

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

GSA Purchased Chinese-Manufactured Videoconference Cameras and Justified It Using Misleading Market Research

Report Number A220070/A/6/F24002 January 23, 2024

Executive Summary

GSA Purchased Chinese-Manufactured Videoconference Cameras and Justified It Using Misleading Market Research Report Number A220070/A/6/F24002 January 23, 2024

Why We Performed This Audit

In 2022, our office was contacted by a GSA employee who was concerned about GSA's purchase and use of Chinese-manufactured videoconference cameras. Since these cameras were manufactured in China, they were not compliant with the Trade Agreements Act of 1979 (TAA). Our audit objective was to determine whether GSA's purchase and use of these Chinese-manufactured videoconference cameras were in accordance with federal laws, regulations, and internal guidance.

What We Found

GSA Office of Digital Infrastructure Technologies (IDT) employees misled a contracting officer with egregiously flawed information to acquire 150 Chinese-made, TAA-noncompliant videoconference cameras. Before completing the purchase, the contracting officer requested information from GSA IDT to justify its request for the TAA-noncompliant cameras, including the existence of TAA-compliant alternatives and the reason for needing this specific brand. In response, GSA IDT provided misleading market research in support of the TAA-noncompliant cameras and failed to disclose that comparable TAA-compliant alternatives were available.

The TAA-noncompliant cameras have known security vulnerabilities that need to be addressed with a software update. However, GSA records indicate that some of these TAA-noncompliant cameras have not been updated and remain susceptible to these security vulnerabilities.

What We Recommend

We recommend that the GSA Administrator:

- 1. Ensure that GSA no longer purchases TAA-noncompliant cameras if there are TAAcompliant cameras that meet the Agency's requirements.
- 2. Return, or otherwise dispose of, previously purchased TAA-noncompliant cameras.
- 3. Strengthen controls to ensure that:
 - a. TAA-compliant products are prioritized during future procurements;
 - b. TAA contracting officer determinations are adequately reviewed prior to approval, including any comparisons or market research performed;
 - c. Head of contracting activity non-availability determinations are obtained prior to procuring TAA-noncompliant products; and

- d. Information technology equipment is being updated in a timely manner to reduce the risk of overlooking identified vulnerabilities.
- 4. Take appropriate action against the Office of GSA Information Technology and GSA IDT personnel to address the misleading information provided to the contracting officer for the purchase of TAA-noncompliant cameras.

The GSA Administrator agreed with our recommendations, except for Recommendation 2, with which she partially agreed. In her comments, she stated she is confident that GSA's current security protocols are sufficient to secure the TAA-noncompliant cameras. The GSA Administrator said those security protocols included already discontinuing the use of some TAA-noncompliant cameras that do not meet GSA's standards. However, due to security and procurement concerns, we reaffirm our recommendation that GSA should return or dispose of these TAA-noncompliant cameras. GSA's written comments did not affect our findings and recommendations, and are included in their entirety in *Appendix B.*

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Introduction

We performed an audit of GSA's purchase and use of videoconference cameras that were not compliant with the Trade Agreements Act of 1979 (TAA).

Purpose

We initiated this audit in August 2022 based on information provided to our office from a GSA employee who was concerned about GSA's purchase and use of Chinese-manufactured videoconference cameras.

Objective

Our audit objective was to determine whether GSA's purchase and use of these Chinesemanufactured videoconference cameras were in accordance with federal laws, regulations, and internal guidance.

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

Background

GSA Office of Digital Infrastructure Technologies (IDT), a component of the Office of GSA Information Technology (GSA IT), requested the purchase of videoconference cameras specifically made by Company A.¹ This purchase was requested as part of an agile pilot project through a task order managed by the GSA Federal Acquisition Service's Federal Systems Integration and Management Center (FEDSIM).² FEDSIM provides assisted acquisition services for federal agencies, which include acquisition, financial, and project management services. A FEDSIM contracting officer used the Digital Innovation for General Services Administration Infrastructure Technologies (DIGIT) task order to purchase 150 Chinese-manufactured cameras, made by Company A, in two separate procurements for the agile pilot project. The FEDSIM contracting officer purchased 70 of the TAA-noncompliant cameras in March 2022, followed by an additional purchase of 80 TAA-noncompliant cameras in October 2022.

Applicable Laws, Regulations, and Internal Guidance

The Trade Agreements Act of 1979, 19 U.S.C. Chapter 13, was enacted on July 26, 1979, to foster fair and open international trade. This act requires the federal government to only

¹ Company A is headquartered in the United States, but its videoconference cameras, which GSA purchased, were manufactured in China. In an effort to not name this company in the audit report, it is referenced throughout the report as Company A.

² The agile pilot project was initiated because a significant portion of GSA's conference room equipment was outdated.

purchase goods that are manufactured in the United States or a TAA-designated country, with limited exceptions. Examples of countries that are not TAA-designated are China, India, Iran, Iraq, and Russia. The videoconference cameras GSA purchased were manufactured in China; therefore, they are TAA-noncompliant.

GSA must adhere to the Federal Acquisition Regulation (FAR) when conducting procurements. FAR 25.402(b), *General*, states that the value of an acquisition is a determining factor in the applicability of TAA. TAA applies to GSA's purchases of these cameras because the potential value of the acquisition exceeds the \$183,000 threshold established in FAR 25.402(b).

According to FAR 52.225-6(c), *Trade Agreements Certificate*, the government will only consider "U.S.-made or designated country end products unless the Contracting Officer determines that there are no offers for such products or that the offers for those products are insufficient to fulfill the requirements of [the] solicitation." FAR 25.502(b)(3), *Application*, adds additional provisions, specifying that if there were no offers of U.S.-made or designated country end products, then the agency must make a non-availability determination. FAR 25.103(b)(2), *Individual Determinations*, takes it one step further, naming the head of contracting activity as the person who should make the non-availability determination.

Security Vulnerabilities

In June 2022, a private information technology (IT) security company publicly issued a report that identified five security vulnerabilities with the TAA-noncompliant camera purchased by FEDSIM. This IT security company summarized the vulnerabilities by stating that the cameras "can be turned into rogue wireless network gateways" that can be abused to act as a backdoor to the owner's network.

In response to the IT security company's report, Company A released software updates to address the identified vulnerabilities. These updates are typically pushed out to the cameras if they are consistently connected to the internet. However, if the camera is not connected to the internet, it must be updated manually using a smartphone-compatible application and Bluetooth. In our discussion with a Company A official, they mentioned that the cameras would still work if they had not been updated but would remain susceptible to the security vulnerabilities. To mitigate this, Company A recommended that the cameras remain connected to the internet so they can be updated consistently.

The U.S. Department of Homeland Security's Cybersecurity and Infrastructure Security Agency (CISA) is the operational lead for federal cybersecurity and the national coordinator for critical infrastructure security and resilience. CISA issued a public alert in June 2022 encouraging users and administrators to update the TAA-noncompliant cameras FEDSIM purchased because the vulnerability could be exploited to obtain sensitive information.

Results

GSA IDT employees misled a contracting officer with egregiously flawed information to acquire 150 Chinese-made, TAA-noncompliant videoconference cameras. Before completing the purchase, the contracting officer requested information from GSA IDT to justify its request for the TAA-noncompliant cameras, including the existence of TAA-compliant alternatives and the reason for needing this specific brand. In response, GSA IDT provided misleading market research in support of the TAA-noncompliant cameras and failed to disclose that comparable TAA-compliant alternatives were available.

The TAA-noncompliant cameras have known security vulnerabilities that need to be addressed with a software update. However, GSA records indicate that some of these TAA-noncompliant cameras have not been updated and remain susceptible to these security vulnerabilities.

Finding 1 – GSA IDT employees misled a contracting officer with egregiously flawed information to acquire 150 Chinese-made, TAA-noncompliant videoconference cameras.

GSA IDT requested that FEDSIM purchase cameras specifically made by Company A. Before the FEDSIM contracting officer completed the purchase, she required market research that justified why Company A's camera was the only option to meet GSA IDT's requirements. In response, GSA IDT provided the contracting officer with inaccurate and incomplete market research to support the procurement of the TAA-noncompliant cameras. GSA's purchase of these cameras is in violation of the FAR because similar TAA-compliant alternatives that met GSA IDT's requirements were available at the time of procurement.

GSA Purchased TAA-Noncompliant Cameras Although Compliant Alternatives Were Available

In March 2022, GSA IDT requested the purchase of 70 TAA-noncompliant cameras using the FEDSIM-managed DIGIT task order. The FEDSIM contracting officer did not receive a FAR 25.103(b)(2)-required non-availability determination from the head of contracting authority before approving the purchase. Instead, the FEDSIM contracting officer requested additional information to support the purchase of the TAA-noncompliant cameras to make her own determination.

GSA IDT responded to the contracting officer's request by providing inaccurate, incomplete, and misleading market research that favored the TAA-noncompliant camera over similar TAA-compliant alternatives. The market research supported purchasing the TAA-noncompliant camera, stating that there was no comparable product that complied with the TAA. However, there was at least one similar camera, previously evaluated by GSA IDT, that was TAA-compliant and available to purchase from Company B.³ Despite GSA IDT's knowledge and evaluation of

³ Company B has headquarters in the United States and manufactures products in a wide range of countries, including Taiwan, where the TAA-compliant cameras are made.

this TAA-compliant product, the market research provided to the contracting officer did not include information on this alternative.

In a March 2022 memorandum, the GSA Chief Information Officer (GSA CIO) concurred with the purchase of the TAA-noncompliant cameras despite the contracting officer's acknowledgement that this purchase conflicts with Executive Order 14005.⁴ A statement in the signed memorandum reads:

Concurrence signature represents agreement that the ... products are of best value while understanding that the products run afoul of the spirit of the President's Executive Order 14005. Per the market research conducted by GSA IDT, there are no available comparable products that are compliant.

After receiving the misleading market research and the concurrence from the GSA CIO, the contracting officer approved the purchase of 70 TAA-noncompliant cameras.

In October 2022, FEDSIM purchased an additional 80 TAA-noncompliant cameras from Company A under the same DIGIT task order, as requested by GSA IDT. After GSA IDT provided updated market research and an additional concurrence memorandum signed by the GSA CIO, the purchase was approved by the same FEDSIM contracting officer who approved the March 2022 procurement. The second purchase occurred during this audit, despite GSA IT and FEDSIM personnel's knowledge that we were determining whether the March 2022 purchase was in accordance with federal laws, regulations, and internal guidance.

This updated market research, as detailed in the next section, was also misleading and heavily favored the TAA-noncompliant camera. The misleading research is especially concerning because at the time of the second purchase, there were three TAA-compliant cameras available for purchase from Company B. GSA IDT informed us that two of the three TAA-compliant cameras had been previously evaluated as part of the agile pilot project. When we interviewed GSA IDT officials about the flawed market research for both purchases, they told us that even though the TAA-compliant and TAA-noncompliant cameras are similar, the users preferred the noncompliant camera because of where it was able to sit on the table during a meeting. The placement of the camera was not documented as a procurement requirement, nor was it made clear to us why that feature would justify purchasing TAA-noncompliant cameras.

⁴ On January 25, 2021, President Biden issued Executive Order 14005, *Executive Order on Ensuring the Future Is Made in All of America by All of America's Workers*. This executive order promoted the enforcement of the Buy American Act, stating that "the U.S. government should, whenever possible, purchase goods, products, materials, and services from sources that will help American businesses compete in strategic industries and help America's workers thrive."

Market Research Contained Inaccurate and Misleading Statements

The market research for both purchases of TAA-noncompliant cameras contained several inaccurate and misleading statements. These inaccurate and misleading statements are summarized below, including descriptions of incomplete tables, misleading statements, and false claims about the limitations of the alternative TAA-compliant cameras:

- GSA IDT claimed that there was no data transmission or storage while using the TAAnoncompliant cameras. This is not true. These cameras have both Bluetooth and Wi-Fi antennas that transmit data, as well as some storage capacity.
- GSA IDT claimed that there were no TAA-compliant cameras that met the technical specifications to fulfill the procurement requirements. This is not true. As stated above, we found that there was at least one TAA-compliant camera that met the technical requirements at the time of the March 2022 purchase and at least two additional (three total) TAA-compliant cameras that met the technical requirements at the time of the October 2022 purchase. GSA IDT was aware of, and had evaluated, two of these TAA-compliant cameras.
- GSA IDT claimed that one of the TAA-compliant alternatives cannot be easily relocated and must be permanently mounted. This is not true. The TAA-compliant alternative camera is of a similar size, weighs less than the TAA-noncompliant camera, and does not need to be permanently mounted. When we asked GSA IDT officials about this, they agreed that the TAA-compliant alternatives do not need to be mounted but are required to sit at one end of the room instead of the middle of a table.
- GSA IDT included a table comparing cameras to the procurement requirements. This table indicated whether the cameras did or did not meet each requirement. However, for both the March and October 2022 purchases, GSA IDT only fully completed this table for the TAA-noncompliant camera it wanted to buy. It did not complete the table for the alternative cameras, leaving the contracting officer with an incomplete picture of the capabilities of the alternative cameras. When we asked GSA IDT officials about this, they stated they skipped parts of the table because they viewed the alternatives as TAA-noncompliant and "people preferred the portability of the [Company A cameras]." This indicated to us that alternative cameras, TAA-compliant or not, were never seriously considered during the procurement process.

When we presented these inaccuracies and misleading statements to the FEDSIM contracting officer, she stated that it appears she relied on "egregiously flawed information" from GSA IDT to make her determination in favor of purchasing TAA-noncompliant products. She also shared other factors that led to her decision to make the purchases. She confirmed that purchasing the TAA-noncompliant cameras as part of a pilot, as opposed to a final Agency-wide selection, was important to her decision to allow the purchase of TAA-noncompliant cameras. She stated that the GSA CIO's concurrence signature supported her decision to purchase the TAA-noncompliant

cameras. However, she concluded that if she had been provided accurate market research, including information about the existence of TAA-compliant products that met the requirements, then the FAR would have required her to only consider the TAA-compliant cameras for purchase.

When we discussed these purchases with the GSA CIO and asked him specifically about his concurrence signatures, he said that although it was not normal for him to be involved at this level of the purchases, he had signed the memorandum because he trusted that his team had done its research. When we asked about his knowledge of the market research, the GSA CIO said that he did not review it, but he believed his team when they said there were no TAA-compliant cameras that met the Agency's requirements.

As a result of the inaccurate and misleading statements provided by GSA IDT, GSA purchased the TAA-noncompliant videoconference cameras and violated the TAA. In addition, GSA violated the FAR by procuring TAA-noncompliant products when compliant products were available. FAR 52.225-6(c) requires agencies to only consider TAA-compliant products unless none are available. However, GSA purchased the TAA-noncompliant videoconference cameras although TAA-compliant products were available and, as a result, GSA violated FAR 52.225-6(c).

Finding 2 – The TAA-noncompliant cameras have known security vulnerabilities that need to be addressed with a software update. However, a substantial number of these cameras were not updated and remained susceptible to these security vulnerabilities.

GSA IDT records from October 2022 show that there were 152 TAA-noncompliant cameras registered to individuals with GSA.gov email addresses. At that time, FEDSIM had purchased 70 of these cameras under the agile pilot project; the remaining 82 were purchased independent from the pilot. We determined that the 82 TAA-noncompliant cameras that were not purchased under the pilot were bought with government purchase cards and possibly used the GSA Multiple Award Schedule.⁵ Regardless of how they were purchased, the TAA-noncompliant videoconference cameras were used in GSA conference rooms throughout the country. Many were registered to GSA personnel and were not updated consistently, leaving the cameras susceptible to security vulnerabilities.⁶ GSA IT was not adequately monitoring software updates for the TAA-noncompliant cameras; in fact, GSA IT informed us that it placed restrictions on the use of GSA's network with these cameras, making it more difficult to keep the cameras adequately updated. Nevertheless, a significant number of the TAA-noncompliant cameras were not updated and remained vulnerable.

⁵ In addition to the DIGIT task order, the TAA-noncompliant camera was also offered on the GSA Multiple Award Schedule, incorrectly listing country of origin of Taiwan, which is a TAA-compliant country. During this audit, the audit team notified the Multiple Award Schedule contracting officer that the country of origin was actually China. The contracting officer requested the camera be removed on October 11, 2022.

⁶ The TAA-noncompliant cameras require an internet connection and email address during the initial setup. Data provided by GSA IT shows which email address was used during the initial setup.

As mentioned in the *Background*, In June 2022, a private IT security company publicly issued a report that identified five security vulnerabilities with the TAA-noncompliant camera purchased by GSA. These vulnerabilities were recognized by CISA and Company A, which led to the release of software updates addressing the identified vulnerabilities. Since GSA IT informed us that it has restricted the cameras from being connected to its network, the cameras need to be manually updated.

Of the 152 TAA-noncompliant cameras registered to GSA email addresses in October 2022, 79 (52 percent) had not been updated with the most recent September 2022 software version releases. Additionally, 54 of the 152 cameras (36 percent) had not been updated to the June and July 2022 software versions that addressed the prior security vulnerabilities.

A representative of Company A confirmed to us that the TAA-noncompliant cameras will still work if they have not been updated but will remain susceptible to the security vulnerabilities. To mitigate this, Company A recommended that the cameras remain connected to the internet so they can be updated consistently. However, GSA IT's restrictions on these cameras connecting to GSA's network make it impossible for GSA to follow Company A's recommendation. Based on the data provided by GSA IDT and the restriction to connect the cameras to GSA's network, the TAA-noncompliant cameras improperly purchased by GSA would remain vulnerable to identified security weaknesses.

After issuing a draft version of this report to GSA, we received updated camera software data. As of September 18, 2023, there were 210 active TAA-noncompliant cameras registered to GSA email addresses. Of the 210 cameras, 37 (18 percent) had not been updated with the most recent September 2022 security-related software version—released nearly 1 year prior. Additionally, 29 of the 210 cameras (14 percent) had not been updated to the June and July 2022 software versions that addressed the prior security vulnerabilities.

In sum, after we made GSA IDT aware of the vulnerable cameras, many of those cameras were updated, including all active agile pilot videoconference cameras. However, a significant number of cameras registered to GSA email addresses are still not properly updated and remain susceptible to known security vulnerabilities.

Conclusion

GSA IDT employees misled a contracting officer with egregiously flawed information to acquire 150 Chinese-made, TAA-noncompliant videoconference cameras. Before completing the purchase, the contracting officer requested information from GSA IDT to justify its request for the TAA-noncompliant cameras, including the existence of TAA-compliant alternatives and the reason for needing this specific brand. In response, GSA IDT provided misleading market research in support of the TAA-noncompliant cameras and failed to disclose that comparable TAA-compliant alternatives were available.

The TAA-noncompliant cameras have known security vulnerabilities that need to be addressed with a software update. However, GSA records indicate that some of these TAA-noncompliant cameras have not been updated and remain susceptible to these security vulnerabilities.

GSA should ensure that it complies with all federal TAA guidance and strengthen controls for future procurements. GSA should also take action to address the previously purchased TAA-noncompliant videoconference cameras and those personnel who provided the misleading market research.

Recommendations

We recommend that the GSA Administrator:

- 1. Ensure that GSA no longer purchases TAA-noncompliant cameras if there are TAAcompliant cameras that meet the Agency's requirements.
- 2. Return, or otherwise dispose of, previously purchased TAA-noncompliant cameras.
- 3. Strengthen controls to ensure that:
 - a. TAA-compliant products are prioritized during future procurements;
 - b. TAA contracting officer determinations are adequately reviewed prior to approval, including any comparisons or market research performed;
 - c. Head of contracting activity non-availability determinations are obtained prior to procuring TAA-noncompliant products; and
 - d. IT equipment is being updated in a timely manner to reduce the risk of overlooking identified vulnerabilities.
- 4. Take appropriate action against GSA IT and GSA IDT personnel to address the misleading information provided to the contracting officer for the purchase of TAA-noncompliant cameras.

GSA Comments

The GSA Administrator agreed with our recommendations, except for Recommendation 2, with which she partially agreed. In her comments, she stated she is confident that GSA's current security protocols are sufficient to secure the TAA-noncompliant cameras. The GSA

Administrator said those security protocols included already discontinuing use of some TAAnoncompliant cameras that do not meet GSA's standards. However, due to security and procurement concerns, we reaffirm our recommendation that GSA should return or dispose of these TAA-noncompliant cameras. GSA's written comments did not affect our findings and recommendations, and are included in their entirety in *Appendix B*.

Audit Team

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

Michelle Westrup Daniel Riggs Andrew Kehoe Regional Inspector General for Auditing Audit Manager Auditor-In-Charge

Appendix A – Objective, Scope, and Methodology

Objective

In 2022, our office was contacted by a GSA employee who was concerned about GSA's purchase and use of Chinese-manufactured videoconference cameras. Since these cameras were manufactured in China, they were not compliant with the TAA. Our audit objective was to determine whether GSA's purchase and use of these Chinese-manufactured videoconference cameras were in accordance with federal laws, regulations, and internal guidance.

Scope and Methodology

This audit assessed GSA's purchase and use of TAA-noncompliant videoconference cameras within GSA-managed facilities. Our audit scope focused on two FEDSIM purchases made in March and October 2022 under the FEDSIM-managed DIGIT Task Order 47QFCA21F0014, for a total of 150 videoconference cameras.

To accomplish our objective, we:

- Reviewed laws, regulations, and guidance related to TAA compliance;
- Reviewed correspondence and task order file documentation, including procurement justifications;
- Analyzed prior GSA Office of Inspector General audit work that was significant to the audit objective;
- Analyzed equipment inventory provided by GSA IDT in October 2022, January 2023, and September 2023 listing device names, locations, software version, and registration information (*Note: The equipment inventory included additional cameras that were not purchased using the DIGIT task order.*);
- Conducted market research;
- Corresponded with videoconference camera companies and CISA;
- Reviewed GSA-collected survey responses related to the agile pilot project; and
- Interviewed GSA IT and FEDSIM personnel.

Data Reliability

We assessed the reliability of GSA IDT-provided equipment inventory data by interviewing system owners and confirming details of the data with Company A. We determined that the data was sufficiently reliable for the purposes of this audit.

Sampling

During fieldwork, we selected a judgmental sample of TAA-noncompliant cameras within GSAmanaged facilities. Of the 152 TAA-noncompliant cameras shown in the October 2022 GSA IDT- provided equipment inventory data, we selected 10 cameras that were identified as not being purchased through GSA IDT's agile pilot project. After selecting the sample, we sent a list of questions to the email addresses that were provided for the cameras during registration. The questions were related to purchase method, use patterns, and overall knowledge of the cameras.

While our judgmental sample does not allow for projection to the population, it did allow us to adequately 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 August 2022 and May 2023 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 conclusions based on our audit objective.

Appendix B – GSA Comments

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December 22, 2023	December 22, 2023				
MEMORANDUM FOR:	Michelle Westrup Regional Inspector General for Auditing				
FROM:	David Shive David Sluve Chief Information Officer Office of the Chief Information Officer (I)				
	Sonny Hashmi Sonny Hashmi Commissioner				
	Federal Acquisition Service (Q)				
	Jeffrey Koses Juffrug II. Lesus Senior Procurement Executive Office of Government-wide Policy (MV)				
SUBJECT:	Response to Draft Report GSA Purchased Chinese-Manufactured Video Conference Cameras and Justified It Using Misleading Market Research Report Number A220070-2				
Chinese-Manufactured V	Thank you for the opportunity to comment on the referenced draft report GSA Purchased Chinese-Manufactured Video Conference Cameras and Justified It Using Misleading Market Research, Report Number A220070-2, dated December 1, 2023.				
The General Services Ac below.	The General Services Administration (GSA) provides its response to the recommendations below.				
OIG Recommendation	OIG Recommendation 001				
	We recommend ensuring that GSA no longer purchases TAA-non compliant cameras if there are TAA-compliant cameras that meet the Agency's requirements				
Management Response: GSA concurs with recommendation 001 and will establish a corrective action to ensure GSA does not purchase TAA-non compliant cameras if there are TAA-compliant cameras that meet the Agency's requirements.					
OIG Recommendation	OIG Recommendation 002				
	U.S. General Services Administration 1800 F Street NW Washington, DC 20405				

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We recommend that the GSA Administrator return, or otherwise dispose of, previously purchased TAA-non compliant cameras.

Management Response: We partially concur with this recommendation. GSA is confident that the use of the detailed video conference cameras are secure under our current security protocols. Part of this protocol includes having already discontinued use of a subset of these cameras that do not meet our standards. GSA is committed to ensuring the security of our technology environment, as well as prudently utilizing taxpayer money.

OIG Recommendation 003A

We recommend that the GSA Administrator strengthen controls to ensure that TAAcompliant products are prioritized during future procurements.

Management Response: GSA concurs. GSA is committed to complying with all acquisition statutes including the Trade Agreements Act.

OIG Recommendation 003B

OIG recommends that the GSA Administrator strengthen controls to ensure that TAA contracting officer determinations are adequately reviewed prior to approval, including any comparisons or market research performed.

Management Response: GSA concurs with recommendation 003B.

OIG Recommendation 003C

We recommend that the GSA Administrator strengthen controls to ensure that head of contracting activity non-availability determinations are obtained prior to procuring TAA-non compliant products

Management Response: GSA concurs with recommendation 003C

OIG Recommendation 003D

We recommend that the GSA Administrator strengthen controls to ensure that IT equipment is being updated in a timely manner, to reduce the risk of overlooking identified vulnerabilities.

Management Response: GSA concurs with the recommendation and is instituting a process to ensure timely remediation.

OIG Recommendation 004

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We recommend that the GSA Administrator take appropriate action against GSA IT and GSA IDT personnel to address the misleading information provided to the contracting officer for the purchase of TAA-non compliant cameras.

Management Response: GSA concurs with the recommendation. We appreciate the OIG's review, and acknowledge the inconsistent documentation of customer requirements and market research. We are committed to taking appropriate action to address this issue.

Thank you for the opportunity to review this draft report. GSA concurs or partially concurs with these recommendation(s). Upon issuance of the final audit report, GSA will establish a Corrective Action Plan which will outline the specific actions to be taken in support of the implementation as well as the estimated dates for completion of those actions. If you have any questions regarding acquisition and legal related aspects of this response, please contact Chiara McDowell, Chief of Staff, GSA Assisted Acquisition Services Defense at chiara.mcdowell@gsa.gov or 703-589-3211. Any questions relating to GSA IT should be directed to Mick Harris, GSA IT audit liaison, at michael.harris@gsa.gov or 703-605-9376.

Appendix C – Report Distribution

GSA Administrator (A)

GSA Deputy Administrator (AD)

FAS Acting Commissioner (Q)

FAS Deputy Commissioner TTS (Q2)

FAS Chief of Staff (Q0A)

GSA Chief Information Officer (I)

GSA Acting Deputy Chief Information Officer (ID)

GSA IT Chief of Staff (I)

Chief Financial Officer (B)

Office of Audit Management and Accountability (BA)

Assistant Inspector General for Auditing (JA)

Deputy Assistant Inspector General for Acquisition Audits (JA)

Deputy Assistant Inspector General for Real Property Audits (JA)

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