



**Office of Audits
Office of Inspector General
U.S. General Services Administration**

IMPLEMENTATION REVIEW OF CORRECTIVE ACTION PLAN

**Audit of PBS's Controls Over
Security of Building Information
Report Number A070216/P/R/R08005
Dated September 30, 2008**

*Assignment Number A120079
May 3, 2012*



Office of Audits
Office of Inspector General
U.S. General Services Administration

DATE: May 3, 2012

TO: Linda Chero
Acting Commissioner, Public Buildings Service (P)

FROM: Susan P. Hall *Susan P. Hall*
Audit Manager, Real Property Audit Office (JA-R)

SUBJECT: Implementation Review of Corrective Action Plan
Audit Of PBS's Controls Over Security of Building Information
Report Number A070216/P/R/R08005, Dated September 30, 2008

Assignment Number A120079

We have completed an implementation review of the management actions taken in response to the three recommendations contained in the subject audit report. We found that the Public Buildings Service's (PBS) revised corrective action plan, dated July 15, 2009 (see **Appendix B**) addressed the audit recommendations. However, during our review we identified a related issue we would like to bring to your attention.

Other Issue

One PBS action addressing Recommendation 3 was to "Develop guidance for regional PBS acquisition program review, which requires verification of 3490.1A clause in contracts that contain or create SBU building information." Essentially, this action would require reviews to ensure that contracts include a clause compelling contractors to secure sensitive information related to buildings.

While the guidance has been developed and issued, as part of our testing, we requested the results of the program reviews to verify that applicable contracts did, in fact, contain the required clauses. This is especially important since our initial review disclosed that PBS contracting officers were inconsistently implementing the detailed PBS policy issued to safeguard sensitive building information. PBS was unable to provide these results and a PBS official indicated the reviews were not being performed.

Scope and Methodology

To accomplish this implementation review we: (1) examined the documentation submitted by PBS which supported accomplishment of the action plan steps; (2) performed limited testing of the implementation of the guidance contained in these supporting documents; and (3) met and corresponded with PBS personnel.

If you have any questions regarding this report, please contact me or any member of the audit team at the following:

Susan Hall	Audit Manager	susan.hall@gsaig.gov	(202)501-2073
Felicia Silver	Auditor-In-Charge	felicia.silver@gsaig.gov	(202)501-1360

On behalf of the audit team, I would like to thank you and your staff for your assistance during this review.

Appendix A – Recommendations from Report Number A070216/P/R/R08005

Assignment Number A120079

We recommend that the PBS Commissioner:

1. Incorporate PBS 3490.1 requirements directly into the boilerplate Solicitation for Offers and contracts for A/Es, construction, and lease construction contracts.
 - a. Require contractors to include PBS 3490.1 requirements in their subcontracts.
 - b. Develop a course of action to be taken when contractors do not fulfill their contractual obligations regarding the protection of SBU information.
2. Ensure PBS officials are provided training on the PBS 3490.1. The training should include encryption software applications available to PBS project personnel.
3. Implement a system of controls to ensure that PBS 3490.1 requirements are being followed by PBS project teams.

Appendix B – Management’s Corrective Action Plan

Assignment Number A120079

PUBLIC BUILDINGS SERVICE REVISED ACTION PLAN

CONTROLS OVER SECURITY OF BUILDING INFORMATION

Designated Responding Official: Diane L. Herdt, PBS CIO

Revised as of 7-15-09

Contact Person: Wayne Smedley

Completion Date

Telephone Number: 202-501-9135

September 30, 2009

Date: 07/15/2009

Action Report Number and Title	Recommendation Number	Proposed Recommendation Completion Date
Audit of PBS’s Controls Over Security of Building Information Report Number A070216/P/R/R08005, September 30, 2008	1	7/31/2009

Recommendation: Incorporate PBS 3490.1 requirements directly into the boilerplate Solicitation for Offers and contracts for A/Es, construction, and lease construction contracts.

- a. Require contractors to include PBS 3490.1 requirements in their subcontracts.
- b. Develop a course of action to be taken when contractors do not fulfill their contractual obligations regarding the protection of SBU information.

Action to be Taken	Supporting Documentation to be sent to OIG	Documentation will be sent
1. Edit draft revision of 3490.1A to include contract clause, requirement for contractors to require subcontractors to comply, and noncompliance consequence language when appropriate.	Draft copy of 3490.1A.	Completed
2. Submit 3490.1 through the PBS issuance process.	Copy of submission e-mail.	Completed
3. Collect comments from the issuance process.	Consolidated copy of comments.	Completed
4. Address comments, resubmit issuance if necessary	Revised copy of 3490.1A.	Completed
5. Issue 3490.1A.	Final version of 3490.1A.	Completed
6. Issue appropriate guidance from the PBS Deputy Commissioner for incorporation of SBU requirements in SFOs and SOWs.	Copy of directive from the “P” organization.	Extended 7/31/2009

Action Report Number and Title	Recommendation Number	Proposed Recommendation Completion Date
Audit of PBS’s Controls Over Security of Building Information Report Number A070216/P/R/R08005, September 30, 2008	2	9/30/2009

Recommendation: Ensure PBS officials are provided training on PBS 3490.1, which should include encryption software applications available to PBS project personnel.

Action to be Taken	Supporting Documentation to be sent to OIG	Documentation will be sent
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Appendix B – Management’s Corrective Action Plan (cont.)

Assignment Number A120079

Action to be Taken	Supporting Documentation to be sent to OIG	Documentation will be sent
1. Develop training content for Contracting Officers, COTRs, Project Managers, and IT components.	Draft copy of training content	Completed
2. Consolidation of content of course material.	Completed course material	Completed
3. PGD works with On-Line University (O-LU) contractor to have courses developed.	Screen shot of courses on O-LU.	Extended 8/31/2009
4. Develop educational materials for contractors	Copy of training materials.	7/31/2009
5. PM, PGC, PV and PR to implement training strategy.	Spreadsheets with targeted GSA personnel identified for each functional area.	7/31/2009
6. Issue guidance to PM, PGC, PV and PR mandating completion of the training.	Copy of guidance	9/30/2009

Action Report Number and Title	Recommendation Number	Proposed Recommendation Completion Date
Audit of PBS's Controls Over Security of Building Information Report Number A070216/P/R/R08005, September 30, 2008	3	9/30/2009

Recommendation: Implement a system of controls to ensure that PBS 3490.1 requirements are being followed by PBS project teams.

Action to be Taken	Supporting Documentation to be sent to OIG	Documentation will be sent
1. Develop guidance for regional PBS acquisition program review , which requires verification of 3490.1A clause in contracts that contain or create SBU building information.	Copy of the Guidance	9/30/2009
2. Training requirement within IDP for all new and transferred personnel who require 3490.1A training.	Example of an IDP with this requirement.	9/15/2009

Appendix C – Report Distribution

Assignment Number A120079

Acting Commissioner, Public Buildings Service (P)
Regional Administrator, National Capital Region (NCR)
Regional Administrator, Southeast Sunbelt Region (4A)
Regional Administrator, Greater Southwest Region (7A)
Acting Regional Inspector General for Auditing (JA-4, JA-7)
Special Agent in Charge (JI-W, JI-4, JI-7)
Office of Inspector General (J)
Assistant Inspector General for Auditing (JA, JAO)
Assistant Inspector General for Investigations (JI)
Office of the Chief Financial Officer (B)
Division Director, GAO/IG Audit Response Division (H1C)