risk-based selection approach would provide greater assurance that AOC directs its limited oversight resources towards contracts presenting the greatest contract administration and performance risk.

Conclusion

AOC implemented annual COR file audits and required use of the COR Review Checklist, which improved consistency for conducting and documenting annual COR file audits. However, the selection process remains discretionary rather than risk-informed. Without documented criteria to guide risk-informed selections, the files reviewed may not present the greatest monetary, contract administration, and compliance risk. This condition increases the likelihood that documentation deficiencies, performance concerns, unsupported payments, or other weaknesses will remain undetected and reduces assurance that contracted services provided are consistent with contract requirements.

Recommendation

Recommendation 2

Office of Inspector General recommends Acquisition and Material Management Division develop and implement a risk-based approach for selecting Contracting Officer's Representative contract files for audit and periodically assess the effectiveness of the process.

Recommendation 2 – AOC Comment

Concur. AMMD will develop and implement a risk-based approach for selecting COR contract files for audit and create a risk register to track and assess the process's effectiveness. This

[7] A "bridge contract" is defined as a short-term sole-source contract awarded generally to the incumbent contractor to continue critical services when a follow-on competitive contract action could not be completed in a timely manner. It provides needed services until the program and contracting offices can establish a new competitive contract. Refer to https://www.acquisition.gov/dars/5817.000-definitions for the full definition.

[8] GAO-25-107721, Standards for Internal Control in the Federal Government, known as the "Green Book," sets the standards for an effective internal control system for federal executive branch agencies. OIG used the Green Book as a best-practice benchmark in evaluating the design of AOC monitoring controls.

risk-based approach will supplement the current random selection of COR file reviews. Anticipated completion by April 1, 2027.

Recommendation 2 – OIG Comment

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

FINDING 3

AOC Should Clarify Guidance and Provide Training to CORs on Contract Administration File Documentation

The 2019 OIG audit found that AOC contracting officials did not properly monitor Task Order No. 1 to ensure adequate oversight of contractor performance. Specifically, the COR did not adequately perform and document the post-award administration duties. COR documentation was limited for the complete 3-year period of performance under review for task order No. 1.

Previous Recommendation[9]

B.3. We recommend that the CO and COR perform the duties as required in the Appointment of COR Memorandum and Contracting Manual 34-1 – Section 13.1.2(c) COR for the ITD BPA Task Order No.1.

B.4. We recommend that the CO and COR document and maintain detailed records of COR and contractor's performance.

The AOC partially concurred with recommendation B.3 and concurred with recommendation B.4. In the agency's response to the final report, the AOC stated that although most of the post-award duties of the CO and COR were performed in accordance with AOC Order 34-1 and the COR Appointment Letter, better documentation could have been provided to support duties performed. The AOC stated AMMD will review (1) existing policies and procedures relative to documentation requirements to ensure they are up to date and (2) the COR's file for the task orders to ensure that it contains all required documentation. In its Notice of Final Action, the AOC stated that IL [redacted], *Contract Administration File Documentation*, was issued on February 21, 2020, and in-house training was conducted during a branch meeting on January 30, 2020.

Evaluation Results

AOC Established COR Contract Administration Documentation Requirements

OIG's follow-up evaluation found that the AOC implemented the COR portions of recommendations B.3 and B.4. [redacted] addressed documentation requirements for COs but

[9] This finding addresses the COR portion of recommendations B.3 and B.4.

did not provide guidance on COR duties and documentation requirements. However, in response to findings from a related 2024 OIG report, *Evaluation of the Architect of the Capitol's Contract Officer and Contracting Officer's Representative Oversight* (2023-0002-IE-P), the AOC developed the COR Handbook in April 2025. The handbook requires CORs to maintain a file for each assigned contract or task order using a standardized file index. The file index provides a clear structure for CORs to follow to ensure adequate post-award administration of their contract. Additionally, it provides CORs with a consistent framework for organizing contract administration records, which may improve the completeness, accessibility, and oversight of COR documentation.

The COR Handbook was not in place for the performance period of the ITSS BPA contract and task orders under review.[10] However, some ITD CORs reported that there was no current formal requirement to follow a standardized file structure. The CO's understanding was that CORs were not required to maintain post-award administration documentation in a centralized location or follow a prescribed file index. Only one of the three CORs interviewed was aware of the COR Handbook. CORs stated that their documentation practices were based primarily on years of experience rather than standardized requirements.

One ITD COR Did Not Maintain Support for Some Contract Deliverables

OIG's follow-up evaluation found that two of the three CORs' files reviewed contained detailed documentation of SOW deliverables used to monitor contractor performance. However, the COR file for task order F001 did not contain all required records. Specifically, contractor personnel timesheets and the enterprise architecture document set were missing. This occurred because the COR misunderstood the documentation requirements associated with monitoring contractor performance. The COR appointment letter requires the COR to monitor and document contractor performance, but the COR did not retain personnel timesheets because the COR believed they were not necessary under a firm-fixed price contract since they were not used to support contractor payment. Table 4 provides details on the required contract SOW deliverables.

Table 4: List of Contract Deliverables Found in COR Contract Files

Required Deliverables	Overall BPA	TO F001	TO F011
Kickoff Meeting	Yes	Yes	Yes
Quarterly Status Report	Yes	N/A*	N/A*
Monthly Status Report	Yes	N/A*	N/A*
Weekly Status Report	N/A*	N/A*	Yes
Contract Personnel Timesheets	Yes	No	Yes
Enterprise Architecture Document Set	N/A*	No	N/A*

[10] Therefore, the OIG did not use the handbook to assess historical compliance but considered it in evaluating the AOC's current documentation controls.

Required Deliverables	Overall BPA	TO F001	TO F011
Project Management Plan	Yes	N/A*	N/A*
Transition Out Plan	Yes	N/A*	N/A*
Is the COR File complete?	Yes	No	Yes

* N/A – The SOW does not require the deliverable under the BPA or TO.

These issues likely occurred because an ITD Administrative Officer handled most of the administrative tasks associated with COR duties for many years. Following the employee's departure from the agency in April 2025, the BPA CO noticed that many ITD CORs were unfamiliar with their COR responsibilities. This reliance on one individual, combined with insufficient communication and training, contributed to inconsistent file maintenance practices.

Conclusion

The COR appointment letter requires the COR to monitor and document contractor performance. However, review of the 2022 ITSS BPA found that one of the COR's files did not contain all required SOW deliverables. AOC established standardized COR file documentation requirements through the April 2025 COR Handbook, which provided CORs with a consistent framework for organizing contract administration records. However, the OIG found that the three CORs interviewed were not familiar with the file documentation requirements in the COR Handbook. These interviews support that COR contract file requirements require further communication and implementation guidance. Effective communication and compliance with existing guidance are essential because they ensure CORs maintain the documentation needed to verify that contractors provide services consistent with contract requirements.

Recommendation

Recommendation 3

Office of Inspector General recommends that Acquisition and Material Management Division communicate existing guidance on contract administration file documentation requirements and provide targeted training to Contracting Officer's Representatives (COR) to ensure consistency and alignment with the COR Handbook.

Recommendation 3 – AOC Comment

Concur. AMMD will communicate existing guidance and provide targeted training to CORs on contract administration file documentation requirements to ensure consistency and alignment with the COR Handbook. Anticipated completion by April 1, 2027.

Recommendation 3 – OIG Comment

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

FINDING 4

AOC Should Develop Guidance on Performance Standards under a SOW

The 2019 OIG audit found that contract task orders did not include all performance standards and a quality assurance plan in the SOW. As a result, it was unclear how the contracting officials were able to adequately determine that the task order requirements were met.

Previous Recommendation

B.6. We recommend that the CO develop measurable performance standards and quality assurance plans for Task Order No. 1.

B.7. We recommend that the CO establish proper internal controls to ensure that contracting documents include measurable performance standards and quality assurance plans.

The AOC partially concurred with recommendation B.6. In the agency's response to the final report, the AOC stated that although AOC Order 34-1 does not require every task or subtask in the SOW to have a measurable performance standard, the CO will review tasks not covered by such standards to determine whether any other measurable performance standards would be appropriate and practicable. In its Notice of Final Action, the AOC stated that IL [redacted], *Measurable Performance Standards and Quality Assurance Surveillance Plan (QASP)*, was issued in February 2020, and in-house training was conducted in January 2020, providing detailed guidance on expectations for the insertion of QASPs under performance-based acquisitions.

The AOC concurred with recommendation B.7. In its Notice of Final Action, the AOC stated that paragraph 8.2.5 of AOC Order 34-1, that addresses performance-based contracting, will be updated by July 2020, to cover the development of a Statement of Objective (SOO) and Performance Work Statement (PWS) and the requirements for using a QASP.

Evaluation Results

AOC Issued Contractor Performance Standards Guidance but Did Not Include Guidance for SOWs

OIG's follow-up evaluation found that the AOC implemented the corrective actions for recommendations B.6 and B.7 in the Notice of Final Action to the 2019 OIG audit report. In response to the 2019 OIG Report recommendation B.6, the AOC issued IL [redacted], *Measurable Performance Standards and Quality Assurance Surveillance Plan*, which required a

QASP for performance-based acquisitions exceeding the simplified acquisition threshold when using a PWS or SOO. In response to recommendation B.7, the AOC updated the Contracting Manual provisions governing performance-based acquisitions.

However, the AOC's corrective actions did not explicitly address measurable performance standards or QASP requirements for acquisitions using a SOW. This distinction is important because ITD used SOWs to define the requirements for the ITSS BPA and its 13 task orders. A SOW provides detailed information on what the AOC expects the contractor to deliver or accomplish and the overall range or extent of the work or services to be provided under the contract. Without guidance addressing SOW-based acquisitions, contracting personnel do not have clear direction on when and where they should include measurable inspection and acceptance criteria to support objective contractor-performance monitoring.

Measurable Performance Criteria Were Inconsistently Applied

SOWs were used to define requirements for the ITSS BPA and its 13 task orders. The OIG's follow-up evaluation found that task order F001 included a QASP with measurable inspection and acceptance criteria, including IT help desk performance metrics. However, task order F011 did not include a QASP. Task order F011 required technical reviews of the contractor's work but did not contain measurable inspection and acceptance criteria that would allow the CO or COR to objectively determine whether performance met established expectations. Additionally, OIG found that performance standards for task order F011 were inconsistent. Specifically, section 7.0 QASP/Quality Control Plan of the SOW, stated that the contractor should follow the BPA QASP, and the Government would review the contractor's software changes by conducting technical reviews. However, OIG reviewed the ITSS BPA SOW, which stated the QASP is not applicable to this contract and that the Government would not be performing quality assurance activities because it was not a performance work statement.

This occurred because the AOC has not established clear, comprehensive guidance specifying when measurable performance standards and QASP are required for contracts under a SOW. The AOC also does not provide guidance on which measurable standards are appropriate for different contract types or service requirements. Without this guidance, contracting personnel may apply performance-measurement requirements inconsistently, resulting in gaps in oversight.

CO Did Not Document SOW Review for Task Order F001

The AOC Contracting Manual requires COs to review SOWs for compliance with contracting requirements and document the review using a Contract Action Review Sheet. The contract files contained completed review sheets for the overall BPA and task order F011. However, for task order F001, the contract file did not contain a review sheet, and OIG confirmed that no contract documentation was maintained outside the CO contract file. Therefore, OIG could not determine whether the CO performed the required SOW review.

Conclusion

The AOC's corrective actions clarified QASP requirements for certain performance-based acquisitions but did not provide guidance for SOW-based acquisitions. Because ITD used SOWs for the ITSS BPA and related task orders, this gap likely contributed to inconsistent use of measurable inspection and acceptance criteria. Without clear guidance, COs and CORs may lack objective criteria for monitoring contractor performance, supporting inspections and acceptance decisions, and determining whether services meet contract requirements.

Recommendation

Recommendation 4

Office of Inspector General recommends the Architect of the Capitol develop and communicate clear guidance to Contracting Officers and Contracting Officer's Representatives on the requirements for measurable performance standards and Quality Assurance Surveillance Plans under a Statement of Work.

Recommendation 4 – AOC Comment

Concur. The AOC will develop and communicate clear guidance to COs and CORs on requirements for measurable performance standards and QASPs under SOWs. Anticipated completion by September 30, 2027.

Recommendation 4 – OIG Comment

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

APPENDIX A

Scope and Methodology

OIG conducted this evaluation from January 2026 through September 2026, in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.[11] These standards require that OIG plan and perform the evaluation to obtain sufficient, appropriate evidence to provide a reasonable basis for findings and conclusions based on evaluation objectives. OIG believes that the evidence obtained provides a reasonable basis for its findings and conclusions based on its evaluation objectives.

This follow-up evaluation was self-initiated by the AOC OIG and included in OIG's FY 2026 Oversight Plan. The objective of this follow-up evaluation was to determine whether the AOC effectively implemented corrective actions to address the findings and recommendations in the July 2019 OIG report, *Audit of the Architect of the Capitol's Information Technology Division Contracting Services Blanket Purchase Agreement* (Report No. OIG-AUD-2019-03).

To address the evaluation objective, OIG:

- Reviewed relevant AOC policies, procedures, and federal best practices
- Evaluated whether AOC implemented corrective actions for prior OIG findings and recommendations by reviewing post-award administration documentation and AOC updates to policy and guidance
- Reviewed the ITSS BPA [redacted] and selected task order F001 and task order F011 to assess post-award administration documentation
- Reviewed IGEs, contractor quotations, award documentation, price-analysis documentation, SOWs, QASPs, Contract Action Review Sheets, COR files, status reports, timesheets, and other post-award administration records
- Interviewed AMMD officials, the ITD BPA CO and COR, and the task order CORs regarding IGE development, documentation practices, contract oversight, and performance monitoring
- Reviewed COR file audit documentation for FY 2024 and FY 2025 and assessed the AOC's process for selecting files for review
- Compared AOC practices with GAO guidance on cost estimating and federal internal control standards

[11] Council of the Inspectors General on Integrity and Efficiency. 2020. Quality Standards for Inspection and Evaluation (Blue Book). https://www.ignet.gov/sites/default/files/files/QualityStandardsforInspectionandEvaluation-2020.pdf

Use of Computer-Processed Data

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

Prior Coverage

In the past 5 years, two prior OIG reports were relevant to this follow-up evaluation: *Audit of the AOC's Information Technology Division Contracting Services Blanket Purchase Agreement* (Report No. OIG-AUD-2019-03) and *Evaluation of Architect of the Capitol's Contracting Officer and Contracting Officer's Representative Oversight* (Report No. 2023-0002-IE-P).

APPENDIX B

Notification Letter

ARCHITECT OF THE CAPITOL

Office of Inspector General
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202.593.1948

www.aoc.gov

United States Government

MEMORANDUM

DATE: January 13, 2026

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

FROM: Luiz A. Santos, CFE, PMP
Inspector General

SUBJECT: Announcement for the Follow-up Evaluation of the Architect of the Capitol's (AOC) Information Technology Division Contracting Services Blanket Purchase Agreement (Project No. 2026-0001-FLD-P)

This is to notify you that the Office of Inspector General (OIG) is initiating a follow-up evaluation of the July 2019 OIG report, *Audit of the AOC's Information Technology Division Contracting Services Blanket Purchase Agreement* (OIG-AUD-2019-03). Our objective is to determine whether the AOC has effectively implemented corrective actions to address the findings and recommendations in the July 2019 OIG report.

We will contact the appropriate AOC offices to schedule an entrance conference in the upcoming weeks. If you have any questions, please contact me at 202.593.1948 or Luiz.Santos@aoc.gov. Alternatively, your staff may contact Brittany Banks, Assistant Inspector General for Follow-Up, at 202.436.1445 or Brittany.Banks@aoc.gov.

Distribution List:

Joseph Campbell, Deputy Architect of the Capitol
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Danna Planas Ocasio, Deputy Chief of Staff
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APPENDIX C

Management Comments

ARCHITECT OF THE CAPITOL

Architect of the Capitol
U.S. Capitol, Room SB-16
Washington, DC 20515
202.228.1793

www.aoc.gov

United States Government

MEMORANDUM

DATE: September 25, 2026

TO: Luiz A. Santos, CFE, PMP
Inspector General

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

SUBJECT: OIG's Follow-up Evaluation of the Architect of the Capitol's Information Technology Division Contracting Services Blanket Purchase Agreement (2026-0001-FLD-P)

Thank you for the opportunity to review and comment on the Office of the Inspector General's (OIG) Follow-up Evaluation of the Architect of the Capitol's Information Technology Division Contracting Services Blanket Purchase Agreement. The Architect of the Capitol (AOC) appreciates the OIG's continued oversight and concurs with all four recommendations. The AOC is committed to strengthening acquisition governance, improving internal controls, and ensuring contracting practices align with federal best practices. Our responses to each recommendation are provided below:

Recommendation 1

The AOC develop, implement, and communicate standardized cost estimating policies and procedures that incorporate best practices from the Government Accountability Office's Cost Estimating and Assessment Guide (GAO-20-195G) to ensure IGEs are supported and include documentation of management review and acceptance.

AOC Response

We concur. The AOC will develop, implement, and communicate standardized cost-estimating policies and procedures that incorporate best practices from GAO-20-195G and ensure independent government estimates (IGEs) follow an internal control process that requires management review and acceptance.

Anticipated Completion: September 30, 2027

Recommendation 2

Acquisition and Material Management Division (AMMD) develop and implement a

risk-based approach for selecting COR contract files for audit and periodically assess the effectiveness of the process.

AOC Response

We concur. AMMD will develop and implement a risk-based approach for selecting Contracting Officer's Representative (COR) contract files for audit and create a risk register to track and assess the process's effectiveness. This risk-based approach will supplement the current random selection of COR file reviews.

Anticipated Completion: April 1, 2027

Recommendation 3

AMMD communicate existing guidance and provide targeted training to CORs on contract administration file documentation requirements to ensure consistency and alignment with the COR Handbook.

AOC Response

We concur. AMMD will communicate existing guidance and provide targeted training to CORs on contract administration file documentation requirements to ensure consistency and alignment with the COR Handbook.

Anticipated Completion: April 1, 2027

Recommendation 4

The AOC develop and communicate clear guidance to COs and CORs on the requirements for measurable performance standards and Quality Assurance Surveillance Plans under a SOW.

AOC Response

We concur. The AOC will develop and communicate clear guidance to Contracting Officers (COs) and CORs on requirements for measurable performance standards and Quality Assurance Surveillance Plans under SOWs.

Anticipated Completion: September 30, 2027

Doc. No. 260909-02-01

ACRONYMS AND ABBREVIATIONS

AMMD	Acquisition and Material Management Division
AOC	Architect of the Capitol
APB	Acquisition Policy Branch
BPA	Blanket Purchase Agreement
CO	Contracting Officer
COR	Contracting Officer's Representative
DCA	Design & Construction Acquisition Division
FAR	Federal Acquisition Regulation
FSS	Federal Supply Schedule
FY	fiscal year
GAO	Government Accountability Office
GSA	General Services Administration
IGE	Independent Government Estimate
IL	Information Letter
IT	Information Technology
ITD	Information Technology Division
ITSS	Information Technology Support Services
OCAO	Office of the Chief Administrative Officer
OIG	Office of Inspector General
PGI	Policy Guidance and Interpretation
PWS	Performance Work Statement
QASP	Quality Assurance Surveillance Plan
SOO	Statement of Objective
SOW	Statement of Work
SSMMD	Supplies, Services & Materials Management Division