Why We Performed This Audit

In April 2020, we began monitoring GSA’s activities in response to the nationwide public health emergency resulting from Coronavirus Disease 2019 (COVID-19) and GSA’s implementation of the Coronavirus Aid, Relief, and Economic Security Act. During our COVID-19 monitoring efforts, we identified concerns with air filtration practices in GSA-controlled (owned and leased) facilities that may lead to an increased risk of exposure to COVID-19. As a result, we began this audit to determine whether GSA’s Public Buildings Service (PBS) has implemented the Centers for Disease Control and Prevention (CDC) recommendations and GSA policy to limit exposure to COVID-19 in GSA-controlled facilities by improving central air filtration in heating, ventilation, and air conditioning (HVAC) systems.

What We Found

The CDC’s Guidance for Businesses and Employers Responding to Coronavirus Disease 2019 (COVID-19) recommends improving building ventilation to slow the spread of COVID-19 in the workplace. To do so, the CDC recommends increasing air filtration to the highest possible level without significantly reducing design airflow. It also advises employers to check air handling unit air filters to ensure they are within their service lives and are appropriately installed. The CDC guidance incorporates the American Society of Heating, Refrigeration, and Air-Conditioning Engineers technical resources, which state that the Minimum Efficiency Reporting Value (MERV) of 13 or higher rated air filters are efficient at capturing airborne viruses.

PBS faces challenges in its efforts to improve air filtration in GSA-controlled facilities to help prevent workplace exposures to COVID-19. We found that PBS cannot install the recommended air filters in some GSA-owned facilities because the aging HVAC systems cannot handle MERV 13 air filters. In addition, PBS is not consistently verifying that operations and maintenance contractors change air filters or meet preventive maintenance requirements for air handling units in GSA-owned facilities. We also found that PBS is not consistently inspecting GSA-leased space to ensure that air filters meet lease requirements. In some cases, lessors used noncompliant air filters or did not change them regularly. As a result, PBS is using air filters in some GSA-controlled facilities that are less efficient at capturing airborne viruses, including the virus that causes COVID-19.

What We Recommend

We recommend that the PBS Commissioner:

1. For GSA-owned facilities:
   a. Conduct an accurate and complete assessment of HVAC systems to identify deficiencies in air filtration. Based upon the assessment, PBS should maximize central air filtration in existing HVAC systems without significantly reducing design airflow;
   b. Review and update current and future operations and maintenance contracts to ensure that they clearly identify the required MERV air filters and preventive maintenance schedules;
   c. Establish controls to ensure that PBS obtains and maintains complete preventive maintenance records; and
   d. Ensure that contracting officer representatives conduct inspections of mechanical rooms and...
2. For GSA-leased space:
   a. Review and update current and future lease agreements to ensure that they clearly identify the required MERV air filters and preventive maintenance schedules;
   b. Ensure that lessors maintain and provide required preventive maintenance records and provide timely access to mechanical rooms; and
   c. Ensure that PBS representatives inspect mechanical rooms and preventive maintenance records to ensure that air filters meet MERV requirements.

The PBS Commissioner agreed with Recommendations 1c-d and partially agreed with Recommendations 1a-b and 2a-c. GSA’s written comments are included in their entirety in Appendix C. In response to these comments, we made certain revisions to Recommendation 1a, as described in our OIG Response. These revisions did not affect our findings and conclusions.