IMPLEMENTATION REVIEW OF CORRECTIVE ACTION PLAN

GSA Should Monitor and Track Facility Security Assessments
A160101/O/7/F18002
December 4, 2017

Assignment Number A210074
October 19, 2021
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Introduction

We have completed an implementation review of the management actions taken in response to the recommendations contained in our December 2017 audit report, *GSA Should Monitor and Track Facility Security Assessments*, Report Number A160101/O/7/F18002.

Objective

The objective of our review was to determine whether GSA’s Public Buildings Service (PBS) and Office of Mission Assurance (OMA) have taken the actions as outlined in the corrective action plan for *GSA Should Monitor and Track Facility Security Assessments* (see Appendix A). To accomplish our objective we:

- Examined documentation submitted by PBS and OMA to support the completion of the corrective action plan; and
- Interviewed PBS and OMA personnel responsible for implementing the corrective action plan.

Background

The U.S. Department of Homeland Security (DHS) and GSA share responsibility for protecting federal buildings. GSA is the landlord for the civilian federal government. In this role, GSA acquires space on behalf of federal agencies and is responsible for operations, maintenance, and protection of federal buildings and grounds under the custody and control of the GSA Administrator.

DHS’s Federal Protective Service (FPS) is responsible for protecting GSA’s owned and leased buildings. In 1995, Executive Order 12977 established the Interagency Security Committee (ISC) to evaluate security standards and establish policies for security in federal buildings. In February 2003, this order was amended by Executive Order 13286 to name DHS as the head of the ISC.

According to *The Risk Management Process for Federal Facilities*, a standard issued by the ISC, FPS is responsible for identifying and analyzing security risks including threats, vulnerabilities, and potential consequences; and recommending appropriate countermeasures for GSA-owned and leased buildings in its facility security assessment (FSA) reports.

GSA’s protection responsibilities include installing building-related fixtures such as fencing, lighting, vehicular barriers, guard booths, blast resistant windows, and door locks. GSA is also responsible for coordinating with FPS to ensure tenant security.
In June 2006, GSA and DHS signed a Memorandum of Agreement (MOA) outlining the responsibilities of each organization with regard to building security. According to the MOA, FPS is required to conduct FSAs of GSA buildings in accordance with ISC standards. The resulting FSA report should include recommended countermeasures for identified vulnerabilities. The MOA also established that both organizations are responsible for the implementation of approved countermeasures, with FPS responsible for security equipment and GSA in charge of building security fixtures.

The ISC standard states that buildings with two or more federal tenants should have a Facility Security Committee. The Facility Security Committee is responsible for addressing building-specific security issues and approving the implementation of recommended countermeasures included in the FSA reports. The Facility Security Committee uses a building’s FSA report to: (1) evaluate security risk, (2) implement countermeasures to mitigate risk, and (3) allocate security resources effectively.

On December 4, 2017, we issued an audit report, GSA Should Monitor and Track Facility Security Assessments, to PBS and OMA. The objectives of the audit were to determine: (1) whether GSA received FSA reports from FPS; (2) how GSA monitored and used reports received; and (3) the effect if GSA did not receive the FSA reports.

Our audit found that to fulfill its building protection responsibilities, GSA should ensure that it receives and uses FSA reports.

To address the finding identified in our report, we recommended that the GSA Acting Administrator:

1. Implement policies and procedures to:
   a. Monitor and track FSA reports. This should include developing an automated methodology to track whether PBS received the FSA reports.
   b. Require that PBS and OMA officials follow up with FPS when reports are not received.

2. Require training for PBS property managers on the use of FSA reports.

GSA agreed with our report recommendations.
**Results**

Our implementation review determined that PBS and OMA have taken appropriate corrective actions to address the recommendations. We determined that no further action is necessary.

**Audit Team**

This review was managed out of the Greater Southwest Region Audit Office and conducted by the individuals listed below:

- Charles Harris  
  Regional Inspector General for Auditing
- Hector Molina-Rodriguez  
  Audit Manager
- Susan Houghtalin  
  Auditor-In-Charge
# Appendix A – Corrective Action Plan for Report Number A160101/O/7/F18002

## GSA Should Monitor and Track Facility Security Assessments

**Report Number A160101/O/7/F18002**  
**Corrective Action Plan**

**Designated Responding Official:** Robert J. Carter  
**Contact Person:** Maggie Dugan  
**Telephone Number:** (202) 294-5531  
**Date:** February 7, 2018

<table>
<thead>
<tr>
<th>A160101/O/7/F18002: GSA Should Monitor and Track Facility Security Assessments</th>
<th>Recommendation Number 001A</th>
<th>Proposed Recommendation Completion Date November 30, 2018</th>
</tr>
</thead>
</table>

**Recommendation 001A:** Implement policies and procedures to monitor and track facility security assessment reports. This should include developing an automated methodology to track whether PBS received the facility security assessment reports.

### Action to be Taken Step by Step

- **001A.001:** Release OMA 1000.3 CHGE 1: Responsibilities for Implementation of Facility Security Assessment Countermeasures  
- **Lead Organization:** OMA

### Supporting Documentation to be sent to HIEB

- **Signed OMA 1000.3 CHGE 1: Responsibilities for Implementation of Facility Security Assessment Countermeasures Directive.**

### Documentation Will be Sent Last Day

- **February 28, 2018**
### Corrective Action Plan

#### GSA Should Monitor and Track Facility Security Assessments

**Report Number A160101/O/7/F18002**

**Corrective Action Plan**

<table>
<thead>
<tr>
<th>Action to be Taken Step by Step</th>
<th>Supporting Documentation to be sent to</th>
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<tbody>
<tr>
<td>001A.002: Convene FSA implementation accountability working group</td>
<td><strong>H1EB</strong> Notes from Working Group Meetings</td>
<td><strong>July 31, 2018</strong></td>
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<td><strong>Lead Organization:</strong> OMA</td>
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<tr>
<td>001A.003: Release OMA 1000.3 CHGE 1 Responsibilities for Implementation of Facility Security Assessment Countermeasures Implementation Plan</td>
<td><strong>H1EB</strong> OMA 1000.3 CHGE 1 Responsibilities for Implementation of Facility Security Assessment Countermeasures Implementation Plan</td>
<td><strong>September 30, 2018</strong></td>
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<td><strong>Lead Organization:</strong> OMA</td>
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<tbody>
<tr>
<td>001A.004: Implement Automated Tracking Method for FSAs.</td>
<td><strong>H1EB</strong> Screenshots of tracking method.</td>
<td><strong>November 30, 2018</strong></td>
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<td><strong>Lead Organization:</strong> OMA</td>
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## Appendix A – Corrective Action Plan for Report Number A160101/O/7/F18002

**GSA Should Monitor and Track Facility Security Assessments**

**Report Number A160101/O/7/F18002**

**Corrective Action Plan**

**Designated Responding Official:** Robert J. Carter  
**Contact Person:** Maggie Dugan  
**Telephone Number:** (202) 294-5531  
**Date:** February 7, 2018  

<table>
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<tr>
<th>Report Number: A160101/O/7/F18002</th>
<th>Recommendation Number 001B</th>
<th>Proposed Recommendation Completion Date: February 28, 2018</th>
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<tr>
<td><strong>Recommendation 001B:</strong> Implement policies and procedures to require that PBS and OMA officials follow up with FPS when reports are not received.</td>
<td><strong>Action to be Taken Step by Step</strong></td>
<td><strong>Supporting Documentation to be sent to H1ER</strong></td>
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<tr>
<td><strong>001B.001:</strong> Release OMA 1000.3 CHGE 1: Responsibilities for implementation of Facility Security Assessment Countermeasures</td>
<td><strong>Lead Organization:</strong> OMA</td>
<td><strong>Signed OMA 1000.3 CHGE 1: Responsibilities for Implementation of Facility Security Assessment Countermeasures Directive.</strong></td>
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**Documentation Will be Sent Last Day**  
**February 28, 2018**

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Appendix A – Corrective Action Plan for Report Number A160101/O/7/F18002

GSA Should Monitor and Track Facility Security Assessments
Report Number A160101/O/7/F18002
Corrective Action Plan

Designated Responding Official: Aimée Whiteman
Contact Person: Martin Gusky
Telephone Number: (202) 527-2149
Date: February 7, 2018

| A160101/O/7/F18002: GSA Should Monitor and Track Facility Security Assessments | Recommendation Number 002 | Proposed Recommendation Completion Date November 30, 2018 |

Recommendation 002: Require training for PBS property managers on the use of facility security assessment reports.

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<th>Action to be Taken Step by Step</th>
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Appendix B – Report Distribution

GSA Administrator (A)
GSA Deputy Administrator (AD)
Associate Administrator for Mission Assurance (D)
Deputy Associate Administrator (D1)
Chief of Staff (D2)
Commissioner (P)
Deputy Commissioner (PD)
Chief of Staff (PB)
Deputy Chief of Staff (PB)
Assistant Commissioner for Strategy & Engagement (PS)
Chief Financial Officer (B)
Office of Audit Management and Accountability (BA)
Assistant Inspector General for Auditing (JA)
Director, Audit Planning, Policy, and Operations Staff (JAO)