



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

Audit of PBS NCR's Metropolitan Service Center Reimbursable Work Authorizations

Report Number A210039/P/R/R22007
September 23, 2022

Executive Summary

Audit of PBS NCR's Metropolitan Service Center Reimbursable Work Authorizations

Report Number A210039/P/R/R22007

September 23, 2022

Why We Performed This Audit

We performed this audit based on previous audits that identified deficiencies in GSA's Public Buildings Service (PBS) service centers' management and oversight of Reimbursable Work Authorizations (RWAs). Our objective was to determine whether the PBS National Capital Region's (NCR's) Metropolitan Service Center (MSC) is ensuring that RWAs are completed and closed in a timely manner in accordance with GSA policies and regulations.

What We Found

PBS NCR's MSC is not fulfilling its stewardship responsibilities for customer agency funding of RWAs. We found that the MSC is not providing customer agencies with milestone schedules or submitting written justifications when contracts are not awarded within a reasonable time frame. We also found that the MSC and GSA's Office of the Chief Financial Officer (OCFO) are not recording substantial completion dates in a timely manner. Taken together, these deficiencies impair the MSC's ability to effectively manage and return customer agency funding and increase the risk of appropriations law violations and inaccurate financial reporting.

What We Recommend

We recommend that:

1. The PBS Commissioner direct the Reimbursable Services National Program to update all applicable policies and procedures to align with the current RWA organizational structure and to clarify the roles and responsibilities of PBS project managers and OCFO budget analysts in updating the RWA Entry and Tracking Application (RETA) status for substantial completion.
2. The Acting NCR Regional Commissioner should:
 - a. Establish controls to ensure staff are trained on the *PBS Reimbursable Work Authorizations National Policy Manual* requirement to update RETA with a milestone schedule or written justification.
 - b. Develop a program to train staff in their role in the revised guidance regarding updating the RETA status for substantial completion.
 - c. Coordinate with the OCFO to ensure national RWA policies and goals are met for substantial completion dates to be entered into RETA.

In its response to our report, PBS wrote that it “acknowledges the legitimacy of [our] findings, generally agrees with [our] recommendations, and will work to develop a comprehensive Corrective Action Plan to address the deficiencies identified.” PBS’s response can be found in its entirety in **Appendix B**.

Table of Contents

Introduction	1
Results	
<i>Finding 1 – The MSC is not providing customer agencies with milestone schedules or submitting written justifications when it does not award contracts within a reasonable time frame.....</i>	<i>5</i>
<i>Finding 2 – The MSC and GSA’s OCFO are not recording substantial completion dates in a timely manner, which can delay the return of residual RWA funding to the customer.</i>	<i>7</i>
Conclusion.....	11
<i>Recommendations</i>	<i>11</i>
<i>GSA Comments.....</i>	<i>11</i>
Appendixes	
Appendix A – Objective, Scope, and Methodology	A-1
Appendix B – GSA Comments	B-1
Appendix C – Report Distribution.....	C-1

Introduction

We performed an audit of how the GSA Public Buildings Service (PBS) National Capital Region's (NCR's) Metropolitan Service Center (MSC) manages its Reimbursable Work Authorizations (RWAs) for post-occupancy projects in GSA-controlled (owned and leased) space.

Purpose

We performed this audit based on previous audits that identified deficiencies in PBS service centers' management and oversight of RWAs.

Objective

The objective of this audit was to determine whether the PBS NCR's MSC is ensuring that RWAs are completed and closed in a timely manner in accordance with GSA policies and regulations.

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

Background

The MSC is one of five service centers in the PBS NCR that direct, manage, and coordinate the day-to-day property management operations and programs in GSA-controlled space. The MSC currently has 209 buildings in its inventory, which includes 122 leased and 87 federally owned buildings.

The MSC's property management services include assisting customers with real estate projects and services in GSA-controlled space that are considered "above-standard" because they are not included in a customer's rental agreement. When a customer needs an above-standard project or service, the customer submits an RWA to GSA.¹ An RWA is an interagency agreement that establishes the formal agreement between the customer agency and GSA. It authorizes GSA to provide a project or service on the customer's behalf and receive reimbursement for costs plus applicable GSA fees. Examples of RWA projects or services include facility renovations, repairs, alterations, and utility/cleaning services.

The Reimbursable Services National Program in the PBS Office of Design and Construction oversees above-standard services and is responsible for the *PBS Reimbursable Work Authorizations National Policy Manual* (RWA Policy), which is the primary resource for RWA policies.² The RWA Policy requires federal customers to send all RWA information to GSA

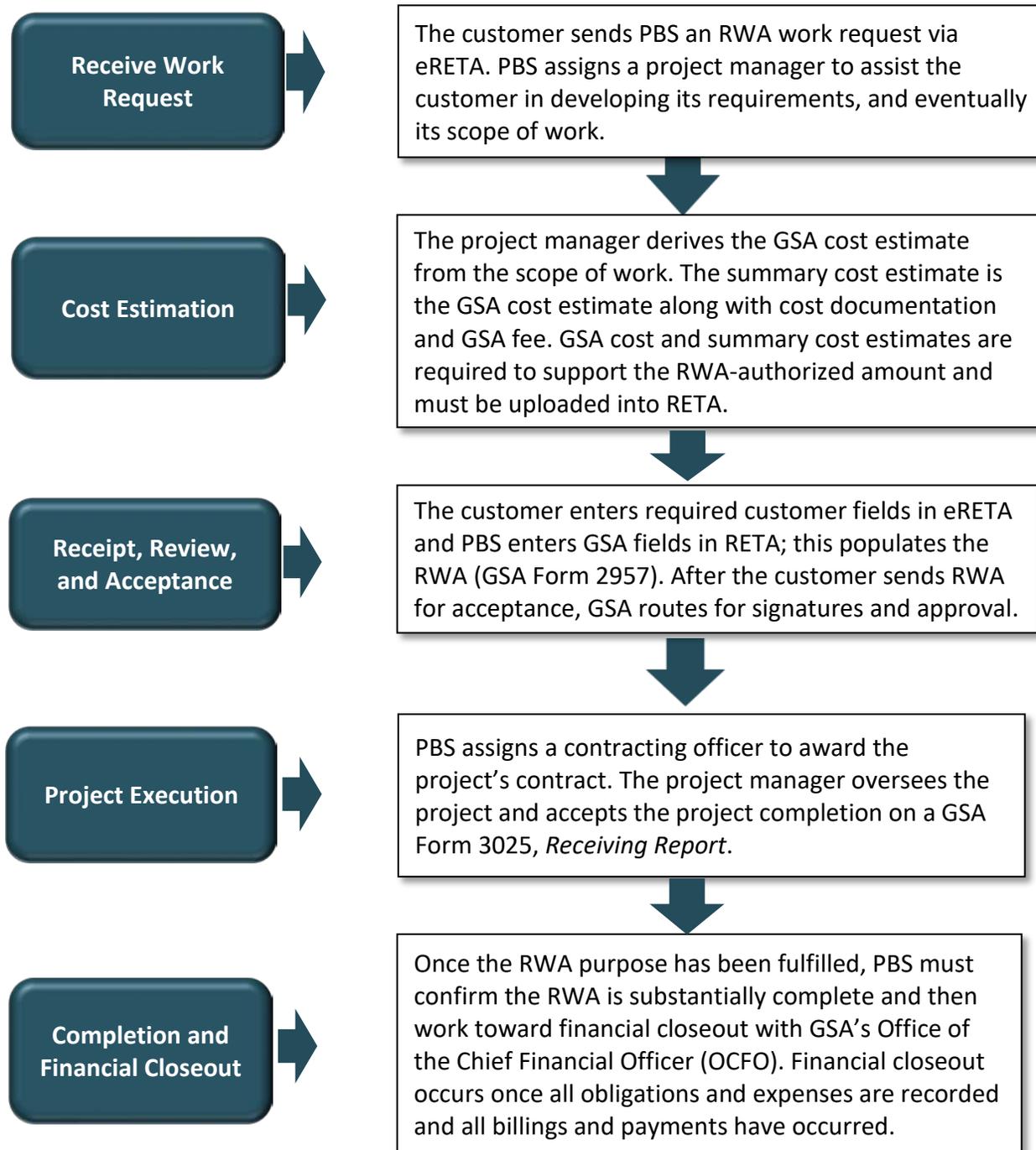
¹ RWAs are submitted using GSA Form 2957, *Reimbursable Work Authorization*.

² RWA National Policy Manual PBS 1000.2B, issued August 2020.

through the RWA Entry and Tracking Application (RETA/eRETA), GSA's electronic repository for all RWA projects.

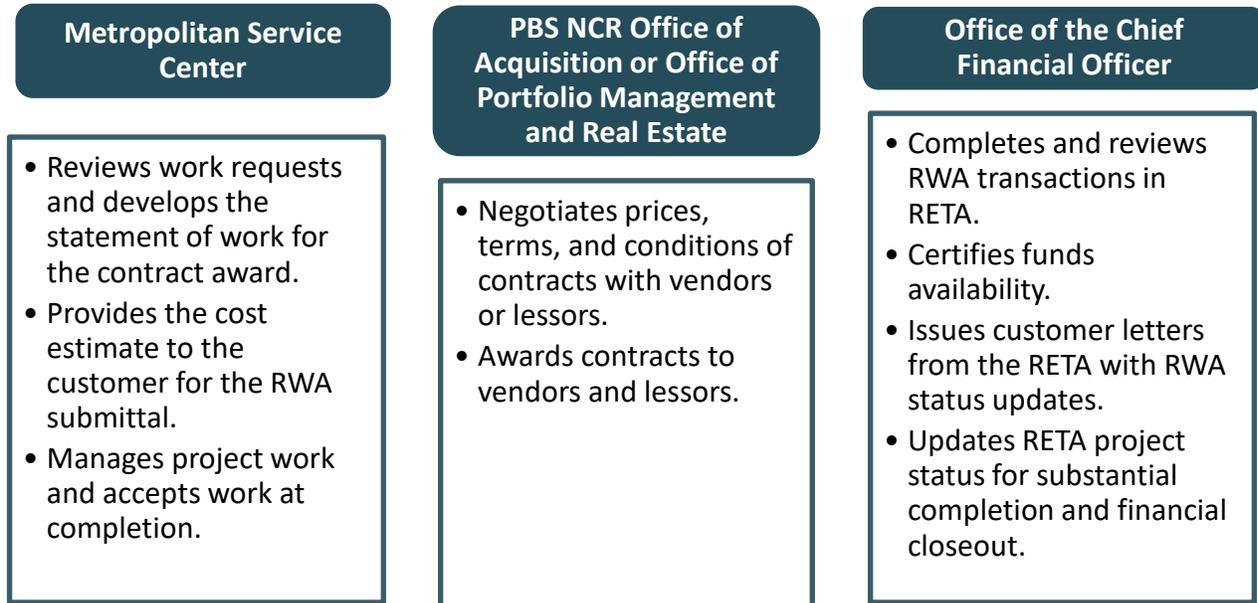
RWA Project Life Cycle. The RWA Policy divides the RWA project life cycle into five phases, as shown in *Figure 1*.

Figure 1 – RWA Project Life Cycle



RWA Roles and Responsibilities. The RWA project life cycle assigns responsibilities to various GSA offices, as shown in *Figure 2*.

Figure 2 – RWA Roles and Responsibilities



RWA Systems. The RWA project life cycle uses various PBS systems to capture and process the RWA request, as shown in *Figure 3*.

Figure 3 – RWA Systems

RWA Systems	Description
RWA RETA/eRETA	This system serves as PBS’s centralized repository for RWA information.
Enterprise Acquisition System Integrated (EASi)	This system integrates and streamlines the entire acquisition management process from requisition through contract award, modification, receipt, and closeout.
Electronic Project Management System (ePM)	This project management platform is used by GSA project teams managing design and construction projects in federally owned space and post-occupancy projects in leased space. ³
GSA Real Estate Exchange (G-REX)	This lease acquisition application manages the life cycle of lease acquisitions.

³ As of July 31, 2022, PBS discontinued use of ePM and transitioned to Kahua as its project management software.

Previous Audit Reports on PBS's Management of RWAs

Our office has previously identified deficiencies in PBS service centers' management and oversight of RWAs. Examples include:

- A January 2017 audit memorandum, *Review of Reimbursable Work Authorizations Managed by the PBS Pacific Rim Region Service Centers*, in which we found that the PBS Pacific Rim Region's service centers did not award contracts against RWAs within established time frames. The service centers did not award contracts for 21 of 25 RWAs tested within the 90-day time frame required by PBS policy or include required written justifications documenting the reason for noncompliance with the reasonable time rule. In addition, service center personnel were not monitoring contracts completed against RWAs to ensure that contractors adhered to schedule contract completion dates.⁴
- A January 2017 audit report, *Procurement and Internal Control Issues Exist within PBS's Brooklyn/Queens/Long Island Service Center*, in which we found that the service center had an RWA that violated the reasonable time rule. PBS did not award the task order to do the work until 4.5 years after PBS accepted the RWA.⁵

⁴ Audit Memorandum Number A150036, dated January 26, 2017.

⁵ Report Number A130003/P/2/R17002, dated January 20, 2017.

Results

PBS NCR's MSC is not fulfilling its stewardship responsibilities for customer agency funding of RWAs. We found that the MSC is not providing customer agencies with milestone schedules or submitting written justifications when contracts are not awarded within a reasonable time frame. We also found that the MSC and GSA's OCFO are not recording substantial completion dates in a timely manner. Taken together, these deficiencies impair the MSC's ability to effectively manage and return customer agency funding and increase the risk of appropriations law violations and inaccurate financial reporting.

Finding 1 – The MSC is not providing customer agencies with milestone schedules or submitting written justifications when it does not award contracts within a reasonable time frame.

The MSC is violating the RWA Policy by not providing customer agencies with milestone schedules or submitting written justifications in RETA when contract awards are delayed. Project managers stated they were unaware or unclear on their responsibilities to complete the milestone schedule or submit a written justification. As a result, PBS is at an increased risk of mismanaging customer agency funding and violating appropriations law.

The RWA Policy states that RWAs may only be accepted when contract award is expected within a reasonable time, which is defined as 90 calendar days of acceptance of the RWA. The RWA Policy notes that PBS must determine if the requested work represents a bona fide need of the customer. The customer's bona fide need could be questioned if the contract is not awarded within a reasonable time. The customer must have a current bona fide need for the goods or services to be provided by PBS at the time the customer signs the RWA.⁶ The RWA (GSA Form 2957) serves as written documentation of the bona fide need of the customer's request.

Further, the RWA Policy states that if the PBS project manager determines contract award will not occur within the 90-day time frame, the project manager must provide the customer with a milestone schedule that clearly identifies when award will take place. The milestone schedule must be available in RETA, G-REX, or ePM. If neither of these requirements are met (award within 90 days or providing a milestone schedule), the project manager must submit a written justification in RETA.

⁶ The Bona Fide Needs Rule (31 U.S.C. 1502 (a)) states that a customer may obligate a time-limited appropriation (e.g., for Fiscal Year 2022) only to meet a legitimate, or bona fide, need arising during the period of availability for which the appropriation was made.

We reviewed a sample of 20 N-type, non-severable RWAs accepted by the MSC from October 1, 2018, through September 30, 2021, to determine compliance with the 90-day requirement.⁷ We found that 6 of 20 RWAs (30 percent) did not meet the 90-day requirement for contract award. Further, we found no evidence that the project managers shared a milestone schedule with the customer or submitted written justifications in RETA for any of the six RWAs. As shown in *Figure 4*, the project managers we interviewed identified a variety of causes, often more than one for each RWA, for the delays in contract award.

Figure 4 –RWA Acceptance to Contract Award Days Lapsed⁸

RWA Number	Causes for Delay in Contract Award	Acceptance Date	Days Lapsed
N1007219	- Proposals overestimated - Delays in scheduling site visits	5/16/2019	120
N1897092	- Delay in assigning contract specialist and site visit	6/10/2019	113
N2013778	- Change in building ownership - Use of sole-source procurement	3/26/2020	97
N2064183	- Change in procurement method - Amended RWA to add funds	7/31/2020	222
N2171678	- End of fiscal year workload caused delays in assigning contracting officer	7/27/2021	279*
N2086187	- End of fiscal year workload caused delays in assigning contracting officer - Customer pushback on pricing - Lessor registration in System for Award Management expired	8/26/2021	249*

*Contracts were not awarded against these RWAs as of the end of our audit fieldwork.

As discussed above, the RWA Policy allows contract award beyond the 90 days if the project manager provides the customer with a milestone schedule or completes a written justification. When we asked why a milestone schedule was not prepared, one project manager said they did not believe the milestone schedule was mandatory. Another project manager stated that he communicated the project status to his customers through emails and meetings, not through the use of a milestone schedule.

⁷ N-type, non-severable RWAs are nonrecurring, one-time needs in which the customer agency receives value only at the completion of the service or project (see Sampling section in *Appendix A*).

⁸ *Figure 4* is up-to-date as of May 2, 2022.

Compliance with the RWA Policy’s requirements for contract award and documentation of project milestones in a timely manner is a critical component of PBS’s stewardship of customer agency funding. Taken together, these requirements are designed to ensure that RWAs are not accepted without a bona fide need or used to “park” customer agency funding in an attempt to extend the life of their appropriations. Accordingly, PBS NCR should train its staff on the RWA Policy requirements to ensure effective management of customer agency funding.

Finding 2 – The MSC and GSA’s OCFO are not recording substantial completion dates in a timely manner, which can delay the return of residual RWA funding to the customer.

Entry of the substantial completion date in RETA is an important part of GSA’s stewardship of the customer agency’s funding because it starts the process for financial closeout of the RWA and return of any residual funds to the customer agency. However, we found that the MSC and the OCFO are not working effectively to enter substantial completion dates in RETA in a timely manner.

Substantial Completion Date Not Updated in RETA within the 30-Day Criteria

Substantial completion is the date when PBS inspects, approves, and determines the scope of work has been completed. The RWA Policy states that once the project funded by the RWA is substantially complete, the “Region” must ensure that the completion date is entered in RETA within 30 calendar days of the actual substantial completion date.

We found that the substantial completion dates were not entered within 30 calendar days for 13 of the 16 RWAs (81 percent) in our sample that were in the substantial completion phase. *Figure 5* on the next page shows the number of days lapsed between the receiving report’s actual substantial completion date and the RETA entry date for these 13 RWAs. On average, it took 141 days between the actual substantial completion date and the entry of the date in RETA for these 13 RWAs.

**Figure 5 – Days Lapsed to Enter
Substantial Completion Date in RETA**

RWA Number	Days Lapsed to Enter Substantial Completion Date in RETA
N2013778	429
N2046693	274
N1897092	264
N2064879	209
N1882641	105
N2097998	96
N1878516	94
N2100995	78
N1917875	72
N2211910	66
N2064183	56
N1007219	45
N2133412	41
Average number of days lapsed:	141

The MSC and the OCFO Are Not Working Effectively to Update RETA

The MSC and the OCFO have a shared responsibility for entering substantial completion dates in RETA within 30 calendar days. In general, MSC project managers are responsible for verifying that the work is substantially complete and OCFO budget analysts are responsible for entering the substantial completion dates in RETA. However, for the three reasons described below, we found that MSC and OCFO personnel are not entering substantial completion dates in RETA in a timely manner.

Notification Processes Are Not Operating Effectively. The RWA Policy requires project managers to document actual substantial completion using GSA Form 3025, *Receiving Report*, which is the basis for the OCFO budget analyst to update RETA. In particular:

- For federally owned space, MSC project managers generally enter receiving reports into the PBS Enterprise Acquisition System Integration (EASi) program. However, OCFO budget analysts stated that the EASi program does not send them a notice when a receiving report is completed.
- For leased space, MSC project managers submit the receiving reports to the OCFO's Accounts Payable Mailbox. OCFO budget analysts do not have access to this mailbox because it is managed by a different OCFO division.

Additionally, MSC project managers do not usually follow up to confirm that the OCFO enters the substantial completion date in RETA. Based on our interviews, MSC project managers believe their role ends after submitting the receiving report in EASi or the OCFO's Accounts Payable Mailbox. Instead, OCFO budget analysts conduct their own internal reviews and reach out to project managers to determine substantial completion dates and enter them in RETA. The OCFO asks PBS to ensure that RWA balances are valid by determining if the project: (1) is in delivery stage or (2) is recently completed with timely recorded substantial completion.

OCFO Budget Analysts Are Unaware of the 30-Day Requirement. OCFO budget analysts stated that they were not aware that the RWA Policy requires that substantial completion dates be entered in RETA within 30 calendar days of actual substantial completion. Their supervisors stated that, while they were aware of the 30-day requirement, they consider the requirement to be more applicable to PBS than to the OCFO. Instead, their goal is to enter substantial completion dates as soon as possible.

PBS Substantial Completion Guidance for Project Managers Is Contradictory and Vague. PBS's guidance for project managers related to entry of substantial completion dates is contradictory and vague. For example:

- PBS's RWA Policy states that "the Region must enter the substantial completion date into RETA."
- PBS's *Reimbursable Services Program Reimbursable Work Authorization Standard Operating Procedure* document instructs project managers to "send notification [of substantial completion] to the RETA Data Entry User." However, the document does not specify who holds the position of "RETA Data Entry User."
- PBS's *RWA Substantial Completion Date Process* document states that the project manager must send the receiving report directly to the applicable regional OCFO RWA Regional Mailbox for substantial completion notification for RETA data entry. However, the project managers are sending the receiving report to the OCFO's Accounts Payable Mailbox.

The Reimbursable Services Program Manager told us that the current RWA Policy represents a prior organizational structure in which the finance role resided in PBS. The Reimbursable Services Program Manager said the responsibility to update RETA for substantial completion currently resides with the OCFO.

Additionally, the supervisor of the OCFO budget analysts said it is not clear if the "RETA Data Entry User" referenced in the *Reimbursable Services Program Reimbursable Work Authorization Standard Operating Procedure* document is someone in PBS or OCFO.

PBS's contradictory and vague guidance leads to delay in the entry of substantial completion dates in RETA, thus delaying the return of residual RWA funding to the customer and inaccurate

financial reporting. Entry of the substantial completion date is an important part of GSA's stewardship of the customer agency's funding because it starts the process for financial closeout of the RWA and return of any residual funds to the customer agency. Of the 13 RWAs in our sample that did not meet the requirement to enter the substantial completion date in RETA within 30 calendar days, 8 (62 percent) had remaining fund balances whose return was impacted. These balances ranged from \$1,424 to \$35,849.

Additionally, the lack of timely recording of the substantial completion date prevents PBS from ensuring accurate financial records. PBS's internal control guidance notes that prior material weaknesses in GSA financial statements led to GSA requiring semiannual reviews of the RWA balances.⁹ It notes, in part, that "failure to conduct timely closeout is a violation of regulatory and statutory requirements, and negatively impacts GSA's accurate and timely financial recording, as well as customer agency reporting." Accurate RWA records will reflect that fully delivered contracts are closed out.

PBS should update the RWA Policy to clarify the roles and responsibilities of PBS project managers and OCFO budget analysts in updating the substantial completion date in RETA. Following that, the MSC should familiarize its staff with these roles and responsibilities and improve coordination with the OCFO.

⁹ *PBS Financial Accounting Processes and Internal Control Desk Guide*, issued July 30, 2021.

Conclusion

PBS NCR's MSC is not fulfilling its stewardship responsibilities for customer agency funding of RWAs. We found that the MSC is not providing customer agencies with milestone schedules or submitting written justifications when contracts are not awarded within a reasonable time frame. We also found that the MSC and GSA's OCFO are not recording substantial completion dates in a timely manner. Taken together, these deficiencies impair the MSC's ability to effectively manage and return customer agency funding and increase the risk of appropriations law violations and inaccurate financial reporting.

To address these deficiencies, PBS should update the current RWA Policy to clarify the roles of PBS project managers and OCFO budget analysts in updating RETA. Following this, PBS should train its staff on the updated policy and coordinate with OCFO to ensure that the RWA Policy is implemented. PBS should also train staff on the RWA Policy requirement that if a contract award is not made in a reasonable time, project managers should update RETA with a milestone schedule or written justification.

Recommendations

We recommend that:

1. The PBS Commissioner direct the Reimbursable Services National Program to update all applicable policies and procedures to align with the current RWA organizational structure and to clarify the roles and responsibilities of PBS project managers and OCFO budget analysts in updating the RETA status for substantial completion.
2. The Acting NCR Regional Commissioner should:
 - a. Establish controls to ensure staff are trained on the *PBS Reimbursable Work Authorizations National Policy Manual* requirement to update RETA with a milestone schedule or written justification.
 - b. Develop a program to train staff in their role in the revised guidance regarding updating the RETA status for substantial completion.
 - c. Coordinate with the OCFO to ensure national RWA policies and goals are met for substantial completion dates to be entered into RETA.

GSA Comments

In its response to our report, PBS wrote that it “acknowledges the legitimacy of [our] findings, generally agrees with [our] recommendations, and will work to develop a comprehensive Corrective Action Plan to address the deficiencies identified.” PBS's response can be found in its entirety in **Appendix B**.

Audit Team

This audit was managed out of the Real Property Audit Office and conducted by the individuals listed below:

Byron G. Bustos	Associate Deputy Assistant Inspector General for Auditing
Meseret E. Henriques	Audit Manager
Gary W. Vincent	Auditor-In-Charge
Laura L. Ziligson	Auditor

Appendix A – Objective, Scope, and Methodology

Objective

The objective of this audit was to determine whether the PBS NCR's MSC is ensuring that RWAs are completed and closed in a timely manner in accordance with GSA policies and regulations.

Scope and Methodology

We evaluated the MSC's management of N-type, non-severable RWAs for Fiscal Years 2019 through 2021.

To accomplish our objective, we:

- Reviewed the RWA policies and procedures in the *PBS Reimbursable Work Authorizations National Policy Manual*, *PBS Financial Accounting Processes and Internal Control Desk Guide*, and the *Reimbursable Services Program Reimbursable Work Authorization Standard Operating Procedure*;
- Discussed the RWA process with management officials in the MSC, OCFO, and the PBS Office of Design and Construction;
- Interviewed PBS project managers and OCFO budget analysts for the sampled RWAs;
- Reviewed PBS data for the MSC's N-type, non-severable RWAs in RETA as of October 19, 2021, for Fiscal Years 2019 through 2021;
- Reviewed RWA documentation in RETA, contract information in EASi, and project schedules in ePM for the sampled RWAs;
- Reviewed previous GSA Office of Inspector General audit reports referencing RWAs; and
- Reviewed delegation of authority and training certificates for RWA approvers.

Data Reliability

We assessed the reliability of data through review of policy manuals and tracing to source documents. We determined that the data were sufficiently reliable for the purposes of this audit.

Sampling

The RWA Policy notes that RWAs can be divided into two types of service categories: severable and non-severable. A severable service is continuous in nature, such as utilities. A non-severable service or project is one in which the customer agency receives value only at the completion of the service or project, such as a repair. N-type RWAs are used for standalone projects, such as the post-occupancy projects in the MSC, which was our audit focus. However, because N-type RWAs can be both severable and non-severable, we downloaded RWA data from RETA for MSC sorting for both N-type and non-severable.

We summarized PBS data for N-type, non-severable RWAs accepted by the MSC during the period October 1, 2018, through September 30, 2021 (Fiscal Years 2019 through 2021), for a total of 95 RWAs. N-type, non-severable RWAs provide for a one-time need, typically repairs or space alteration projects. We limited our review to RWAs under \$250,000 because MSC told us RWAs in excess of that amount are managed by the PBS Office of Design and Construction. We removed 13 N-type, non-severable RWAs associated with the U.S. Food and Drug Administration's White Oak Campus because this project has been the focus of another GSA Office of Inspector General audit, leaving a total of 82 RWAs.

From this total, we selected a judgmental sample of 22 N-type, non-severable RWAs for review based on the highest-dollar-value RWAs for the following RETA status fields: Accepted, Substantially Complete, and Financially Closed. Specifically, we reviewed:

- Six RWAs in Accepted status;
- Six RWAs in Substantially Complete status; and
- Eight RWAs in Financially Closed status.

We did not review the remaining two RWAs because they were cancelled.

The judgmental sample design did not include sample sizes that would allow for projection to the population; however, they allowed us to sufficiently address our audit objective.

Internal Controls

We assessed internal controls significant within the context of our audit objective against GAO-14-704G, *Standards for Internal Control in the Federal Government*. The methodology above describes the scope of our assessment and the report findings include any internal control deficiencies we identified. 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.

Compliance Statement

We conducted the audit between February 2021 and May 2022 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.

Appendix B – GSA Comments

DocuSign Envelope ID: EBC07300-B191-4CCE-88B6-A693F3EAE5D



Public Buildings Service

September 1, 2022

MEMORANDUM FOR: BYRON G. BUSTOS
ASSOCIATE DEPUTY ASSISTANT INSPECTOR
GENERAL FOR AUDIT, REAL PROPERTY
(JA-R)

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

FROM: AIMEE WHITEMAN
ACTING REGIONAL COMMISSIONER
PUBLIC BUILDINGS SERVICE (WP)

DocuSigned by:

Ivan G. Swain
0A2E4AA5468A4D9...

SUBJECT: Response to the Office of Inspector General (OIG)
Draft Report: *Audit of PBS NCR's Metropolitan
Service Center Reimbursable Work Authorizations
(A210039)*

Thank you for the opportunity to comment on the subject audit report. The Public Buildings Service (PBS) acknowledges the legitimacy of your findings, generally agrees with your recommendations, and will work to develop a comprehensive Corrective Action Plan to address the deficiencies identified. With respect to the recommendation that the PBS Commissioner update applicable Reimbursable Work Authorization (RWA) policies and procedures, PBS believes it would be most appropriate to update the Nation Capital Region's (NCR) RWA Process and Help Guide.

In advance of your final report, we would like to take this opportunity to make you aware of several action items that have been recently implemented or are in the planning stages to include:

- PBS NCR consulted with the National RWA Policy Team in the PBS Office of Design and Construction. That Team recommended that PBS NCR review, refine, and reiterate NCR's RWA Process and Help Guide. PBS NCR plans to update this Guide to align with the current RWA organizational structure and to clarify the roles and responsibilities of PBS project managers and OCFO budget analysts in updating RETA status for substantial completion. These edits will impact multiple Guide narratives.

U.S. General Services Administration
1800 F St NW
Washington, DC 20407
www.gsa.gov

- PBS NCR Office of Facilities Management (OFM) and Office of the Chief Financial Officer (OCFO) are developing a training program to train staff on the RWA National Policy Manual requirements regarding a customer agency's *bona fide* Need, PBS's reasonable time within which to re-obligate customer agency funds, PBS and customer agency roles and responsibilities, and PBS's RWA Substantial Completion Date Process.
- In FY23, PBS will implement the use of Kahua as a method to transfer the substantial completion date into RWA Entry and Tracking Application.
- In FY23 PBS will pilot the use of the Post Occupancy Event Tracker, a tool to improve oversight and transparency throughout the project life cycle.

If you have any questions, please contact me or Shauna Carter, Director, Office of Facilities Management at 202-302-2140.

Appendix C – Report Distribution

GSA Administrator (A)

GSA Deputy Administrator (AD)

PBS Commissioner (P)

PBS Deputy Commissioner (PD)

Chief of Staff (PB)

Deputy Chief of Staff (PB)

Assistant Commissioner for Strategy & Engagement (PS)

Acting NCR Regional Administrator and PBS Regional Commissioner (WPX)

Director, Service Delivery Division (WPM1B)

Chief Financial Officer (B)

Deputy Chief Financial Officer (B)

Office of Audit Management and Accountability (BA)

Assistant Inspector General for Auditing (JA)

Deputy Assistant Inspector General for Acquisition Program Audits (JA)

Deputy Assistant Inspector General for Real Property Audits (JA)

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