



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

Audit of Roof Fall Protection and Safety in GSA-Owned Buildings

Report Number A240041/P/9/R25004
August 14, 2025

Executive Summary

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Why We Performed This Audit

We performed this audit to determine if the Public Buildings Service's (PBS's) policies and procedures are effective in protecting GSA employees and contractors from roof fall hazards. This audit was included in the GSA Office of Inspector General's *Fiscal Year 2024 Audit Plan* based on roof safety deficiencies in GSA-owned buildings that were either identified in prior audit reports or alleged in a December 2022 hotline complaint.

Our audit objective was to determine if PBS's operations and oversight of operations and maintenance (O&M) contractor performance adequately comply with Occupational Safety and Health Administration (OSHA) and GSA requirements to protect GSA employees and contractors from roof fall hazards.

What We Found

PBS is not consistently complying with OSHA and GSA requirements to protect GSA employees and contractors from roof fall hazards. We found that PBS is not providing adequate oversight of O&M contractors' safety plans, lacks sufficient fall protection systems and protective equipment, and is not ensuring PBS facility managers receive safety training. As a result, PBS is not ensuring that its employees and contractors comply with fall protection requirements.

We also found that PBS risk management surveys are not effectively identifying and resolving roof fall hazards in a timely manner. Additionally, PBS did not conduct the roof fall protection assessments for roof replacement projects required by GSA's P100, *Facilities Standards for the Public Buildings Service*, and did not always post appropriate signage at its buildings to warn GSA employees, contractors, and tenants of roof fall hazards. Taken together, these deficiencies increase the risk of fall-related injury or death.

What We Recommend

We recommend that the Acting GSA Administrator:

1. For buildings where GSA employees access the roof, include a requirement to perform roof inspections during annual Occupational Safety and Health surveys conducted in accordance with GSA Order 5940.2, *General Services Administration Occupational Safety and Health Program*.

We recommend that the PBS Commissioner:

2. Improve oversight of O&M contractors to ensure they develop and use safety and health plans that comply with the National O&M Specification and National Consolidated Maintenance Specification contract templates.
3. Provide training to PBS contracting officer's representatives and regional safety offices on their roles and responsibilities for accepting, reviewing, and approving compliant safety and health plans.
4. Provide fall protection training to PBS facility managers that addresses roof fall hazards and fall protection requirements issued by OSHA and GSA.
5. Resolve identified roof fall hazards in a timely manner by installing necessary OSHA-compliant fall protection on roofs with equipment located near unprotected roof edges. If no funding is available to do so, implement interim controls to protect against fall hazards and monitor the performance of those controls to ensure they remain effective.
6. Require contractors to use OSHA-compliant fall protection.
7. Implement a consistent process for ensuring facility managers are aware of all open risk conditions in the Inventory Reporting Information System, address open risk conditions in a timely manner, and periodically review open risk conditions until they are abated.
8. Improve risk management surveys to ensure survey inspectors identify and record all applicable roof fall hazards under OSHA 1910.28, *Duty to have fall protection and falling object protection*, consistently.
9. Review all ongoing and future roof replacement projects to ensure they comply with P100 roof replacement requirements for a review of existing fall protection by a qualified consultant; and, if the fall protection is deemed inadequate, design and install OSHA-compliant fall protection.
10. Post appropriate signage at all roof access points to warn employees, contractors, and tenants of roof fall hazards.

The PBS Commissioner agreed with our recommendations.

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Introduction

We performed this audit to determine if the Public Buildings Service's (PBS's) policies and procedures are effective in protecting GSA employees and contractors from roof fall hazards.

Purpose

This audit was included in the GSA Office of Inspector General's *Fiscal Year 2024 Audit Plan* based on roof safety deficiencies in GSA-owned buildings that were either identified in prior audit reports or alleged in a December 2022 hotline complaint.

Objective

Our audit objective was to determine if PBS's operations and oversight of operations and maintenance (O&M) contractor performance adequately comply with Occupational Safety and Health Administration (OSHA) and GSA requirements to protect GSA employees and contractors from roof fall hazards.

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

Background

PBS is the landlord of the civilian federal government. PBS is responsible for operating and maintaining GSA-owned space to: (1) provide a safe and healthy environment for federal employees and the visiting public and (2) act promptly and appropriately in response to risks.¹ GSA is also responsible for protecting its employees and contractors from workplace hazards, including roof fall hazards they encounter when working on or visiting the roofs of any GSA-owned buildings.

OSHA has determined that falls are the leading cause of fatal workplace injuries. Based on historical U.S. Bureau of Labor Statistics data and OSHA enforcement history, 13 percent of fatal workplace injuries in 2021 were caused by falls from elevations. GSA employees and contractors are at risk of these preventable fatalities as they visit or work on the roofs of the more than 1,600 buildings that GSA owns.

OSHA Standard 1910.28(a)(1), *Duty to have fall protection and falling object protection*, requires fall protection for employees on an unprotected roof edge higher than 4 feet above the lower level. Guardrails, parapets, safety nets, and personal fall arrest systems (e.g., harnesses and anchors) are examples of OSHA-compliant fall protection. GSA, PBS, and O&M contractors that require their employees to work on roofs are responsible for complying with OSHA's fall protection requirements.

¹ 41 C.F.R. 102, *Federal Management Regulation*.

Roof Safety Roles and Responsibilities in GSA-Owned Buildings

General Services Administration. GSA Order ADM 5940.2, *General Services Administration Occupational Safety and Health Program*, (GSA Order 5940.2) states that GSA's Office of Administrative Services is responsible for the occupational safety and health of the GSA workforce. The Office of Administrative Services is responsible for managing and overseeing the GSA Occupational Safety and Health (GSA OSH) program in accordance with OSHA standards.

The GSA OSH program requires safety training for GSA employees exposed to roof fall hazards; annual safety surveys of GSA workplaces, including roofs; and abatement of identified safety conditions. According to the GSA OSH program manager, the program relies on regional PBS environmental, health, and safety offices (regional safety offices) to perform these inspections and to record safety conditions in PBS's Inventory Reporting Information System (IRIS).

Public Buildings Service. According to GSA Order PBS 5940.3, *PBS Safety and Health Management*, PBS is responsible for implementing and managing safety and health programs to protect all occupants of GSA-owned buildings. Regional safety offices are responsible for executing each region's safety and health program and providing support to field offices. In addition, regional safety offices are responsible for conducting surveys of all GSA-owned buildings at least every 5 years and reviewing O&M contractor safety and health plans. PBS facility managers are responsible for touring GSA-owned buildings to observe safety conditions and hazards and are responsible for resolving identified safety conditions.

The PBS contracting officer's representative (COR) is responsible for ensuring O&M contractors comply with fall protection requirements in their O&M contracts, including developing safety and health plans, using fall protection equipment, and training workers on fall protection.

O&M contractors. O&M contractors perform necessary repairs and preventive maintenance of equipment to assist PBS in operating and maintaining its GSA-owned buildings. PBS awards contracts for O&M services using either its National O&M Specification or National Consolidated Maintenance Specification contract template. O&M contracts require the contract holder to:

- Perform repairs and preventive maintenance of equipment on a roof;
- Provide OSHA-compliant fall protection equipment and fall protection training for employees working on roofs; and
- Submit site-specific safety and health plans that include fall protection procedures for the building to PBS for review and approval within 30 days of contract award.

Office of Inspector General Reports

We have previously identified roof fall hazards at GSA-owned buildings. We issued the following memorandums and an audit report to bring those deficiencies to PBS's attention:

- On August 29, 2024, we issued a memorandum, *Assessment of a Hotline Complaint: GSA's Public Buildings Service Faces a Significant Backlog of Open Occupational Safety and Health, and Fire Risk Conditions*.² We found nearly 36,000 actionable, open risk conditions nationwide. Roof fall hazards accounted for 116 of the open risk conditions.
- On October 27, 2020, we issued a memorandum, *Alert Memorandum: Building Safety Concerns in PBS's Federal Aggregated Solar Procurement Pilot Contracts in Region 9*.³ We identified the following significant roof fall hazards:
 - The Leo J. Ryan Federal Records Center building in San Bruno, California, had 52 lightning rods placed on the roof, with some having no barriers or caps to reduce the risk of impalement.
 - The U.S. Geological Survey Campus in Menlo Park, California, had no parapet or perimeter railing to protect against falls. Furthermore, there were no warning lines or other markings on the unprotected sides of the roof to alert personnel that they were near the edge of the roof while maintaining the building's solar panels.
- On July 23, 2020, we issued an audit report, *Audit of the Public Buildings Service's Green Roof Maintenance and Safety Practices*.⁴ We found that half of the green roofs we tested lacked safeguards to protect O&M contractors and GSA employees from roof fall hazards.

² Memorandum Number A230075.

³ Memorandum Number A201020-2.

⁴ Report Number A180085/P/4/R20008.

Results

PBS is not consistently complying with OSHA and GSA requirements to protect GSA employees and contractors from roof fall hazards. We found that PBS is not providing adequate oversight of O&M contractors' safety plans, lacks sufficient fall protection systems and protective equipment, and is not ensuring PBS facility managers receive safety training. As a result, PBS is not ensuring that its employees and contractors comply with fall protection requirements.

We also found that PBS risk management surveys are not effectively identifying and resolving roof fall hazards in a timely manner. Additionally, PBS did not conduct the roof fall protection assessments for roof replacement projects required by GSA's P100, *Facilities Standards for the Public Buildings Service*, and did not always post appropriate signage at its buildings to warn GSA employees, contractors, and tenants of roof fall hazards. Taken together, these deficiencies increase the risk of fall-related injury or death.

Finding 1 – PBS is not providing adequate contract oversight of O&M contractors' safety plans, lacks sufficient fall protection systems and protective equipment, and is not ensuring PBS facility managers receive safety training.

OSHA and GSA requirements are designed to protect employees and contractors working on roofs from injury or death due to roof fall hazards. However, PBS is not consistently complying with these requirements because it is not providing adequate oversight of O&M contractors' safety plans, lacks sufficient fall protection systems and protective equipment, and is not ensuring facility managers receive safety training. These deficiencies increase the risk of fall-related injury or death and, in some cases, have prevented O&M contractors from maintaining critical building equipment.

Inadequate Oversight of O&M Contractors' Safety Plans

PBS is not providing adequate oversight to ensure that O&M contractors' safety plans meet fall safety requirements. O&M contract terms require contractors to have a site-specific safety and health plan that identifies: (1) roof fall hazards at each building and (2) the O&M contractor's plan for using OSHA-compliant fall protection when working at unprotected roof edges. Regional safety offices are required to review and approve the safety and health plan before the O&M contractor begins work. However, we found that PBS CORs accepted inadequate safety and health plans from O&M contractors without review and approval from regional safety offices.

PBS awards contracts for O&M services using either its National O&M Specification or National Consolidated Maintenance Specification contract template. All PBS O&M contracts for our sampled buildings included the template clause requiring contractors to develop a site-specific safety and health plan that identifies: (1) roof fall hazards at each building and (2) site-specific

fall protection procedures for work on roofs, equipment, and other elevated areas.⁵ This plan must be designed to comply with 29 C.F.R. 1910, *Occupational Safety and Health Standards*. In addition, the *PBS Desk Guide for Safety & Health Management* (PBS Safety and Health Desk Guide), which accompanies GSA Order PBS 5940.3, requires O&M contractors to provide a written plan for performing work at elevated roof edges. In accordance with the PBS Safety and Health Desk Guide, regional PBS safety office personnel must review and approve this plan prior to the start of work.

We requested safety and health plans covering the O&M contracts at 43 GSA-owned buildings.⁶ PBS provided safety and health plans covering 40 buildings; however, it was unable to provide a plan covering the remaining 3 buildings. For these 40 buildings, only 3 (8 percent) had safety and health plans that described the site-specific work required under the fall protection contract clause. Although accepted by the CORs, the safety and health plans for the remaining 37 buildings only included general fall protection information that did not identify site-specific roof fall hazards.

Furthermore, none of the safety and health plans for these 37 buildings were approved by their regional safety offices prior to the start of work. This occurred because: (1) the CORs did not submit the plans to their regional safety offices for review or (2) the regional safety offices were unaware of their responsibility to review and approve these plans.

We asked regional safety office staff in the four GSA regions we visited if they review O&M contractors' safety and health plans. We received the following responses:

- Southeast Sunbelt Region (GSA Region 4) only reviews the plans if requested by the PBS COR;
- Rocky Mountain Region (GSA Region 8) was not aware of the PBS Safety and Health Desk Guide's requirement to review and approve the plans;
- Pacific Rim Region (GSA Region 9) only reviews the plans if requested by the PBS COR. GSA Region 9 also incorrectly noted that it is not a requirement for the COR to submit the plans to the regional safety office for review prior to the start of work; and
- National Capital Region (GSA Region 11) did not receive any plans for review.

PBS's lack of oversight of O&M contractors' safety and health plans increases the potential risk of fall-related injury or death.

⁵ Clause C.5.4.2, *Workplace Safety and Health Program*.

⁶ We sampled 48 buildings; however, PBS delegated the operation and maintenance of 5 buildings to tenant agencies. Although PBS is responsible for surveying delegated buildings and performing roof repairs and alterations, tenant agencies awarded and administer the O&M contracts; therefore, we did not request safety and health plans for these contracts.

Lack of Sufficient Fall Protection Systems and Protective Equipment

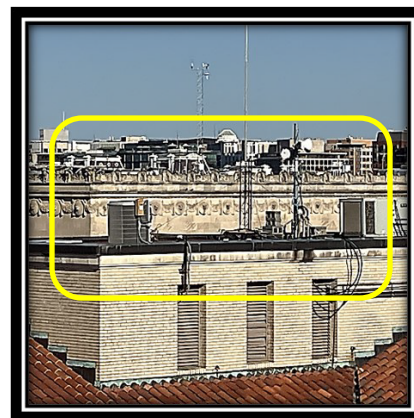
OSHA standards require the use of OSHA-compliant fall protection systems or protective equipment when work is performed on low-slope roofs within 15 feet of an unprotected edge.⁷ OSHA-compliant fall protection systems include personal fall arrest systems, such as harnesses and anchors, or travel restraint systems using rope or wire rope.⁸

However, many of the buildings we sampled were not equipped with these systems. We found that 36 of the 48 buildings in our sample had access hatches or equipment, such as drains, solar panels, or lighting, within 15 feet of an unprotected edge of low-slope roofs. Of these 36 buildings, 28 (78 percent) were not equipped with required OSHA-compliant fall protection systems or other appropriate protective equipment, such as fall arrest systems or travel restraint systems.

O&M contractors told us, and maintenance records confirmed, that they worked on equipment near unprotected roof edges at these buildings despite the lack of fall protection systems. The O&M contractors also told us they did not use fall protection when working on these roofs.

Below are three examples of GSA-owned buildings without OSHA-compliant fall protection systems or protective equipment.

Environmental Protection Agency West Building in Washington, D.C.: This building has a low-slope platform with heating, ventilation, and air conditioning equipment located at unprotected roof edges (see yellow highlighted box). O&M contractors told us that they service the heating, ventilation, and air conditioning equipment on the roof at least quarterly. Maintenance records show that O&M contractors serviced equipment on the roof at least four times during 2024.⁹



⁷ OSHA Standard 1910, *Occupational Safety and Health Standards*, requires fall protection systems or protective equipment on low-slope roofs, defined as roofs that rise less than or equal to a ratio of 4 inches for every 1 foot.

⁸ OSHA Standard 1926.502(d)(15), *Fall arrest systems criteria and practices*, requires the anchorages used for attachment of personal fall arrest equipment to support 5,000 pounds per employee attached.

⁹ Photograph taken by the audit team, September 10, 2024.

C. F. Haynesworth Federal Building and U.S. Courthouse in Greenville, South Carolina: This building has low parapets along the edge of the sloped roofs. O&M contractors must walk on the edge of the roof, next to the low parapet, to maintain security cameras and drains (see yellow highlighted box). Maintenance records show that O&M contractors serviced equipment on the roof seven times during 2024.¹⁰



Romano Mazzoli Federal Building in Louisville, Kentucky: This building has two green roofs with several centrifugal fans and air conditioning condensers along the perimeter, near unprotected roof edges. Maintenance records show that O&M contractors serviced the green roof eight times during 2024.¹¹



PBS personnel told us that OSHA-compliant fall protection could not be installed in these buildings because: (1) no funds were available or (2) the roof of a historical building could not be altered.

We recognize the challenges that PBS faces in maintaining its aging building inventory and that it must prioritize project funding accordingly. Where PBS cannot make improvements to address fall protection deficiencies, it should implement interim controls to protect against fall hazards and monitor the performance of those controls to ensure they are operating effectively. PBS should require contractors to use OSHA-compliant fall protection, such as fall arrest systems or travel restraint systems, to prevent employees from falling off unprotected roof edges.

¹⁰ Photograph taken by the audit team, August 22, 2024.

¹¹ Photograph taken by the audit team, August 20, 2024.

Facility Managers Are Not Receiving Safety Training

PBS facility managers have not taken fall protection training that would: (1) allow them to protect GSA personnel from roof fall hazards and (2) give them the technical knowledge as CORs to understand and enforce the fall protection requirements for the O&M contractors.¹²

GSA Order 5940.2 requires personnel with specific work environments to take job-specific risk training. Appendix H of the order, *Occupational Safety and Health Training*, recommends a 10-hour OSHA General Industry training, which includes a section that covers fall-related hazards. This course would meet the training requirements for those who manage or inspect facilities. Appendix H of the order recommends that this training be taken every 4 years.

We reviewed training records for the 28 facility managers responsible for the 35 non-delegated buildings with roof safety hazards and found that only 5 had taken the recommended 10-hour OSHA General Industry fall protection training.¹³ The remaining 23 facility managers did not take the recommended fall protection training or any specific roof fall-hazard training. These 23 facility managers told us they had not taken the training either because they were new to the role, or the training had not been offered to them.

Lack of Maintenance of Critical Building Equipment

The deficiencies described above can increase the risk of falls from roofs, which can lead to injury or death. Further, these deficiencies have prevented O&M contractors from maintaining critical building equipment, as shown in the examples below.

- **Building 67 of the Denver Federal Center in Lakewood, Colorado:** PBS told us that the replacement of one aircraft warning light has been deferred since 2023 because the contractor is concerned about the nearby unprotected roof edge. The building is located 0.5 miles away from a local hospital that has two helicopter landing pads. For the safety of the helicopter flights, the aircraft warning light must work properly.
- **Peachtree Summit Federal Building in Atlanta, Georgia:** In 2011, PBS installed a 2,800-square-foot green roof system at this building that cost more than \$230,000 for design and installation. However, the O&M contractor told us that maintenance of the green roof system has been deferred since 2021 because the ladder used to access the roof is in disrepair and there is no fall protection.

¹² For the buildings in our sample, the facility manager duties typically included the COR role. In some cases, when the O&M contract was not for a sole building but covered a larger area, such as statewide, PBS would assign a separate COR. The facility manager would assist the COR in monitoring O&M contractor performance.

¹³ PBS facility managers can manage multiple buildings. Our site visit to GSA Region 11 included delegated buildings managed by the tenant, not GSA. In those cases, we communicated with the tenant—not the PBS facility manager.

- **Richard B. Russell Federal Building and U.S. Courthouse in Atlanta, Georgia:** The O&M contractor has not completed annual maintenance on two air supply fans since 2022 because the roof lacks OSHA-compliant fall protection. The building operation plan from the O&M contractor states that maintaining equipment and systems in peak operating condition is critical to efficient facility operations, and that tenants are most comfortable when good air quality is maintained.

In sum, PBS is not consistently meeting OSHA and GSA requirements designed to protect against roof fall hazards. To address this deficiency, PBS should strengthen its oversight to ensure that O&M contractors develop and use safety and health plans that comply with fall protection requirements. PBS should also ensure that the regional safety office approves the safety and health plans prior to the start of work.

Additionally, PBS should install necessary OSHA-compliant fall protection on roofs with equipment located near unprotected roof edges. If no funding is available to do so, PBS should implement interim controls to protect against falls and monitor the performance of those controls to ensure they remain effective. Lastly, PBS should: (1) require that O&M contractors use OSHA-compliant fall protection, and (2) provide fall protection training to PBS facility managers.

Finding 2 – PBS risk management surveys are not effectively identifying and resolving roof fall hazards.

According to GSA policy and PBS guidance, PBS performs risk management surveys of GSA workplaces annually and performs surveys of GSA-owned buildings every 5 years. However, we found that the risk management surveys were ineffective in addressing roof fall hazards because PBS either: (1) failed to identify hazards during risk management surveys or (2) identified the hazards but did not resolve them in a timely manner. As a result, GSA employees and O&M contractors are at risk from unresolved roof fall hazards that could lead to injury or death.

PBS uses risk management surveys to identify, mitigate, and abate risk conditions. We focused on two types of risk management surveys that identified open risk conditions on the roof. The following criteria govern these risk management surveys for GSA-owned buildings:

- **OSH Survey** – OSHA Standard 1960.25(c), *Qualifications of safety and health inspectors and agency inspectors*, states that “all areas and operations of each workplace ... shall be inspected at least annually,” and “more frequent inspections shall be conducted when there is an increased risk of accident, injury, or illness due to the nature of the work performed.” GSA Order 5940.2 requires annual OSH surveys to meet the OSHA requirement. Although PBS conducts OSH surveys, GSA OSH personnel are responsible for ensuring the surveys are completed.

- **Facility Health and Safety Survey** – The PBS Safety and Health Desk Guide states that regional safety offices will conduct inspections of all GSA-owned buildings every 5 years for compliance with regulations, safety and health practices, and PBS policy.

According to OSHA Standard 1960.30(c), *Abatement of unsafe or unhealthful working conditions*, and the PBS Safety and Health Desk Guide, open risk conditions that do not comply with OSHA standards should be abated within 30 days, if possible. Otherwise, PBS is required to develop a plan to abate the safety condition and put interim controls in place to isolate the hazard until it is resolved. PBS facility managers are responsible for resolving safety conditions in their assigned buildings.

PBS Did Not Identify Roof Fall Hazards in the Inventory Reporting Information System

According to the PBS Safety and Health Desk Guide, PBS must enter conditions from each risk management survey into a PBS enterprise system to ensure that GSA employees maintain a log of unsafe conditions with the staff responsible for abating and tracking the condition. PBS uses the Inventory Reporting Information System (IRIS) to record safety conditions found during the risk management surveys. PBS regional safety office staff track safety conditions in IRIS through final abatement or closeout.

Of the 48 buildings we visited, 41 have unprotected roof edges. Furthermore, many of these buildings have access hatches, drains, and equipment located near the unprotected roof edges, which put GSA employees and O&M contractors at risk of falls when maintaining these features. However, 20 of the unprotected roof edges (49 percent) were not identified as open risk conditions in IRIS. For example, we found that roof fall hazards for the following three buildings were not identified in IRIS.

Environmental Protection Agency West Building in Washington, D.C.: We noted access hatches that were not guarded with an OSHA-standard railing and self-closing gate to prevent the risk of falling into the open hatch. The hatch opening in the photograph to the right is also located near an unprotected roof edge.¹⁴



¹⁴ Photograph taken by the audit team, September 10, 2024.

Building 20 of the Denver Federal Center in Lakewood, Colorado: We observed a solar panel array near an unprotected roof edge.¹⁵



Building 67 of the Denver Federal Center in Lakewood, Colorado: The penthouse roof of this 14-story building had aircraft warning lights located at unprotected roof edges (see yellow highlighted box).¹⁶



PBS Did Not Resolve Roof Fall Hazards in a Timely Manner

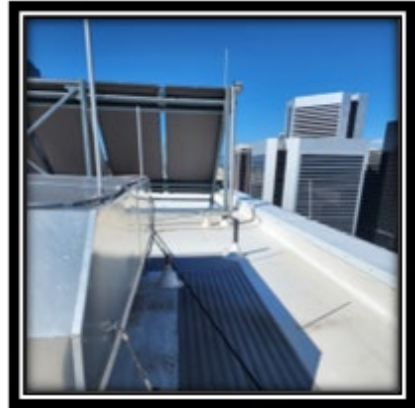
As previously noted, OSHA standards and the PBS Safety and Health Desk Guide require that PBS, within 30 calendar days, either: (1) abates unsafe or unhealthful conditions or (2) submits an abatement plan to address the conditions.¹⁷ For the 48 buildings we visited, PBS had not resolved 23 open risk conditions related to roof fall hazards. Of these 23 open risk conditions, 12 were identified prior to 2018. The photographs on the next page show three examples of unresolved roof fall hazards that are recorded in IRIS.

¹⁵ Photograph taken by the audit team, August 6, 2024.

¹⁶ Photograph taken by the audit team, August 7, 2024.

¹⁷ OSHA Standard 1960.30(c).

Byron G. Rogers Federal Building and U.S. Courthouse in Denver, Colorado (Survey Completion Date: September 14, 2021): There is inadequate fall protection on both the federal building and courthouse roofs. Pictured are the solar panels and equipment located at or near the low parapets of the federal building.¹⁸



U.S. Tax Court Building in Washington, D.C. (Survey Completion Date: April 20, 2015): The exhaust fan on the north roof is mounted in a recessed enclosure that is covered with a hatched steel grating. The exhaust fan is 48 inches below and immediately adjacent to (within 10 feet) the unprotected roof edge.¹⁹



Former GSA Regional Headquarters in Washington, D.C. (Survey Completion Date: August 19, 2014): A number of fixed ladders on the roof are not OSHA-compliant.²⁰ PBS staff did not document why the ladders were not OSHA-compliant, but we saw a significant amount of rust on the ladders. OSHA Standard 1910.23(b)(6), *General requirements for all ladders*, states that metal ladders should be protected against corrosion and made with corrosion resistant materials.²¹



¹⁸ Photograph taken by the audit team, August 5, 2024.

¹⁹ Photograph taken by the audit team, September 12, 2024.

²⁰ OSHA Standard 1910.21(b), *Definitions*, defines a “fixed ladder” to be “a ladder with rails or individual rungs that is permanently attached to a structure, building, or equipment.”

²¹ Photograph taken by the audit team, September 11, 2024.

Multiple Factors Prevent PBS from Effectively Identifying and Resolving Roof Fall Hazards

We found that the following factors prevent PBS from effectively identifying and resolving roof fall hazards:

- PBS does not include roofs in the annual OSH surveys because roofs are not considered to be a “GSA workplace.”
- PBS facility managers are not aware of identified roof fall hazards or are not taking action to resolve these hazards.
- Inspectors are performing Facility Health and Safety surveys inconsistently.

Each factor is described below.

PBS does not include roofs in the annual OSH surveys because roofs are not considered to be a “GSA workplace.” Roofs are not included in the annual OSH surveys because neither GSA OSH nor PBS considers the roof to be a GSA workplace. However, this position is inconsistent with the following GSA and PBS policies, which specifically refer to the roof as a GSA workplace:

- GSA Order 5940.2 states that the purpose of the OSH program is to “ensure that GSA workplaces and work environments are free from recognized hazards,” and specifically states in the first example in Appendix E, *Job Safety Analysis/Job Hazard Analysis*, that OSHA-compliant fall protection is required for a PBS facility manager accessing the roof.
- The PBS Safety and Health Desk Guide defines GSA workplaces as “the offices where GSA employees reside as well as other facilities and areas where one or more GSA employees regularly visit, tour or work (e.g., common areas, mechanical rooms, roofs, etc.).”

The GSA OSH program manager told us that GSA does not consider the roof a GSA workplace; however, GSA has not performed an assessment or analysis to support its decision. Further, officials from the PBS Facility Risk Management Division, which falls under the PBS Office of Facilities Management, stated that the roof is not a GSA workplace because facility managers only visit the roof to perform inspections, citing the inspection exemption under OSHA Standard 1910.28(a)(2)(ii).

The inspection exemption states that “when employers are inspecting, investigating, or assessing workplace conditions,” they do not need to be provided OSHA-compliant fall protection. However, the exemption neither addresses nor negates the need for an annual OSH survey of all areas and operations of each workplace prescribed in OSHA Standard 1960.25(c). Accordingly, PBS should ensure that its procedures for an annual OSH survey are aligned with OSHA and PBS safety and health requirements for employee workspaces, including roofs.

PBS facility managers are not aware of identified roof fall hazards or are not taking action to resolve these hazards. As previously noted, OSHA standards and the PBS Safety and Health Desk Guide require open risk conditions recorded in IRIS to be abated within 30 days, or a plan be put in place for abatement. PBS facility managers are responsible for the abatement of open risk conditions. However, when asked about the open risk conditions during our site visits, PBS facility managers were either: (1) unaware of identified roof fall hazards or (2) were aware of identified roof fall hazards but took no action to permanently resolve the issue or implement temporary corrective action.

PBS should implement a consistent process to ensure that facility managers: (1) are aware of open risk conditions recorded in IRIS, (2) address the open risk condition or develop an abatement plan within 30 days, and (3) periodically review the open risk conditions until they are abated.

Inspectors are performing Facility Health and Safety surveys inconsistently. Facility Health and Safety surveys use a template that includes roof safety questions. For example, the template includes the following question:

Is the roof properly guarded from falls through guardrails, anchors, fall protection plans?

Despite the template's standardized questions, we noted that inspectors are not answering these roof safety questions consistently. Several buildings in our sample had roof fall hazards identified in the survey for unprotected roof edges, even though there was no equipment near the roof edges. Other sampled buildings had no roof fall hazards identified in the survey for unprotected roof edges even though equipment was located near the roof edges. Based on these inconsistent survey results, PBS should provide additional oversight to ensure roof fall hazards are consistently identified and recorded.

Risk management surveys are critical to identifying and resolving roof fall hazards at GSA workplaces and GSA-owned buildings. However, GSA and PBS are not complying with OSHA standards and their own policies to perform OSH surveys at GSA workplaces. Furthermore, PBS facility managers were either unaware of roof fall hazards or took no action to resolve them, and inspections are performed inconsistently to identify roof fall hazards.

PBS must improve its risk management survey program to include a requirement to perform roof inspections during annual OSH surveys where GSA employees access the roof. PBS should also implement a consistent process to ensure facility managers are aware of all open risk conditions in IRIS, address the open risk conditions in a timely manner, and periodically review the open conditions until they are abated. Lastly, PBS should improve risk management surveys to ensure survey inspectors are identifying and recording roof fall hazards consistently.

Finding 3 – PBS did not comply with its policy to assess roof fall protection during roof replacement projects.

GSA's P100, *Facilities Standards for the Public Buildings Service*, establishes design standards and performance criteria for GSA-owned buildings.²² The P100 states that roof replacement projects completed after 2017 must include an assessment of the existing roof fall protection by a qualified consultant. If the roof fall protection is deemed inadequate or unsafe, the project must include the design and installation of necessary fall protection systems, equipment, and components. However, PBS did not perform the required roof fall protection assessments during roof replacement projects at five GSA-owned buildings we inspected during our site visits.

We visited the following five GSA-owned buildings that had roof replacement projects completed after 2017:

- Building 48 of the Denver Federal Center in Lakewood Colorado;
- Building 53 of the Denver Federal Center in Lakewood, Colorado;
- Building 810 of the Denver Federal Center in Lakewood, Colorado;
- U.S. Post Office and Courthouse in Lexington, Kentucky; and
- U.S. Tax Court Building in Washington, D.C.

None of the five PBS project teams for these roof replacements hired a qualified consultant to review the existing fall protection or installed OSHA-compliant fall protection features. Furthermore, we observed stairs, drains, or equipment near unprotected roof edges at three of the replaced roofs, as discussed below and on the next page.

Building 53 of the Denver Federal Center in Lakewood, Colorado: The roof replacement started on July 1, 2021, and was completed on April 30, 2024. During our visit on August 8, 2024, we observed equipment near roof edges with no fall protection. No fall protection assessment was performed.²³



²² On February 24, 2025, PBS rescinded the P100 until a process is developed to update it in accordance with Section 2309 of the Water Resources Development Act for projects at GSA-owned buildings with less than 50 percent of construction activity completed (measured by dollar value) as of January 21, 2025.

²³ Photograph taken by the audit team, August 8, 2024.

U.S. Post Office and Courthouse in Lexington, Kentucky:

The roof replacement started on December 21, 2018, and was completed on September 30, 2019. During our visit on August 21, 2024, we observed equipment or stairs near roof edges with low parapets, and a wall ladder to access the third-floor roof from the fourth-floor roof alongside an unprotected roof edge. No fall protection assessment was performed.²⁴



U.S. Tax Court Building in Washington, D.C.: The roof replacement started on September 15, 2022, and was completed on October 6, 2023. During our visit on September 12, 2024, we observed drains near roof edges with no fall protection. No fall protection assessment was performed.²⁵



When asked why they did not comply with the P100, the PBS project managers for these roof replacements told us they: (1) prioritized use of funds for actual roof repairs, (2) were not aware of the P100 requirement, or (3) could not provide documentation of a review of the existing roof fall protection by a qualified consultant. In addition, we asked PBS Central Office personnel for further explanation. They noted that PBS Central Office provides input on these projects; however, the designs ultimately are developed and approved regionally.

Roof replacements give PBS an opportunity to resolve existing roof fall hazards that pose a risk of injury or death to GSA employees, contractors, and tenants. Accordingly, PBS should ensure that project managers adhere to the P100 roof fall protection assessment requirements for roof replacement projects.

²⁴ Photograph taken by the audit team, August 21, 2024.

²⁵ Photograph taken by the audit team, September 12, 2024.

Finding 4 – PBS does not consistently use caution signs to warn against roof fall hazards.

OSHA provides signage guidance to address fall hazards for roofs with unprotected edges. However, PBS did not always place caution signs on the access points to roofs with unprotected edges.

OSHA Standard 1910.145, *Specifications for accident prevention signs and tags*, states that caution signs are used to identify hazards that may lead to accidental injury to workers or the public. OSHA classifies these signs by their use and the potential hazard level of severity, as described below:

- Danger signs are used to identify immediate dangers;
- Caution signs are used for potential hazards; and
- Safety instruction signs are used for general information.

Further, the PBS Safety and Health Desk Guide notes that PBS regional safety office personnel should identify roof fall hazards and communicate them to facility staff, including the facility manager. The PBS Safety and Health Desk Guide indicates that posting signs is a method to communicate hazards.

PBS used a yellow caution sign on the roof access doors or hatches in 30 of the 41 buildings we identified with unprotected roof edges. As shown in *Figure 1* below, the caution sign read, “Do not approach unprotected roof edges without adequate fall protection measures in place.” No caution signage was posted at the roof access points for the remaining 11 buildings.

Figure 1. Fall Hazard Caution Sign at the GSA Headquarters Building in Washington, D.C.²⁶



²⁶ Photograph taken by the audit team, September 5, 2024.

In some cases, we found that PBS posted a caution sign shortly before our site visits. For example, PBS posted the caution sign shown in *Figure 1* a week before our visit to the GSA Headquarters Building. After learning of this, we conducted five unannounced building visits in GSA Region 11 and found no signage at three of the five buildings. In another example, we noted that GSA Region 8 safety office personnel directed staff to post signage just 4 days before our site visits after they discovered that signage was not present.

We determined that the caution signage was not posted for two reasons:

- First, caution signs were not posted at buildings we visited because the risk management surveys did not consistently identify the presence of an unprotected roof edge (see *Finding 2*).
- Second, even when the PBS risk management surveys identified an unprotected roof edge, the corrective action field in IRIS did not always note the need for a caution sign.

By not posting caution signs on the roof access points of buildings with roof fall hazards, PBS did not meet its responsibility to promote workplace safety by making GSA personnel and contractors aware of fall hazards and necessary safety precautions. Accordingly, PBS should ensure that appropriate signage is posted to warn employees, contractors, and tenants of roof fall hazards.

Conclusion

PBS is not consistently complying with OSHA and GSA requirements to protect GSA employees and contractors from roof fall hazards. We found that PBS is not providing adequate oversight of O&M contractors' safety plans, lacks sufficient fall protection systems and protective equipment, and is not ensuring PBS facility managers receive safety training. As a result, PBS is not ensuring that its employees and contractors comply with fall protection requirements.

We also found that PBS risk management surveys are not effectively identifying and resolving roof fall hazards in a timely manner. Additionally, PBS did not conduct the roof fall protection assessments for roof replacement projects required by the P100 and did not always post appropriate signage at its buildings to warn GSA employees, contractors, and tenants of roof fall hazards. Taken together, these deficiencies increase the risk of fall-related injury or death.

To address these deficiencies, PBS should improve oversight of O&M contractors to ensure they comply with fall protection contract requirements and provide training to facility managers to ensure they are knowledgeable of roof fall hazards and OSHA requirements. GSA should also improve its risk management survey program to include roofs in annual OSH surveys, resolve identified roof fall hazards in a timely manner, and record safety conditions consistently. Lastly, PBS should ensure that roof replacement projects adhere to the P100 requirement to assess existing fall protection and post appropriate signage to warn employees, contractors, and tenants of roof fall hazards.

Recommendations

We recommend that the Acting GSA Administrator:

1. For buildings where GSA employees access the roof, include a requirement to perform roof inspections during annual OSH surveys conducted in accordance with GSA Order 5940.2, *General Services Administration Occupational Safety and Health Program*.

We recommend that the PBS Commissioner:

2. Improve oversight of O&M contractors to ensure they develop and use safety and health plans that comply with the National O&M Specification and National Consolidated Maintenance Specification contract templates.
3. Provide training to PBS CORs and regional safety offices on their roles and responsibilities for accepting, reviewing, and approving compliant safety and health plans.
4. Provide fall protection training to PBS facility managers that addresses roof fall hazards and fall protection requirements issued by OSHA and GSA.

5. Resolve identified roof fall hazards in a timely manner by installing necessary OSHA-compliant fall protection on roofs with equipment located near unprotected roof edges. If no funding is available to do so, implement interim controls to protect against fall hazards and monitor the performance of those controls to ensure they remain effective.
6. Require contractors to use OSHA-compliant fall protection.
7. Implement a consistent process for ensuring facility managers are aware of all open risk conditions in the Inventory Reporting Information System, address open risk conditions in a timely manner, and periodically review open risk conditions until they are abated.
8. Improve risk management surveys to ensure survey inspectors identify and record all applicable roof fall hazards under OSHA 1910.28 consistently.
9. Review all ongoing and future roof replacement projects to ensure they comply with P100 roof replacement requirements for a review of existing fall protection by a qualified consultant; and, if the fall protection is deemed inadequate, design and install OSHA-compliant fall protection.
10. Post appropriate signage at all roof access points to warn employees, contractors, and tenants of roof fall hazards.

GSA Comments

The PBS Commissioner agreed with our recommendations. For *Recommendation 9*, PBS noted that GSA rescinded the P100 on February 24, 2025. Until a process is developed to update the P100, PBS staff will comply with the newly issued *PBS Interim Core Building Standards* for roof replacement projects. PBS's written comments are included in their entirety in **Appendix B**.

Appendix A – Objective, Scope, and Methodology

Objective

We performed this audit to determine if PBS's policies and procedures are effective in protecting GSA employees and contractors from roof fall hazards. This audit was included in the GSA Office of Inspector General's *Fiscal Year 2024 Audit Plan* based on roof safety deficiencies in GSA-owned buildings that were either identified in prior audit reports or alleged in a December 2022 hotline complaint. Our audit objective was to determine if PBS's operations and oversight of O&M contractor performance adequately comply with OSHA and GSA requirements to protect GSA employees and contractors from roof fall hazards.

Scope and Methodology

We conducted site visits in GSA Regions 4, 8, 9, and 11 to review roof conditions at a total of 48 GSA-owned buildings. We also performed five additional unannounced building visits in GSA Region 11 to verify if PBS only posted caution signs in anticipation of our site visits.

To accomplish our objective, we:

- Reviewed OSHA Standard 1910, *Occupational Safety and Health Standards*; and OSHA Standard 1960, *Federal Employee Occupational Safety and Health Programs*, to understand roof safety requirements and federal workplace safety requirements, respectively;
- Reviewed GSA Order ADM 5940.2, *General Services Administration Occupational Safety and Health Program*; and GSA Order PBS 5940.3, *PBS Safety and Health Management*, and its companion, *PBS Desk Guide for Safety & Health Management*;
- Reviewed the National O&M Specification and the National Consolidated Maintenance Specification contract templates to understand O&M requirements to provide roof fall protection and safety;
- Reviewed GSA's P100, *Facilities Standards for the Public Buildings Service*, to determine the design requirements for roof replacement projects;
- Analyzed the results of prior audit reports and corrective actions that are significant to roof safety in PBS;
- Interviewed the GSA OSH program manager to understand the OSH program and annual survey practices;
- Interviewed PBS Office of Design and Construction staff to understand the P100 requirement for roof replacement projects;
- Interviewed PBS Risk Management Division staff to understand risk management surveys and abatement requirements;
- Conducted site visits to 48 buildings in GSA Regions 4, 8, 9, and 11 to tour the roofs and observe any unprotected edges, roof fall safety features, and open IRIS roof safety conditions;

- Interviewed regional safety office officials in GSA Regions 4, 8, 9, and 11 to understand their role in executing their regions’ safety and health programs;
- Reviewed roof safety conditions in IRIS for the sampled buildings to evaluate the effectiveness of the risk management survey and to determine if the conditions had been abated;
- Interviewed PBS facility managers, CORs, and O&M staff during our site visits to understand their responsibilities on the roofs of GSA-owned buildings, their fall protection practices, and related training;
- Obtained the O&M contract and required O&M contract submittals, such as the safety and health, building operation, and quality control plans, for each building; and
- Determined if the roof replacement projects at five buildings met P100 requirements by reviewing the project scope of work and contacting the project managers.

Data Reliability

We assessed the reliability of data in GSA’s Owned Building List, which PBS provided, by reviewing a sample of buildings and comparing building addresses to geospatial mapping websites. Additionally, we assessed the reliability of risk management survey data we extracted from IRIS by reviewing a sample of risk conditions and making direct observations of roof conditions during our site visits. We determined that the data was sufficiently reliable for the purposes of this audit.

Sampling

We examined a nonstatistical (judgmental) sample of buildings from a list of 2,108 GSA-owned buildings that PBS provided to us on March 4, 2024. Our nationwide sample included 48 buildings from four GSA regions, as outlined below.

GSA Region	Number of Sampled Buildings
4 – Southeast Sunbelt	10
8 – Rocky Mountain	16
9 – Pacific Rim	7
11 – National Capital	15
Total	48

To ensure adequate coverage and consideration of risk, we considered the following factors when selecting the sample:

- Buildings with roof fall safety conditions documented in IRIS;
- Roof replacement projects completed after 2017;
- Satellite images showing equipment near roof edges, green roofs, or solar panels;
- The year the building was built; and
- Proximity to other nearby GSA-owned buildings.

Separate from our sample on the previous page, we judgmentally selected five GSA-owned buildings from GSA Region 11 for unannounced visits to verify if PBS only posted caution signs in anticipation of our site visits. These buildings were selected because they are in proximity to a building in our sample.

While our judgmental sampling 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 July 2024 and March 2025 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

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Public Buildings Service

July 18, 2025

MEMORANDUM FOR: HILDA M. GARCIA
REGIONAL INSPECTOR GENERAL FOR AUDITING
PACIFIC RIM REGION AUDIT OFFICE (JA-9)

THROUGH: MICHAEL P. PETERS *Michael Peters*
COMMISSIONER
PUBLIC BUILDINGS SERVICE (P)

FROM: COURTNEY B. HATCHEL *Courtney Hatchel*
ACTING ASSISTANT COMMISSIONER
OFFICE OF FACILITIES MANAGEMENT (PM)

SUBJECT: Response to the GSA Office of Inspector General Draft
Report, *Audit of Roof Fall Protection and Safety in GSA
Owned Buildings*, Report Number A240041

Thank you for the opportunity to comment on the Office of Inspector General draft report, *Audit of Roof Fall Protection and Safety in GSA Owned Buildings*.

The health and safety of Federal employees and facility occupants is of the utmost importance to the Public Buildings Service (PBS). PBS agrees with all the recommendations presented in the audit draft report, and has provided below in Attachment "A" a more detailed response to each recommendation.

If you have any questions regarding this information, please contact Martin Gusky, Facility Risk Management Director, PBS Office of Facilities Management, at 202-527-2149.

Attachment "A"

Detailed Responses to Audit Recommendations

- 1. We recommend that the Acting GSA Administrator, for buildings where GSA employees access the roof, include a requirement to perform roof inspections during annual Occupational Safety and Health surveys conducted in accordance with GSA Order 5940.2, *General Services Administration Occupational Safety and Health Program*.**

PBS agrees with the intent of this recommendation. In accordance with concurrence received from the Department of Labor-Occupational Safety and Health Administration, for locations where GSA employees can and do access roofs of buildings with frequency, PBS will require the roof at those locations to be inspected as a part of the annual Occupational Safety and Health survey.

- 2. We recommend that the PBS Commissioner improve oversight of O&M contractors to ensure they develop and use safety and health plans that comply with the National O&M Specification and National Consolidated Maintenance Specification contract templates.**

PBS agrees with the recommendation.

- 3. We recommend that the PBS Commissioner provide training to PBS contracting officer's representatives and regional safety offices on their roles and responsibilities for accepting, reviewing, and approving compliant safety and health plans.**

PBS agrees with the recommendation.

- 4. We recommend that the PBS Commissioner provide fall protection training to PBS facility managers that addresses roof fall hazards and fall protection requirements issued by OSHA and GSA.**

PBS agrees with the recommendation.

- 5. We recommend that the PBS Commissioner resolve identified roof fall hazards in a timely manner by installing necessary OSHA-compliant fall protection on roofs with equipment located near unprotected roof edges. If no funding is available to do so, implement interim controls to protect against fall hazards and monitor the performance of those controls to ensure they remain effective.**

PBS agrees with the recommendation for fall hazards as listed in the Audit.

6. We recommend that the PBS Commissioner require contractors to use OSHA-compliant fall protection

PBS agrees with the recommendation and as such requires contractors to use compliant fall protection in its [National Operation and Maintenance Specification](#) (see Section "C.5.4.4 Fall Protection")

7. We recommend that the PBS Commissioner implement a consistent process for ensuring facility managers are aware of all open risk conditions in the Inventory Reporting Information System, address open risk conditions in a timely manner, and periodically review open risk conditions until they are abated.

PBS agrees with the recommendation. Since 2021, and at the time of this audit, PBS included Critical Element language in employee performance plans of over 1000 PBS Office of Facilities Management employees requiring this awareness, the timely addressing of risk conditions, and the review of open risk conditions.

8. We recommend that the PBS Commissioner improve risk management surveys to ensure all applicable roof fall hazards under OSHA 1910.28 are consistently identified and recorded by survey inspectors.

PBS agrees with the recommendation. PBS implemented its revised [Risk Management Survey Standard Operating Procedures](#) in March 2025. The procedures established surveyor qualifications, as well as an oversight process to review draft reports (i.e., quality control process) before the surveys are finalized in the Inventory Reporting Information System. PBS continues to review and revise its survey templates on an annual basis. The Safety and Health survey templates have included a number of questions relating to fall protection since 2001.

9. We recommend that the PBS Commissioner review all ongoing and future roof replacement projects to ensure they comply with P100 roof replacement requirements for a review of existing fall protection by a qualified consultant; and, if the fall protection is deemed inadequate, design and install OSHA-compliant fall protection.

PBS agrees with the intent of this recommendation. On February 24, 2025, GSA rescinded *The Facilities Standards for the Public Buildings Service* (P100). All roof replacement projects that were in progress to a 50% or greater level of completion, as measured in dollar value, on February 24, 2025, will continue to comply with the P100 roof replacement requirements that were applicable at that time. All roof replacement projects that were in progress but less than 50% complete, as measured in dollar value, by that date, and all future roof replacement projects will comply with the newly issued PBS Interim Core Building Standards.

10. We recommend that the PBS Commissioner post appropriate signage at all roof access points to warn employees, contractors, and tenants of roof fall hazards.

PBS agrees with the recommendation.

Appendix C – Report Distribution

Acting GSA Administrator (A)

GSA Deputy Administrator (AD)

Commissioner (P)

Acting Deputy Commissioner (P1)

Acting Chief of Staff (P2)

Deputy Commissioner of Enterprise Strategy (P2)

Acting Chief of Staff (PB)

Acting Deputy Chief of Staff (PB)

Acting Assistant Commissioner, Office of Facilities Management (PM)

Chief Architect, Office of the Chief Architect (PA)

Chief Administrative Services Officer, Office of Administrative Services (H)

Chief of Staff, Office of Administrative Services (H)

Chief Financial Officer (B)

Acting Deputy 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 (JAO)



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