



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

PBS Did Not Always Follow CDC and Internal Guidance to Limit the Risk of COVID-19 Exposure

Report Number A201018/P/4/R21005
August 26, 2021

Executive Summary

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Why We Performed This Audit

On April 2, 2020, we initiated a project to monitor GSA's activities in response to the nationwide public health emergency resulting from confirmed cases of coronavirus disease 2019 (COVID-19) and GSA's implementation of the Coronavirus Aid, Relief, and Economic Security Act. During our monitoring efforts, we identified concerns with GSA's response that could lead to increased exposure to and transmission of COVID-19 in buildings under GSA's jurisdiction, custody, or control. As a result, on May 7, 2020, we initiated an audit of the GSA Public Buildings Service's (PBS's) COVID-19 communication and cleaning procedures.

Our audit objectives were to determine whether PBS: (1) notified building occupants of confirmed COVID-19 cases and (2) cleaned and disinfected impacted space in accordance with Centers for Disease Control and Prevention (CDC) and PBS guidance in order to limit exposure to and transmission of COVID-19 in buildings under its jurisdiction, custody, or control.

What We Found

PBS did not always take appropriate action to limit the risk of exposure to COVID-19 in its owned and leased facilities. We found that PBS did not always receive or provide timely notice of positive COVID-19 incidents in accordance with PBS's notification process. As a result, PBS could not take appropriate action to clean and disinfect affected space. Further, building occupants, contractors, and visitors may have unknowingly passed through space contaminated by individuals infected with COVID-19, and been at increased risk of exposure to and transmission of the disease.

In addition, PBS did not always provide contractors with the correct scope of work to conduct detailed cleaning and disinfection services. Also, PBS did not implement consistent inspection and quality assurance procedures for COVID-19 custodial services. For these reasons, PBS does not have assurance that contractors cleaned and disinfected space in accordance with CDC and PBS guidance.

What We Recommend

We recommend that the PBS Commissioner:

1. Issue timely notification of all COVID-19 incidents in GSA-controlled facilities to all occupant agencies, contractors, and visitors. In addition, take steps to maximize awareness of COVID-19 incidents in GSA-controlled facilities.
2. Ensure that tenant agencies are aware of the requirement to immediately notify PBS of COVID-19 incidents.
3. Ensure that *Scope 3 – COVID-19 Cleaning* is followed whenever a COVID-19 incident occurs in a GSA-controlled facility.
4. Ensure inspection procedures and guidance are clear, concise, and include appropriate processes to conduct and document inspections for *Scope 3 – COVID-19 Cleaning*. Also, ensure that inspection requirements are communicated to staff.
5. Implement quality assurance procedures that ensure PBS's consistent oversight of the delivery of safe, efficient, and effective custodial services.

The PBS Commissioner acknowledged the issues we noted in the sampled incidents and agreed with our recommendations. PBS's response is included in its entirety in **Appendix D**.

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Introduction

We performed an audit of the GSA Public Buildings Service's (PBS's) coronavirus disease 2019 (COVID-19) communication and cleaning procedures. This audit stemmed from a project to monitor GSA's activities in response to the nationwide public health emergency resulting from confirmed cases of COVID-19 and GSA's implementation of the Coronavirus Aid, Relief, and Economic Security Act.

Purpose

On April 2, 2020, we initiated a project to monitor GSA's activities in response to the COVID-19 nationwide public health emergency. Based on risks identified during this monitoring project, on May 7, 2020, we initiated this audit of PBS's COVID-19 communication and cleaning procedures.

Objectives

The objectives of this audit were to determine whether PBS: (1) notified building occupants of confirmed COVID-19 cases and (2) cleaned and disinfected impacted space in accordance with Centers for Disease Control and Prevention (CDC) and PBS guidance in order to limit exposure to and transmission of COVID-19 in buildings under its jurisdiction, custody, or control.

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

Background

COVID-19 is an infectious disease first identified in Wuhan, China, in December 2019. According to the CDC, individuals infected with COVID-19 may experience a range of symptoms—from mild to moderate respiratory illness to serious illness and even death. COVID-19 is transmitted from person to person, most frequently among close contacts. In contaminated spaces, the virus may remain viable on surfaces from days to weeks.

On March 11, 2020, the World Health Organization declared COVID-19 a worldwide pandemic. On March 13, 2020, former President Donald J. Trump declared COVID-19 a national emergency. As of August 9, 2021, there have been 202 million COVID-19 cases worldwide, including 4.2 million attributed deaths. In the United States, there have been nearly 36 million cases and 615,000 deaths. There have been approximately 14,640 reports of suspected or confirmed COVID-19 cases in GSA-owned or leased facilities.

During a pandemic emergency, the *U.S. General Services Administration Communicable Disease Pandemic Plan* spells out GSA's four primary goals: (1) protecting the health and safety of GSA employees, contractors, vendors, and visiting public; (2) maintaining mission essential functions; (3) supporting federal response efforts; and (4) communicating with employees,

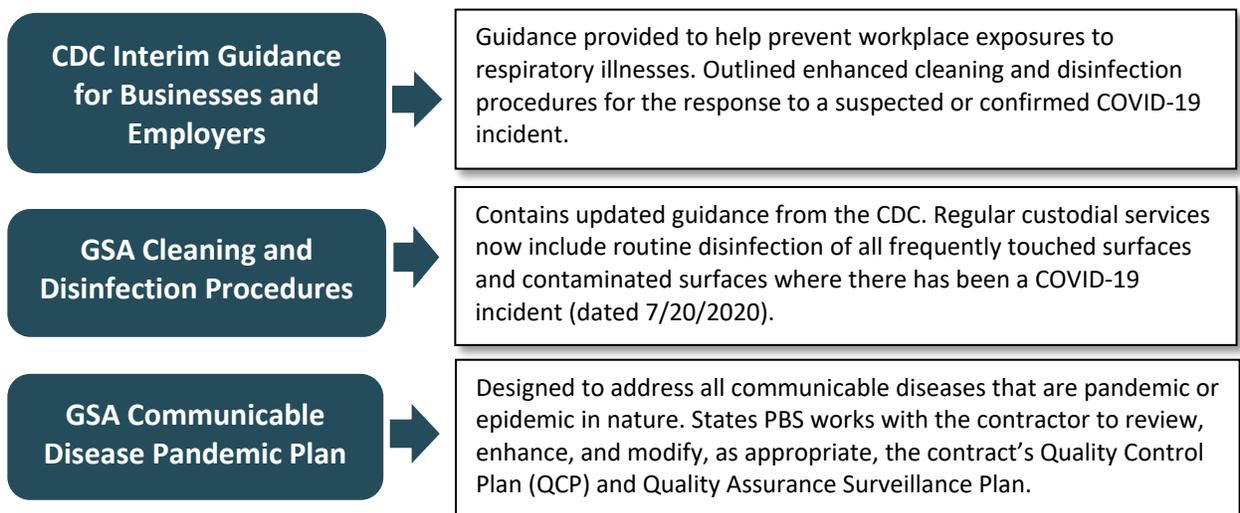
tenants, and other stakeholders. The GSA pandemic plan also provides guidance to GSA employees on how to respond before, during, and after a pandemic and outlines the different roles and responsibilities of GSA offices. The pandemic plan identifies a number of PBS responsibilities including, but not limited to, ensuring GSA-owned and leased facilities follow all CDC, state, and local health department guidance and determining the effects on contracted services of closing or limiting access to buildings under its control. In addition, PBS is responsible for reviewing and executing contract modifications for cleaning and ensuring facility operations incorporate the means and methods necessary to reduce risk of infection as defined by the CDC.

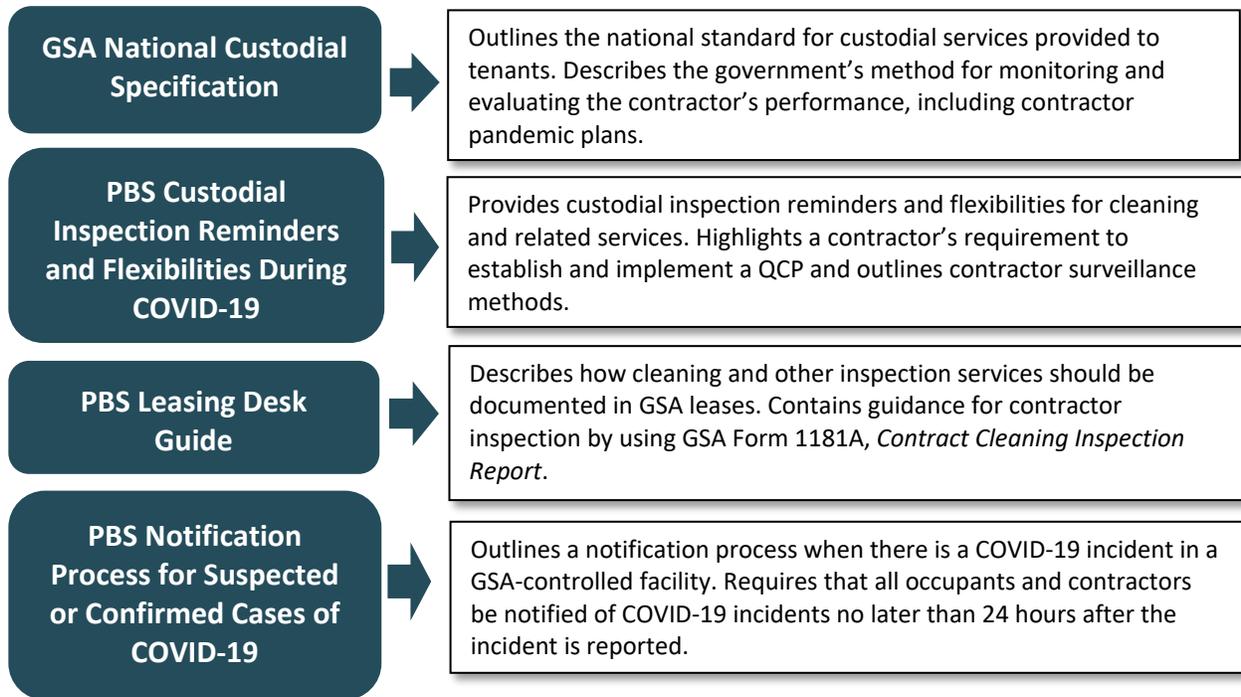
Within PBS, the Office of Facilities Management has the responsibility of providing facilities-related services to federal tenants in GSA-owned and leased workspaces. At the onset of the pandemic, an Office of Facilities Management official told us that their office had the following COVID-19-related responsibilities:

- Tracking suspected or confirmed cases;
- Developing scopes for disinfection and cleaning;
- Responding to funding inquiries;
- Notifying building occupants of suspected or confirmed cases;
- Coordinating efforts with concessions and fitness centers; and
- Providing resources for building managers.

To protect building occupants, PBS relied on guidance from the CDC as well as its own regulations and directives, as shown in *Figure 1*. PBS monitored available guidance and updated its policies/practices when appropriate. For example, the PBS *Notification Process for Suspected or Confirmed Cases of COVID-19* (Notification Process) changed at least seven times during the course of our audit.

Figure 1 – Regulations and Guidance Related to Protecting PBS Building Occupants from COVID-19





Preliminary Audit Results Issued in Alert Memoranda

We have issued two memoranda alerting GSA management to COVID-19 related issues since we initiated our oversight of GSA's response to the COVID-19 pandemic in April 2020.

First, on September 3, 2020, we issued an alert memorandum identifying concerns with PBS's communication and cleaning process for COVID-19 exposures (alert memorandum).¹ In the alert memorandum, we notified PBS leadership of our preliminary findings that PBS did not always receive timely notice of COVID-19 incidents from building occupants and did not always provide timely notification of confirmed COVID-19 cases. In addition, because PBS did not have a standard inspection process for COVID-19 cleaning and disinfection services, it did not have assurance that contractors cleaned and disinfected space in accordance with PBS and CDC guidance. We urged PBS to take immediate action to address these issues pending completion of this audit.

Second, on January 15, 2021, we issued an alert memorandum notifying GSA that it was impeding our oversight of its COVID-19 activities.² In the January 15, 2021, alert memorandum, we notified GSA that its centralized review and approval process for all Office of Inspector General COVID-19 related inquiries compromised the integrity of information provided by GSA personnel. This process also caused frequent and unnecessary delays, and likely had a chilling

¹ Alert Memorandum: Concerns Regarding PBS's Communication and Cleaning Procedures for Coronavirus Disease 2019 (COVID-19) Exposures (A201018-2).

² Alert Memorandum: GSA Is Impeding Oversight of Its COVID-19 Activities (A201018-4).

effect on PBS employee responses. As a result, we had little assurance that the responses provided to our inquiries were complete, accurate, and reliable. Additionally, we found that GSA attempted to restrict and limit the audit team's access to information and resources. Taken together, GSA's actions impeded our ability to identify areas of GSA's COVID-19 pandemic response that should be improved to protect the health of GSA's tenants, employees, contractors, and visitors.

GSA notified us in February 2021 that it has ceased the centralized review of responses to our oversight requests. Subsequently, we conducted additional procedures to ensure that the evidence was sufficient and appropriate to address our objectives and support our audit findings and conclusions.³

³ See the *Report Qualification* section in **Appendix A** for the additional procedures applied.

Results

We reviewed a sample of 33 confirmed positive COVID-19 incidents and found that PBS did not always take appropriate action to limit the risk of exposure to COVID-19 in its owned and leased facilities. In some cases, PBS did not always receive or provide timely notice of positive COVID-19 incidents in accordance with PBS's Notification Process. As a result, PBS could not take appropriate action to clean and disinfect affected space. Further, building occupants, contractors, and visitors may have unknowingly passed through space contaminated by individuals infected with COVID-19, and been at increased risk of exposure to and transmission of the disease.

In addition, PBS did not always provide contractors with the correct scope of work to conduct detailed cleaning and disinfection services. Also, PBS did not implement consistent inspection and quality assurance procedures for COVID-19 custodial services. For these reasons, PBS does not have assurance that contractors cleaned and disinfected space in accordance with CDC and PBS guidance.

Finding 1 – PBS did not always follow its *Notification Process for Suspected or Confirmed Cases of COVID-19*.

PBS did not always receive or provide timely notice of positive COVID-19 incidents in accordance with its Notification Process for COVID-19 cases. Without timely notification of COVID-19 incidents, PBS could not take appropriate action to clean and disinfect affected space. Further, building occupants, contractors, and visitors may have unknowingly passed through space contaminated by individuals infected with COVID-19, and been at increased risk of exposure to and transmission of the disease. We previously reported these concerns in our September 3, 2020, alert memorandum.

The CDC's *Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 (COVID-19)* states that if an employee is confirmed to have COVID-19, employers should inform fellow employees of their possible exposure to COVID-19 in the workplace. PBS's Notification Process details the notification process for any COVID-19 incident in a facility under GSA's jurisdiction, custody, or control.

PBS's Notification Process states that once an individual becomes aware of a COVID-19 incident, they must immediately notify their supervisor, who in turn must notify the chain of command within the individual's organization. The organization must then notify all of its staff in the building, on telework, or elsewhere, and the GSA facility manager or the lease administration manager. All occupants and contractors in a GSA-controlled facility must be notified of

COVID-19 incidents no later than 24 hours after the incident is first reported to the GSA Office of Facilities Management.⁴

We found that GSA's tenant agencies did not always notify PBS of COVID-19 incidents in accordance with the Notification Process. For 5 of 33 sampled incidents, we observed delays of 2 to 5 days between when tenant agencies became aware of employee's positive COVID-19 test results and when the agencies notified PBS (see **Appendix B** for details). As a result, PBS could not timely notify all building occupants about contaminated space.

We also found that PBS did not always provide timely notification to building occupants or contractors once it had received notice of positive COVID-19 incidents. In 6 of the 33 sampled incidents, PBS did not notify building occupants in accordance with the Notification Process as described below.

- In four of the six incidents, PBS did not provide any notice to building occupants. PBS stated that notice was not provided in one of these incidents because there was only one other tenant in the building and their staff was teleworking at the time of the incident. In another incident, PBS decided too much time had passed since the affected individual was in the tenant space for any notice to be effective. In the other two incidents, PBS relied on tenants to notify building occupants.
- In the remaining two incidents, PBS provided notice 3 to 4 days after receiving notice from the tenants instead of within 24 hours as required. One of the delays in notification occurred because the point of contact was on leave and the acting point of contact failed to issue timely notice. PBS stated that the second delay occurred because it took time to gather required information, identify the areas of travel, and make arrangements for the cleaning.

We also found that in four incidents, PBS did not notify contractors who had been in the facility at the time of COVID-19 incidents. In two of these incidents, PBS relied on the tenant to notify contractors. In the third incident, PBS opted not to notify occupants or contractors because too much time had passed since the infected individual was last in the space. In the final incident, PBS notified the building tenants but failed to notify contractors.

PBS's Notification Process also states that visitors to GSA-owned or leased facilities should be notified as applicable and practicable. However, PBS made no attempts to notify visitors of the increased risk of exposure to COVID-19 for any of the sampled incidents. When we asked if PBS attempted to notify visitors, PBS officials stated that the policy only requires that they notify visitors "as applicable and practicable." PBS also stated that visitors are not permitted at some

⁴ A COVID-19 incident is one in which an individual with a confirmed or suspected case of COVID-19 has accessed a GSA-controlled facility.

locations, and that it is the tenant agencies' responsibility to notify their visitors and contractors.

In our alert memorandum, we expressed concern that PBS did not always receive or provide timely notice of positive COVID-19 incidents. In response, PBS issued updates to its Notification Process designed to ensure that building occupants' designated points of contact are aware of their responsibilities under the process. In accordance with these updates, GSA facility managers and lease administration managers are now required to send a standard message to each point of contact, notifying them of the Notification Process and any subsequent revisions.

While these updates may promote awareness of the Notification Process, they do not diminish the fact that GSA and its tenant agencies must follow the process in order to minimize exposure to and transmission of COVID-19. Throughout its response to the pandemic, PBS has updated its Notification Process multiple times. Each update has required: (1) tenants to immediately notify staff, contractors, and GSA building management when they become aware of a COVID incident; and (2) GSA building management to notify building occupants of COVID-19 incidents within 24 hours of PBS becoming aware of the incident. Nonetheless, we continued to find that PBS and tenant agencies did not follow the Notification Process during our audit testing.

In sum, without timely awareness of COVID-19 incidents, PBS cannot take the appropriate steps to clean and disinfect affected space. Further, building occupants, contractors, and visitors may unknowingly pass through space contaminated by individuals infected with COVID-19. To prevent this from occurring, PBS must ensure that GSA employees, tenant agencies, and contractors are aware of and follow PBS's Notification Process.

Finding 2 – PBS does not have assurance that contractors cleaned and disinfected space in GSA-controlled facilities in accordance with CDC and PBS guidance.

PBS did not always provide contractors with the correct scope of work to conduct detailed cleaning and disinfection services. Also, PBS did not implement consistent inspection and quality assurance procedures for COVID-19 custodial services. As a result, PBS does not have assurance that contractors cleaned and disinfected space in accordance with CDC and PBS guidance. We previously notified PBS leadership of similar concerns in our alert memorandum.

Scope of Work

PBS did not always provide contractors with the correct scope of work to conduct detailed cleaning and disinfection. Therefore, PBS cannot ensure that contaminated space was cleaned in accordance with CDC and GSA guidance.

When a COVID-19 incident occurs in a federally owned or leased facility, the *GSA Cleaning and Disinfection Procedures* require PBS staff to have contractors clean and disinfect the space in accordance with the *Scope 3 – COVID-19 Cleaning*. This scope details required contractor qualifications and procedures the contractor must follow to safely and effectively clean and

disinfect contaminated spaces. For example, contractors must be trained in current blood-borne pathogens requirements, submit proposed disinfectants to the contracting officer's representative prior to use, and follow specific disposal procedures for used cleaning supplies.

We found that for 3 of our 33 sampled incidents, PBS used the building's existing custodial contractor to clean and disinfect contaminated space; however, PBS could not provide any evidence that it provided the *Scope 3 – COVID-19 Cleaning* to the contractors (see **Appendix C** for details). In the first case, PBS did not use the correct scope of work because it thought the existing contract was sufficient. In the other two instances, PBS told us that it spoke to the contractors about *Scope 3 – COVID-19 Cleaning* but did not modify the existing contracts to incorporate this scope. Without evidence that contractors received and understood required procedures, PBS cannot ensure that contaminated space was cleaned in accordance with CDC and GSA guidance.

In December 2020, PBS management notified us that the use of existing custodial contractors for *Scope 3 – COVID-19 Cleaning* is permissible; however, the scope must be added to the base contract as a modification prior to utilizing the contractor for this type of work. In March 2021, as a result of concerns identified during our fieldwork and changes to CDC and GSA guidance, PBS issued guidance for regions using the custodial contractor to perform the work. The purpose of this guidance is to ensure that: (1) the services are properly contracted for (i.e., the work performed is within the scope of the contract) and (2) the contract file is properly documented.

Inspection Process

PBS did not always document inspections for COVID-19 cleaning and disinfection services in accordance with GSA and PBS policy. As a result, PBS cannot ensure that work was performed in accordance with CDC and GSA guidance.

The *GSA National Custodial Specification* and the *PBS Leasing Desk Guide* require PBS to inspect work completed by contractors. PBS can use the *Contract Cleaning Inspection Report* or equivalent to document inspections.⁵ Using this report, inspectors document the date and time of the inspection, description of work performed, the contractor's acknowledgment of receipt, and whether the work was performed satisfactorily.

For COVID-19, PBS created the *Cleaning and Disinfecting Work - Checklist* to be used along with the *Contract Cleaning Inspection Report*. This checklist is used to ensure that the contractor:

- has completed required training;
- has minimum personal protective equipment;
- uses required disinfectants; and

⁵ GSA Form 1181A, *Contract Cleaning Inspection Report*.

- coordinates adequate air circulation of the contaminated space with building operations and maintenance contractors.

The checklist also allows PBS to confirm that the contractor has appropriately cleaned and disinfected the contaminated space.

We found several instances where PBS staff did not complete the appropriate inspection documentation during the course of our audit (see **Appendix C** for details). We first notified PBS about the lack of required inspection documentation in our alert memorandum. In response, the former PBS Commissioner stated that PBS had developed the *Cleaning and Disinfecting Work - Checklist* to ensure the cleaning and disinfecting work was completed in accordance with *Scope 3 – COVID-19 Cleaning*. However, in testing conducted subsequent to this response, we identified 10 additional instances where PBS did not complete the checklist as required. In six of those instances, PBS could not provide any evidence of an inspection. Without verification, PBS does not have assurance that services rendered and paid for complied with CDC and GSA guidance.

Following our audit review on this issue, PBS implemented a procedure that requires staff to upload a completed *Cleaning and Disinfecting Work - Checklist* in order to close out each incident involving a *Scope 3 – COVID-19 Cleaning* cleaning. In order to ensure that PBS staff and contractors properly complete all requirements in *Scope 3 – COVID-19 Cleaning* cleanings, PBS must ensure that staff complete the checklist when cleanings occur.

Quality Assurance

PBS did not always follow its quality assurance guidance for COVID-19 cleaning and disinfection services. As a result, it has little assurance that custodial services were safe, efficient, effective, and performed in accordance with CDC and PBS guidelines.

The *U.S. General Services Administration Communicable Disease Pandemic Plan* states that during a global pandemic, it is important that PBS work with the contractor to review, enhance, and modify, as appropriate, the Quality Control Plan (QCP) and Quality Assurance Plan to ensure the delivery of safe, efficient, and effective custodial services. The *GSA National Custodial Specification* states that contractor evaluations shall be conducted in accordance with the Quality Assurance Surveillance Plan (QASP), which details the government's method for monitoring and evaluating the contractor's performance. Additionally, it requires contractors to prepare a pandemic plan outlining steps to prevent and reduce the spread and mitigate the potential effects of a pandemic on custodial services. At the onset of the pandemic, PBS developed the *Pandemic Plan Submittal Checklist* to evaluate the sufficiency of these plans.

In our alert memorandum, we notified PBS of its failure to update, enhance, or modify contractor oversight plans. In response, the former PBS Commissioner stated that PBS required all custodial contractors to submit a pandemic plan, but that it was not required to enhance or modify contractor oversight plans. The former PBS Commissioner added that "PBS believes the

Pandemic Plan should be used as the mechanism to demonstrate that adequate safeguards are in place to provide for the delivery of safe, effective, and efficient custodial services.”

However, subsequent to the former PBS Commissioner’s response, we identified seven instances where PBS approved pandemic plans that did not contain all the required elements listed in the *Pandemic Plan Submittal Checklist*. When we followed up with PBS staff, they told us that a few of the pandemic plans were evaluated and accepted prior to the development of the checklist. This statement conflicts with the former PBS Commissioner’s response to our alert memorandum, which stated that PBS officials reviewed pandemic plans and worked with contractors to revise them until there was an acceptable, up-to-date pandemic plan in place for every PBS custodial contract.

Further, in nine instances, PBS did not work with contractors to enhance or modify QCPs; nor did PBS enhance or modify QASPs to include a surveillance method for pandemic-related cleaning. Without adequate quality control and assurance procedures, PBS cannot ensure the delivery of safe, efficient, and effective custodial services for these pandemic-level cleanings (see **Appendix C** for details).

After we issued our alert memorandum, PBS issued guidance effective October 1, 2020, to address quality assurance. The guidance requires facility managers to review both the custodial vendor’s pandemic plan and QCP to ensure that the plans appropriately address the new contract requirements. Further, if the existing plan is not adequate, then the contracting officer’s representative should request that the vendor revise its plan and resubmit it for approval. Once the vendor’s pandemic plan and QCP are approved by the contracting officer’s representative, facility managers should review the government’s QASP to verify that it is also still appropriate. PBS must fully implement this procedure to ensure safe, efficient, and effective *Scope 3 – COVID-19 Cleaning* cleanings.

Conclusion

PBS did not always take appropriate action to limit the risk of exposure to COVID-19 in its owned and leased facilities. We found that PBS did not always receive or provide timely notice of positive COVID-19 incidents in accordance with PBS's Notification Process. As a result, PBS could not take appropriate action to clean and disinfect affected space. Further, building occupants, contractors, and visitors may have unknowingly passed through space contaminated by individuals infected with COVID-19, and been at increased risk of exposure to and transmission of the disease.

In addition, PBS did not always provide contractors with the correct scope of work to conduct detailed cleaning and disinfection services. Also, PBS did not implement consistent inspection and quality assurance procedures for COVID-19 custodial services. For these reasons, PBS does not have assurance that contractors cleaned and disinfected space in accordance with CDC and PBS guidance.

PBS needs to take comprehensive action to ensure that PBS staff and its tenants follow CDC and GSA COVID-19 guidance and procedures, particularly with respect to notification, cleaning and disinfection, and quality assurance in order to limit the spread and transmission of COVID-19 in GSA-controlled buildings. PBS should also assess whether additional actions are needed based on the deficiencies identified in this report.

Recommendations

We recommend that the PBS Commissioner:

1. Issue timely notification of all COVID-19 incidents in GSA-controlled facilities to all occupant agencies, contractors, and visitors. In addition, take steps to maximize awareness of COVID-19 incidents in GSA-controlled facilities.
2. Ensure that tenant agencies are aware of the requirement to immediately notify PBS of COVID-19 incidents.
3. Ensure that *Scope 3 – COVID-19 Cleaning* is followed whenever a COVID-19 incident occurs in a GSA-controlled facility.
4. Ensure inspection procedures and guidance are clear, concise, and include appropriate processes to conduct and document inspections for *Scope 3 – COVID-19 Cleaning*. Also, ensure that inspection requirements are communicated to staff.
5. Implement quality assurance procedures that ensure PBS's consistent oversight of the delivery of safe, efficient, and effective custodial services.

GSA Comments

The PBS Commissioner acknowledged the issues we noted in the sampled incidents and agreed with our recommendations. PBS's response is included in its entirety in **Appendix D**.

Audit Team

This audit was managed out of the Southeast Sunbelt Region Audit Office and conducted by the individuals listed below:

Nicholas Painter	Regional Inspector General for Auditing
Arthur Edgar	Audit Manager
Alenda Blackwell	Auditor-In-Charge
Renee Davis	Auditor

Appendix A – Scope and Methodology

We reviewed PBS's actions to: (1) communicate positive COVID-19 cases to building occupants and (2) to contract for and accept cleaning and disinfection services of contaminated space to determine if PBS followed applicable CDC and GSA guidance. Specifically, we selected a judgmental sample of 33 of 1,210 positive COVID-19 cases reported in GSA-owned and leased locations between July 1 and September 4, 2020. This sample included three incidents from each of GSA's 11 regions. These cases are independent of the survey sample for this audit, which resulted in the issuance of the alert memorandum. The survey sample included 11 positive COVID-19 cases identified between March 2020 and May 2020. This sample included one incident from each of GSA's 11 regions.

To accomplish our objectives, we:

- Reviewed the following CDC guidance: *Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 (COVID-19)*, *Interim Recommendations for U.S. Community Facilities with Suspected/Confirmed Coronavirus Disease 2019 (COVID-19)*, and *Interim Guidance for Administrators of US K-12 Schools and Childcare Programs*;
- Reviewed GSA and PBS guidance and procedures including the following: *U.S. General Services Administration Communicable Disease Pandemic Plan*, *GSA National Custodial Specification*, *PBS Leasing Desk Guide*, *GSA Cleaning and Disinfection Procedures*, *Notification Process for Suspected or Confirmed Cases of COVID-19*, *Cleaning and Disinfecting Work - Checklist*, and *Pandemic Plan Submittal Checklist*;
- Reviewed contract documents including scopes of work, inspection forms, and quality control and quality assurance documents used to ensure proper cleaning and disinfection of contaminated space;
- Reviewed email correspondence between PBS staff, tenant agencies, and contractors to determine: (1) if notification of COVID-19 incidents was consistent with GSA guidance and (2) how PBS cleaned and disinfected contaminated space and accepted custodial services;
- Interviewed PBS leadership and staff who were knowledgeable about PBS's COVID-19 guidance and procedures and who were responsible for reviewed incidents;
- Compared PBS's COVID-19 response actions, as evident in incident documentation, against CDC, GSA, and PBS guidance and procedures to determine compliance; and
- Assessed the design, implementation, and operating effectiveness of relevant internal controls.

We conducted the audit between May 2020 and April 2021 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 objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Internal Controls

We assessed internal controls significant within the context of our audit objectives against GAO-14-704G, *Standards for Internal Control in the Federal Government*. Our assessment is not intended to provide assurance on GSA’s internal control structure as a whole. GSA management is responsible for establishing and maintaining internal controls.

In planning and performing our audit, we identified the following internal control components and underlying internal control principles as significant to the audit objectives:

Internal Control Components	Internal Control Principles
Control Environment	The oversight body should oversee the entity’s internal control system.
	Management should establish an organizational structure, assign responsibility, and delegate authority to achieve the entity’s objectives.
Risk Assessment	Management should define objectives clearly to enable the identification of risks and define risk tolerances.
	Management should identify, analyze, and respond to significant changes that could impact the internal control system.
Control Activities	Management should design and implement control activities to achieve objectives and respond to risks.
	Management should design the entity’s information system and related control activities to achieve objectives and respond to risks.
Information and Communication	Management should use quality information to achieve the entity’s objectives.
	Management should internally and externally communicate the necessary quality information to achieve the entity’s objectives.
Monitoring	Management should establish and operate monitoring activities to monitor the internal control system and evaluate the results.

We assessed the design, implementation, and operating effectiveness of these internal controls. The methodology above describes the scope of our assessment and the report findings include any internal control deficiencies we identified. Because our audit was limited to these internal control components and underlying principles, it may not have disclosed all existing internal control deficiencies.

Report Qualification

In performing oversight of GSA's COVID-19 activities, we initiated two projects: (1) the monitoring of GSA's activities in response to the nationwide public health emergency resulting from confirmed cases of COVID-19 and GSA's implementation of the Coronavirus Aid, Relief, and Economic Security Act; and (2) the *Audit of PBS's Coronavirus Disease 2019 Communication and Cleaning Procedures* (i.e., this audit). In response to our oversight, GSA established a new centralized review and approval process for responses to all audit inquiries.

On January 15, 2021, we issued an *Alert Memorandum: GSA Is Impeding Oversight of Its COVID-19 Activities* to notify GSA that the centralized review and approval process compromised the integrity of information provided by GSA personnel. This process also caused frequent and unnecessary delays, and likely had a chilling effect on PBS employee responses. As a result, we had little assurance that the responses provided to our inquiries were complete, accurate, and reliable. Additionally, GSA attempted to restrict and limit the audit team's access to information and resources. Taken together, these actions impeded our ability to identify areas of GSA's COVID-19 pandemic response that should be improved to protect the health of GSA's tenants, employees, contractors, and visitors.

Throughout this audit, the audit team took the following steps to validate questionable audit responses resulting from GSA's review and approval process: (1) requested source documentation, including but not limited to contractual documents and internal and external email correspondence; (2) compared audit inquiry responses to the source documentation provided by PBS; and (3) interviewed PBS staff.

Once we discovered that GSA was impeding our oversight, the team: (1) re-interviewed PBS staff and (2) held impromptu discussions with PBS management and staff to confirm information provided in written responses. These procedures yielded what we believe to be sufficient and appropriate evidence to address the audit objectives and support our audit findings and conclusions.

Appendix B – Finding 1 Issues by Location

Incident Location	Tenant Delayed Notification to PBS	PBS Late or No Notification to Building Tenants	No Notification to Contractors	Date Incident Reported	Date Employer Aware	Date PBS Notified	Date PBS Notified Building Occupants
1100 L Street NW, Washington, D.C.		X		8/27/2020	8/27/2020	8/27/2020	None
4600 Silver Hill Road, Suitland, MD		X	X	7/8/2020	7/7/2020	7/8/2020	None
John F. Kennedy Federal Building, Boston, MA	X			8/3/2020	7/31/2020	8/3/2020	8/3/2020
Abraham A. Ribicoff Federal Building and U.S. Courthouse, Hartford, CT			X	7/1/2020	7/1/2020	7/1/2020	7/2/2020
Ron de Lugo Federal Building and U.S. Courthouse, Charlotte Amalie, St. Thomas, U.S. Virgin Islands	X	X	X	7/10/2020	7/8/2020	7/10/2020	None
St. Elizabeths Campus, Washington, D.C.	X			8/26/2020	8/21/2020	8/26/2020	Not required
London Courthouse Annex, London, KY		X	X	7/21/2020	7/21/2020	7/21/2020	None
George H. Mahon Federal Building and U.S. Courthouse, Lubbock, TX		X		7/23/2020	7/23/2020	7/23/2020	7/27/2020
Federal Justice Tower, Las Vegas, NV	X			8/17/2020	8/15/2020	8/17/2020	8/17/2020

Appendix B – Finding 1 Issues by Location (cont.)

Incident Location	Tenant Delayed Notification to PBS	PBS Late or No Notification to Building Tenants	No Notification to Contractors	Date Incident Reported	Date Employer Aware	Date PBS Notified	Date PBS Notified Building Occupants
Santa Ana Federal Building, Santa Ana, CA		X		8/21/2020	8/21/2020	8/21/2020	8/24/2020
Portland International Center, Portland, OR	X			8/4/2020	8/2/2020	8/5/2020	Not required

Appendix C – Finding 2 Issues by Location

Incident Location	Incorrect Scope of Work	No Cleaning and Disinfecting Checklist	No Evidence of Inspection	Inadequate Pandemic Plan	QCP/QASP Not Updated	Date Incident Reported
4600 Silver Hill Road, Suitland, MD	X	X		X	X	7/8/2020
Abraham A. Ribicoff Federal Building and U.S. Courthouse, Hartford, CT	X				X	7/1/2020
London Courthouse Annex, London, KY	X	X	X	X		7/21/2020
1100 L Street NW, Washington, D.C.		X	X			8/27/2020
Robert H. Jackson U.S. Courthouse, Buffalo, NY		X			X	8/17/2020
4801 Washington Avenue, Evansville, IN		X	X			7/31/2020
Weslaco Border Patrol Station, Weslaco, TX		X	X			7/28/2020
Otay Mesa Land Port of Entry, San Diego, CA		X				7/24/2020
Federal Justice Tower, Las Vegas, NV		X	X			8/17/2020
St. Elizabeths Campus, Washington, D.C.		X	X		X	8/26/2020
Council Bluffs Federal Building and U.S. Courthouse, Council Bluffs, IA		X				8/7/2020

Appendix C – Finding 2 Issues by Location (cont.)

Incident Location	Incorrect Scope of Work	No Cleaning and Disinfecting Checklist	No Evidence of Inspection	Inadequate Pandemic Plan	QCP/QASP Not Updated	Date Incident Reported
Diana E. Murphy U.S. Courthouse, Minneapolis, MN				X		8/31/2020
Charles F. Prevedel Federal Building, Overland, MO				X		8/28/2020
Santa Ana Federal Building, Santa Ana, CA				X		8/21/2020
James M. Fitzgerald U.S. Courthouse and Federal Building, Anchorage, AK				X		8/19/2020
Seattle U.S. District Courthouse, Seattle, WA				X	X	8/21/2020
Ron de Lugo Federal Building and U.S. Courthouse, Charlotte Amalie, St. Thomas, U.S. Virgin Islands					X	7/10/2020
George H. Fallon Federal Building, Baltimore, MD					X	8/7/2020
Fritz G. Lanham Federal Building, Ft. Worth, TX					X	8/6/2020
George H. Mahon Federal Building and U.S. Courthouse, Lubbock, TX					X	7/23/2020

Appendix D – GSA Comments

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Public Buildings Service

August 09, 2021

MEMORANDUM FOR: NICHOLAS V. PAINTER
REGIONAL INSPECTOR GENERAL FOR AUDITING
SOUTHEAST SUNBELT REGION AUDIT OFFICE (JA-4)
OFFICE OF INSPECTOR GENERAL

FROM: NINA M. ALBERT 
COMMISSIONER
PUBLIC BUILDINGS SERVICE (P)

SUBJECT: Response to the Office of the Inspector General Draft
Report, *PBS Did Not Always Follow CDC and Internal
Guidance to Limit the Risk of COVID-19 Exposure*
(A201018-2)

Thank you for the opportunity to review and comment on the U.S. General Services Administration (GSA) Office of Inspector General's (OIG) draft report, entitled *PBS Did Not Always Follow CDC and Internal Guidance to Limit the Risk of COVID-19 Exposure*, Report Number A201018-2 (July 14, 2021). The Public Buildings Service (PBS) appreciates OIG sharing this draft version of the report and providing PBS the opportunity for feedback. We also appreciate OIG's recognition of the importance of PBS's response to the COVID-19 pandemic, and we remain committed to doing everything we can to provide for the safety of occupants and visitors in facilities under GSA's jurisdiction, custody or control (GSA-controlled facilities).

PBS has undertaken numerous steps to mitigate the COVID-19 risk in GSA-controlled facilities. As set forth more fully below, PBS has also continually sought to improve its processes and adapt to changes in circumstances and in our understanding of the nature of how COVID-19 spreads, based on the best available science. As a result of these efforts, I am confident that PBS has acted appropriately to limit COVID-19 risk in its facilities, and worked continuously to improve its policies and practices, including in response to the alert memorandum dated September 3, 2020, entitled *Concerns Regarding PBS's Communication and Cleaning Procedures for Coronavirus Disease 2019 (COVID-19) Exposures*, Interim Memorandum Number A201018-2 (the "2020 Alert Memorandum").

Since the first report of a COVID-19 incident in a GSA-controlled facility on March 9, 2020, PBS has responded to over 15,000 COVID-19-related incidents across more than 900 federally owned and 2,200 leased facilities. Throughout that time, the health and safety of every individual accessing a GSA-controlled facility has been our top priority. PBS continues to follow and implement guidelines issued by the Centers

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for Disease Control and Prevention (CDC) and the Occupational Safety and Health Administration to help mitigate COVID-19 risks for building occupants. PBS developed a protocol to notify all building occupant points of contact (POC) of COVID-19-related incidents within 24 hours of PBS becoming aware of a confirmed or suspected case of an individual with COVID-19 that accessed a GSA-controlled facility. PBS incorporated enhanced cleaning and disinfection of frequently touched surfaces in common and high-traffic areas as part of its regular custodial service, and modified its custodial and lease contracts to reflect that level of service as agencies have returned to the physical workplace. Additionally, PBS developed a standard scope of work for cleaning and disinfection in response to a confirmed or suspected COVID-19 case in a GSA-controlled facility, and has implemented measures to verify that the scope is executed properly by its custodial vendors and lessors. To that end, PBS instituted the *Cleaning and Disinfection Work Checklist* to confirm that the cleaning and disinfection work is completed in accordance with the enhanced scope.

While PBS acknowledges the issues OIG noted in the sampled incidents and agrees with OIG's recommendations, we believe the actions taken in response to the aforementioned 2020 Alert Memorandum have fully and appropriately addressed those recommendations. These actions include:

- On September 3, 2020, GSA added a new Appendix B to the Facility Notification Process. Appendix B is a sample message to inform each designated POC of GSA's notification process for COVID-19 incidents in a GSA-controlled facility. GSA Facility Managers and Lease Administration Managers (LAMs) are required to send the message in Appendix B to each building occupant POC and are also required to send each POC any subsequent revision to the notification process. This action was taken in response to a draft version of the 2020 Alert Memorandum.
- On September 24, 2020, PBS revised and reissued its *Cleaning and Disinfecting Work Checklist*. The checklist is used to perform the inspections and record the results of COVID-19-related incident cleaning and disinfection services performed by GSA contractors or lessors in GSA-controlled facilities. This checklist is required to be completed and properly filed by the Facility Manager, LAM or Contracting Officer's Representative (COR). To ensure inspections are documented properly, incidents cannot be closed in GSA's tracking system until the GSA reporting official confirms that the completed checklist has been filed.

Additionally, PBS notes that OIG's sample of incidents was taken prior to the actions taken in response to the 2020 Alert Memorandum.

The sections below provide additional information in response to each of OIG's findings:

Appendix D – GSA Comments (cont.)

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Finding 1: PBS did not always follow its Notification Process for Suspected and Confirmed Cases of COVID-19.

Notification Process Revisions

The 2020 Alert Memorandum identified concerns regarding GSA's notification process for COVID-19-related incidents prior to the date of its issuance. In response to the 2020 Alert Memorandum, PBS revised its COVID-19 notification process to require building occupant POCs to notify GSA promptly of COVID-19-related incidents involving their organization, and to inform others within their organization of COVID-19-related incidents involving other building occupants.

On September 3, 2020, the same day that OIG released its 2020 Alert Memorandum, the PBS Office of Facilities Management issued the revised notification process to the PBS Regional Commissioners and regional Facilities Management and Service Center Directors for further dissemination to all Facility Managers and LAMs. As part of that issuance, Facility Managers and LAMs were directed to send a copy of Appendix B of the revised notification process to their building occupant POCs as quickly as possible. Appendix B clearly identifies the POC's responsibility to notify GSA promptly of all COVID-19-related incidents involving their organization, and to inform others within their organization of COVID-19-related incidents involving other building occupants.

Every time the notification process has been subsequently revised, the Facility Manager or LAM, as applicable, has provided the updated protocol to the building occupant POCs to ensure they remain aware of their responsibilities. No iteration of GSA's notification process for COVID-19-related incidents has required the Facility Manager or LAM to notify all occupants of the facility; the only notification goes to the building occupant POCs, who are then responsible for notifying their respective organizations.

Impact of Delayed Notifications

The draft report references the delay in notification of COVID-19-related incidents as increasing COVID-19 risk for building occupants, who may have unknowingly passed through space contaminated by individuals infected with COVID-19. It is true that occupants may have unknowingly passed through this type of space due to a delay in notification.

As the revised process on notifications reflects, GSA appreciates the importance of timely notifications. It is also important to recognize that CDC's understanding of how COVID-19 spreads has evolved over time. Significantly, in its update dated January 5, 2021, CDC eliminated the requirement to disinfect the individual's entire path of travel, if other areas throughout the facility potentially accessed by the impacted individual(s), such as restrooms, lobbies and hallways, had already been routinely cleaned and disinfected. On April 5, 2021, CDC further revised its guidance for cleaning and disinfection to remove the requirement for routine disinfection of high-touch surfaces, because it determined the risk of surface transmission is extremely low. Additionally, on

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the same day, CDC revised its guidance for cleaning and disinfection in response to a COVID-19 incident. The guidance as of July 2021 no longer includes a requirement to disinfect, if the affected individual(s) has not accessed the facility in more than 24 hours, and instructs users to focus on the immediate areas occupied by the affected individual, rather than the affected individual's entire path of travel. Taken together, this indicates a low likelihood that occupants unknowingly passing through space contaminated by individuals infected with COVID-19 due to a notification delay were subject to increased COVID-19 risk.

Finding 2: PBS does not have assurance that contractors cleaned and disinfected space in GSA-controlled facilities in accordance with CDC and PBS guidance.

Scope of Work

The draft report notes that PBS did not always provide contractors with the correct scope of work to conduct detailed cleaning and disinfection. On that basis, OIG concluded that PBS had no assurance that contaminated space was cleaned in accordance with CDC and GSA guidance.

GSA acknowledges that, initially, there were limitations with regard to the confirmation of cleaning and disinfecting of impacted space in accordance with CDC and GSA guidance, but GSA took affirmative steps to resolve this issue as soon as OIG shared its 2020 Alert Memorandum. On September 24, 2020, PBS issued guidance to address the way COVID-19-related incidents are reported, tracked and inspected in GSA-controlled facilities. The guidance included step-by-step processes and procedures for Facility Managers, LAMs and CORs to use in GSA-controlled facilities following a report of a confirmed or suspected COVID-19 incident. Specifically, on page 4 of the "GSA PBS Confirmed or Suspected COVID-19 Incident Procedures for GSA-Controlled Facilities," Facility Managers, LAMs and CORs were instructed to provide the Scope 3 scope of work and approximate square footage to the vendor.

Inspection Process

The draft report notes that PBS did not always document inspections for COVID-19 cleaning and disinfection services in accordance with GSA and PBS policy. As a result, OIG concluded that PBS could not be assured that the work was being performed in accordance with CDC and GSA guidance.

Similar to the challenges with the scope of work, while GSA acknowledges that there were limitations with the initial steps in its inspection process, GSA took affirmative steps to resolve this issue as soon as OIG shared the 2020 Alert Memorandum. As part of the September 24, 2020, guidance, PBS issued two versions of the *Cleaning and Disinfection Work Checklist* - one for federally owned facilities and one for leased facilities. These checklists must be completed and properly filed for every COVID-19-related incident where additional cleaning and disinfection is required. To ensure

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inspections are documented appropriately, the incident cannot be closed in GSA's tracking system until the GSA reporting official confirms that the completed checklist was filed.

Quality Assurance

The draft report notes that PBS did not always follow its quality assurance guidance for COVID-19-related cleaning and disinfection services. As a result, OIG concluded that PBS had little assurance that custodial services were safe, efficient, effective, and performed in accordance with CDC and PBS guidelines.

As with other aspects of OIG's findings, GSA acknowledges that there were limitations with the initial steps in its quality assurance process, and took affirmative steps to resolve this issue as soon as OIG shared its 2020 Alert Memorandum. As part of the September 24, 2020, guidance, PBS implemented a requirement for Facility Managers to review both the custodial vendor's Pandemic Plan and Quality Control Plan to verify that the plans appropriately addressed the new contract requirements. If the Facility Manager determined that either one or both of the vendor's plans were not adequate, the COR would direct the vendor to revise and resubmit its plans, as necessary, for approval. Once the vendor's Pandemic Plan and Quality Control Plan were approved by the COR, Facility Managers would review the Government's Quality Assurance Surveillance Plan to verify that it was also still appropriate and would make any necessary changes to reflect the current level of service.

For these reasons, we agree that there were limitations in GSA's initial COVID-19 response procedures. PBS has appropriately addressed these findings in response to OIG's 2020 Alert Memorandum.

Thank you again for the opportunity to review and comment on the draft report. If you have questions or would like to discuss further, please contact me on (202) 501-1100.

Appendix E – Report Distribution

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