

MEMO

Date August 28, 2020
To Dr. Carla Hayden
Librarian of Congress
From Kurt W. Hyde 
Inspector General
Subject Final Audit Report– *Follow-up Audit of the Contracts and Grants Directorate*,
Report No. 2020-PA-101

This transmits the final report for the Office of the Inspector General's (OIG) follow-up audit of the Contracts and Grants Directorate performed by Cotton & Company LLP (Cotton).

The contracting function has been a longstanding Top Management Challenge for the Library, however, in recent years the Library has made steady progress to address our recommendations. Based on the results of this follow-up audit and prior audits preceding it, the Inspector General has determined that management has made significant progress in addressing operational, human capital, and internal control weaknesses to merit removal of contracting from the Library's list of Top Management Challenges. We will highlight this in our upcoming Semi-annual Report. We commend the Library's effort towards reaching this milestone.

Cotton did not make any recommendations in this report. As such, we will not require a corrective action plan.

We appreciate the cooperation and courtesies extended by the Contracts and Grants Directorate.

cc Principal Deputy Librarian of Congress
Chief Operating Officer
Chief Acquisition Officer
General Counsel



Cotton &
Company

Answers Questioned

FOLLOW-UP AUDIT OF THE CONTRACTS AND GRANTS DIRECTORATE

LIBRARY OF CONGRESS

OFFICE OF THE INSPECTOR GENERAL

August 24, 2020

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**FOLLOW-UP AUDIT OF THE CONTRACTS AND GRANTS DIRECTORATE
LIBRARY OF CONGRESS OFFICE OF THE INSPECTOR GENERAL**

I. EXECUTIVE SUMMARY

Over the last 15 years, the Library of Congress (Library) Office of the Inspector General (OIG) has conducted a series of audits of the Library's Office of Contracts and Grants Management (OCGM¹). The most recent report released in February 2018, Report No. 2016-PA-101, *Incremental Improvement Has Been Made to Modernize the Office of Contracts and Grants Management* (Report), found that, although Library management had made incremental progress in modernizing its procurement operation, it had yet to attain a truly modernized operation. Overall, the Report found that the Library's procurement function continued to pose ongoing systemic risks to Library programs and the Library's mission. Those risks arose from conditions such as an insufficient human capital plan, inadequate monitoring of contracts during the contract administration phase, and internal control design weaknesses in the processing of contract data and financial reporting. The OIG determined that the Library's procurement function was not successful due to fundamental deficiencies in the Library's strategic leadership and its governance approach for driving change.

The OIG engaged Cotton & Company LLP (referred to as "we" in this report) to conduct a performance audit, the objectives of which were: (1) to determine whether the Library's Contracts and Grants Directorate (CGD), formerly OCGM, had fulfilled the requirements of Report Recommendations 3, 4, 5, 7, 8, and 14 through 20, and (2) if CGD had not yet implemented all of the recommendations, to describe what steps CGD had accomplished to date and what further actions were required to fulfill any outstanding recommendations.

Based on the audit procedures performed, we determined that CGD has fulfilled the requirements of each of the 12 Report recommendations that were included in the scope of our audit.

We communicated the results of our audit and the related findings and recommendations to CGD and the OIG. The Library chose not to issue a formal response to the audit report.

II. OBJECTIVES, SCOPE, AND METHODOLOGY

The OIG engaged Cotton & Company LLP to conduct a performance audit, the objectives of which were: (1) to determine whether CGD had fulfilled the requirements of Report Recommendations 3, 4, 5, 7, 8, and 14 through 20, and (2) if CGD had not yet implemented all of the recommendations, to describe what steps CGD had accomplished to date and what further actions were required to fulfill any outstanding recommendations. We focused primarily on CGD's acquisitions function activity during fiscal years (FYs) 2018 and 2019, emphasizing the areas noted in the Report. Testing criteria included the Report, the Government Accountability Office's (GAO's) *Framework for Assessing the Acquisition Function at Federal Agencies*, GAO-05-218g (September 2005), and Project Management Body of Knowledge (PMBOK) Guide best practices.

¹ OCGM was renamed CGD after the FY 2018 Report.

To meet our audit objectives, we:

- Interviewed CGD management regarding its corrective actions related to the 12 recommendations included in the scope of our audit.
- Reviewed the documents that CGD provided to support its progress in implementing the recommendations, including strategic plans, staffing plans and diagrams, standard operating procedures (SOPs), quality assurance reviews, Momentum reconciliations, and reports covering performance targets, risk analysis, quality assurance, and file management and closeout.
- Interviewed the CGD Policy Analyst and a Procurement Technician regarding their roles in the procurement function and the quality assurance process.
- Compared the written procedures for file management and quality assurance to CGD's actual practices based on our interviews and review of documentation to determine whether the procedures were working as intended.
- Traced a sample of CGD's documented strategies and goals through the process of analyzing risks, creating responses, assigning responsibility, tracking performance, and reporting on performance and progress to assess whether CGD adequately reviewed and evaluated performance.
- Interviewed representatives from the Financial Systems Division (FSD) and walked through the process for reconciling the Momentum financial and acquisition modules.

We conducted this performance audit from March to July of 2020 in accordance with Generally Accepted Government Auditing Standards (GAGAS). Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

III. BACKGROUND

The Library is the world's largest and most comprehensive library, maintaining a collection of more than 170 million items – many of them unique and irreplaceable – in more than 470 languages. The Library's mission is to engage, inspire, and inform Congress and the American people with a universal and enduring source of knowledge and creativity.

The Library's OIG was established in 1988 as a non-statutory office deriving its authority from the Librarian of Congress. The OIG became statutory with the passage of the Library of Congress Inspector General Act of 2005 (2 U.S. Code (U.S.C.) § 185), with a mandate to:

- Independently conduct and supervise audits and investigations of fraud, waste, and abuse relating to the Library.
- Lead, coordinate, and recommend policies to promote economy, efficiency, and effectiveness.
- Keep the Librarian of Congress and the Congress fully and currently informed about problems and deficiencies relating to the administration and operations of the Library.

The Inspector General is a member of the Council of the Inspectors General on Integrity and Efficiency (CIGIE), a unified council of all federal statutory Inspectors General. The Audits Division conducts in-

depth reviews that address the efficiency, effectiveness, and economy of the Library's programs, activities, and functions; provides information to responsible parties to improve public accountability; facilitates oversight and decision-making; and initiates corrective action as needed.

We designed this performance audit to meet the objectives identified in the Objectives, Scope, and Methodology section of this report. We conducted the audit in accordance with GAGAS, issued by GAO. We communicated the results of our audit and the related findings and recommendations to CGD and the OIG.

IV. AUDIT RESULTS

The objective of our audit was to determine whether CGD had fulfilled the requirements of the 12 recommendations included in the scope of our audit. Based on the results of our audit procedures, we determined that CGD fulfilled the requirements of these recommendations. We summarized the actions that CGD has taken with regard to each of these recommendations below.

Recommendation 3: *We recommend that the COO [Chief Operating Officer] develop strategies and tactics to accomplish the target state of the procurement function for the short-, mid-, and long-term strategic goals along with valid annual performance goals and valid and reliable performance measures.*

CGD has created or assisted in creating several strategic planning documents in response to this recommendation:

- *Strategic Plan for FY16 – FY20*
- *Plan to Improve Contracting for FY18 – FY19*
- *Draft Strategic Plan for FY18 – FY20*
- *COO Directional Plan for FY20 – FY23*

The *Plan to Improve Contracting for FY18 – FY19* document identifies short-, mid-, and long-term goals, as well as performance measure targets. The short-term goals include assessing the skills and experience of the acquisition workforce and implementing performance reporting. The mid-term goals include improving the contract service delivery model, recruiting, retention, and training; obtaining and creating better tools and procedures for identifying, reporting and addressing risks in the acquisition process; and improving efficiency. The long-term goals include achieving efficiency and effectiveness in the acquisition workforce and contracting operations by ensuring that the Library has (1) an expert workforce that is organized and managed appropriately to respond to changing needs, and (2) business processes and technology that follow best practices and standards.

The *COO Directional Plan for FY20 – FY23* identifies CGD's goals, along with its objectives, initiatives, and metrics. For example, Objective 1.3 of this plan states, "Improve accessibility of CGD's documents by digitizing all documents into a CGD shared drive." The plan goes on to outline initiatives for this objective, such as "Transition paper files to digital files (FY20)," and identify metrics for these initiatives, such as decreasing the percentage of files lost, decreasing the time required to retrieve files, and increasing the percentage of staff that are able to perform routine telework.

CGD's corrective actions with regard to developing strategic plans fulfilled all of the requirements of Recommendation 3.

Recommendation 4: *Use PMBOK best practices to develop and implement a project plan with a critical path for achieving the procurement strategic plan that includes all components (e.g., work breakdown structures, milestones, performance targets and metrics, and methods for tracking and reporting progress).*

The Office of the Chief Operating Officer (OCOO) *Project Plan for Acquisitions* outlines CGD's critical path to achieving its strategic plan for procurement. The document *Plan to Improve Contracting for FY18 – FY19* contains the work breakdown structure, milestones, performance targets, and metrics for tracking and reporting progress in achieving this plan. The *COO Directional Plan for FY20 – FY23*, dated September 2019, incorporated items from the *Plan to Improve Contracting for FY18-FY19*, including performance targets and metrics. In addition, CGD creates weekly reports to track other performance targets and metrics that do not rise to the level of being included in the *COO Directional Plan for FY20 – FY23*.

Under PMBOK best practices, quality metrics should specifically identify project or product attributes and state how the quality control process will verify compliance with these attributes. CGD developed performance targets and metrics designed to verify compliance with the milestones and project deliverables identified in the project plan.

CGD's corrective actions with regard to developing a project plan fulfilled all of the requirements of Recommendation 4.

Recommendation 5: *Include in the critical path activities to address the 18 recommendations OIG made in the March 2012 report that remain outstanding. The Director should submit an action plan to the COO with planned steps and target dates for fully resolving all of the recommendations. The COO should make the development of the plan an element in the Director's FY 2018 performance plan.*

CGD developed its critical path activities in April 2018, by which time it had fully resolved 14 of the 18 outstanding recommendations from the 2012 report. CGD included the four remaining items in the critical path outlined in the *OCOO Project Plan for Acquisitions* document and resolved these four items by the end of FY 2018. In addition, the COO made the development of this action plan an element in the Director's FY 2018 performance plan.

CGD's corrective actions with regard to including the 2012 report recommendations in its critical path activities and making the development of the action plan an element in the Director's FY 2018 performance plan fulfilled all of the requirements of Recommendation 5.

Recommendation 7: *Engage the Director and HRS² to immediately prioritize the development of a strategic workforce plan for the procurement function that has metrics focused on reducing average vacancy terms, reducing attrition, and emphasizing position longevity. The plan should be developed using a PMBOK approach, include comprehensive strategies for recruiting, retaining, and developing procurement personnel, and include performance measures to evaluate the plan's progress in addressing human capital goals.*

In its *Plan to Improve Contracting for FY18 – FY19*, CGD prioritized the development of assessments for workforce performance and training. As discussed above under Recommendation 4, the *Plan to Improve*

² Human Resources Services (HRS) was renamed HCD after the FY 2018 Report.

Contracting for FY18 – FY19 followed PMBOK best practices. CGD separately developed staffing plans representing the optimal organization of its acquisition workforce and regularly shared these plans with the COO in memoranda. After the *Plan to Improve Contracting for FY18 – FY19*, CGD began developing sections of the *COO Directional Plan for FY20 – FY23*, which includes high-level organizational goals for workforce development. CGD’s objectives include increasing its productivity using automated business processes and improving the accessibility of its documents. CGD also included metrics for optimizing contract actions and for reducing attrition and emphasizing position longevity by increasing the number of staff with the ability to telework.

The *COO Directional Plan for FY20 – FY23* also includes strategic workforce goals from the Human Capital Directorate (HCD). These goals include items such as decreasing hiring time and improving the effectiveness of talent acquisition, enhancing employee engagement through improved rapport between leadership and staff, and identifying and closing competency gaps in the Library’s workforce. HCD also provided metrics for decreasing hiring time and reducing average vacancy terms by improving user sentiment for both hiring managers and job applicants.

In addition to these high-level metrics and strategies, CGD and HCD track metrics such as:

- Skills inventory (through surveys in collaboration with HCD)
- Attrition rate (through HCD’s Tableau site)
- Projected retirement rates (through the HCD Dashboard)
- Dispersion of performance appraisal ratings (through the HCD Dashboard)
- Average period required to fill vacancies (through the HCD Dashboard)
- The use of incentives (through the HCD Dashboard)
- Employee feedback surveys (through the Federal Employee Viewpoint Survey)
- Acceptance rates of job candidates (through the HCD Dashboard)
- Number of personnel receiving training (through the HCD Dashboard)

CGD also internally tracks:

- Average vacancy
- Annual attrition
- Exit interview feedback
- CGD staff training and certification data
- Money spent on training
- Procurement action lead time
- Suspended requisitions

CGD’s corrective actions with regard to developing a strategic workforce plan that included metrics fulfilled all of the requirements of Recommendation 7.

Recommendation 8: *As indicated by the strategic workforce plan, expedite HRS’ efforts to fill key senior- and staff-level vacancies, including the following as appropriate:*

- *Contracts Chief,*
- *Policy Analyst,*
- *two Supervisory Senior Contracting Officers,*
- *two GS-13s,*
- *three GS-12s,*

- two GS-9s, and
- one GS-7.

CGD filled each of these vacancies, as shown in the table below.

Efforts to Fill Key Labor Positions	
Vacant Labor Categories	Hire Dates
Contracts Chief	March 4, 2018
Policy Analyst	April 15, 2018
Supervisory Senior Contracting Officer	December 10, 2017
Supervisory Senior Contracting Officer	February 4, 2018
General Schedule (GS)-13	October 15, 2017
GS-13	March 4, 2018
GS-12	April 29, 2018
GS-12	April 29, 2018
GS-12	May 12, 2019
GS-9	May 15, 2017 (via promotion)
GS-9	May 15, 2017 (via promotion)
GS-7	October 29, 2018

In addition, CGD has increased in size since the Report was issued, growing from 31 positions to 47 positions. This increase has included the creation of four new management positions: Policy Analyst, Chief of Policy, and two additional team leads, raising the total number of team heads from three to five. Only one management position, a GS-14, was vacant as of June 1, 2020. The average vacancy term has also decreased, from 121 days in FY 2017 to 71 days in FY 2019. The creation of additional management positions and the decreased vacancy periods for these positions addresses the underlying issue of this recommendation; i.e., that the CGD Director did not have the level of support required to operate strategically.

CGD’s corrective actions with regard to reducing vacancies and filling management positions fulfilled all of the requirements of Recommendation 8.

Recommendation 14: *Conduct a full evaluation of the Momentum acquisition module’s internal control design to ensure the appropriate controls are implemented for assuring the reliability and accuracy of contract and related financial data.*

CGD performed an evaluation of its acquisition module in FY 2018. This evaluation, known as the Legislative Branch Financial Management System (LBFMS) Acquisition Module Assessment (Assessment), included an assessment of items such as the module’s internal controls. The Assessment resulted in 22 recommendations, 6 of which were specific to the module’s internal controls. We summarized the six internal control recommendations and the status of CGD’s implementation of these recommendations below.

1. Align the Momentum security organizations (SECORGs) with the organizations and requirements of staff to execute their duties (Status: In progress)
2. Revisit LBFMS user access process (Status: Partially complete; currently on hold until the April 2021 Momentum upgrade)

3. Utilize automated continuous control monitoring (CCM) system (Status: Delayed due to lack of funding)
4. Enhance OCGM communications and data and document management processes (Status: Complete)
5. Develop additional Internal Security Administration Standard Operating Procedures (Status: In progress)
6. Segregation of duties needs to be revisited at the Library of Congress (Status: Under evaluation by FSD)

As noted above, Recommendation No. 3 (IC3) is delayed due to a lack of funding. The LBFMS Steering Committee voted against moving forward with this recommendation for the FY21 budget cycle. However FSD will consider re-proposing the CCM system after the April 2021 Momentum Upgrade.

Recommendation IC3 was aimed at enhancing “management and internal control officers’ ability to identify and remediate potential segregation of duties issues, and provide the Library with a wide array of on-demand reports.” Specifically, the recommendation focused on automating controls that are currently being performed manually. The CCM system would eliminate “the need to consistently manually maintain segregation of duties spreadsheets.” Currently, FSD maintains a list of incompatible roles and reviews it annually. Each system administrator has this list and reviews it as needed when creating or updating user profiles. CGD certifies to FSD annually that the roles are accurate. In addition FSD performs a quarterly review of users with incompatible roles using a report generated in the Financial Reporting System. Requests for permissions to the system are approved by CGD upper management level only. A CGD roles report is generated and reviewed on a weekly basis, and CGD management reviews the weekly reports and notifies the Momentum help desk when permissions need to be revoked, as in cases of terminating access for former employees.

Because CGD did conduct an evaluation in accordance with Recommendation 14 and has made an effort to implement or evaluate each of the internal control recommendations resulting from this assessment, we consider Recommendation 14 to be closed. However, we recommend that CGD continue with its implementation of all six internal control recommendations included in the Assessment.

CGD’s corrective actions with regard to evaluating Momentum’s internal controls reasonably fulfilled the requirements of Recommendation 14.

Recommendation 15: *Revise OCGM’s policies and procedures to require quality assurance processes for verifying that all systems are operating as designed and compliance is adequate.*

CGD revised its file management and quality assurance SOPs as of the following dates:³

- File Management SOP, Revision 3: March 6, 2020
- CGD Contract File Peer Review SOP, Revision 2: December 18, 2018
- Contracting Officer’s Representative (COR) File Review SOP, Revision 2: February 5, 2019
- CGD Closeout SOP, Revision 1: September 26, 2018

³ Dates shown reflect the most recent revision.

The quality assurance processes that CGD implemented in response to this recommendation addressed the underlying conditions identified in the Report and included the following properties:

- Internal controls that provide reasonable assurance as to the contract data's accuracy, completeness, timeliness, and reliability.
- Consistency among data definitions, sources, controls, and edit routines.
- Logical category groupings for data that management collects, in accordance with commonly accepted reporting timeframes.
- Elimination of data inconsistencies.
- Minimizing of data redundancies.
- Accessibility of data to authorized users when needed.
- Establishment and review of performance measures and indicators.

We determined that CGD had created policies for compiling files both manually and electronically. Further, CGD implemented review procedures to ensure the quality of the documentation in those files, including comparing the data in the contract files to the contract data reported in Momentum.

CGD's corrective actions with regard to revising its policies and procedures fulfilled all of the requirements of Recommendation 15.

Recommendation 16: *Develop and implement an OCGM quality assurance program to assure the completeness of contract documentation and consistency between Momentum system data and hard copy contract files.*

CGD developed quality assurance processes to ensure the completeness of contract documentation and consistency between the Momentum system data and the hard-copy contract files. These processes included creating policies for compiling files, both manually and electronically, and implementing a peer review process for contract files, as well as a COR file review process to ensure the quality of the documentation in those files. CGD's review procedures include sampling 50 contract files per quarter and verifying that the sampled files include documents such as the statement of work, market research reports, evidence that the Contracting Officer (CO) checked the System for Award Management (SAM) for exclusions, and a copy of the solicitation. The reviewer also compares the contract file documentation to the contract data included in Momentum and reports any missing files.

The quality assurance processes that CGD implemented in response to this recommendation addressed the underlying conditions identified in the Report and included the following properties:

- Review of contract files for missing contract numbers.
- Review of discrepancies between Momentum system data and CGD shared drive/hard-copy files.
- Management and storage of the completed contract file that is organized according to the base contract.
- Periodic review of the CGD shared drive for contract files.
- Confirmation that personnel have uploaded all of the necessary documentation to Momentum.

- Confirmation that personnel have appropriately updated the contract ceilings to reflect current information.

CGD's corrective actions with regard to developing and implementing a quality assurance program fulfilled all of the requirements of Recommendation 16.

Recommendation 17: *Obtain assistance from cataloging and systems experts within the Library to design and install an OCGM contract file management process that appropriately tracks contracts files. The system should include a full battery of reports for managing and retrieving missing files, conducting full or partial file inventories, and removing expired files.*

CGD obtained assistance from a research librarian to design and develop a file management process that appropriately tracks contract files. As part of the new process, CGD's Policy Analyst implemented a strict file lockdown policy that limits physical access to the contract file storage area to a small group of file custodians. CGD staff must contact the file custodians to request a physical file; the file custodians will physically retrieve the file and sign it out. In addition, CGD created and filled a Procurement Technician position to streamline file management.

The file management process that CGD implemented in response to this recommendation provides assurance that:

- All task orders are filed alongside the base contract.
- All required documents are present in the contract file and are under proper control.
- Data validity controls surrounding the contract/task order number, amount, date, vendor, CO, and COR are functioning and in place.
- All documents are readily accessible to approved individuals when needed.

CGD's file management, closeout, and file review process also includes procedures for managing and retrieving missing files, conducting full and partial inventories of files, and removing expired files. CGD has set a goal of closing out and removing all expired files on time (i.e., within six months of contract end). CGD has also implemented procedures to perform quarterly audits to purge expired files from prior years. Other specific considerations that CGD is tracking include:

- Current contract ceilings sorted by base contract (recorded in each contract file)
- A listing of contracts organized by base contract (available as part of the Procurement Technicians' daily reports)
- Contract documentation that does not have a contract number (identified during the quarterly file reviews)
- A listing of high-risk contracts and task orders, including contract amounts (available as part of the Procurement Technicians' daily reports)
- Data anomalies or inconsistencies (identified during the quarterly file reviews)

As part of its strategy to improve the accessibility of CGD documents, as reported in the *COO Directional Plan for FY20 – FY23*, CGD is in the process of implementing an electronic data management system (EDMS) that will be completed in the FY 2020/FY 2021 timeframe. Once this system is operational, CGD

will have access to additional tools for file management, as well as an increased need to review its system integration.

CGD's corrective actions with regard to developing and implementing a file management process program fulfilled all of the requirements of Recommendation 17.

Recommendation 18: *Develop and install a daily automated reconciliation process for balancing contract/task order open obligations by number and amount between Momentum's acquisition and financial modules.*

We determined that FSD is running a daily automated reconciliation that identifies any differences between the data in the Momentum acquisitions module and the general ledger data. If the reconciliation identifies any differences, FSD runs a report of the contract-level data, and an accountant from the Financial Reports Division reviews the differences and makes any corrections needed.

FSD's corrective actions with regard to developing and installing a daily automated reconciliation fulfilled all of the requirements of Recommendation 18.

Recommendation 19: *Update the November 2014, Momentum Acquisition System Gap Analysis by evaluating the design of system internal controls, the electronic audit trail/workflow, and data input validation.*

CGD conducted a new Momentum Acquisition System gap analysis in FY 2018, the LBFMS Acquisition Module Assessment (Assessment), which resulted in 22 recommendations, 6 of which were specific to the module's internal controls. CGD's corrective actions with regard to the internal control recommendations are still in progress, with completion planned in later years (see Recommendation 14 for additional information regarding the status of these recommendations).

Both the FY 2014 and FY 2018 analyses addressed the requisitions workflow and Momentum queries. CGD increased the number of queries available to users and provided training on the various query functions. The SOP that CGD developed for contract closeouts also includes instructions for running the reference query and purchase query.

CGD considered the requisitions workflow recommendation that CGD implement procedures to prevent the CO from submitting an award/order for which they are listed as the CO on the header of the form, but decided against implementing this recommendation. CGD stated that it made this determination because it believed that the responsibility for creating and awarding actions belonged with the CO, and that implementation of this additional segregation of duties would decrease the efficiency of the contract award process. CGD instead implemented a peer review process to identify and correct errors in the contract files. (Please also see Recommendation 16 with regard to the peer review process.) We agree that the peer review process is sufficient to ensure the quality of the contract files.

We recognize that CGD is currently implementing a new EDRMS (electronic document and records management system), which may create additional issues related to the integration of controls. We are not noting a finding related to this potential issue; however, CGD should evaluate the integration of EDRMS and the related internal controls to resolve the underlying weaknesses identified in the gap analysis. Some controls to consider include controls to ensure that:

- Personnel upload all relevant documentation.
- The system appropriately integrates digital files.
- Meta-data on digitized documents is accurate.
- Contract amounts do not exceed the contract ceiling.

CGD's corrective actions with regard to performing an updated Momentum Acquisition System gap analysis substantially fulfilled all of the requirements of Recommendation 19.

Recommendation 20: *Develop quality assurance program performance metrics.*

CGD developed performance metrics for its quality assurance program to track the defects identified. CGD is responsible for several metrics in the *COO Directional Plan for FY20 – FY23* and tracks other metrics on an internal basis. CGD is currently tracking the following performance metrics identified in the *COO Directional Plan for FY20 – FY23*:

- Engagement Success: CGD tracks customer survey results on an annual basis.
- Procurement Action Lead Time: CGD reports this information to the COO at least monthly.

CGD also tracks the following data as part of its file review process:

- Lost/misplaced files
- Reconciliation of Momentum data to contract files
- Contract files closed out on time

CGD reports to the Director regarding this data on a quarterly basis.

In addition, CGD tracks and reports on goals, risks, and risk responses and provides reports to the Director on a monthly basis, to the COO on a quarterly basis, and to the Principal Deputy Librarian of Congress on an annual basis.

The *COO Directional Plan for FY20 – FY23* includes plans for establishing additional goals and metrics in the future.

CGD's corrective actions with regard to developing performance metrics for its quality assurance program fulfilled all of the requirements of Recommendation 20.

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