



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

IMPLEMENTATION REVIEW OF ACTION PLAN

**Sensitive But Unclassified Building  
Information Unprotected in GSA's  
Cloud Computing Environment  
Report Number A140157/P/R/W14001  
August 19, 2014**

*Assignment Number A160096  
January 26, 2017*

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## **Introduction**

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We have completed an implementation review of the management actions taken in response to the recommendations contained in our August 2014 audit report, *Sensitive But Unclassified Building Information Unprotected in GSA's Cloud Computing Environment*. The contents of this report do not reflect a new security event. The original report was previously restricted for security reasons. These restrictions no longer apply because the related security issues have been resolved.

### **Objective**

The objective of our review was to determine whether the Public Buildings Service (PBS) has taken the corrective actions as outlined in the action plan for *Sensitive But Unclassified Building Information Unprotected in GSA's Cloud Computing Environment*. To accomplish our objective we:

- Examined documentation submitted by PBS supporting completion of the action plan steps;
- Performed limited testing of the corrective actions outlined in the action plan;
- Performed sample testing of building documents for proper labeling; and
- Interviewed and corresponded with PBS and the Office of GSA IT (GSA IT) personnel.

### **Background**

In July 2014, the Office of Inspector General (OIG) Office of Forensic Auditing, Evaluation, and Analysis discovered unprotected sensitive information residing in GSA's Google cloud computing environment.<sup>1</sup> In response, we conducted an audit to determine if GSA had identified and remedied all instances of sensitive data access control vulnerabilities within its cloud computing environment, as well as to determine how to prevent additional instances in the future. Due to the serious nature of the conditions identified, we issued an alert report to PBS management.

Our audit found:

- Documents that contained sensitive but unclassified (SBU) building information were accessible to employees and contractors without a need to know the information.

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<sup>1</sup> This office is now referred to as the Office of Inspections and Forensic Auditing.

- Documents that contained SBU building information were not properly labeled as required by GSA Order PBS 3490.1A, *Document Security for Sensitive But Unclassified Building Information*.<sup>2</sup>

To address the issues identified by our audit, we recommended that the Commissioner of PBS:

1. Evaluate all PBS content contained in GSA's Google cloud computing environment and immediately restrict any information that is available to those without a valid need to know the information.
2. Notify government agencies, contractors, employees, and any other parties that were affected by the potential improper disclosure of SBU building information, unless it is determined that such notification is not warranted.
3. Prohibit the posting of any new PBS content to Google applications, including Google Groups, Google Sites, and Google Docs until sufficient controls are established and implemented to ensure that SBU building information is properly protected and only accessible to individuals with a need to know such information.
4. Ensure PBS project team members mark SBU building information in accordance with GSA Order PBS 3490.1A.
5. Review existing building documents in GSA's Google cloud computing environment for missing or improper labeling.
6. Train PBS employees and contractors on the requirements in GSA Order PBS 3490.1A; specifically, how to handle SBU building information, and how to apply the concept of need to know. Ensure this training is mandatory and delivered on a routine basis.

The Commissioner of PBS agreed with our recommendations.

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<sup>2</sup> This policy was cancelled by GSA Order PBS P 3490.2, *Document Security for Sensitive But Unclassified Building Information*, dated September 2, 2014. While this Order did not change the requirement for identifying and marking SBU building information, it now requires the PBS Regional Commissioners to make an initial determination regarding whether a building document is considered sensitive.

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## Results

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Our implementation review found that PBS did not fully implement 2 of the 27 action steps in its action plan. Specifically, we found that PBS did not fully implement the action steps to:

- Notify other Agency points of contact that their information was shared improperly across GSA, the extent of the potential exposure, and any corrective steps that GSA has taken; and
- Perform sampling of SBU building information to ensure such documents are properly marked per GSA Order PBS P 3490.2.

### **Finding 1 – Parties affected by the disclosure of sensitive documents may not have been contacted.**

Our alert report identified SBU building documents that were not properly restricted as required by PBS policy. According to GSA Order PBS P 3490.2, sensitive building documents in electronic and hard copy formats should be controlled and only be made available to individuals who have a legitimate need to know. Limiting the access of sensitive building information reduces the risk that inappropriate disclosure may result in harm to people or property.

According to its corrective action plan, PBS stated that it would notify government agencies, contractors, employees, and any other parties that were affected by the potential improper disclosure of these documents. Those affected were to be notified of the extent of the exposure and the corrective actions taken by GSA. During our testing of the corrective action plan, PBS did not provide sufficient evidence to support that actual contact was made with the affected parties or their respective points of contact. The supporting evidence provided by PBS was missing one or more of the following pieces of information:

- The name of the person contacted;
- The person's contact information;
- The method used to contact the person; and/or
- The timeframe they were notified.

As a result, we were not able to verify that PBS completed this action step.

### **Finding 2 – PBS did not ensure that SBU documents were properly marked per GSA Order PBS P 3490.2.**

SBU building information is information related to GSA-controlled space that is sufficiently sensitive to warrant some level of protection from full and open public disclosure. GSA Order PBS P 3490.2, *Document Security for Sensitive But Unclassified Building Information*, includes specific examples of SBU building

information and identifies how this information should be marked. Examples of specific documents covered under this policy include, but are not limited to, the location and details of prisoners or judges' walking routes, location and type of structural framing for buildings such as seismic and blast mitigation, and risk assessments and information regarding security systems or strategies.

GSA Order PBS P 3490.2 requires any electronic or printed document that contains SBU building information to be prominently labeled with the following markings:

***SENSITIVE BUT UNCLASSIFIED (SBU)  
PROPERTY OF THE UNITED STATES GOVERNMENT  
FOR OFFICIAL USE ONLY  
Do not remove this notice  
Properly destroy or return documents when no longer needed***

In addition, the following marking must be affixed to the cover or first page of any document (such as the cover page on a set of construction drawings).

***SENSITIVE BUT UNCLASSIFIED (SBU)  
PROPERTY OF THE UNITED STATES GOVERNMENT  
COPYING, DISSEMINATION, OR DISTRIBUTION OF THIS DOCUMENT  
TO UNAUTHORIZED RECIPIENTS IS PROHIBITED  
Do not remove this notice  
Properly destroy or return documents when no longer needed***

According to its corrective action plan, PBS stated that it would review a sample of SBU building information to ensure that policy was followed and documents were properly marked. PBS provided supporting documentation to confirm that the review was completed. Our review of this documentation confirmed that PBS reviewed potential SBU documents for proper sharing permissions to ensure that only personnel with a valid need to know have access to the document. However, we found no supporting evidence to show that these documents were reviewed for proper markings in accordance with GSA Order PBS P 3490.2.

GSA IT provided us with approximately 2,200 documents that were created or modified between August 17 and September 1, 2016. These documents were flagged based on PBS-identified keywords and criteria as potentially containing sensitive information. We selected and reviewed 25 of these documents for proper labeling per GSA Order PBS P 3490.2. We found three documents that contained SBU building information that were not appropriately labeled as required by PBS policy, as discussed below.

- Seismic Diagram. We selected a 7-page document that describes alternatives to provide seismic strengthening to an 8-story concrete encased steel structure courthouse. The document provides schematic diagrams and alternatives to strengthening the building based on costs. GSA Order PBS P 3490.2 identifies building seismic mitigation information as SBU building information. Therefore,

the seismic information contained in this document should be protected and labeled as required by the PBS policy. In reviewing the document, we did not find any markings to indicate that the document contains SBU building information as required by GSA Order PBS P 3490.2.

- Scope of Work. We also selected a 27-page scope of work document that details the renovation of a federal building. GSA Order PBS P 3490.2 identifies building systems and strategies as SBU building information. The scope of work provides detailed building information on the HVAC, electrical, plumbing, and fire safety systems. We did not find any markings on this document to indicate that the document contains SBU building information. The detailed building information contained in this document should be protected and labeled as required by GSA Order PBS P 3490.2.
- Statement of Work. We selected a 231-page statement of work document for a federal transportation center. The first page of the document contains “SENSITIVE BUT UNCLASSIFIED (SBU)” in the footer of the page. The second page of the document is labeled “SENSITIVE BUT UNCLASSIFIED, PRIVILEGED AND CONFIDENTIAL, SOURCE SELECTION SENSITIVE INFORMATION.” The remaining pages of the document are marked with “SBU” in the footer. Accordingly, although the document contains SBU markings, the labeling used is inconsistent with the language required by GSA Order PBS P 3490.2.

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## **Conclusion**

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Our implementation review found that PBS did not successfully implement 2 of the 27 steps in its action plan. Specifically, PBS did not provide sufficient evidence that it notified those parties potentially affected by the improper disclosure of SBU building information. If affected parties have not been notified, they are not able to evaluate the potential impact to their agency or personnel and take the necessary corrective actions. Also, PBS is not ensuring SBU building documents are properly marked per GSA Order PBS P 3490.2. Therefore, individuals may be unaware that they are handling sensitive building information and could share or release that information improperly.

As a result of our findings, PBS must submit a revised action plan addressing these two open action steps within 30 days to this office and the GSA GAO/IG Audit Management Division.

### **Audit Team**

This review was managed out of the Acquisition and Information Technology Audit Office and conducted by the individuals listed below:

Duane A. Royal	Audit Manager
Bruce E. McLean	Auditor-In-Charge



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## ***Appendix A – Report Distribution***

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GSA Administrator (A)

GSA Deputy Administrator (AD)

Commissioner (P)

Deputy Commissioner (PD)

Chief of Staff (P)

Public Buildings Service Audit Liaisons (P)

Chief Information Officer (I)

Chief Administrative Services Officer (H)

GAO/IG Audit Management Division (H1G)

Assistant Inspector General for Auditing (JA)

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