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PBS Is Not Consistently Complying with Its Internal Guidance for the Building Assessment Tool, Resulting in Underreported Liabilities and Increasing the Risk of Errors

Report Number A250036/P/2/R26006
September 9, 2026

Executive Summary

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Why We Performed This Audit

Building maintenance liabilities are the current estimated costs to repair building deficiencies to an acceptable condition. GSA is required to identify and report its building maintenance liabilities annually.[1] Accurate, complete, and reliable building maintenance liability data is critical to GSA because it: (1) directly affects its financial reporting; (2) informs its long-term capital planning; and (3) supports decisions about funding, prioritizing, and executing repairs across GSA's building portfolio.

GSA's Public Buildings Service (PBS) uses the Building Assessment Tool (BAT) system to estimate the cost of repairs and maintenance needed to correct major deficiencies in GSA-owned buildings, as well as in certain leased buildings for which GSA is responsible for repairs and alterations. PBS prepares this estimate using BAT surveys, which are 40-section surveys completed by a PBS employee based on physical inspections of individual GSA buildings.

BAT surveys were previously completed on a 2-year cycle; however, because PBS underwent significant staffing reductions and a major reorganization in 2025, it now requires BAT surveys to be completed on a 5-year cycle. The longer interval between BAT surveys increases the risk of outdated building maintenance liability data, making it critically important that PBS's BAT surveys are complete, accurate, and reliable.

Due to the importance of the BAT system to PBS's management of its building portfolio, we included this audit on the GSA Office of Inspector General's *Fiscal Year 2025 Audit Plan*. The objective of the audit was to determine whether PBS is effectively using the BAT system to monitor the costs of building repairs and maintenance in accordance with internal guidance.

What We Found

PBS is not consistently complying with the internal guidance it designed to ensure that the estimated costs of building repairs and maintenance in the BAT system are complete and accurate, resulting in underreported building maintenance liabilities and increasing the risk of undetected errors.

Specifically, we found that:

[1] 40 U.S.C. 524, *Duties of executive agencies*.

- PBS did not consistently review existing data sources for repair and alteration costs when preparing some BAT surveys, resulting in underreported building maintenance liabilities. We found that 79 of the BAT surveys in our sample of 196 buildings underreported repair and alteration costs by a total of $73 million.

- PBS did not consistently perform independent completeness and accuracy reviews of BAT surveys, thereby increasing the risk of undetected errors.

Taken together, these deficiencies limit assurance that PBS consistently uses and reports complete, accurate, and reliable information on the repair and maintenance needs of its building portfolio.

What We Recommend

We recommend that the PBS Commissioner:

1. Improve oversight of the BAT surveys by:
    a. Ensuring surveyors and approvers have access to the building maintenance liability information contained in the Inventory Reporting Information System (IRIS) Prioritization of Asset Repair (PAR) and IRIS Work Items (WI) modules.
    b. Requiring surveyors and approvers to review the building maintenance liability information contained in the IRIS PAR and IRIS WI modules when completing and reviewing BAT surveys.

2. Strengthen quality control procedures by incorporating reviews of the building maintenance liability information contained in the IRIS PAR and IRIS WI modules into the annual variance analysis, particularly for BAT surveys reporting zero liabilities.

3. Require a separate surveyor and approver for each BAT survey, clearly document both roles in the BAT system, and ensure each PBS employee performs only the duties of their assigned role. This should include, at a minimum:
    a. Implementing controls to: (1) prevent a BAT survey from being completed and approved by the same person and (2) provide clear guidance to all BAT users regarding separating duties and independent approval expectations.
    b. Updating the February 2026 BAT internal guidance to explicitly prohibit any individual from serving as both surveyor and approver for the same BAT survey.

The PBS Acting Commissioner stated that PBS agrees with the report recommendations. His written comments are included in their entirety in ***Appendix C***.

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Introduction

We performed an audit of the GSA Public Buildings Service's (PBS's) use of the Building Assessment Tool (BAT) system.

Purpose

Building maintenance liabilities are the current, estimated costs to repair building deficiencies to an acceptable condition. GSA is required to identify and report its building maintenance liabilities annually.[2] Accurate, complete, and reliable building maintenance liability data is critical to GSA because it: (1) directly affects its financial reporting; (2) informs its long-term capital planning; and (3) supports decisions about funding, prioritizing, and executing repairs across GSA's building portfolio.

PBS uses the BAT system to estimate the cost of repairs and maintenance needed to correct major deficiencies in federally owned buildings, as well as in certain leased buildings for which GSA is responsible for repairs and alterations. PBS prepares this estimate using BAT surveys, which are 40-section surveys completed by a PBS employee based on physical inspections of individual GSA buildings.

BAT surveys were previously completed on a 2-year cycle; however, because PBS underwent significant staffing reductions and a major reorganization in 2025, it now requires BAT surveys to be completed on a 5-year cycle. The longer interval between BAT surveys increases the risk of outdated building maintenance liability data, making it critically important that PBS's BAT surveys are complete, accurate, and reliable.

Due to the importance of the BAT system to PBS's management of its building portfolio, we included this audit on the GSA Office of Inspector General's *Fiscal Year 2025 Audit Plan*.

Objective

The objective of this audit was to determine whether PBS is effectively using the BAT system to monitor the costs of building repairs and maintenance in accordance with internal guidance.

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

[2] 40 U.S.C. 524, *Duties of executive agencies.*

Background

PBS is the landlord for the civilian federal government. PBS manages more than 370 million rentable square feet of workspace for federal agencies. PBS owns approximately 1,600 assets, totaling more than 180 million rentable square feet; and manages approximately 7,000 leased assets, also totaling more than 180 million rentable square feet.

PBS is subject to multiple requirements for financial reporting and real property management that require accurate, complete, and reliable information. These requirements are listed below:

- **40 U.S.C. 524, *Duties of executive agencies* –** Requires federal agencies to maintain accurate real property inventory.

- **Federal Real Property Council (FRPC) –** Sets government-wide standards for managing and reporting real property performance in accordance with Executive Order 13327, *Federal Real Property Asset Management*.

- **Statement of Federal Financial Accounting Standards (SFFAS) 42, *Deferred Maintenance and Repairs: Amending Statements of Federal Financial Accounting Standards 6, 14, 29 and 32* –** Requires consistent reporting of deferred maintenance and repairs.

- **Office of Management and Budget (OMB) Circular A-136, *Financial Reporting Requirements* –** Provides government-wide reporting standards for disclosing deferred maintenance and repairs.

Information Systems Used to Identify and Manage Building Maintenance Liabilities

To meet these requirements, PBS uses different information systems to identify, estimate, and address building deficiencies and their associated liabilities. The process of identifying building deficiencies and developing a multi-year plan of repair and alteration projects begins within the BAT system.

PBS developed the BAT system to estimate the total amount of repairs and alterations needed to correct major components or system deficiencies in:

- GSA-owned buildings; and
- Certain leased buildings for which GSA is responsible for repairs and alterations.

Effective asset management requires a complete and accurate understanding of asset conditions and existing deficiencies. The BAT system enables PBS to develop informed asset strategies by providing estimates of current and future repair and maintenance costs for each building.

The BAT system includes a 40-section survey (BAT survey) to assess the physical condition of a building's basic structure and systems. It also identifies repair and maintenance liabilities and provides critical information for planning routine and deferred maintenance, identifying systemic deficiencies, tracking the useful life of major equipment, and supporting capital investment planning and prioritization.

BAT surveys are essential because they support regulatory compliance, ensure transparent reporting of building maintenance liabilities to OMB and the taxpayers, and serve as a best practice for managing and maintaining a large building portfolio. To effectively manage PBS's real property portfolio and report on its building maintenance liability costs accurately, it is critical that the information documented in BAT surveys is accurate, complete, and consistent.

PBS surveyors conduct physical inspections of each building to identify existing maintenance liabilities and document them in the BAT survey. The survey consists of more than 600 questions across its 40 sections. Based on the responses, the BAT system will generate deficiencies, actions, and line-item costs. BAT surveys provide a snapshot in time; every time a BAT survey is completed, PBS reassesses and reprioritizes the building's maintenance liabilities.

The BAT system is one of several modules within the Inventory Reporting Information System (IRIS).[3] IRIS is an application GSA uses to:

- Manage estimated repair and alteration costs for building projects and new construction;
- Capture and feed key data elements to downstream financial systems; and
- Track the status of safety and risk deficiencies identified during the survey.

While the BAT system is used to assess total building maintenance liabilities, the process for initiating and tracking projects to repair or replace those liabilities occurs through two other IRIS modules—Prioritization of Asset Repair (IRIS PAR) and Work Items (IRIS WI). However, not all repair projects recorded in these IRIS modules originate from deficiencies identified through BAT surveys.

Figure 1 on the next page summarizes the function of these three IRIS modules (BAT, IRIS PAR, and IRIS WI) and their respective roles in identifying and tracking building maintenance liabilities and related projects.

[3] IRIS has seven modules: Work Items, Facilities Management Assessment, Occupational Safety and Health, Asbestos, BAT, Prioritization of Asset Repair, and Utility Competitive Account Tool.

Figure 1. Functions of the BAT, IRIS PAR, and IRIS WI Modules

IRIS Module	Description
Building Assessment Tool (BAT)	When a building survey is completed in the BAT system, it generates key information, including the total estimated cost of required work, the prioritization of that work, and the Facility Condition Index (FCI). The prioritization data is used to report GSA's deferred maintenance and repair costs in the *Agency Financial Report*. Only liabilities classified as "immediate" are included in that reporting. The FCI, calculated as the ratio of a property's existing deficiencies to its total replacement value, provides a standardized measure of the building's relative condition.
Prioritization of Asset Repair (IRIS PAR)	BAT survey data flows into the IRIS PAR module, which regional asset teams use to prioritize investments and develop asset strategies aimed at maximizing return on investment.[4] The IRIS PAR module serves as the repository for potential projects that have not yet received funding.
Work Items (IRIS WI)	A work item is a repair, replacement, or construction activity that needs to be carried out in a building. Work items originate in several ways, including requests by building managers or customer agencies, safety inspections, or engineering studies. Data from the IRIS PAR module flows into the IRIS WI module, which is used to track pending and active work items for both owned and leased assets. The IRIS WI module includes projects that have been funded and awarded, as well as those for which funding is still pending.

Together, these IRIS modules provide critical information for identifying building maintenance liabilities and for tracking the projects to remediate those liabilities.

BAT Roles and Responsibilities

The National BAT Program Management Team is responsible for establishing national policy and guidance for the BAT system to ensure consistency across all PBS regions. The team:

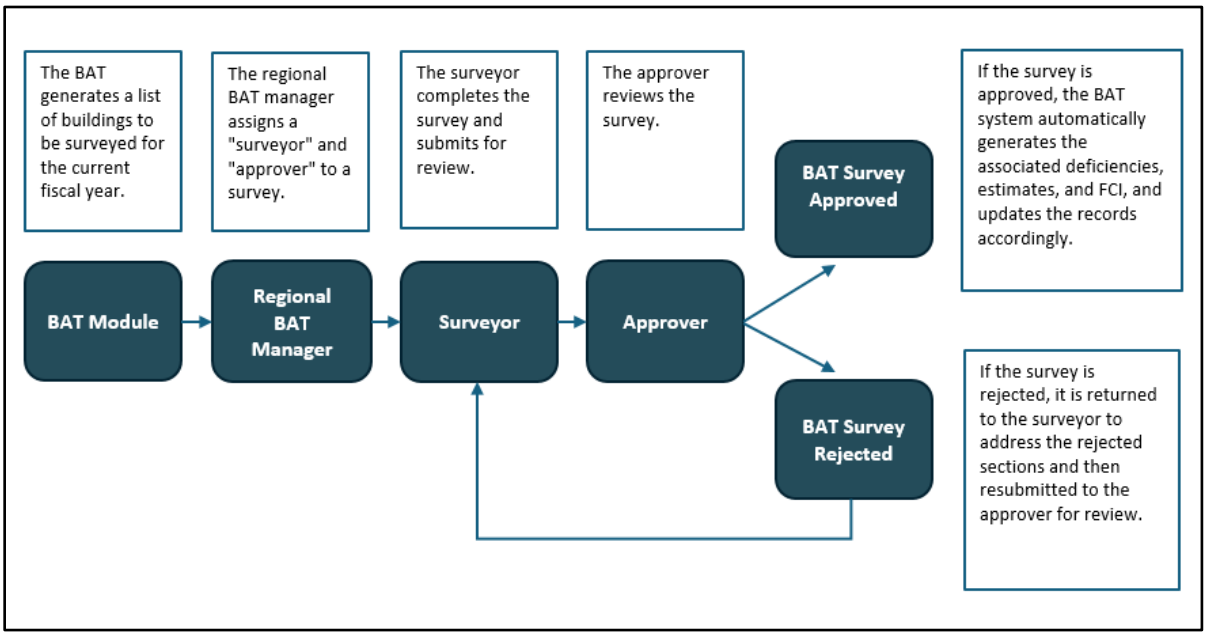
- Serves as the authoritative source for guidance on scope, estimating standards, and survey protocols;
- Develops and maintains training resources, user guides, templates, and video modules for regional teams;

[4] On September 18, 2025, GSA issued GSA Order ADM 5440.760, *Changes in the Public Buildings Service*. Under the order, PBS reorganized from a regional structure to a centralized organization. This eliminated PBS's 11 regional offices. Because a significant portion of our audit fieldwork was completed prior to the reorganization, we retained references to PBS's regional offices in this report.

- Tracks program performance and survey completion to ensure annual goals are met; and
- Ensures compliance with federal requirements for property condition reporting, including OMB and FRPC standards.

Each PBS region has BAT survey teams, which consist of a regional BAT manager, surveyor, and approver for each survey. The regional BAT manager assigns a surveyor and an approver to a BAT survey. The surveyor conducts a physical assessment of the building to identify deficiencies and documents those deficiencies in the BAT survey. The approver validates the completeness and accuracy of the surveys for quality control. Multiple surveyors and approvers may be assigned to a single building undergoing a BAT survey. *Figure 2* below presents the BAT user workflow.

Figure 2. BAT User Workflow



Note: This workflow chart is a summarized version of the one included in PBS's *BAT Regional Program Guidance, V.1.0, Facts, Tips and Best Practices.*

Quality Control

Quality control in the BAT system involves coordinated efforts across multiple roles to ensure the accuracy, completeness, and reliability of survey data. Surveyors conduct thorough physical assessments and are responsible for capturing the best available information during the BAT survey process. Approvers then perform an independent review of the final BAT survey to identify any material errors that require correction.

At a broader level, the National BAT Program Management Team performs additional quality control by reviewing BAT surveys from all PBS regions for conformity; identifying irregularities; and conducting end-of-fiscal-year variance analyses to identify duplicates, errors, and changes from the previous year's reporting.

PBS's Deferred Maintenance Liability

PBS uses the BAT surveys to identify its deferred maintenance liability. PBS breaks down the liability amount based on priority level. BAT survey teams assess and assign a priority level to each building maintenance liability identified and reported in a BAT survey. To do so, the teams consider the estimated useful life cycle, age of components, recent performance history of operable systems, frequency and length of equipment downtime, and other relevant indicators in assigning priority levels to building maintenance liabilities.

Figure 3 below presents the BAT priority levels PBS uses to indicate when a building maintenance liability should be addressed, as well as the corresponding liability amount reported in the BAT system for Fiscal Year (FY) 2025.

Figure 3. Building Maintenance Liability Priority Levels

Priority Level	Description	FY 2025 Amount
Immediate	The issue is critical and requires immediate investment to restore the system to normal operation, stop accelerated deterioration, or correct a life safety hazard. If the issue is not addressed immediately, it is considered deferred for the purpose of deferred maintenance and repair reporting in GSA's fiscal year *Agency Financial Report*.	$6.2 billion
Within 1–2 Years	The issue is anticipated to be critical within the next 2 fiscal years but does not represent an immediate funding priority.	$5.8 billion
Within the Next 3–5 Years	The issue is anticipated to become critical within 3–5 years. An investment need is evident, but it has not caused any downtime or posed a life safety hazard.	$3.2 billion
Within the Next 6 or More Years	Systems need to be repaired or replaced at some point in the future, but it is not deemed a problem at the time of survey completion.	$2.1 billion

BAT System Policy Changes

On February 4, 2026, PBS formally issued its revised BAT system policy, *Building Assessment Tool (BAT) Program Policy*, which updates the survey frequency requirement for the BAT program. Under the prior policy, PBS conducted BAT surveys on every GSA-owned or leased asset every 2 years if: (1) GSA has repair and alterations responsibilities, (2) the asset maintains

an “Active” or “Excess” status, and (3) the asset has a real property type of “building” or “structure.”[5]

Due to reductions in staffing and resources, PBS changed its policy to align with the minimum requirements of the FRPC and SFFAS 42, extending the BAT survey cycle from 2 years to 5 years. For example, if a building was surveyed in FY 2025, it must be surveyed again no later than FY 2030.

To more accurately represent the liabilities of the portfolio over time in the *Agency Financial Report*, PBS will increase the BAT-generated cost estimates for the buildings not surveyed in the subject year. Each year, PBS will update locality material and labor adjustments and line-item costs associated with each survey response. By updating the underlying factors that go into estimating the cost of each response, PBS will escalate the remediation costs to more accurately reflect the cost in the interim years between BAT surveys.

[5] *BAT Regional Program Guidance, V.1.0, Facts, Tips and Best Practices* (April 2021).

Results

Building maintenance liabilities are the current, estimated costs to repair building deficiencies to an acceptable condition. PBS uses the BAT system to determine the amount of its building maintenance liabilities by quantifying the cost of repairs and maintenance necessary to correct deficiencies across its building portfolio. These costs are determined based on BAT surveys that are prepared and reviewed by PBS staff and uploaded into the BAT system. PBS uses this information to make decisions on whether to repair, replace, or dispose of its buildings. Accordingly, PBS has developed internal guidance designed to ensure that the cost of building repairs and maintenance in the BAT system is complete and accurate.

However, PBS is not consistently complying with the internal guidance it designed to ensure that the estimated costs of building repairs and maintenance in the BAT system are complete and accurate, resulting in underreported building maintenance liabilities and increasing the risk of undetected errors. Specifically, we found that:

- PBS did not consistently review existing data sources for repair and alteration costs when preparing some BAT surveys, resulting in underreported building maintenance liabilities. We found that 79 of the BAT surveys in our sample of 196 buildings underreported repair and alteration costs by a total of $73 million.

- PBS did not consistently perform independent completeness and accuracy reviews of BAT surveys, thereby increasing the risk of undetected errors.

Finding 1 – PBS did not consistently review existing data sources for repair and alteration costs when preparing some BAT surveys, resulting in underreported building maintenance liabilities.

PBS's internal guidance establishes that all building deficiencies must be documented in BAT surveys to support effective management of GSA's assets. However, PBS did not consistently review existing data sources for repair and alteration costs when preparing some BAT surveys, resulting in underreported building maintenance liabilities.

BAT surveys are critical to how PBS manages its assets. PBS uses the building condition information from BAT surveys to allocate limited resources; prioritize repairs; and identify when buildings should be repaired, replaced, or disposed of. Accurate and complete BAT surveys lead to more effective PBS budgeting, planning, and funding of capital improvements, alterations, and major repairs.

Accordingly, PBS's internal guidance has consistently required that BAT surveys use the best available information to develop complete, accurate, and reliable information on PBS's building maintenance liabilities. For example, PBS issued internal guidance in 2021 to support "efficient,

comprehensive, accurate, consistent surveys which reflect the best available knowledge about the physical condition of [its assets]."[6]

Similarly, superseding internal guidance issued in 2026 establishes that:

> In order to provide a credible foundation for asset planning, it is essential to account for every asset's liabilities as completely and accurately as possible with the **best available information**….[7] (emphasis in original)

However, PBS did not consistently comply with these requirements when preparing BAT surveys, resulting in underreported building maintenance liabilities. This occurred because some BAT surveys did not include information that was available in other PBS data sources. Specifically, we found that PBS did not consistently review two IRIS modules—Prioritization of Asset Repair (PAR) and Work Items (WI)—when completing BAT surveys. These IRIS modules serve as key sources of information on building maintenance liabilities because they identify planned or funded projects that have not been completed. Until a project to address a building maintenance liability is completed, the corresponding liability remains and must be captured in the BAT survey accordingly.

We reviewed 291 BAT surveys that were completed between FYs 2022–2025. Collectively, these surveys covered 196 buildings. We found that 79 of the BAT surveys in our sample underreported repair and alteration costs by a total of $73 million. This equates to a 23 percent underreporting for the 79 surveys affected and a 6 percent underreporting for the entire sample of 291 surveys valued at $1.17 billion. *Figure 4* below presents a summary of our review.

Figure 4. Sampled BAT Surveys with Underreported Liabilities[8]

BAT Survey Fiscal Year	Number of BAT Surveys with Underreported Liabilities	Building Liabilities Originally Reported ($)	Underreported Amount ($)	Correct Liability Total ($)
		(a)	(b)	(c) = (a) + (b)
2022	20	$72,159,194	$11,051,514	$83,210,708
2023	12	10,076,825	7,215,798	17,292,623
2024	29	142,177,512	39,328,171	181,505,683
2025	18	22,268,305	15,635,001	37,903,306
Total	**79**	**$246,681,836**	**$73,230,484**	**$319,912,320**

[6] *BAT Regional Program Guidance, V.1.0, Facts, Tips and Best Practices* (April 2021).

[7] *Building Assessment Tool (BAT) Program Policy* (February 2026).

[8] Dollar amounts in this table are rounded.

Appendix B presents a comprehensive list of BAT surveys with underreported liabilities identified in our audit sample.

As described below, the underreported liabilities occurred because building maintenance liability information contained in the IRIS PAR and IRIS WI modules was not consistently reviewed: (1) during the preparation of some BAT surveys and (2) in PBS's quality control reviews of buildings with zero liabilities.

PBS Did Not Consistently Review Building Maintenance Liability Information Contained in the IRIS PAR and IRIS WI Modules When Preparing Some BAT Surveys

PBS uses the IRIS PAR and IRIS WI modules to document building projects and work items that address building maintenance liabilities. Between BAT survey cycles, new maintenance needs, repair requirements, and system or component replacements routinely arise. PBS records the potential projects for remedying these deficiencies in the IRIS PAR and IRIS WI modules. Accordingly, PBS instructs its BAT survey teams to review the building maintenance liability information contained in these modules to help ensure that the surveys are accurate and complete.

However, as described in the examples below, PBS did not review the information in these modules when preparing some BAT surveys:

- **Federal Research Center Building, 100 Central Utility Plant, Silver Spring, Maryland –** A chiller replacement project was created in the IRIS PAR module on September 6, 2024, with an estimated cost of $3.15 million. The FY 2025 BAT survey for this building was approved on July 2, 2025. However, no liabilities were noted for the chillers. The regional BAT program manager confirmed that this project should have been included in the FY 2025 BAT survey. As of May 2026, the project has not been completed, and the corresponding liability remains outstanding.

- **Tom Stagg U.S. Courthouse, Shreveport, Louisiana –** The IRIS WI module listed a fire alarm system replacement project that was created on September 8, 2021, with an estimated cost of more than $2.6 million. The FY 2024 BAT survey for this building was approved on July 2, 2024. However, no liabilities were noted for fire protection. A PBS equipment specialist stated that this deficiency should have been included in the FY 2024 BAT survey. As of May 2026, the project has not been completed, and the corresponding liability remains outstanding.

- **The U.S. Secret Service Headquarters Building, Washington, D.C. –** The IRIS PAR and IRIS WI modules included projects created on May 23, 2017, and February 23, 2024, respectively, to install high-efficiency boilers at an estimated cost of $1.5 million. The FY 2024 BAT survey was approved on August 28, 2024. However, no liabilities were noted for the boilers. The regional BAT program manager stated this deficiency should

have been included in the FY 2024 BAT survey. As of May 2026, the project has not been completed, and the corresponding liability remains outstanding.

The building maintenance liabilities noted above were not included in the BAT survey. PBS's April 2021 internal BAT system guidance states that the surveyors should review the IRIS WI module during the pre-survey meeting. However, we found that they did not follow this requirement because many surveyors did not have access to the building maintenance liability information contained in the IRIS WI module.[9] In addition, PBS did not update its policy to include the IRIS PAR module until February 2026—more than 3 years after the creation of the IRIS PAR module in January 2023.[10] As a result, employees were not instructed to consider the building maintenance liability information contained in the IRIS PAR module when completing BAT surveys, contributing to underreported building maintenance liabilities.

We asked BAT surveyors and approvers whether they reviewed the building maintenance liability information contained in the IRIS PAR and IRIS WI modules during BAT surveys. As shown in *Figure 5* below, most told us they did not. In fact, many BAT surveyors and approvers did not have access to the IRIS PAR or IRIS WI modules. As a result, they did not have access to the building maintenance liability information these modules contain.

Figure 5. BAT Surveyors and Approvers Review of the IRIS PAR and IRIS WI Modules

Role	Total Responses	Did Not Review IRIS PAR	No Access to IRIS PAR	Did Not Review IRIS WI	No Access to IRIS WI
Surveyor	24	15	14	16	15
Approver	16	14	14	12	11
Total	**40**	**29**	**28**	**28**	**26**

It is important that BAT survey teams review this information when conducting BAT surveys to help ensure surveys are complete and accurate. To improve the accuracy and completeness of BAT surveys, BAT surveyors and approvers should have access to the building maintenance liability information in both the IRIS PAR and IRIS WI modules.

Building Maintenance Liability Information in IRIS PAR and IRIS WI Modules Was Not Consistently Reviewed in PBS's Quality Control Reviews of Buildings with Zero Liabilities

At the close of each fiscal year, the National BAT Program Team conducts an annual variance analysis as a quality control procedure to identify duplicate entries or reporting errors. The National BAT Program Team then compares the variance results to the prior year's results to assess the changes over time. As part of this process, the National BAT Program Team reviews BAT surveys that show assets with zero liabilities and evaluates whether this amount is

[9] *BAT Regional Program Guidance, V.1.0, Facts, Tips and Best Practices* (April 2021).

[10] *Building Assessment Tool (BAT) Program Policy* (February 2026).

appropriate based on factors such as asset size, use, year built, and recent capital investments or modernizations.

However, this analysis does not account for planned and funded projects in the IRIS PAR or IRIS WI modules. As shown in *Figure 6* below, we identified 11 BAT surveys that reported zero liabilities but had projects to address building maintenance liabilities reported in the IRIS PAR and IRIS WI modules.

Figure 6. BAT Surveys with Liabilities Undetected by PBS's Quality Control Review of Buildings with Zero Liabilities

Building Number	Building Name	City, State	Survey Fiscal Year	Building Liabilities Originally Reported	Underreported Amount ($)
AK0035AA	Anchorage Federal Building and U.S. Courthouse – Parking Lot	Anchorage, AK	2022	-	95,342
AL0011ZZ	Robert S. Vance Federal Building and U.S. Courthouse	Birmingham, AL	2022	-	1,567,474
DC0220SE	Employee Garage – Ravine	Washington, DC	2024	-	823,927
DC0234SE	Gate House No. 4	Washington, DC	2024	-	276,447
DC0240SE	Central Utility Plant	Washington, DC	2022	-	625,771
DC0240SE	Central Utility Plant	Washington, DC	2024	-	3,837,998
DC0296ZZ	Central Heating Plant A/C	Washington, DC	2024	-	3,610,312
TX0725TG	United States Border Station (USBS) Marcelino Serna Tornillo Mechanical Building	Tornillo, TX	2023	-	93,133
TX0725TG	USBS Marcelino Serna Tornillo Mechanical Building	Tornillo, TX	2025	-	100,000
TX8016CB	USBS Colombia Laredo Site	Laredo, TX	2024	-	165,000
TX8023CR	USBS Eagle Pass II Site	Eagle Pass, TX	2023	-	284,540

As described in the examples below, some of the undetected liabilities were significant.

- **Central Utility Plant, Washington, D.C. –** The IRIS PAR and IRIS WI modules included projects totaling $3,837,998 for the building during FY 2024. One of the projects listed in the IRIS PAR module was for a roof load adjustment. Although the estimated cost of this project was $3,500,000, this amount and its corresponding deficiency were not included in the building's FY 2024 BAT survey.

- **Robert S. Vance Federal Building and U.S. Courthouse, Birmingham, Alabama –** The IRIS WI module included projects for the building totaling $1,567,474 during FY 2022. One of these projects was for tuckpointing and rebuilding of the elevator penthouse walls. Although the estimated cost of this project was $1,510,474, this amount and its corresponding deficiency were not included in the building's FY 2022 BAT survey.

Underreported liabilities in the BAT system limit PBS's ability to effectively allocate resources, prioritize repairs, manage risk, and ensure accurate financial reporting. Accordingly, PBS should improve oversight to ensure surveyors and approvers have access to the building maintenance liability information contained in the IRIS PAR and IRIS WI modules when completing and reviewing BAT surveys. PBS should also strengthen quality control procedures by incorporating a review of the building maintenance liability information contained in the IRIS PAR and IRIS WI modules into the annual variance analysis, particularly for BAT surveys that report zero liabilities.

Finding 2 – In many cases, the completeness and accuracy reviews of BAT surveys are ineffective because PBS employees are acting as both surveyor and approver on the same BAT survey, increasing the risk of undetected errors.

According to PBS's internal guidance, a designated approving official should review BAT surveys to verify the completeness and accuracy of the survey findings. However, in many cases, the completeness and accuracy reviews are ineffective because PBS employees are acting as both surveyor and approver on the same BAT survey, increasing the risk of undetected errors.

PBS's April 2021 BAT system guidance clearly delineated the surveyor and approver roles. Surveyors are responsible for completing the survey. Approvers are responsible for validating the completeness and accuracy of each survey and ensuring consistency. The guidance established the importance of the approver role in the BAT survey process, noting that "an expert, objective review is essential and invaluable."

PBS expanded upon its definition of the approver role in its February 2026 BAT system guidance. The updated guidance establishes that approvers conduct "thorough cross-checks" and adds that approvers scrutinize quantity inputs and cost estimates and ensure alignment with established standards and best practices. The guidance states that the approval step provides a second level of review that is essential for identifying discrepancies or inconsistencies that require further review or correction.

However, in many cases, the completeness and accuracy reviews of BAT surveys are ineffective because PBS employees are acting as both surveyor and approver on the same BAT survey. We reviewed the BAT system activity log data for the 2,949 surveys completed during FYs 2022–2025 and found that 524 surveys (17.8 percent) were completed and approved by the same PBS employee. *Figure 7* on the next page shows the number of surveys completed and approved by the same PBS employee by survey year.

Figure 7. BAT Surveys That Were Completed and Approved by the Same PBS Employee

Survey Year	Number of Surveys Completed and Approved by the Same PBS Employee	Reported Liability Amount ($)
2022	166	$1,508,366,575
2023	112	990,319,044
2024	167	1,901,935,313
2025	79	865,948,154
Total	**524**	**$5,266,569,086**

We found that PBS employees were able to act as both the surveyor and approver on the same BAT survey due to the following reasons:

- PBS personnel did not clearly or consistently assign the surveyor's and approver's roles on BAT surveys;
- The BAT system does not prevent survey completion and approval by the same employee; and
- PBS's guidance does not explicitly prohibit survey completion and approval by the same user.

PBS Personnel Did Not Clearly or Consistently Assign the Surveyor's and Approver's Roles on BAT Surveys

According to PBS's April 2021 BAT system guidance, the regional BAT manager is responsible for assigning both a surveyor and an approver for each survey.[11] However, as shown in *Figure 8* below, we identified inconsistencies with the designation of surveyors and approvers within the survey records.

Figure 8. PBS Personnel Surveyor and Approver Roles

Type of Roles Assigned to Personnel	Number of Occurrences
Surveys that had the same PBS employee assigned as both the surveyor and approver	14
Surveys with an assigned surveyor but not an approver	47
Surveys with an assigned approver but not a surveyor	14
Surveys that did not have an assigned surveyor or approver	2
Surveys with an assigned surveyor and approver, but were completed and approved by the assigned surveyor	10
Surveys with an assigned surveyor and approver, but were completed and approved by the assigned approver	331
Surveys with an assigned surveyor and approver, but were completed and approved by an individual not listed in either role	106

[11] *BAT Regional Program Guidance, V.1.0, Facts, Tips and Best Practices* (April 2021).

Clear, consistent, and controlled assignment of the surveyor's and approver's roles is essential to mitigate the risk of inaccurate, incomplete, or improperly approved surveys.

The BAT System Does Not Prevent Survey Completion and Approval by the Same Employee

The BAT system does not have built-in controls to prevent an employee from completing and approving the same BAT survey. For example:

- An IRIS systems business analyst told us that although an approver can update a survey and submit it for review, they are not permitted to approve their own survey. They also stated that if a manager updates and submits a survey, a different manager is required to review and approve it. However, PBS personnel and BAT system records confirmed that this is not correct. As shown in *Figure 7* on the previous page, we found 524 instances in which the same PBS employees both completed and approved the same surveys.

- The IRIS systems business analyst also stated that as of June 30, 2025, a system control was implemented that prevents assigning the same PBS employee to both a surveyor and an approver role. Nonetheless, we identified 44 BAT surveys that were completed and approved by the same PBS employee after this system control was implemented. The IRIS systems business analyst stated that this occurred because users with administrative and management system roles can still review or approve a BAT survey without restriction.

As demonstrated above, the BAT system lacks system controls to prevent the same employee from both completing and approving a survey. As a result, a BAT survey can be completed and approved by the same employee without an independent review for completeness and accuracy.

PBS's Guidance Does Not Explicitly Prohibit Survey Completion and Approval by the Same Employee

PBS's April 2021 BAT system guidance establishes that surveyors and approvers have separate and distinct roles. However, the guidance does not explicitly prohibit a surveyor from also serving as the approver for the same BAT survey.

Specifically, PBS's *[Frequently Asked Questions] to Improve BAT Data Accuracy* states the following: [12]

> Can I be a Surveyor as well as an Approver for a BAT survey?
>
> Answer: Although it is possible, it is not recommended. It is critical that the BAT survey accurately reflects an asset's liability. As such, the survey should undergo

[12] *FAQs to Improve Building Assessment Tool (BAT) Data Accuracy* (April 2021).

a quality assurance check prior to its approval to ensure it does not contain errors or omissions.

This guidance may lead PBS staff to continue the practice of completing and approving their own BAT surveys because the practice is not explicitly prohibited.

Because PBS uses information from the BAT surveys to make decisions that are critical to the management of its real property portfolio, PBS should strengthen controls to ensure that BAT surveys receive a quality assurance check for completeness and accuracy prior to approval.

Accordingly, PBS should require a separate surveyor and approver for each BAT survey, clearly document both roles in the BAT module, and ensure each PBS employee performs only the duties of their assigned role. In addition, PBS should implement controls to prevent a BAT survey from being completed and approved by the same person and provide clear guidance to all BAT users regarding separating duties and independent approval expectations. Lastly, PBS should update its February 2026 policy to explicitly prohibit any individual from serving as both surveyor and approver for the same BAT survey.

Conclusion

PBS is not consistently complying with the internal guidance it designed to ensure that the estimated costs of building repairs and maintenance in the BAT system are complete and accurate, resulting in underreported building maintenance liabilities and increasing the risk of undetected errors. Specifically, we found that:

- PBS did not consistently review existing data sources for repair and alteration costs when preparing some BAT surveys, resulting in underreported building maintenance liabilities. We found that 79 of the BAT surveys in our sample of 196 buildings underreported repair and alteration costs by a total of $73 million.

- PBS did not consistently perform independent completeness and accuracy reviews of BAT surveys, thereby increasing the risk of undetected errors.

PBS uses the building maintenance liability data obtained through the BAT system to make decisions on whether to repair, replace, or dispose of its buildings. Because of its importance to the management of PBS's building portfolio, this data must be complete, accurate, and reliable. The importance of this data is magnified by PBS's recent decision to extend the time frame for conducting BAT surveys from a 2-year to a 5-year cycle. This change, which was made in response to PBS's significant staffing losses and major reorganization in 2025, increases the risk of outdated building maintenance liability data.

Accordingly, PBS should improve oversight to ensure that all available data sources are reviewed when preparing BAT surveys. PBS should also strengthen controls to ensure that the surveyor and approver roles are properly separated.

Recommendations

We recommend that the PBS Commissioner:

1. Improve oversight of the BAT surveys by:
    a. Ensuring surveyors and approvers have access to the building maintenance liability information contained in the IRIS PAR and IRIS WI modules.
    b. Requiring surveyors and approvers to review the building maintenance liability information contained in the IRIS PAR and IRIS WI modules when completing and reviewing BAT surveys.

2. Strengthen quality control procedures by incorporating reviews of the building maintenance liability information contained in the IRIS PAR and IRIS WI modules into the annual variance analysis, particularly for BAT surveys reporting zero liabilities.

3. Require a separate surveyor and approver for each BAT survey, clearly document both roles in the BAT system, and ensure each PBS employee performs only the duties of their assigned role. This should include, at a minimum:
    a. Implementing controls to: (1) prevent a BAT survey from being completed and approved by the same person and (2) provide clear guidance to all BAT users regarding separating duties and independent approval expectations.
    b. Updating the February 2026 BAT internal guidance to explicitly prohibit any individual from serving as both surveyor and approver for the same BAT survey.

GSA Comments

The PBS Acting Commissioner stated that PBS agrees with the report recommendations. His written comments are included in their entirety in ***Appendix C***.

Appendix A – Objective, Scope, and Methodology

Objective

We performed this audit as part of the GSA Office of Inspector General's *Fiscal Year 2025 Audit Plan*. Our audit objective was to determine whether PBS is effectively using the BAT system to monitor the costs of building repairs and maintenance in accordance with internal guidance.

Scope and Methodology

Our audit evaluated the accuracy and completeness of PBS's BAT survey data. We reviewed surveys completed from FYs 2022–2025 and selected a judgmental sample based on defined parameters, as detailed in the *Sampling* section on the next page.

To accomplish our objective, we:

- Reviewed PBS's intranet pages, policies, and guidance related to the BAT system;
- Examined GSA and PBS organizational charts;
- Reviewed 40 U.S.C. 524, Executive Order 13327, and OMB Circular A-136, related to monitoring and reporting of building repair and maintenance;
- Reviewed SFFAS 42 requirements;
- Reviewed a prior GSA Office of Inspector General audit report to identify significant issues that may affect the current audit;
- Reviewed *Agency Financial Reports* to assess deferred maintenance and repair reporting;
- Evaluated BAT system data for FYs 2022–2025;
- Evaluated data obtained from the IRIS PAR and IRIS WI modules;
- Reviewed IRIS user manuals to understand module processes and terminology;
- Interviewed PBS Central Office and regional personnel to understand BAT system processes; and
- Interviewed PBS surveyors and approvers responsible for BAT surveys included in our sample.

Data Reliability

We assessed the reliability of BAT system data provided by PBS through logical tests, source document tracing, independent reconciliations, and staff interviews. For data from the IRIS PAR and IRIS WI modules, we reviewed each module's user manual and communicated with IRIS development team personnel. We determined that the data was sufficiently reliable for the purposes of this audit.

Sampling

From FYs 2022–2025, PBS completed 2,949 BAT surveys for 1,642 buildings.[13] However, the data available at the time we selected our sample included only surveys completed through July 31, 2025. Accordingly, our sample reflects surveys PBS completed from October 1, 2021, through July 31, 2025.

Within this time frame, PBS completed 2,547 BAT surveys for 1,462 buildings. We reviewed the building maintenance liability information in the IRIS PAR and IRIS WI modules to determine whether the buildings had active or planned projects. We excluded the 842 surveys from buildings without projects in either module because there were no potential underreported liabilities that should have been captured in BAT surveys. From the remaining 1,705 BAT surveys, we considered the following criteria when making our sample selection:

- **BAT surveys reporting zero liabilities –** There were 227 BAT surveys with zero liabilities, covering 145 buildings. Of these, 41 surveys had liability data in the IRIS PAR or IRIS WI modules. We selected and reviewed all 41 surveys, representing 31 buildings.

- **BAT surveys with 25 or more sections reporting zero liabilities –** Each BAT survey contains 40 sections. From October 1, 2021, through July 31, 2025, there were 649 BAT surveys with zero liabilities identified in at least 25 of the 40 sections. We selected 210 of those BAT surveys, covering 137 buildings. Using a weighted average approach based on the number of surveys in each region, we selected buildings with the largest gross square footage while ensuring each region had at least four BAT surveys included in the sample.

- **BAT surveys reporting less than $200,000 in liabilities –** There was a total of 189 BAT surveys, covering 126 buildings, with less than $200,000 in liabilities reported. We selected 40 surveys, covering 28 buildings, by choosing those with the largest gross square footage that reported less than $200,000 in liabilities.

After applying these criteria, the population consisted of 879 BAT surveys completed for 549 buildings. Our sample of 291 surveys (for 196 buildings) represents 33.11 percent of this survey population.

Internal Controls

We assessed internal controls significant within the context of our audit objective against internal control guidance for federal agencies. The methodology above describes the scope of our assessment, and the report findings include any internal control deficiencies we identified.

[13] PBS completed multiple BAT surveys for some buildings during this approximate 4-year time period under its biennial policy. This is why the number of completed BAT surveys exceeds the number of buildings covered during this time period in our sample.

Our assessment is not intended to provide assurance on GSA's internal control structure as a whole. GSA management is responsible for establishing and maintaining internal controls.

Compliance Statement

We conducted the audit between February 2025 and February 2026 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 – Underreported Building Maintenance Liabilities

The table below summarizes the underreported building maintenance liabilities we identified in our sample of 291 BAT surveys completed during FYs 2022–2025. It includes the PBS region, building number, survey fiscal year, the building maintenance liabilities originally reported in the BAT survey, the underreported amounts we identified, and the correct liability totals.

PBS Region	Building Number	Survey Fiscal Year	Building Liabilities Originally Reported ($)	Underreported Amount ($)	Correct Liability Total ($)
			(a)	(b)	(c) = (a) + (b)
11	MD0335LB	2022	$1,312,804	$2,899,124	$4,211,928
4	MS0083ZZ	2022	200,885	1,909,505	2,110,390
4	AL0011ZZ	2022	-	1,567,474	1,567,474
11	DC0505ZZ	2022	36,082,377	1,500,000	37,582,377
11	DC0240SE	2022	-	625,771	625,771
9	NV0013ZZ	2022	152,524	560,000	712,524
4	GA0077AC	2022	4,690,387	437,000	5,127,387
9	CA0363ZZ	2022	91,269	250,000	341,269
11	MD0331WO	2022	3,010,418	250,000	3,260,418
7	LA0098ZZ	2022	3,772,599	152,500	3,925,099
11	DC1473SE	2022	3,696,515	150,000	3,846,515
9	CA0309ZZ	2022	1,180,685	141,000	1,321,685
2	PR0521FP	2022	475,657	100,000	575,657
3	NJ5002ZZ	2022	98,874	97,899	196,773
10	AK0035AA	2022	-	95,342	95,342
7	TX0069ZZ	2022	3,488,463	75,000	3,563,463
4	GA0010AE	2022	4,652,575	73,000	4,725,575
11	DC0515AF	2022	3,233,540	60,000	3,293,540
11	DC0573PB	2022	3,554,441	60,000	3,614,441
7	TX0272ZZ	2022	2,465,181	47,900	2,513,081
7	AR0085RK	2023	3,918,569	2,300,000	6,218,569
7	TX0550LT	2023	70,440	1,714,876	1,785,316
11	DC1415NA	2023	2,918,803	704,402	3,623,205
7	NM0037ZZ	2023	38,018	695,000	733,018
5	IL0200ZZ	2023	727,663	439,000	1,166,663
11	MD0826WO	2023	987,825	350,000	1,337,825
11	VA0247AN	2023	25,154	284,847	310,001
7	TX8023CR	2023	-	284,540	284,540
11	MD0822WO	2023	3,362	200,000	203,362
7	TX0725TG	2023	-	93,133	93,133

PBS Region	Building Number	Survey Fiscal Year	Building Liabilities Originally Reported ($)	Underreported Amount ($)	Correct Liability Total ($)
			(a)	(b)	(c) = (a) + (b)
11	MD0810WO	2023	73,176	80,000	153,176
7	NM0038ZZ	2023	1,313,815	70,000	1,383,815
11	DC0501BC	2024	3,235,436	5,000,000	8,235,436
11	DC0240SE	2024	-	3,837,998	3,837,998
11	DC0296ZZ	2024	-	3,610,312	3,610,312
7	LA0098ZZ	2024	4,561,439	3,442,153	8,003,592
11	MD0335LB	2024	3,360,428	2,899,124	6,259,552
11	MD0817WO	2024	926,593	2,782,545	3,709,138
11	DC0505ZZ	2024	42,625,639	2,617,051	45,242,690
5	OH0215ZZ	2024	1,932,914	2,261,000	4,193,914
11	DC0019ZZ	2024	6,567,082	1,949,972	8,517,054
7	AR0031ZZ	2024	6,660,777	1,500,000	8,160,777
7	TX0247ZZ	2024	986,511	1,475,000	2,461,511
7	OK0063ZZ	2024	5,321,241	1,035,000	6,356,241
1	MA0136ZZ	2024	2,792,456	1,000,000	3,792,456
7	LA0097BT	2024	3,441,670	959,060	4,400,730
11	VA0055ZZ	2024	2,472,472	885,835	3,358,307
11	DC0220SE	2024	-	823,927	823,927
7	AR0057ZZ	2024	3,872,140	719,823	4,591,963
7	TX0272ZZ	2024	2,744,242	500,000	3,244,242
11	MD0331WO	2024	2,912,297	350,000	3,262,297
7	OK0101ZZ	2024	7,886,175	280,000	8,166,175
11	DC0234SE	2024	-	276,447	276,447
1	MA0013ZZ	2024	959,967	200,000	1,159,967
7	TX0808FW	2024	3,627,293	200,000	3,827,293
3	MD0415HC	2024	11,247,972	177,500	11,425,472
7	TX8016CB	2024	-	165,000	165,000
7	TX0604MC	2024	93,974	134,000	227,974
7	TX0733NW	2024	2,884,497	106,424	2,990,921
7	LA0099ZZ	2024	2,354,328	80,000	2,434,328
11	DC0515AF	2024	18,709,969	60,000	18,769,969
7	TX0550LT	2025	76,718	3,492,597	3,569,315
11	MD0810WO	2025	162,007	3,230,000	3,392,007
3	VA1608ZZ	2025	6,081,459	2,376,000	8,457,459
11	DC1415NA	2025	4,122,470	1,218,173	5,340,643
7	LA0097BT	2025	3,398,017	959,060	4,357,077
7	TX0435HF	2025	1,600,647	900,000	2,500,647
7	NM0037ZZ	2025	44,192	695,000	739,192

PBS Region	Building Number	Survey Fiscal Year	Building Liabilities Originally Reported ($)	Underreported Amount ($)	Correct Liability Total ($)
			(a)	(b)	(c) = (a) + (b)
7	LA0070ZZ	2025	2,972,232	630,000	3,602,232
11	MD0827WO	2025	287,068	375,000	662,068
11	MD0826WO	2025	981,524	350,000	1,331,524
11	MD0822WO	2025	6,583	300,000	306,583
5	MI0404CI	2025	67,200	275,000	342,200
11	DC1340SE	2025	357,526	250,000	607,526
7	TX0547LT	2025	23,429	200,000	223,429
7	TX0397ZZ	2025	197,769	114,170	311,939
7	TX0725TG	2025	-	100,000	100,000
7	TX0338LI	2025	29,391	90,000	119,391
7	LA0099ZZ	2025	1,860,073	80,000	1,940,073
		Totals	**$246,681,836**	**$73,230,484**	**$319,912,320**

Appendix C – GSA Comments

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U.S. General Services Administration

August 12, 2026

MEMORANDUM FOR: ARTHUR F. MAISANO
REGIONAL INSPECTOR GENERAL FOR AUDITING
NORTHEAST AND CARIBBEAN REGION AUDIT OFFICE
OFFICE OF INSPECTOR GENERAL(JA-2)

FROM: MICHAEL GELBER
ACTING COMMISSIONER
PUBLIC BUILDINGS SERVICE (P)

SUBJECT: Response to the Office of Inspector General's Draft Report, *PBS Is Not Consistently Complying with Its Internal Guidance for the Building Assessment Tool, Resulting in Underreported Liabilities and Increasing the Risk of Errors* (A250036)

The Public Buildings Service (PBS) appreciates the opportunity to review and comment on the subject draft report, in which the Office of Inspector General provides the following recommendations:

(1) Improve oversight of Building Assessment Tool (BAT) surveys by:

(a) Ensuring surveyors and approvers have access to building maintenance liability information contained in the Inventory Reporting Information System (IRIS) Prioritization of Asset Repair (PAR) and Work Items (WI) modules.

(b) Requiring surveyors and approvers to review the building maintenance liability information contained in the IRIS PAR and IRIS WI modules when completing and reviewing BAT surveys.

(2) Strengthen quality control procedures by incorporating reviews of the building maintenance liability information contained in the IRIS PAR and IRIS WI modules into the annual variance analysis, particularly for BAT surveys reporting zero liabilities.

(3) Require a separate surveyor and approver for each BAT survey, clearly document both roles in the BAT system, and ensure each PBS employee performs only the duties of their assigned role. This work should include, at a minimum:

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(a) Implementing controls to: (1) prevent a BAT survey from being completed and approved by the same person and (2) provide clear guidance to all BAT users regarding separating duties and independent approval expectations.

(b) Updating the February 2026 BAT internal guidance to explicitly prohibit any individual from serving as both surveyor and approver for the same BAT survey.

PBS agrees with these recommendations and will develop a plan to address them.

If you have any questions, please contact Ferris Linn, BAT Program Manager, PBS Office of Portfolio Management at ferris.linn@gsa.gov and Renee Sells, BAT Program Manager, PBS Office of Portfolio Management at renee.sells@gsa.gov

Appendix D – Report Distribution

GSA Administrator (A)

GSA Deputy Administrator (AD)

Acting Commissioner (P)

Acting Deputy Commissioner (P1)

Deputy Commissioner (P1)

Acting Chief of Staff (P2)

Acting Chief of Staff (PB)

BAT National Program Manager, Office of Portfolio Management (PT)

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