Incomplete, Outdated, and Unverified Recovery Act Sustainability Data May Affect PBS Reporting and Decision-Making

Report Number A130128/P/R/R15005
March 31, 2015

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

REPORT ABSTRACT

OBJECTIVE

The objective of the audit was to determine whether the Public Buildings Service has an appropriate and effective process in place to evaluate whether American Recovery and Reinvestment Act of 2009 projects are meeting sustainability goals.

Incomplete, Outdated, and Unverified Recovery Act Sustainability Data May Affect PBS Reporting and Decision-Making
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WHAT WE FOUND

We identified the following during our audit:

Finding 1 – Sustainability data is incomplete, outdated, and unverified, which could lead to inaccurate reporting and ineffective management decisions.

Finding 2 – Limited functionality in gBUILD regarding Minimum Performance Criteria (MPC) data restricts project reporting and monitoring of sustainability goals.

Finding 3 – Projects may not improve the sustainability of federal buildings to the fullest extent due to a lack of oversight of sustainability exemptions.

WHAT WE RECOMMEND

Based on our audit findings, we recommend that the Commissioner, Public Buildings Service:

1. Ensure sustainability data is tracked completely, timely, and accurately by:
    a. Requiring that gBUILD MPC statuses and comments are updated within an established amount of time after each project milestone;
    b. Reporting baseline data and anticipated LEED certification levels in gBUILD;
    c. Ensuring advanced meter transmission issues are resolved timely; and
    d. Establishing a process in which sustainability project details are validated for accuracy at the end of each milestone.
2. Improve the compliance tracking in gBUILD by:
    a. Providing additional status choices to indicate if there is difficulty in meeting MPC; and
    b. Restoring gBUILD capability to capture all historical comments and updates made to the MPC throughout the life of the project.
3. Implement a process to oversee the use of sustainability exemptions, including waivers in gBUILD.

MANAGEMENT COMMENTS

The PBS Commissioner concurred with our findings and recommendations. Management's written comments to the draft report are included in their entirety as *Appendix B*.

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

DATE: March 31, 2015

TO: Norman Dong
                   Commissioner, PBS (P)

FROM: Catherine M. Chunn
                   Audit Manager, Program Audit Office (JA-R)

SUBJECT: Incomplete, Outdated, and Unverified Recovery Act Sustainability
                   Data May Affect PBS Reporting and Decision-Making
                   Report Number A130128/P/R/R15005

This report presents the results of our audit of PBS's evaluation of American Recovery and Reinvestment Act of 2009 sustainability results. Our findings and recommendations are summarized in the Report Abstract. Instructions regarding the audit resolution process can be found in the email that transmitted this report.

Your written comments to the draft report are included in *Appendix B* of this report.

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

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

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Introduction

The American Recovery and Reinvestment Act of 2009 (Recovery Act) provided GSA with funding to convert its facilities into high-performance green buildings (HPGB), as defined in the Energy Independence and Security Act of 2007.[1] PBS prepared spending plans[2] to list funding by project and divided these projects into three groups (see *Table 1*).

Table 1 – HPGB Recovery Act Projects

HPGB Category	Number of Projects	Total Funding (in thousands)
Full and partial building modernizations	45	$3,203,643
Limited scope projects	201	887,857
Small projects	236	196,819
Total	*482*	*$4,288,319*

PBS's Office of Design and Construction ensures Recovery Act projects meet sustainability performance measures. In April 2013, PBS replaced its initial sustainability tracking system with the Green Building Upgrade Information Lifecycle Database (gBUILD).[3] In gBUILD, PBS tracks project progress toward 39 Minimum Performance Criteria (MPC) based on the *Guiding Principles for Federal Leadership in High Performance and Sustainable Buildings.*[4] The MPC cover five categories: integrated design, energy, water, indoor environmental quality, and materials.

PBS designed gBUILD to standardize and streamline HPGB-related data collection. PBS intended gBUILD to optimize the portfolio of building investments to achieve sustainability, eliminate conflicting data, and enable efficient reporting. Although gBUILD was developed specifically for Recovery Act projects, PBS intends to use it on all of its capital projects as well.

Objectives

The objective of our audit was to determine whether PBS has an appropriate and effective process in place to evaluate whether Recovery Act projects are meeting sustainability goals.

See *Appendix A* – Purpose, Scope, and Methodology for additional details.

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[1] Section 401 of Public Law 110-140, the Energy Independence and Security Act of 2007, states that HPGBs reduce energy, water, and material resource use, improve indoor environmental quality, reduce negative environmental impacts, and attain other sustainable initiatives as compared to similar buildings.
[2] The *Revised American Recovery & Reinvestment Act Spending Plan #10* is dated November 2012.
[3] The Recovery Act High Performance Green Building Database Online was PBS's first database for tracking Recovery Act sustainability goals.
[4] Established by the *Federal Leadership in High Performance and Sustainable Buildings Memorandum of Understanding*, and required by Executive Orders 13423 and 13514.

Results

We found that PBS used incomplete, outdated, and unverified data to track sustainability progress of Recovery Act projects. Additionally, limitations within PBS's sustainability tracking system further hinder PBS's tracking. Lastly, PBS exercises insufficient oversight of sustainability exemptions. As a result of these issues, PBS's reporting and decision-making on the sustainability of Recovery Act projects could be negatively affected.

Finding 1 – Sustainability data is incomplete, outdated, and unverified, which could lead to inaccurate reporting and ineffective management decisions.

<u>Lack of current information in gBUILD could lead to outdated and inaccurate reporting and the inability to make informed management decisions</u>

According to the *gBUILD User Guide*, "data collected throughout the project lifecycle allows GSA to monitor planned and current projects, prioritize resources, and make impactful decisions." However, PBS lacks a policy specifying when MPC data should be updated in gBUILD. As a result, project teams do not always update MPC data within gBUILD in a timely manner, leading to outdated and inaccurate information, which could impact management's ability to make informed decisions.

The *gBUILD User Guide* suggests MPC updates should be performed when project milestones are completed.[5] However, PBS does not require the MPC updates when milestones are completed, and it does not specify a timeframe for the updates to be made following the completion of the project milestones. To get up-to-date information, PBS's Office of Design and Construction sends periodic data calls to project teams for MPC data updates. However, data calls are not sent as projects meet milestones. Most project teams wait for this prompt rather than proactively updating the MPC data shortly after completing a project milestone. Data should be promptly recorded to maintain relevance and value to management in overseeing projects and making decisions.

Based on the limited data available in gBUILD and PBS's initial sustainability tracking system, we were unable to assess the timeliness of all MPC updates after project milestones. However, we found that 21 (47 percent) of our sample of 45 projects[6]

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[5] Project milestones for full and partial modernization projects include preliminary design, concept design, construction documents, construction, and project completion. Milestones for limited scope projects include project initiation and project completion. We did not include small projects in our sample because these projects were not included in the *gBUILD User Guide* and their Recovery Act funding is significantly lower in total and by average project than the other categories.

[6] We selected a judgmental sample of 45 of 246 Recovery Act projects from two HPGB categories: full and partial building modernizations; and limited scope projects. The sample projects are from the Northeast and Caribbean, Great Lakes, Greater Southwest, Rocky Mountain, Pacific Rim, and National Capital Regions.

lacked current statuses for either the commissioning[7] or advanced metering[8] MPC. Specifically, 11 projects lacked accurate statuses for commissioning, 7 for advanced metering, and 3 projects lacked both.

For example, at the time of our review, eight of the ten projects that lacked accurate statuses for advanced metering had a status of "Implementation in progress." All eight of these projects were substantially complete by December 2012 and meters were transmitting data in an advanced metering system at that time.[9] We considered data transmission in an advanced metering system as having fulfilled the requirements for the completion of the advanced metering MPC, thus requiring a status of "Implementation complete."

The *gBUILD User Guide* states that: "…[C]ollecting data around which federal facilities do or do not incorporate advanced metering …[allows] ODC [the Office of Design and Construction] to compare the overall energy usage and associated utility costs of buildings utilizing advanced metering to those that are not." However, the lack of current, accurate information in gBUILD may hinder the accomplishment of this goal.

Additionally, PBS does not ensure that design control review updates, which detail how a project is progressing towards achieving its MPC during the design phase, are entered in gBUILD until project closeout. At closeout, the design control review provides less value to management in determining whether projects are on track to meet sustainability goals. For some Recovery Act projects, years have passed between the design control review and the gBUILD project closeout.

Incomplete data in gBUILD leads to insufficient reporting of projects

The quantity of incomplete data fields in gBUILD undermines PBS's ability to determine whether projects are meeting performance projection and Leadership in Energy and Environmental Design (LEED)[10] certification goals. Project teams and architect-engineer contractors, who are responsible for updating gBUILD, did not complete all gBUILD data fields. The information in the data fields is required by the *gBUILD User Guide* and is necessary to make effective decisions.

The *gBUILD User Guide* requires that users input and verify the accuracy of baseline data in the KPM[11] tab for all project types. In our sample, 12 projects (27 percent) did not have complete baseline sections in the KPM tab. Baseline data is necessary to

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[7] GSA's *Building Commissioning Guide* defines commissioning as the "systematic process of assuring by verification and documentation…that all facility systems perform interactively in accordance with the design documentation and intent, and in accordance with the owner's operational needs…."

[8] The Department of Energy's *Guidance for Electric Metering in Federal Buildings* states that "advanced meters [can] measure and record interval data (at least hourly for electricity), and communicate the data to a remote location in a format that can be easily integrated into an advanced metering system."

[9] We reviewed the national Schneider ION Enterprise Energy Management system as well as regional advanced metering systems.

[10] LEED is a green building rating and certification program.

[11] Key Performance Measures.

determine whether a building achieves its performance projection goals. Baseline data provides information about a building's resource consumption prior to implementing efficiency improvements and provides a starting point to measure efficiency gains caused by greening initiatives.[12] Baseline data did not exist for 2 of these 12 projects, according to their project managers. For the other ten projects, the project team did not input required baseline figures or provide the energy model type used in gBUILD.

Additionally, the Office of Design and Construction requires users to list the anticipated LEED certification levels in gBUILD. In our sample, two projects (4 percent) did not list their anticipated LEED certification level. The projected LEED certifications reported in PBS's quarterly *Recovery Act Executive Summary* are based on the anticipated LEED certification levels entered in gBUILD. Therefore, if the anticipated LEED certifications in gBUILD are missing, the projections in the *Recovery Act Executive Summary* could be incorrect.

Incomplete data in advanced metering systems for electricity could lead to inaccurate reporting and ineffective management decisions

PBS officials do not collect complete advanced metering data.[13] This affects their ability to accurately track electricity usage for some Recovery Act projects. Incomplete data could lead to inaccurate reporting and ineffective management decisions. Regional officials cited transmittal errors and information security concerns as reasons for the incomplete data for five sample projects (11 percent).

The Energy Policy Act of 2005 required advanced metering of electricity for all federal buildings to the maximum extent practicable by October 1, 2012. The meters are to measure hourly consumption of electricity and provide daily updates, at a minimum. To adhere to the Energy Policy Act of 2005, GSA's Advanced Metering plan required the Agency to complete metering of electricity for covered facilities in fiscal year 2012.[14]

Four of the five projects with incomplete data in our sample were covered facilities. For three of these projects, meters lost connection to an advanced metering system and provided no data for 2 months or longer in our sample period.[15] In another project, regional officials cited a concern that software required to connect the meters to an advanced metering system could cause a virus and consequently did not connect the

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[12] For example, the MPC states that projects should achieve a fossil-fuel reduction of 55 percent and achieve at least 30 percent reduction in energy usage compared to an American Society of Heating, Refrigerating, and Air Conditioning Engineers Standard 90.1-2007 energy model.

[13] We considered data from the building's utility company as well as data in an advanced metering system as satisfying the data collection requirement for our sample.

[14] The Energy Independence and Security Act of 2007 defines covered facilities as "federal facilities…that constitute at least 75 percent of facility energy use at each agency." In fiscal year 2013, the latest figures available, GSA had 198 covered facilities.

[15] The sample period for the testing covered October 1, 2012, through January 31, 2014. During this period, we identified any gaps of 30 days or longer where data was not transmitted to an advanced metering system. For two of these projects, the meters re-established transmission after our sample period.

meters. The fifth project had advanced metering installed before the Recovery Act project started. However, the meters were not reconnected to the advanced metering system after the project was completed. PBS is now fixing this problem.

Unverified data in gBUILD could lead to improper reporting and ineffective management decisions

Although PBS uses the *gBUILD* data to monitor planned and current projects, prioritize resources, and make impactful decisions, the data is not verified for accuracy until project completion. The lack of timely reviews throughout the life of each project could lead to improper reporting and ineffective management decisions.

The *gBUILD User Guide* requires updates, approvals, and validations of project data. Subject matter experts were to perform accuracy checks after each milestone update. However, PBS did not have the personnel to perform these reviews. Therefore, PBS did not verify the accuracy of sustainability data in gBUILD throughout the life of each project.

PBS's process for Recovery Act sustainability data collection, analysis, and reporting requires closeout reviews at project completion to verify gBUILD data accuracy and completeness.   However, the required quality control closeout review was not performed for 9 of 25 completed projects in our sample.[16] PBS stated that four of these nine projects received the review but PBS was unable to provide documentation supporting this claim. Other projects were delayed in receiving this review as the result of changing sustainability tracking systems.   Closeout reviews should be performed promptly following project completion to ensure that final gBUILD data accurately captures project details.

Recommendation 1

We recommend that the Commissioner, Public Buildings Service, ensure sustainability data is tracked completely, timely, and accurately by:
   a. Requiring that gBUILD MPC statuses and comments are updated within an established amount of time after each project milestone;
   b. Reporting baseline data and anticipated LEED certification levels in gBUILD;
   c. Ensuring advanced meter transmission issues are resolved timely; and
   d. Establishing a process in which sustainability project details are validated for accuracy at the end of each milestone.

Management Comments

The PBS Commissioner concurred with the finding and recommendation (see **Appendix B**).

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[16] As of May 22, 2014, 25 of the 45 Recovery Act projects in our sample were complete.

Finding 2 – Limited functionality in gBUILD regarding Minimum Performance Criteria data restricts project reporting and monitoring of sustainability goals.

Limited system functionality for tracking MPC data in gBUILD restricts project reporting and management's ability to monitor progress towards achieving sustainability goals. The gBUILD Compliance tab allows limited options for communicating the current MPC status. Additionally, PBS removed the historical log showing previous MPC statuses and comments in gBUILD. Therefore, the ability to plan a project, prioritize resources, and make business decisions is limited without more MPC status options and a historical log of previous MPC statuses available in gBUILD.

The gBUILD Compliance tab shows a project's current MPC status and the most recent project team and reviewer comments associated with that status. PBS uses this information to track and report sustainability data. PBS's monthly "On Green" progress reports use gBUILD's MPC statuses and comments to report projects' compliance with the *Guiding Principles for Federal Leadership in High Performance and Sustainable Buildings*. However, the Compliance tab status options are limited to "Planned but not Started," "Implementation in progress," "Implementation complete," "Waiver," and "N/A." These status options do not allow project teams to communicate that an MPC's progress may not be on track. Therefore, management's attention is not directed to a project that may be experiencing schedule, budget, or other problems.

Additionally, the previous MPC status is replaced in gBUILD every time the MPC status is updated. When gBUILD was first implemented, a historical log showed all previous statuses and comments. The log provided a clearer understanding of when MPC updates took place and what changes occurred during the life of a project. However, the log was removed, which hinders users' ability to understand and assess the project. This could be a particular problem when a project's key personnel change.

Recommendation 2

We recommend that the Commissioner, Public Buildings Service, improve the compliance tracking in gBUILD by:
  a. Providing additional status choices to indicate if there is difficulty in meeting MPC; and
  b. Restoring gBUILD capability to capture all historical comments and updates made to the MPC throughout the life of the project.

Management Comments

The PBS Commissioner concurred with the finding and recommendation (see ***Appendix B***).

Finding 3 – Projects may not improve the sustainability of federal buildings to the fullest extent due to a lack of oversight of sustainability exemptions.

Projects may not have improved the sustainability of federal buildings to the fullest extent due to a lack of oversight. PBS did not adhere to policies regarding exempting projects from achieving specific MPC and LEED certifications. The impact of this issue may extend beyond Recovery Act projects as all new construction, major renovation, and repair and alteration projects in federal buildings are required to be compliant with the *Guiding Principles for Federal Leadership in High Performance and Sustainable Buildings*, which is the basis for the MPC.

PBS allows project teams to obtain waivers to exempt projects from specific MPC elements and LEED certifications.[17] If work associated with an individual MPC will not be performed for a project, GSA's MPC guidance for Recovery Act projects requires the Regional Recovery Executive's approval for the project to proceed to the next project milestone. The documentation to support the project's exemption from the MPC must be submitted to the Regional Recovery Executive and placed in the project file. The *gBUILD User Guide* also requires users to upload the applicable waiver to support the claimed exemption.

Within our sample of 45 Recovery Act projects, the gBUILD files for 9 projects (20 percent) were missing at least one waiver from the Regional Recovery Executive. In total, 39 of 42 MPC (93 percent) from the nine projects had a "Waiver" status listed in gBUILD but did not include the supporting waiver form.

In addition, GSA allows waivers from its LEED certification requirement. Capital projects are expected to achieve a LEED certification within 18 months of substantial completion unless a LEED exemption waiver is obtained. The *Fiscal Year 2014 Capital Investment and Leasing Program Call* states LEED exemptions "may be granted, in writing, from the Office of Federal High-Performance Green Buildings, for limited scope projects that could not otherwise meet LEED certification."

One sample project did not follow the Office of Federal High-Performance Green Building's process for obtaining a LEED exemption. The project is LEED-exempt according to the project team and gBUILD's LEED tab. The project team initially registered the project for a LEED certification, but later decided against pursuing the certification. However, the project team did not provide the Office of Federal High-Performance Green Buildings with a LEED exemption waiver request. The Office of Federal High-Performance Green Buildings was therefore unaware that this project was no longer pursuing a LEED certification.

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[17] The *gBUILD User Guide* defines a status of "Waiver" as "…work at any phase of the associated MPC that will NOT be performed due to an approved waiver (applicable waiver must be uploaded)."

Recommendation 3

We recommend that the Commissioner, Public Buildings Service, implement a process to oversee the use of sustainability exemptions, including waivers in gBUILD.

Management Comments

The PBS Commissioner concurred with the finding and recommendation (see *Appendix B*)*.*

Other Observation

gBUILD training could be improved

We sent a questionnaire to the project leads of the 45 projects in our sample. Project leads for ten of the projects identified improvements that could be made to the current gBUILD training. These suggestions for improving the training included:

- Including more detail specifically on how to update MPC;
- Using a more hands-on approach to allow participants to navigate through gBUILD; and
- Using a sample project to demonstrate input requirements and serve as a reference for users.

Improvements to the Office of Design and Construction's gBUILD training may help project teams use the system more effectively and efficiently. The system was designed to "standardize… HPGB-related data collection for all project types," and training improvements may increase PBS's ability to deliver accurate, standardized data.

Conclusion

PBS's process to evaluate whether Recovery Act projects are meeting sustainability goals is not as effective as it can be. We found the data used to track sustainability progress to be incomplete, outdated, and unverified.   Additionally, there is limited functionality in gBUILD and insufficient oversight of sustainability exemptions. Policy guidance revisions, increased gBUILD functionality, and consistent oversight are key elements to improving sustainability tracking. PBS has taken steps to address some of these issues, but must remain proactive to ensure that sustainability results for Recovery Act projects are reported accurately and timely.

Appendix A – Purpose, Scope, and Methodology

Purpose

This audit was included in the Fiscal Year 2014 Audit Plan as part of the GSA Office of Inspector General's continuing oversight of projects funded by the Recovery Act.

Scope and Methodology

Our scope included assessing PBS's process to track sustainability results of Recovery Act projects.

To accomplish our objective, we:

- Selected a judgmental sample of 45 of 246 Recovery Act projects from two HPGB categories: full and partial building modernizations and limited scope projects that comprised $2.47 billion in Recovery Act funding (60 percent of the total funding for the two HPGB categories). The sample projects are from the Northeast and Caribbean, Great Lakes, Greater Southwest, Rocky Mountain, Pacific Rim, and National Capital Regions;
- Reviewed the requirements of the Recovery Act, Energy Policy Act of 2005, Energy Information and Security Act of 2007, *gBUILD User Guide*, GSA Metering Plan, and *Fiscal Year 2014 Capital Investment and Leasing Program Call*;
- Reviewed baseline data, LEED data, and MPC statuses and comments in gBUILD in March 2014;
- Reviewed contract file documentation related to commissioning and advanced metering. Obtained supplementary documentation not found in the contract files from the electronic Project Management database and the Department of Energy Compliance Tracking System;
- Analyzed advanced metering data for the period that covered October 1, 2012, through January 31, 2014, in the Schneider ION Enterprise Energy Management system and other advanced metering systems; and
- Interviewed, surveyed, and obtained documentation from PBS project teams, regional energy coordinators, and Regional Recovery Executives.

We conducted the audit between January and July 2014 in accordance with generally accepted government auditing standards. 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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Internal Controls

We evaluated internal controls over PBS's Recovery Act sustainability data tracking and reporting to the extent necessary to answer the audit objective. Related internal control issues are discussed in the context of the audit findings.

GSA

GSA Public Buildings Service

MAR 2 3 2015

MEMORANDUM FOR MARISA A. ROINESTAD
ASSOCIATE DEPUTY ASSISTANT INSPECTOR GENERAL
FOR AUDITING PROGRAM AUDIT OFFICE (JA-R)

FROM: NORMAN DONG
COMMISSIONER
PUBLIC BUILDINGS SERVICE (P)

SUBJECT: Draft Report: Incomplete, Outdated, and Unverified Recovery Act
Sustainability Data May Affect PBS Reporting and Decision-Making
Report Number A130128

The Public Buildings Service (PBS) appreciates the opportunity to comment on the subject draft audit report and concurs with the draft report's findings and recommendations. The report recommends that PBS:

1. Ensure sustainability data is tracked completely, timely, and accurately by:

   a. Requiring that gBUILD minimum performance criteria (MPC) statuses and comments are updated within an established amount of time after each project milestone;
   b. Reporting baseline data and anticipated Leadership in Energy and Environmental Design (LEED) certification levels in gBUILD;
   c. Ensuring advanced meter transmission issues are resolved timely; and
   d. Establishing a process in which sustainability project details are validated for accuracy at the end of each milestone.

2. Improve the compliance tracking in gBUILD by:

   a. Providing additional status choices to indicate if there is difficulty in meeting MPC; and
   b. Restoring gBUILD capability to capture all historical comments and updates made to the MPC throughout the life of the project.

3. Implement a process to oversee the use of sustainability exemptions, including waivers in gBUILD.

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PBS completed a number of improvements to date and plans to execute several actions that will strengthen the PBS sustainability program.

In response to recommendation 1, PBS will strengthen its policy to explicitly require that sustainability data updates, including any necessary changes to MPC statuses and comments, are made within 60 days after the start of each project milestone-driven gBUILD data call. In terms of advanced meter transmission issues, a new service contract is in place to help resolve connection faults, and missing interval utility data can be restored from meters' onboard storage or utility companies. PBS notes that there is not a legal mandate, including in the Recovery Act, to connect advanced meters to a national system.

PBS enhanced its sustainability data oversight by adding new formal review steps. Quality Review Status Reports ("QC Trackers") now validate gBUILD data -- and drive necessary data entry/ updates – two to three times during a project's lifecycle, depending on project type. In addition, monthly "On Green" measure reports and quarterly High Performance Green Buildings dashboards provide project-specific data oversight and transparency.

In response to recommendation 2, PBS will make full use of the status choices when there is difficulty in meeting a MPC. As background, PBS currently requires that projects meet all applicable MPCs, and difficulty or uncertainty about meeting an MPC can be documented via a status of "planned but not started", and comments detailing how feasibility is being determined. If an MPC cannot be met, "N/A" is selected and an explanatory comment is required. (The gBUILD User Guide states that "N/A Refers to either: (1) work that has already been deemed not feasible; or (2) work that is not in the scope of the project.")

In addition, PBS restored gBUILD's ability in FY15 to display all MPC changes made throughout the life of the project. As of March 2015, all historical statuses and comments appear on the system's Compliance tab. MPC histories are also available from the following locations: (a) monthly *On Green* measure reports sent to project teams and management (and posted on a measures website); (b) weekly data backups; and the (c) new Business Intelligence *Project Domain*.

In response to recommendation 3, PBS will implement a new sustainability exemption oversight process. Subject matter experts on the existing PBS P100 Facilities Standards Technical Committee will prospectively evaluate "N/A" or "Waiver" statuses. The Steering Committee will then vote to concur or reject, with results documented in gBUILD's Design Review fields.

Should you or your staff have questions, please contact Laura Stagner at (202) 501-1888.

<u>Technical Comments to the Draft Report</u>

1. As a result of PBS' existing sustainability data oversight processes, and others added since this audit's fieldwork concluded in July 2014, many of the draft report's factual findings have since been resolved. For example:

   a. *Finding 1 (page 2): "21 projects (47 percent) of our sample of 45 projects lacked current statuses for either the commissioning or advanced metering MPC."*

      PBS determined that 100% of these projects' statuses for MPCs 2, 3, and 5 either have either been updated, or didn't need updates, due to project type or phase, as of January 2015.

   b. *Finding 1 (page 5): "[T]he required quality control closeout review was not performed for 9 of 25 completed projects in our sample."*

      PBS determined that quality control closeout review was completed by January 2015 on 100% of these projects that were tracked in gBUILD. Eight had received quality control reviews, and the final one lacked HPGB scope, so was never tracked in this sustainability system.

   c. *Other Observation (page 8): "Improvements to the Office of Design and Construction's gBUILD training may help project teams use the system more effectively and efficiently."*

      PBS has improved gBUILD training, e.g. by adding screenshots from a populated sample project to instructional slides. In addition, PBS plans to share recorded MPC-focused and general gBUILD training sessions in March 2015.

Appendix C – Report Distribution

Commissioner, PBS (P)

Deputy Commissioner, PBS (PD)

Chief of Staff, PBS (P)

Regional Recovery Executive, PBS (2PC, 5P, 7PC, 8PC, 9P2PT, WP)

National Program Office ARRA Executive (PCB)

Assistant Commissioner for Project Delivery (PCB)

Regional Administrator (2A, 5A, 7A, 8A, 9A, WA)

Regional Commissioner, PBS (2P, 5P, 7P, 8P, 9P, WP)

Chief Administrative Services Officer (H)

Branch Chief, GAO/IG Audit Response Branch (H1C)

Strategic Program Manager, PBS, Program Management Support Division (PCBF)

Analyst, PBS, Program Management Support Division (PCBF)

Audit Liaison, PBS (BCP, BCPA, BP, BPAA)

Assistant Inspector General for Auditing (JA)

Director, Audit Planning, Policy, and Operations Staff (JAO)

Director, Office of Internal Operations (JI-I)

Management Analyst, Office of Investigations (JI)