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PBS Should Improve Its Oversight of Electronic Contract Files

Report Number A250037/P/2/R27001
November 6, 2026

Executive Summary

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Why We Performed This Audit

GSA's Public Buildings Service (PBS) acts as the landlord for the civilian federal government, managing more than 8,600 owned and leased assets with over 370 million rentable square feet of space. To fulfill its responsibilities, PBS awards contracts for an extensive range of real property management services, including design and construction; repair, alteration, and renovation; building operations and maintenance; and disposal. As of March 2026, PBS had 8,910 active contracts valued at more than $14.6 billion.

Contract files serve as the official record of acquisition decisions and help ensure proper oversight and administration of contracts. These files document how contracts were planned, awarded, administered, and closed out, which helps ensure transparency, accountability, and compliance with federal acquisition requirements. Accordingly, contract files must be complete, accurate, and reliable. Properly maintained contract files are also critical to ensure continuous, effective contract management in cases of acquisition staffing turnover.

In addition, contract files often contain sensitive information that, while not classified, still requires some level of protection against mishandling and unauthorized access. This information is referred to as controlled unclassified information (CUI). Among other things, acquisition-related CUI includes proprietary pricing information, financial information, trade secrets, and information used by PBS to evaluate a bid or proposal and enter into a contractual agreement.

PBS uses the Electronic Acquisition System integration (EASi) as its official repository for electronic contract files. EASi standardizes contract documentation and provides a centralized record of contractual actions throughout the acquisition life cycle. Since May 1, 2018, EASi has been mandatory for all PBS solicitations and awards above the micro-purchase threshold.[1]

Because of the importance of contract files, we included this audit in the GSA Office of Inspector General's *Fiscal Year 2025 Audit Plan.* Our audit objectives were to determine whether PBS maintains adequate oversight to ensure that: (1) contract files are complete, accurate, and properly maintained within EASi; and (2) documentation that contains CUI is properly marked and designated in EASi in accordance with the Federal Acquisition Regulation (FAR), General Services Administration Acquisition Manual (GSAM), and PBS policy.

[1] The micro-purchase threshold during our audit was $15,000 (FAR 2.1, *Definitions*).

What We Found

PBS did not provide adequate oversight of its electronic contract files. We found that PBS contracting personnel are not maintaining required documentation within EASi, PBS's official system of record, and as a result, PBS's electronic contract files are not complete. Further, documentation necessary for effective contract administration and oversight was also incomplete or missing from the electronic contract files. Lastly, we found that contracting personnel did not properly designate and mark CUI, increasing the risk of mishandling and unauthorized disclosure of sensitive acquisition information.

What We Recommend

We recommend that the Acting PBS Commissioner:

1. Strengthen PBS contract file management by:
    a. Enforcing the requirement that PBS contracting officers use EASi as the official system of record.
    b. Requiring PBS contracting officers to upload all acquisition documents to EASi in a timely manner.
    c. Ensuring contracting officers use the PBS contract file checklist to verify completeness and accuracy of all contract files.
    d. Implementing a standardized oversight process during contract administration and prior to closeout to ensure contract files are complete, accurate, and compliant with FAR, GSAM, and PBS policy requirements.
    e. Providing training or refresher guidance to PBS contracting personnel on proper contract file documentation, effective use of EASi, and the importance of maintaining timely and complete acquisition documents.

2. In conjunction with the GSA Chief Information Officer, evaluate EASi to determine whether its usability and document-management functionality can be improved.

3. Strengthen oversight of contract documentation maintained by contracting officers' representatives (CORs) by:
    a. Requiring contracting officers to verify that all contract documentation maintained by CORs is complete and properly transferred to the official contract file at closeout.
    b. If any portion of the COR file is stored elsewhere, ensuring that the contracting officers include a memorandum for the record in the contract file identifying the approved alternate storage location.
    c. Ensuring that contracting officers confirm that the *Award Closeout Checklist* accurately reflects the status of the COR file transfer.

4. Issue guidance, and provide associated training, to PBS contracting personnel on the proper identification, marking, designation, and management of CUI. This should include:
    a. Instruction on correctly identifying CUI, applying required CUI banners, and checking the CUI designation checkbox in EASi.
    b. Guidance specifying which acquisition documents must be marked as CUI.
    c. Clarification of the roles and responsibilities of acquisition personnel to ensure consistent and compliant CUI handling during contract administration and through contract closeout.

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) oversight of electronic contract files.

Purpose

We included this audit in the GSA Office of Inspector General's *Fiscal Year 2025 Audit Plan* because reliable contract documentation is critical, and deficiencies in contract file management can create significant risks. Complete and accurate contract file documentation is important because it serves as the official record of acquisition decisions; helps ensure proper oversight and responsible use of taxpayer dollars; and protects sensitive information, such as controlled unclassified information (CUI), throughout the acquisition process.

Objectives

Our audit objectives were to determine whether PBS maintains adequate oversight to ensure that: (1) contract files are complete, accurate, and properly maintained within the Electronic Acquisition System integration (EASi), PBS's electronic contract file system; and (2) documentation that contains CUI is properly marked and designated in EASi in accordance with the Federal Acquisition Regulation (FAR), General Services Administration Acquisition Manual (GSAM), and PBS policy.

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

Background

PBS acts as the landlord for the civilian federal government, managing more than 8,600 owned and leased assets with over 370 million rentable square feet of space. To fulfill its responsibilities, PBS awards contracts for an extensive range of real property management services, including design and construction; repair, alteration, and renovation; building operations and maintenance; and disposal. As of March 2026, PBS had 8,910 active contracts valued at more than $14.6 billion.

Effective acquisition and oversight require complete and accurate contract files. Contract files serve as the official record of acquisition decisions and help ensure proper oversight and administration of contracts. These files document how contracts were planned, awarded, administered, and closed out, which helps ensure transparency, accountability, and compliance with federal acquisition requirements.

Maintaining complete and accurate contract files reduces the risk of missing documentation, unauthorized disclosures, improper payments, procurement disputes, and noncompliance with

federal regulations. Properly maintained contract files are also critical to ensure continuous, effective contract management in cases of acquisition staffing turnover.

Roles, Regulations, and Policies Governing Contract Files

Within PBS, two key acquisition roles ensure that contract files are complete, accurate, and properly maintained—contracting officers and contracting officers' representatives. These acquisition roles and the regulations and policy governing their respective files are discussed below.

Contracting officers. Contracting officers hold the legal authority to award, modify, or terminate federal contracts. They are responsible for ensuring all contractual actions comply with the FAR, GSAM, and PBS policy. Contracting officers must maintain official contract files documenting all decisions, approvals, and contractual actions in accordance with the following FAR, GSAM, and PBS policy requirements:

- **FAR 4.802, *Contract files* –** Mandates that contract files document the basis for acquisition and award.

- **FAR 4.803, *Contents of contract files* –** Specifies the records that must be included in contract files, such as the solicitation, offers received, cost/price analysis, negotiation documentation, and the signed contract with all modifications.

- **GSAM 504.802, *Contract files* –** Reinforces the FAR requirements by directing GSA contracting officers to ensure that all documentation required by FAR 4.802 and FAR 4.803 is included in the contract file.

- **PBS Procurement Instructional Bulletin (PIB) 18-02, Amendment 01, *PBS Contract File Content and Organization* (March 3, 2023) –** Requires PBS to use EASi as the official repository for contract file documentation. This PIB also mandates the use of standardized checklists and templates of required documentation to ensure consistent content and organization across all PBS contract files.[2,3]

  The required checklists and documentation include:

  - PBS Contract/Order File Content Checklist;
  - PBS Modification File Content Checklist;
  - PBS Bond Checklist;

[2] For purposes of this report, the term "PIB 18-02" refers to PIB 18-02, Amendment 01 (March 3, 2023).

[3] According to *PBS National Acquisition Resource Center*, PIB 18-02 was archived on May 14, 2026; however, the requirements of PIB 18-02 remain in place.

- Responsibility Determination and System for Award Management Review Memorandum (for new contracts);
- System for Award Management Review Memorandum (for new task/delivery orders); and
- PBS EASi/Electronic Document Management File Naming requirements.

Contracting officers' representatives. The contracting officers' representatives (CORs) are designated and authorized in writing by a COR Appointment Letter to act as the contracting officer's representative in monitoring specific aspects of contractor performance. The COR's role is to help ensure the contractor provides the government with the specific goods and services required in the contract. This is accomplished through effective contract administration and documentation of contractor performance. CORs maintain their own COR contract files, which may be stored in EASi or other PBS-approved electronic systems.[4]

PBS's success in properly awarding and administering contracts depends heavily on accurate and well-maintained documentation; therefore, it is critical that contract files are complete, accurate, and reliable. Maintaining thorough and complete files provides clear evidence that procurement decisions were made fairly and that taxpayer dollars were used appropriately.

Controlled Unclassified Information

PBS contract files often contain sensitive information, referred to as controlled unclassified information (CUI), that requires safeguarding. Executive Order 13556, *Controlled Unclassified Information*, defines CUI as "unclassified information that requires safeguarding or dissemination controls, pursuant to and consistent with applicable law, regulations, and Government-wide policy."

CUI covers a wide range of sensitive data, several categories of which specifically relate to procurement-sensitive information. These include:

- **General Procurement and Acquisition –** Information related to the acquisition and procurement of goods and services, including but not limited to, cost or pricing data, contract information, indirect costs, and direct labor rates.

- **General Proprietary Business Information –** Information related to a company's products, operations, or business activities. This may include financial data, trade secrets, research and development materials, product designs, and information about current or projected company performance.

[4] PBS PIB 21-05, *Contracting Officer's Representative (COR)*, establishes that COR files may be stored in an alternate enterprise-wide system of record (e.g., Kahua or the National Computerized Maintenance Management System). Each region is required to maintain consistency when selecting a filing system. A memorandum for the record must be generated by each region to document their specific filing system.

- **Source Selection –** According to FAR 2.101, *Definitions*, source selection information is any information that is prepared for use by an agency for the purpose of evaluating a bid or proposal to enter into an agency procurement contract, if that information has not been previously made available to the public or disclosed publicly. Examples listed in the FAR include:
    - Bid prices submitted in response to an agency invitation for bids;
    - Proposed costs or prices submitted in response to an agency solicitation;
    - Source selection plans;
    - Technical evaluation plans; and
    - Technical evaluations of proposals.

- **Budget –** Information related to the federal budget, including authorizations and estimates of income and expenditures. This information includes an independent government estimate, which is a government-prepared estimate of the expected cost of a contract or task order, developed by knowledgeable personnel before soliciting contractor proposals or awarding a contract.

Because of its sensitivity, CUI is subject to federal regulations and GSA policy that require the proper identification and safeguarding of sensitive information contained within contract file documentation. These requirements include:

- **Executive Order 13556, *Controlled Unclassified Information* (November 4, 2010) –** Established a standardized, government-wide CUI program to ensure consistent handling of CUI across the executive branch. The order designates the National Archives and Records Administration (NARA) as the executive agent responsible for overseeing agency compliance. NARA also maintains the *CUI Registry*, which is the authoritative reference for all CUI categories, governing authorities, and required markings.

- **GSA Order CIO 2103.2, *Controlled Unclassified Information (CUI) Policy* (April 10, 2021) –** Establishes GSA's framework for identifying, safeguarding, disseminating, and destroying CUI in accordance with the NARA *CUI Registry*.

- ***GSA CUI Program Guide* –** Provides detailed guidance for handling and protecting unclassified government information that requires safeguarding or dissemination controls.

Electronic Acquisition System Integration

PBS uses the Electronic Acquisition System integration (EASi) as its official repository for electronic contract files. EASi standardizes contract documentation and provides a centralized record of contractual actions throughout the acquisition life cycle. Since May 1, 2018, EASi has been mandatory for all PBS solicitations and awards above the micro-purchase threshold.[5]

[5] The micro-purchase threshold during our audit was $15,000 (FAR 2.1, *Definitions*).

EASi uses a standardized 45-tab structure for the electronic contract files—36 tabs for the contracting officer and 9 for the COR. Each award is captured as an electronic record, and team members are granted access based on their assigned roles, including the ability to upload attachments. When uploading documents, acquisition personnel must enter key details, including whether the attachment contains CUI.

Maintaining complete and accurate contract files within EASi is essential because it provides a centralized location where contract documentation can be easily accessed and referenced when needed. EASi usage also promotes consistency in how contract files are stored across PBS regions and helps ensure continuity of operations due to acquisition personnel changes or turnover.[6]

Prior GSA Office of Inspector General Audit Reports

Our office has issued numerous reports identifying deficiencies in PBS's contract file documentation. Significant examples include:

- In June 2021, we issued a report on an audit of a contract to upgrade three passenger elevators at the United States Court of International Trade Building in PBS's Northeast and Caribbean Region (PBS Region 2).[7] We found that PBS Region 2 did not maintain necessary contract file documentation, which could have caused project delays and potential claims.

- In April 2023, we issued a report on a task order for water intrusion repairs and mold remediation at the Fort Lauderdale Federal Building and Courthouse.[8] We found that the PBS Southeast and Sunbelt Region (PBS Region 4) did not maintain a complete and accurate task order file. Specifically, PBS Region 4 uploaded 383 documents to the task order file in response to our audit. Despite the significant number of documents added during the audit, several key documents remained missing, including the acquisition plan, security and background information, certified payroll records, and other required documentation.

- In September 2024, we reported on an audit of the PBS Region 2's procurement and administration of a paving project for six land ports of entry at New York State's

[6] 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 all sampled contracts were completed prior to the reorganization, we retained references to PBS's regions in this report.

[7] *Audit of PBS Basic Repairs and Alterations Project: United States Court of International Trade Building* (Report Number A200976/P/2/R21004, June 17, 2021).

[8] *Audit of PBS Basic Repairs and Alterations Project: Fort Lauderdale Federal Building and Courthouse* (Report Number A220042/P/6/R23007, April 20, 2023).

northern border.[9] We found that PBS Region 2 did not maintain complete and accurate contract file documentation. As a result, some contract documents were missing, incomplete, or unsigned.

[9] *Oversight of PBS's Projects Funded by the Infrastructure Investment and Jobs Act: Audit of Paving Project at New York State's Northern Border* (Report Number A220036/P/2/R24008, September 24, 2024).

Results

PBS did not provide adequate oversight of its electronic contract files. We found that PBS contracting personnel are not maintaining required documentation within EASi, PBS's official system of record, and as a result, PBS's electronic contract files were not complete. Further, documentation necessary for effective contract administration and oversight was also incomplete or missing from the electronic contract files. Lastly, we found that contracting personnel did not properly designate and mark CUI, increasing the risk of mishandling and unauthorized disclosure of sensitive acquisition information.

Finding 1 – PBS contracting personnel are not maintaining required documentation within EASi, PBS's official system of record, and as a result, PBS's electronic contract files are not complete.

Federal regulations and GSA and PBS policies require complete contract files. Both the FAR and the GSAM require contracting officers to establish and maintain complete and accurate contract files to ensure effective contract management and support informed decision-making.[10] To support compliance with these requirements, PBS policy mandates a single, official system of record for its electronic contract files, EASi.

However, we found that PBS's electronic contract files were not complete, and required documentation was not consistently maintained in EASi. These deficiencies occurred because PBS contracting personnel did not consistently use PBS's mandatory contract file checklist and contract review practices. PBS contracting officers also stated that they did not consistently upload documents into EASi because they found network drives or GSA's Google Drive easier to use for contract file storage.

PBS Electronic Contract Files Are Not Complete, and Required Documentation Is Not Consistently Maintained in EASi

Contract files serve as the official record of acquisition decisions and help ensure proper oversight and administration of contracts. These files document how contracts were planned, awarded, administered, and closed out, which helps ensure transparency, accountability, and compliance with federal acquisition requirements.

The contents of contract files are governed by the following requirements:

- **FAR 4.802, *Contract files* –** Mandates that contract files document the basis for acquisition and award.

[10] FAR 4.801, *General*, and GSAM 504.802, *Contract files*.

- **FAR 4.803, *Contents of contract files* –** Specifies the records that must be included in contract files, such as the solicitation, offers received, cost/price analysis, negotiation documentation, and the signed contract with all modifications.

- **GSAM 504.802, *Contract files* –** Reinforces the FAR requirements by directing GSA contracting officers to ensure all documentation required by FAR 4.802 and FAR 4.803 is included in the contract file.

Additionally, PBS PIB 18-02 mandates the use of EASi as the official repository for contract file documentation.

However, PBS is not complying with these requirements. We selected a judgmental sample of one closed contract from each of the 11 PBS regions and found that all 11 files were incomplete.[11] As shown in *Figure 1* below, a significant number of contract documents were missing from the contract files across all regions at the start of our audit.

Figure 1. Regional Electronic Contract File Completeness

PBS Region	Contract Number	Contract Amount ($)*	Documents Before Audit Request (a)	Documents Added After Audit Request (b)	Percent of Docs Missing at Time of Request (c) = (b)/(a + b)
1	47PB0023P0009	1,033,711	18	21	54%
2	47PC0222F0037	3,594,181	58	92	61%
3	47PD0223C0003	3,064,175	119	14	11%
4	47PE0622F0048	5,574,167	61	20	25%
5	47PF0023F0182	1,288,673	21	528	96%
6	47PG0223F0013	1,830,070	73	5	6%
7	47PH0222F0288	5,182,458	45	15	25%
8	47PJ0023F0237	1,732,543	59	42	42%
9	47PK0122F0012	4,344,850	20	60	75%
10	47PL0122C0002	1,353,940	197	142	42%
11	47PM0222C0012	2,069,930	92	17	16%
Total		**31,068,698**	**763**	**956**	

*Dollar amounts in this column are rounded.

As shown in *Figure 1* above, PBS acquisition personnel uploaded nearly 1,000 contract documents into the contract files based on our audit inquiries. In some cases, PBS was unable to locate the documents, and as a result, the documents remained missing. We provide specific examples of contract file documentation deficiencies on the following pages.[12]

[11] See ***Appendix A*** for additional information on our sampling methodology.

[12] See ***Appendix B*** for additional examples of required contract documents that were missing or incomplete.

- **PBS Great Lakes Region (PBS Region 5) –** This contract was for the procurement and installation of Physical Access Control System card readers and controllers for multiple locations in Ohio, valued at $1,288,673. We found that a significant amount of contract file documents were missing from the electronic contract file in EASi. As a result of our audit inquiry, PBS uploaded 528 documents to the file. However, several key documents remained missing, including the following:

  - **Warranty –** FAR 46.702, *General*, states that the principal purposes of a warranty in a federal contract are to delineate the rights and obligations of the contractor and the government for defective items and services and to foster quality performance.

    Although the contract documentation referenced a warranty, no warranty was included in the contract file. Without a warranty, PBS is at risk of lacking protection if defects or performance issues arise.

  - **Performance and Payment Bonds –** FAR 28.102-1, *General*, requires performance and payment bonds for all federal construction contracts over $150,000, and FAR 52.228-15, *Performance and Payment Bonds-Construction*, mandates the use of Standard Forms 25 and 25A unless GSA approves deviations in writing. These bonds protect the government by ensuring contractor performance and guaranteeing payment to subcontractors and suppliers.

    Although the contract documentation referenced the submission of bonds, PBS Region 5 confirmed that the required bonds were never requested—likely due to an oversight by a previous contracting officer. Without the required performance and payment bonds, the government is exposed to financial and performance risk. If the contractor fails to perform, defaults, or does not pay its subcontractors or suppliers, PBS lacks the protection necessary to recover costs or ensure completion of the work.

  A PBS contracting officer supervisor told us that the contract documents that were recovered had been stored outside of EASi on the former contracting officer's and COR's drives. When we asked why the documents were not uploaded to EASi, the supervisor stated that the former contracting officer chose not to store the documents in the system. He also stated that in PBS Region 5, files are typically maintained in EASi and that it was unacceptable for the files not to be stored in the system.

- **PBS Northwest/Arctic Region (PBS Region 10) –** This contract was for the design-build and installation of new boiler systems at two land ports of entry in Alaska, valued at $1,353,940. In response to our audit inquiry, PBS uploaded 142 documents to the electronic contract file. However, some documents provided were incomplete, lacking approval or required signatures. Examples include:

- **Acquisition Plan –** FAR 7.1, *Acquisition Plans*, requires agencies to conduct acquisition planning, including the development of a written acquisition plan that addresses all technical, business, management, and other significant considerations governing the procurement.

  However, the approved acquisition plan was not in the contract file. The acquisition plan documents the overall acquisition strategy, and when it is missing or incomplete, the contract file lacks evidence of adequate planning. It also increases the risk that acquisition actions were not reviewed or authorized by the required PBS officials.

- **Source Selection Plan –** FAR 15.3, *Source Selection*, requires the source selection authority to approve the source selection strategy or acquisition plan, if applicable, before the solicitation is released. The Source Selection Plan in the contract file includes a designated signature line, indicating that approval by the source selection authority or contracting officer is required.

  However, a signed Source Selection Plan was missing from the contract file, and PBS could not locate the approved document. Without an approved Source Selection Plan, PBS cannot demonstrate that the source selection process was properly reviewed or authorized by the required officials.

The Contracting Director from the PBS Heartland Region (PBS Region 6) told us that they were not familiar with this contract and could not explain why the documents were not initially uploaded into EASi.[13] He stated that ensuring documents are uploaded into EASi ultimately depends on the individual taking the time to do so. He also told us that everyone has different levels of due diligence and that the process of maintaining contract files depends on the contracting officer and the quality control practices within the region.

Incomplete Contract File Documentation Is Due to Ineffective Oversight and Inconsistent Use of EASi

We found that the deficiencies described above occurred for the following reasons:

- PBS contracting officers are not consistently using PBS's mandatory contract file checklist;
- PBS lacks a centralized contract file review process; and
- PBS contracting officers prefer using other means to store contract files that they consider to be more efficient than EASi.

[13] We interviewed the Contracting Director from PBS Region 6 because the individuals who handled the contract in PBS Region 10 were no longer working for GSA at the time of our audit. Due to the reduction in staff that occurred in 2025, PBS Region 6 was assigned responsibility for managing most of PBS Region 10's contracts.

PBS contracting officers are not consistently using PBS's mandatory contract file checklist. PBS PIB 18-02 requires contracting officers to use a standardized checklist to ensure all required documents are included in the official contract file. However, contracting officers did not consistently use these checklists to ensure required documents were prepared, obtained, and properly uploaded to EASi.

To promote consistency and completeness of its electronic contract files, PBS developed standardized checklists that must be used for all contract files. Specifically, the *PBS Contract/Order File Content Checklist* identifies the documentation that the contracting officer and COR must maintain within EASi's 45-tab structure. The checklist must be maintained in Tab 1 of the EASi file.

However, for the 11 contracts we reviewed, the contracting officers could not provide 3 checklists, and the remaining 8 checklists were incomplete. As a result, the electronic contract files were missing key documents, and some documents were uploaded under incorrect tabs. In addition, unrelated documents from other contracts were included in the files. These deficiencies resulted in missing contract documents and disorganized contract files across all PBS regions.

The contracting officers we interviewed generally stated that administrative and technical difficulties prevented them from consistently using the checklist as mandated. One contracting officer stated that they do not verify whether the checklist is included in EASi and do not use it to identify missing documentation. They further stated that they viewed the checklist primarily as an audit tool or as something useful for new staff, rather than a required part of their workflow. Notwithstanding these comments, the checklist is mandatory.

PBS should reinforce the consistent use of its mandatory contract file checklist to ensure contracting officers verify the completeness, accuracy, and proper organization of all contract files.

PBS lacks a centralized contract file review process. Contract file reviews are important oversight practices that help ensure required contract file documentation is complete, accurate, and properly maintained within the electronic contract file system. These reviews also provide transparency and accountability over the award and administration of contracts; reduce the risk of errors or improper actions; and support compliance with the FAR, GSAM, and PBS policy.

However, PBS lacks a centralized contract file review process. Prior to February 2025, PBS relied on the GSA Office of Government-wide Policy's Procurement Management Review (PMR) Division to conduct contract file reviews. During these reviews, PMR staff examined acquisition documentation from both contracting officers and CORs, selecting contracts either randomly or based on factors such as risk level, contract value, or program significance. However, following

the 2025 GSA-wide reorganization, the PMR Division is no longer performing contract file reviews.

In some cases, contracting officials reported that they conducted regional or local contract file reviews. However, these review practices varied significantly, and there were no policies or guidance to ensure that contracting officials provided effective oversight to ensure contract files are complete, accurate, and well-maintained.

PBS contracting officers prefer using other means to store contract files that they consider to be more efficient than EASi. As described above, PBS contracting officers did not upload all required contract file documents into EASi. Although the contracting officers acknowledged that EASi is the system of record for official contract files, they told us that they did not consistently use the system. Instead, they were storing contract documents on network drives, email, and GSA's Google Drive.[14]

PBS contracting officers cited poor system performance and time-consuming processes as their reason for not consistently using EASi. Several contracting officers described the system as slow, difficult to use, and limited in functionality. They told us that uploading or managing documents in EASi often requires 5 to 10 clicks, long load times, and repeated steps, whereas accessing files on network drives or GSA's Google Drive takes only a couple of clicks.

One contracting officer stated that EASi becomes particularly tedious and slow during August and September, when end-of-year activity increases and there is more system usage. She stated that the system often "bogs down" during this period and suggested increasing EASi's bandwidth to make the system faster.

Contracting officers also stated that EASi does not support working or "live" documents, requiring them to create and edit files in external platforms (e.g., Microsoft Word, Adobe Acrobat PDF, and GSA's Google Drive) before uploading them. Because of these system limitations, they stated that they maintain working files outside of EASi.

Another contracting officer suggested adding functionality for creating, storing, and managing live documents within EASi to help acquisition personnel ensure that the most current versions are maintained in the system. She told us that documents are often created and stored in GSA's Google Drive and, in some cases, never transferred to EASi. She noted that it would be beneficial if users could begin working on documents directly in EASi and complete the entire process there. Notwithstanding these user preferences, maintaining all contract documentation in EASi is a PBS requirement designed to ensure that contract files are complete.

[14] GSA uses Google Workspace to collaborate across the Agency. GSA's implementation of Google Workspace includes Google Drive, which is a tool that allows all GSA users to store, share, collaborate, and access files from a mobile device, tablet, or computer.

In sum, PBS did not maintain complete electronic contract files in the official system of record, EASi. Without centralized, complete, and accessible contract files, PBS's ability to effectively manage and oversee its contracts is significantly hampered. Accordingly, PBS should strengthen contract file oversight to ensure complete contract files are uploaded and maintained in EASi. In addition, PBS should evaluate EASi to determine whether its usability and document-management functionality can be improved.

Finding 2 – Documentation necessary for effective contract administration and oversight is incomplete or missing from the electronic contract files.

The COR plays a critical role in contract oversight by holding the contractor accountable for fulfilling the requirements of their contract. In carrying out this important responsibility, the COR, like the contracting officer, must maintain complete files. However, we found that COR files were not properly maintained, resulting in missing and incomplete documentation.

According to FAR 1.604, *Contracting Officer's Representative (COR)*, CORs must maintain documentation that supports all actions taken under their delegated authority. In addition, PBS PIB 21-05, *Public Buildings Service (PBS) Contracting Officer's Representative (COR) Policy*, further directs CORs to maintain their files in accordance with FAR and PBS policies. While CORs may use systems outside of EASi, such as Kahua, they must upload a memorandum for the record to EASi identifying the alternate system where contract documents are stored.

GSAM 504.802 states that the contracting officer is responsible for the official contract file. It also states that individuals creating documents relating to the contract must provide those documents to the contracting officer for inclusion in the contract file. PBS reinforces this requirement through the *Award Closeout Checklist* within EASi, which includes confirmation that the COR's contract file has been turned over to the contracting officer. This requirement emphasizes the need for the COR contract documentation to be uploaded into the COR-designated tabs within EASi or otherwise be provided to the contracting officer before closeout to ensure the official contract file remains complete and accurate.

As described below, we found that 8 of the 11 COR files for the contracts we sampled were not properly maintained.

- The COR for the PBS Region 1 contract did not maintain a COR file. Nonetheless, the contract closeout checklist indicated that the COR's file had been turned over to the contracting officer.

- CORs for four of the PBS contracts (PBS Regions 2, 5, 7, and 8) did not follow the requirement in PBS PIB 18-02 and PIB 21-05 to consistently manage or store their files in PBS-approved electronic contract file systems. Instead, the COR files were stored in the employees' individual drives.

- The designated CORs for the contracts in PBS Regions 4 and 6 left the Agency and their COR files were not complete. The respective contracting officers could not obtain missing documentation, including a warranty and contractor personnel security information. These are important documents that should have been maintained in the contract files because they can be used to protect the government's interests. Specifically, the documents are used to ensure that defective items or services are corrected under the warranty and that only properly vetted contractor personnel are authorized to work on GSA projects.

- For the PBS Region 4 contract, the contracting officer indicated that the COR maintained files outside of EASi, and the contracting officer did not have access to the files. PBS Region 6 did not know whether a COR file had been maintained. Despite this, the *Award Closeout Checklist* for both contracts indicated that the COR's file had been turned over to the contracting officer.

- PBS Region 9 confirmed that additional COR documentation for the PBS Region 9 contract was stored in Kahua, an approved electronic contract file system; however, the required memorandum for the record identifying Kahua as the storage location was not uploaded to EASi.

- All 11 PBS regions completed the *Award Closeout Checklist*. Nine regions indicated that the COR file had been turned over to the contracting officer, while PBS Regions 8 and 11 marked the checklist item as "not applicable." However, both contracts had designated CORs who maintained COR files.

Contracting officers provided different views regarding who is responsible for reviewing the COR files to ensure that all pertinent contract documents are included. Only 1 of the 11 contracting officers we interviewed stated that they are responsible for maintaining the electronic contract file and told us that they review the COR tabs in EASi to ensure required documents are included in the file.

Conversely, another contracting officer stated that the COR's supervisor should be responsible for reviewing the COR files, noting that contracting officers operate in a different business line and cannot manage COR files in addition to their own workload. Other contracting officers stated that the responsibility for reviewing the files is shared between the contracting officer and the COR, with each responsible for maintaining their respective documents.

Notwithstanding these different perspectives, GSAM 504.802 provides that the contracting officer is responsible for the official contract file, and individuals who create documents related to the contract must provide those documents to the contracting officer for inclusion in the file. This requirement reinforces the contracting officer's responsibility for ensuring that all documentation, including COR materials, is included in the official contract files.

Incomplete COR files hinder PBS's ability to ensure that the COR monitored contractor performance and held the contractor accountable for their performance under the contract. Accordingly, PBS should strengthen oversight of COR files to ensure that they are complete.

Finding 3 – PBS contracting personnel did not properly designate and mark controlled unclassified information, increasing the risk of mishandling and unauthorized disclosure of sensitive acquisition information.

Controlled unclassified information (CUI) is sensitive information that must be handled with specific safeguards or dissemination controls consistent with applicable laws, regulations, and government-wide policies. GSA Order CIO 2103.2, *Controlled Unclassified Information (CUI) Policy*, establishes the GSA CUI program and its requirements for handling, marking, protecting, sharing, destroying, and decontrolling CUI. GSA guidance requires that all documents that contain CUI must include a CUI marking at the top of each printed page. Additionally, the *GSA CUI Marking Manual* provides examples of CUI to assist personnel in applying the required markings. GSA also provides a reference spreadsheet listing the CUI categories most commonly used within the Agency.[15] Furthermore, GSA employees are required to complete annual information technology training, which includes general information on protecting CUI.

However, PBS did not ensure that contract documents containing CUI were properly designated and marked, increasing the risk of unauthorized disclosure and mishandling of sensitive acquisition information. Specifically, we found that PBS contract file documents:

- Were incorrectly designated as CUI;
- Lacked proper CUI markings; and
- Were not consistently designated as CUI in EASi.

Overall, these deficiencies occurred because PBS contracting personnel lack a clear understanding of CUI requirements.

Contract File Documents Were Incorrectly Designated as CUI

For four of the contracts in PBS Regions 2, 3, 4, and 9, contracting personnel collectively designated 24 documents as CUI. However, we identified seven documents that were incorrectly designated as CUI in EASi. These documents include:

- **Construction Bid Form (PBS Region 2) –** This is a standardized template used during the construction bidding process. Because the form was blank, it does not contain any CUI-related information.

[15] This spreadsheet is titled *GSA CUI Registry of Categories, Authorities, Markings, Most Likely to be Used*.

- **Construction Contract Guide Checklist (PBS Region 3) –** This is a checklist used by the contracting team for construction contracts. It serves as an extension of the contract file checklist and contains no CUI-related information.

- **Inherently Governmental Function Memorandum (PBS Region 4)[16] –** This document is a standard component of the procurement request package and does not contain any CUI-related information.

- ***2022 GSA PBS Preventive Maintenance Guide*** **(PBS Region 4) –** This is a publicly accessible resource that provides general preventive maintenance instructions for equipment and systems in federal buildings. It does not contain sensitive operational details or any references to CUI.

- **Statement of Work (PBS Region 2), Specifications (PBS Region 3), and Solicitation (PBS Region 4) –** These documents contained standard language and no sensitive or controlled information.

The above documents did not contain sensitive information and therefore were incorrectly designated as CUI in EASi.

Contract File Documents Lacked Proper CUI Markings

As described below, we identified 84 unmarked contract documents within EASi that should have been marked as CUI in accordance with GSA's CUI requirements.

- **Independent Government Estimates –** As part of the government's internal budgeting and cost-estimation process, the independent government estimate (IGE) reveals the government's expected cost for a procurement, which is sensitive acquisition information. Releasing it could compromise competition or give vendors an unfair advantage.

  Under the NARA *CUI Registry*, this falls under the Budget category of sensitive information. GSA training and the mandatory PBS contract file checklist specify that IGEs must be marked as CUI. Specifically, the *2025 GSA IT Security and Privacy Awareness Training* states that confidential acquisition-related information, including government cost estimates, is considered CUI. The checklist further requires that IGEs must be marked "*Controlled Unclassified Information (CUI) CUI//SP-BUDG.*"[17]

[16] In accordance with FAR 7.5, *Inherently Governmental Functions*, the program office must complete a written determination confirming that the subject requirement is not an inherently governmental function.

[17] CUI//SP-BUDG marking means that the IGE is "CUI Specified" information that is related to information concerning the federal budget, including authorizations and estimates of income and expenditures.

However, 40 of 41 IGEs in the sampled contract files lacked the required CUI markings—39 were not marked at all; 1 was marked incorrectly.

- **Acquisition Plans –** Seven contract files (PBS Regions 2, 3, 4, 5, 9, 10, and 11) contained eight acquisition plans, each of which included the IGE amount. Because the IGE amount is part of the government's internal budgeting and cost-estimation process identified in the *CUI Registry*, the acquisition plans contained CUI and should have been marked accordingly. However, none of the eight acquisition plans contained the required CUI markings.

- **Liquidated Damages –** Liquidated damages computations are pre-established rates approved by the contracting officer and are used to calculate the amount the government may recover to compensate for probable damages resulting from late delivery or untimely performance.

  We identified six contract files (PBS Regions 2, 3, 6, 9, 10, and 11) that contained nine liquidated damages computations. Of the nine liquidated damages computations reviewed, two included the IGE amount but did not contain the required CUI markings.

  Failing to mark contract documents that contain IGE information as CUI increases the risk of unauthorized disclosure of sensitive budget data and limits PBS's ability to ensure that acquisition documents are properly safeguarded.

- **Contractor's Personnel Security Information –** Five contract files (PBS Regions 2, 3, 5, 9, and 11) contained six spreadsheets with information related to contractor personnel vetting, including background investigations, or security clearances. These spreadsheets were labeled either *Contractor PIV Card Validation Report* or *Requesting Official Contractor Approval List*. They included full names, employment statuses, point of contact lists, and background investigation information (e.g., investigation type). However, none of the six spreadsheets included the required CUI markings.

- **Source Selection Documentation –** PBS awarded Region 10's contract for the design-build and installation of new boiler systems at two land ports of entry in Alaska. In accordance with FAR 3.104, *Procurement Integrity*, source selection information must be protected from unauthorized disclosure. Similarly, the *CUI Registry* requires source selection information to be marked and handled as CUI.

  However, we identified five source selection documents that lacked the required CUI markings. These documents included attachments, which also contained CUI but lacked the required markings. As a result, a total of 29 CUI-containing documents were not properly marked. The documents included source selection strategies, contractor pricing and technical data, evaluation criteria, the government's personnel analyses, and the rationale for selecting the winning offeror. Because the disclosure of this

information could compromise the fairness and integrity of the competitive acquisition process, each of the documents required CUI markings.

Contract File Documents Were Not Consistently Designated as CUI in EASi

To support proper identification of CUI in its electronic contract files, PBS added a CUI designation checkbox to EASi in April 2018. EASi technical guidance instructs personnel to review each uploaded document and indicate whether it contains CUI by selecting a checkbox. Once selected, EASi displays a "Yes" or "No" indicator for each document to show whether it has been designated as CUI.

However, PBS contract file documents that contain CUI were not consistently designated as CUI in EASi. As described above, we found that 84 contract documents were not properly marked as CUI. Of these 84 documents, 79 were also not designated as CUI in EASi. This included 38 of the 41 IGEs, all 29 source selection documents, seven of eight acquisition plans, four of six contractor's personnel security information, and one of two liquidated damages computations. Additionally, we found that although CUI markings were properly applied to 11 contract file documents, PBS did not designate those documents as CUI within EASi. These documents contained sensitive building drawings and pictures.

PBS Contracting Personnel Lack a Clear Understanding of CUI Requirements

The discrepancies identified above occurred because PBS contracting personnel lacked a clear understanding of CUI requirements and their responsibilities for properly identifying, marking, and designating CUI within electronic contract files. Interviews with contracting officers across all PBS regions showed inconsistent knowledge of how to apply the CUI designation in EASi and limited awareness of their role in managing CUI. For example:

- Five contracting officers stated that CUI management was the responsibility of others, such as project managers or CORs.

- One contracting officer acknowledged that greater attention should be given to the purpose and proper use of the CUI designation checkbox in EASi.

Improperly identified and unmarked CUI increases the risk of unauthorized disclosure and mishandling of sensitive acquisition information. Accordingly, PBS should strengthen oversight to ensure that contract file documentation containing CUI is properly identified, marked, and handled.

Conclusion

PBS did not provide adequate oversight of its electronic contract files. We found that PBS contracting personnel are not maintaining required documentation within EASi, PBS's official system of record, and as a result, PBS's electronic contract files are not complete. Further, documentation necessary for effective contract administration and oversight was also incomplete or missing from the electronic contract files. Lastly, we found that contracting personnel did not properly designate and mark CUI, increasing the risk of mishandling and unauthorized disclosure of sensitive acquisition information.

Maintaining complete and accurate contract files is important, because it reduces the risk of missing documentation, unauthorized disclosures, improper payments, procurement disputes, and noncompliance with federal regulations. It is also critical to ensure that effective contract oversight is sustained in the event of changes to assigned acquisition personnel or turnover. This is particularly important in the wake of the widespread staffing reductions undertaken by PBS in 2025. As a result of those staffing reductions, PBS lost approximately 380 of its 774 (49 percent) acquisition personnel.[18] Many of these acquisition personnel left incomplete contract files, forcing PBS officials to search extensively for required documents in response to our audit inquiries.

For example, one PBS official told us that the lack of a complete file for one contract in our sample forced them to go on a "fishing expedition" to obtain the required documents. Another PBS official had to work with staff from GSA's information technology office to try and obtain contract file documents that had been stored on a former employee's external drives.

Accordingly, PBS should improve its oversight to ensure that contract files maintained by its contracting officers and CORs are complete, accurate, and maintained in full compliance with the FAR, GSAM, and PBS policy. PBS should also take action to ensure that CUI is properly safeguarded against mishandling and unauthorized disclosure.

Recommendations

We recommend that the Acting PBS Commissioner:

1. Strengthen PBS contract file management by:
    a. Enforcing the requirement that PBS contracting officers use EASi as the official system of record.
    b. Requiring PBS contracting officers to upload all acquisition documents to EASi in a timely manner.

[18] This includes acquisition personnel in the 1102 series (contracting officers/contract specialists), 1105 series (purchasing agents), and 1106 series (procurement clerical and technician).

c. Ensuring contracting officers use the PBS contract file checklist to verify completeness and accuracy of all contract files.
d. Implementing a standardized oversight process during contract administration and prior to closeout to ensure contract files are complete, accurate, and compliant with FAR, GSAM, and PBS policy requirements.
e. Providing training or refresher guidance to PBS contracting personnel on proper contract file documentation, effective use of EASi, and the importance of maintaining timely and complete acquisition documents.

2. In conjunction with the GSA Chief Information Officer, evaluate EASi to determine whether its usability and document-management functionality can be improved.

3. Strengthen oversight of contract documentation maintained by CORs by:
    a. Requiring contracting officers to verify that all contract documentation maintained by CORs is complete and properly transferred to the official contract file at closeout.
    b. If any portion of the COR file is stored elsewhere, ensuring that the contracting officers include a memorandum for the record in the contract file identifying the approved alternate storage location.
    c. Ensuring that contracting officers confirm that the *Award Closeout Checklist* accurately reflects the status of the COR file transfer.

4. Issue guidance, and provide associated training, to PBS contracting personnel on the proper identification, marking, designation, and management of CUI. This should include:
    a. Instruction on correctly identifying CUI, applying required CUI banners, and checking the CUI designation checkbox in EASi.
    b. Guidance specifying which acquisition documents must be marked as CUI.
    c. Clarification of the roles and responsibilities of acquisition personnel to ensure consistent and compliant CUI handling during contract administration and through contract closeout.

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 – Objectives, Scope, and Methodology

Objectives

We performed this audit as part of the GSA Office of Inspector General's *Fiscal Year 2025 Audit Plan*. Our audit objectives were to determine whether PBS maintains adequate oversight to ensure that: (1) contract files are complete, accurate, and properly maintained within EASi, PBS's electronic contract file system; and (2) documentation that contains CUI is properly marked and designated in EASi in accordance with the FAR, GSAM, and PBS policy.

Scope and Methodology

Our audit assessed the completeness, accuracy, and proper maintenance of PBS's electronic contract files and its marking and designation of CUI within EASi. We examined a judgmental sample of one electronic contract file from each of the 11 PBS regions that were awarded in Fiscal Years (FYs) 2022–2023 and closed out in FY 2024. Additional details on our sampling methodology are provided in the *Sampling* section on the next page.

To accomplish our objectives, we:

- Reviewed PBS's intranet pages, policies, and guidance related to both the EASi system and CUI;
- Examined GSA and PBS organizational charts to understand reporting structures and roles;
- Reviewed the FAR, GSAM, and relevant PBS policy, including PBS PIB 18-02, *PBS Contract File Content and Organization*; and PBS PIB 21-05, *Public Buildings Service (PBS) Contracting Officer's Representative (COR) Policy*, to gain an understanding of PBS's responsibilities in following the regulatory criteria;
- Reviewed federal regulations relating to CUI including: (1) Executive Order 13556, *Controlled Unclassified Information*; and (2) GSA Order CIO 2103.2, *Controlled Unclassified Information (CUI) Policy;*
- Reviewed EASi manuals, user guides, and newsletters to understand EASi processes and implemented features;
- Reviewed GSA CUI resources, such as the *CUI Program Guide* and the *GSA CUI Marking Manual*, to understand CUI marking requirements and responsibilities;
- Reviewed prior GSA Office of Inspector General audit reports to identify significant issues that may affect the current audit;
- Selected a judgmental sample of 11 PBS contracts and reviewed and evaluated contract file documentation for each sampled contract;
- Compared the contents of sampled EASi contract files to the PIB 18-02 contract file checklist;
- Obtained and reviewed missing documentation for sampled contract files to determine the extent and nature of contract file documentation issues;

- Reviewed documents from sampled contract files, including contract modifications, to determine if they were being marked in accordance with CUI policy;
- Conducted interviews with PBS Office of Acquisition Management personnel to understand the EASi system and its relationship to CUI;
- Corresponded with PBS personnel from the Office of Acquisition Management to clarify CUI criteria;
- Interviewed and corresponded with PBS acquisition personnel, including contracting officers, contract specialists, and CORs related to the sampled contracts; and
- Interviewed PMR Division officials to understand the contract files review process.

Sampling

To assess the completeness of contract files and the associated CUI practices, we selected a judgmental sample of one closed contract from each of the 11 PBS regions. The sampled contracts totaled approximately $31 million, selected from a universe of 5,726 PBS contracts, valued at $755,827,330, that were awarded during FYs 2022–2023 and closed out in FY 2024. We selected contracts with higher monetary values, ranging from about $1.0 million to $5.6 million.

While our judgmental sample does not allow for projection of the results to the population, it did allow us to sufficiently address our audit objectives.

Internal Controls

We assessed internal controls significant within the context of our audit objectives 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. 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 March 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 objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix B – Examples of Missing or Incomplete Required Contract Documentation

The table below summarizes examples of required contract documentation that was missing or incomplete across the 11 contract files we sampled. For each document, the table identifies: (1) the requirement (including the applicable FAR citation), (2) what we found during our audit, (3) the explanation provided by contracting personnel, and (4) the impact of the missing or incomplete documentation.

Document(s)	Requirement(s)	What We Found	Explanation Given	Impact
Independent Government Estimate (IGE)	FAR 36.203, *Government estimate of construction costs*	In one contract file, a justification for other than full and open competition referenced comparing to an IGE; however, the IGE was never prepared.	Contracting officer's limited time and resources within the program office.	Contract proposals cannot be evaluated against a reliable benchmark, increasing the government's risk of overpaying.
Acquisition Plan	FAR 7.1, *Acquisition Plans*	In one contract file, the acquisition plan was missing entirely. In another, the contracting officer could not provide the finalized plan, relying on the draft plan stored in EASi.	None	The acquisition may proceed without sufficient planning, increasing the risk of inefficiencies, higher costs, or delays.
Contractor Responsibility Assessment	FAR 9.1, *Responsible Prospective Contractors*	These assessments were not completed in four of the contract files we examined.	Lack of awareness, oversight, and reliance on alternate procedures.	Increased risk of awarding contracts to contractors that are not fully qualified to perform the work.
Performance and Payment Bonds for Construction	FAR 28.102-1, *General;* FAR 52.228-15, *Performance and Payment Bonds-Construction*	In one contract file, the required bonds were never requested.	An oversight.	Exposes the government to unnecessary financial risk and potential project disruptions.
Certificate of Insurance	FAR 28.301, *Policy*	In two contract files, certificates of insurance were not obtained to cover the full contract period.	An oversight; lack of review.	Exposes the government to unnecessary financial risk and potential project disruptions when incidents occur.
COR Nomination and Revocation Letter	FAR 1.604, *Contracting Officer's Representative (COR)*; PBS PIB 21-05, *Contracting Officer's Representative (COR) Policy*	In one contract file, no documentation was prepared when the COR departed.	An oversight; letter should have been issued.	Increased risk of unclear responsibilities and oversight gaps.
Warranty	FAR 46.702, *General*	In two contract files, documentation referred to a warranty; however, there was no warranty in the files.	An oversight; warranty should have been included in the contract file.	Increased risk that the government may not be protected if defects or performance issues arise.
Notification to Unsuccessful Quotes/Offerors	FAR 15.503, *Notifications to unsuccessful offerors*	In one contract file, this document was missing.	None	Reduced transparency of the source selection process and limits PBS's compliance with post-award communication requirements.
Labor Standards Interview	FAR 22.406-7, *Compliance checking*	In six contract files, these interviews were not conducted and documented.	An oversight.	Limits the government's ability to comply with labor standards and increases risk of undetected wage or classification violations.
Liquidated Damages	FAR 11.501, *Policy*	In one contract file, the contracting officer did not sign the computation document.	None	Limited understanding of an important contract term.
8(a) Sole-Source Memorandum	FAR 6.303-1, *Requirements*	In one contract file, the contracting officer did not sign the memorandum and later provided us with a backdated version.	None	Reconstructed contract actions undermine the integrity of the contract file.

Appendix C – GSA Comments

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U.S. General Services Administration

October 22, 2026

MEMORANDUM FOR ARTHUR MAISANO
REGIONAL INSPECTOR GENERAL FOR AUDITING
OFFICE OF AUDITS
NORTHEAST AND CARIBBEAN REGION
OFFICE OF INSPECTOR GENERAL (JA-2)

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

DocuSigned by: Michael Gelber A9A852427E846A

SUBJECT: Response to the Office of Inspector General (OIG) Draft Report, *PBS Should Improve Its Oversight of Electronic Contract Files* (A250037)

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

(1) Strengthen PBS contract file management by:

(a) Enforcing the requirement that PBS contracting officers use EASi as the official system of record.

(b) Requiring PBS contracting officers to upload all acquisition documents to EASi in a timely manner.

(c) Ensuring contracting officers use the PBS contract file checklist to verify completeness and accuracy of all contract files.

(d) Implementing a standardized oversight process during contract administration and prior to closeout to ensure contract files are complete, accurate, and compliant with FAR, GSAM, and PBS policy requirements.

(e) Providing training or refresher guidance to PBS contracting personnel on proper contract file documentation, effective use of EASi, and the importance of maintaining timely and complete acquisition documents.

(2) In conjunction with the GSA Chief Information Officer, evaluate EASi to determine whether its usability and document-management functionality can be improved.

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(3) Strengthen oversight of contract documentation maintained by contracting officers' representatives (CORs) by:

(a) Requiring contracting officers to verify that all contract documentation maintained by CORs is complete and properly transferred to the official contract file at closeout.

(b) If any portion of the COR file is stored elsewhere, ensuring that the contracting officers include a memorandum for record in the contract file identifying the approved alternate storage location.

(c) Ensuring that contracting officers confirm that the *Award Closeout Checklist* accurately reflects the status of the COR file transfer.

(4) Issue guidance, and provide associated training, to PBS contracting personnel on the proper identification, marking, designation, and management of Controlled Unclassified Information (CUI). This should include:

(a) Instruction on correctly identifying CUI, applying required CUI banners, and checking the CUI designation checkbox in EASi.

(b) Guidance specifying which acquisition documents must be marked as CUI.

(c) Clarification of the roles and responsibilities of acquisition personnel to ensure consistent and compliant CUI handling during contract administration and through contract closeout.

PBS agrees with the four recommendations listed above and is working on a plan to address them and will ensure that the corrective actions are consistent with the Revolutionary FAR and GSAR Overhaul guidance.

Under the recent PBS restructuring, all contracting divisions were consolidated under the PBS Office of Acquisition Management (OAM). With this new structure, OAM will work to create consistent standard operating procedures, which include expanding on the guidance related to contract file management and contract file reviews. Furthermore, OAM is including EASi and Electronic Contract File (ECF) related enhancements in the Fiscal Year 2027 IT Needs funding request and are also resourcing a programmatic review of the OAM ECF Alert automation that will identify weaknesses in the contract file.

Please contact Amanda Sweeney, Acting Commissioner PBS Office of Acquisition Management at amanda.sweeney@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)

PBS Office of Acquisition Management (PQ)

Chief Financial Officer (B)

Deputy Chief Financial Officer (B)

Audit Management Division (BPA)

Assistant Inspector General for Auditing (JA)

Deputy Assistant Inspector General for Acquisition Audits (JA)

Deputy Assistant Inspector General for Real Property Audits (JA)

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