



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

IMPLEMENTATION REVIEW OF CORRECTIVE ACTION PLAN

**Audit of the Calexico
West Land Port of
Entry Expansion and
Modernization Project
Report Number
A210070/P/9/R23006
March 2, 2023**

Assignment Number A260017
April 16, 2026

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Introduction

We have completed an implementation review of the management actions taken in response to the recommendations contained in our March 2023 audit report, *Audit of the Calexico West Land Port of Entry Expansion and Modernization Project*, Report Number A210070/P/9/R23006.

Objective

The objective of our review was to determine whether GSA's Public Buildings Service (PBS) has taken the actions as outlined in the corrective action plan for our audit report, *Audit of the Calexico West Land Port of Entry Expansion and Modernization Project* (see **Appendix A**). To accomplish our objective we:

- Reviewed the original audit report to understand the recommendations and provide context to the corrective action plan;
- Corresponded with PBS personnel; and
- Examined documentation submitted by PBS personnel for addressing the corrective action plan steps.

Background

The Calexico West Land Port of Entry (LPOE) is located in Calexico, California, along the border with Mexico. It processes non-commercial traffic, including more than 4.5 million northbound vehicles and 4 million pedestrians annually. In July 2006, PBS determined that the Calexico West LPOE, which was built in 1974, could no longer accommodate traffic loads or meet the security requirements of the U.S. Department of Homeland Security's U.S. Customs and Border Protection. PBS began expanding and modernizing the port, to include new pedestrian and privately owned vehicle inspection facilities, new operations and administration buildings, and 300 staff parking spaces. PBS estimated total project costs of \$416 million.

PBS issued contracts for design services, soil analysis, construction, and construction management. The construction manager is responsible for providing necessary support services to ensure the quality of the work during the design and construction stages of the project. While the construction manager has a significant role in the day-to-day management of the project, PBS remains responsible for ensuring the project is completed in accordance with applicable requirements.

On March 2, 2023, we issued an audit report, *Audit of the Calexico West Land Port of Entry Expansion and Modernization Project*, to PBS. The objective of the audit was to determine whether PBS's planning, award, administration, and close out of construction contracts related to the expansion and modernization of the Calexico West LPOE were in accordance with the Federal Acquisition Regulation, the General Services Administration Acquisition Manual, and PBS's pricing policy and facilities standards.

Our audit found:

- Security at the Calexico West LPOE project is compromised by inconsistent requirements and inadequate enforcement;
- PBS did not oversee the acquisition activities performed by the construction manager;
- PBS contract modifications lack essential documents, including support for price reasonableness determinations and regional business clearance reviews;
- Oversight of contractor compliance with labor standards requirements is inadequate to ensure PBS responsibilities are met;
- PBS violated federal acquisition procedures and competition requirements by awarding a soil analysis contract without seeking multiple offers and reviewing qualifications; and
- PBS did not ensure that contractors completed required safety orientation training before working on-site, creating the potential for safety incidents.

To address the findings identified in our report, we recommended that the PBS Regional Commissioner for the Pacific Rim Region:¹

1. Review the contracts and site security procedures for the Calexico West LPOE project and modify contracts and site security procedures that contain inconsistent or contradictory security requirements.
2. Perform an internal review to identify all contractors for the Calexico West LPOE project who did not undergo HSPD-12 processing and submit all identified personnel, including the 41 identified during [the] audit, for HSPD-12 processing.² In addition, review the access rights for the eight contractors with criminal histories identified during [the] audit and take appropriate corrective action.
3. Verify all contract employees working on the Calexico West LPOE project pass initial HSPD-12 screening, as well as the U.S. Customs and Border Protection Quick Check screening, if applicable, before working on the project.
4. Ensure that contractors are not performing inherently governmental functions.
5. Implement controls to carefully monitor contractors performing acquisition activities that are closely associated with inherently governmental functions.

¹ 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, including the Pacific Rim Region. Because our audit report was issued prior to the reorganization, we retained references to the PBS Pacific Rim Region in this implementation review report.

² HSPD-12 stands for the 2004 Homeland Security Presidential Directive 12, *Policy for a Common Identification Standard for Federal Employees and Contractors*.

6. Develop and implement effective controls to ensure contracting officers have performed all acquisition activities necessary to determine fair and reasonable pricing, establish the contractors' technical abilities, and authorize funding when awarding contract modifications.
7. Require that PBS officials perform an adequate number of labor standards interviews for the Calexico West LPOE project. In addition, review and validate all labor standards interviews with available data, including payroll, to ensure contractors comply with labor standards requirements.
8. Ensure all contractors working at the Calexico West LPOE are paid prevailing wages and their corresponding benefits.
9. Ensure all awards below the simplified acquisition threshold comply with Federal Acquisition Regulation simplified acquisition procedures.
10. Implement controls to ensure all contract employees complete required safety orientation training before accessing the Calexico West LPOE site.

The PBS Regional Commissioner for the Pacific Rim Region agreed with our report recommendations.

Results

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

Appendix A – Corrective Action Plan for Report Number A210070/P/9/R23006

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R9 Public Buildings Service Corrective Action Plan

Designated Responding Official: Dan Brown, Regional Commissioner, Pacific Rim Region (R9) Public Buildings Service

Signature:  Date 8/8/2023

Contact Person: Emma Cocks, AMD Director, 9PQ for Action Step 1. Gabriela Sanchez, Procurement Analyst, OAM, PQAA (Telephone 312-353-6323) and Phil Ahn, Supervisory Program Specialist, OMA, DBAB (Telephone 202-660-2644) for Action Step 2

Telephone Number: 415-271-4858

Date: June 5, 2023

Report number A210070/P/9/R23006 Audit of the Calexico West Land Port of Entry Expansion and Modernization Project, Dated March 2, 2023	Recommendation number: 001	Proposed Recommendation Completion Date February 29, 2024
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Finding(s): Only one per page. Findings are for GSA internal use only.

Security at the Calexico West LPOE project is compromised by inconsistent requirements and inadequate enforcement.

Root Cause of Finding(s): Root cause determination is for GSA internal use only.

The project team followed established fitness determination protocols for various categories of contractor personnel accessing the site as required by the existing National CMc Construction Template, the Requesting Official Training Manual, and Security Clearance Process in use at the time. Clear coordination between OMA and PBS to avoid inconsistencies in contract language and procedures could have improved the determination process. Phase 2A of the project, reviewed by the audit team, will reach substantial completion in November of 2023. Modifying the contract(s) at this late time in the project is not practical and does not address inconsistencies in the National templates. Inconsistencies in the National construction contract templates must be addressed at a national level.

Recommendation: Only one per page

OIG recommends that the PBS Regional Commissioner for the Pacific Rim Region review the contracts and site security

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procedures for the Calexico West LPOE project and modify contracts and site security procedures that contain inconsistent or contradictory security requirements.

<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to the OCFO BA or BG office</u>	<u>Documentation will be sent Last Duty Day of the month</u>
001. R9 PBS to review existing site security procedures and to change Calexico West LPOE's Guidelines for All Contractor Employees Security Background Check to require both CBP Quick Check and GSA HSPD-12.	001. Meeting minutes to include implementation of consistent security requirements.	001. Complete - June 30, 2023
002. Reissue templates and procedural guidance as necessary, to be done in collaboration with the Office of Mission Assurance and PBS Office of Acquisition Management. Communicate changes in new templates and guidance.	002. Revised Construction Templates, Revised Site Security Procedures. Email informing interested parties of the changes.	002. February 29, 2024

Version Date: 3/1/2023

R9 Public Buildings Service Corrective Action Plan

Designated Responding Official: **Dan Brown, Regional Commissioner, Pacific Rim Region (R9) Public Buildings Service**

Signature  _____ Date **8/8/2023**

Contact Person: **Mario Ramirez, Acting D&C Director, 9PC**

Telephone Number: **415-310-9735**

Date: **June 5, 2023**

Report number A210070/P/9/R23006 Audit of the Calexico West Land Port of Entry Expansion and Modernization Project, Dated March 2, 2023	Recommendation number: 002	Proposed Recommendation Completion Date August 31, 2023
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Finding(s): Only one per page. Findings are for GSA internal use only.

Security at the Calexico West LPOE project is compromised by inconsistent requirements and inadequate enforcement.

Root Cause of Finding(s): Root cause determination is for GSA internal use only.

The project team followed established fitness determination protocols for various categories of contractor personnel accessing the site as required by the existing National CMc Construction Template, the Requesting Official Training Manual, and Security Clearance Process in use at the time. Clear coordination between OMA and PBS to avoid inconsistencies in contract language and procedures would have been helpful. Phase 2A of the project, reviewed by the audit team, will reach substantial completion in November of 2023. Modifying the contract (s) at this late time in the project is not practical and does not address inconsistencies in the National templates. Inconsistencies in the National construction contract templates must be addressed at a national level.

Recommendation: Only one per page

OIG recommends that the PBS Regional Commissioner for the Pacific Rim Region perform an internal review to identify all contractors for the Calexico West LPOE project who did not undergo HSPD-12 processing and submit all identified personnel,

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including the 41 identified during this audit, for HSPD-12 processing. In addition, review the access rights for the eight contractors with criminal histories identified during this audit and take appropriate corrective action.

<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to the OCFO BA or BG office</u>	<u>Documentation will be sent Last Duty Day of the month</u>
<p>001. R9 PBS conducted an internal audit of security clearances, which identified individuals who did not undergo the CBP Quick Check. PBS conducted the appropriate follow-up with the contractor.</p>	<p>001. CXLPOE-Security & Payroll Audit_Sept Pay App_2022110.26; Example of letters depicted in the "Notes" column of the audit and under Column 1 "Security Review" (before clearance) and Column 2 "Security Compliant" (completed clearance) columns.</p>	<p>001. Complete- April 30, 2023</p>
<p>002. R9 PBS regularly conducts Security Clearance Verification Checks. The Security Clearance Report is generated every other week and sent to the general contractor for action. (See Letters with reports attached).</p>	<p>002. Security Clearance Verification Check Letters with accompanying report (1/25/23 and 03/06/23 as examples of on-going process).</p>	<p>002. Complete - April 5, 2023</p>
<p>003. R9 PBS COR will follow up on information obtained from the OIG about the personnel who did not</p>	<p>003. Summary report of the confirmation actions taken for the personnel identified.</p>	<p>003. August 31, 2023</p>

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<p>undergo the security processing and coordinate with OMA to ensure corrective actions have been taken and the individuals who did not meet the security requirements were either removed or not allowed to work on the project.</p>		
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R9 Public Buildings Service Corrective Action Plan

Designated Responding Official: **Dan Brown, Regional Commissioner, Pacific Rim Region (R9) Public Buildings Service**

Signature:  _____ Date 8/8/2023

Contact Person: **Mario Ramirez, Acting D&C Director, 9PC**

Telephone Number: **415-310-9735**

Date: **June 5, 2023**

Report number A210070/P/9/R23006 Audit of the Calexico West Land Port of Entry Expansion and Modernization Project, Dated March 2, 2023	Recommendation number: 003	Proposed Recommendation Completion Date Complete - June 30, 2023
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Finding(s): Only one per page. Findings are for GSA internal use only.

Security at the Calexico West LPOE project is compromised by inconsistent requirements and inadequate enforcement.

Root Cause of Finding(s): Root cause determination is for GSA internal use only.

The project team followed established fitness determination protocols for various categories of contractor personnel accessing the site as required by the existing National CMc Construction Template, the Requesting Official Training Manual, and Security Clearance Process in use at the time. Clear coordination between OMA and PBS to avoid inconsistencies in contract language and procedures would have been helpful. Phase 2A of the project, reviewed by the audit team, will reach substantial completion in November of 2023. Modifying the contract (s) at this late time in the project is not practical and does not address inconsistencies in the National templates. Inconsistencies in the National construction contract templates must be addressed at a national level.

Recommendation: Only one per page

OIG recommends that the PBS Regional Commissioner for the Pacific Rim Region verify all contract employees working on the Calexico West LPOE project pass initial HSPD-12 screening, as well as the U.S. Customs and Border Protection Quick Check

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screening, if applicable, before working on the project.

<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to the OCFO BA or BG office</u>	<u>Documentation will be sent Last Duty Day of the month</u>
001. R9 PBS will draft a letter to the construction contractor reminding them of their responsibilities under the contract to ensure all contractor employees pass the required security screening before they start working on site	001. Letter to the construction contractor; contract showing responsibilities of contractor and progress payment withhold for non compliance.	001. Complete - May 31, 2023
002. R9 PBS to enforce HSPD-12 and Quick Check, if applicable, screening for all contract employees at bi weekly project meetings.	002. Meeting minutes to show review and action taken of Security Clearance Verification Checklist. Those not in compliance are removed and never allowed on site.	002. Complete - June 30, 2023

Version Date: 3/1/2023

R9 Public Buildings Service Corrective Action Plan

Designated Responding Official: **Dan Brown, Regional Commissioner, Pacific Rim Region (R9) Public Buildings Service**

Signature  _____ Date 8/8/2023

Contact Person: **Emma Cocks, AMD Director, 9PQ**

Telephone Number: **415-271-4858**

Date: **June 5, 2023**

Report number A210070/P/9/R23006 Audit of the Calexico West Land Port of Entry Expansion and Modernization Project, Dated March 2, 2023	Recommendation number: 004	Proposed Recommendation Completion Date Complete - June 30, 2023
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Finding(s): Only one per page. Findings are for GSA internal use only.

PBS did not oversee the acquisition activities performed by the construction manager.

Root Cause of Finding(s): Root cause determination is for GSA internal use only.

This finding focused on Phase 1 of the Calexico project, which was awarded in 2015. PBS did not sign to acknowledge review and acceptance of some documents prepared by the construction manager, such as some IGE's, some technical analyses, and some price negotiation memorandums as review and acceptance were not a part of the process outlined in use of Construction Management (CM) Services at the time. Much of this changed with the inception of PBS's electronic contract filing system (EASi) and PIB 18-02, which detailed what must be in PBS contract files. Further guidance came after the Audit of the GSA Public Building Service's Use of CM Services, Report Number A150028/P/4/R20009 in 2020 and the subsequent Corrective Action Plan.

Recommendation: Only one per page

OIG recommends that the PBS Regional Commissioner for the Pacific Rim Region ensure that contractors are not performing inherently governmental functions.

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<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to the OCFO BA or BG office</u>	<u>Documentation will be sent Last Duty Day of the month</u>
<p>001. Central Office (CO) PBS issued PIB 18-02, Amendment 1, and Attachment 1 to detail what documents must be in a contract file. Tab 14 specifically requires the filing of, "The IGE, which was reviewed, signed and dated by the government official responsible for its preparation."</p>	<p>001. PIB 18-02, Amendment 1, PBS Contract File Content and Organization; PIB 18-02, Amendment 1, Attachment 1, PBS Contract/Order File Content Checklist (specifically tab 14 of the checklist, starting on row 143, addresses IGEs, and TAs; and tab 2, starting on row 56, addresses SOWs and other technical documents.)</p>	<p>001. Complete - April 5, 2023</p>
<p>002. R9 contract files are reviewed at the pre-solicitation and pre-award stages at escalating levels (CO, Section Chief, Branch Chief, Procurement Analyst, Division Director, Attorney, HCA) based on contract type and dollar value. This review includes looking at the documents contained in each tab of the electronic contract file to ensure compliance with current policy, regulation and law.</p>	<p>002.R9 Review Approval Matrix; R9 Policy Letter 9PQ-P-22-0001 (requires use of the Matrix, dated 2022); Sample of Review Spreadsheet Template.</p>	<p>002. Complete - Apr 5, 2023</p>

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<p>003. CO PBS developed and provided training to project teams (COs/ CORs, PMs) to ensure PBS personnel understand inherently governmental tasks.</p> <p>004. Calexico Project Team will retake the CM Services Best Practices Training by watching the video recording from Aug. 2021.</p> <p>005. The R9 project team will remind the contractors to not perform government inherent functions.</p>	<p>003. CM Services Best Practices, Training provided in August 2021; Attendance Sheet for Training</p> <p>004. Attendance sheet</p> <p>005. Meeting minutes of the discussion</p>	<p>003. Complete - April 5, 2023</p> <p>004. Complete - June 30, 2023</p> <p>005. Complete - June 30, 2023</p>
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Version Date: 3/1/2023

R9 Public Buildings Service Corrective Action Plan

Designated Responding Official: **Dan Brown, Regional Commissioner, Pacific Rim Region (R9) Public Buildings Service**

Signature:  _____ Date 8/8/2023

Contact Person: **Emma Cocks, AMD Director, 9PQ**

Telephone Number: **415-271-4858**

Date: **June 5, 2023**

Report number A210070/P/9/R23006 Audit of the Calexico West Land Port of Entry Expansion and Modernization Project, Dated March 2, 2023	Recommendation number: 005	Proposed Recommendation Completion Date Complete - June 30, 2023
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Finding(s): Only one per page. Findings are for GSA internal use only.

PBS did not oversee the acquisition activities performed by the construction manager.

Root Cause of Finding(s): Root cause determination is for GSA internal use only.

This finding focused on Phase 1 of the Calexico project, which was awarded in 2015. PBS did not sign to acknowledge review and acceptance of some documents prepared by the construction manager, such as some IGE's, some technical analyses, and some price negotiation memorandums as review and acceptance were not a part of the process outlined in use of CM Services at the time. Much of this changed with the inception of PBS's electronic contract filing system (EASi) and PIB 18-02, which detailed what must be in PBS contract files. Further guidance came after the Audit of the GSA Public Building Service's Use of CM Services, Report Number A150028/P/4/R20009 in 2020 and the subsequent Corrective Action Plan.

Recommendation: Only one per page

OIG recommends that the PBS Regional Commissioner for the Pacific Rim Region implement controls to carefully monitor contractors performing acquisition activities that are closely associated with inherently governmental functions.

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<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to the OCFO BA or BG office</u>	<u>Documentation will be sent Last Duty Day of the month</u>
<p>001. CO PBS issued PIB 18-02, Amendment 1, and Attachment 1 to detail what documents must be in a contract file. Tab 14 specifically requires the filing of, "The IGE, which was reviewed, signed and dated by the government official responsible for its preparation."</p>	<p>001. PIB 18-02, Amendment 1, PBS Contract File Content and Organization; PIB 18-02, Amendment 1, Attachment 1, PBS Contract/Order File Content Checklist (specifically tab 14 of the checklist, starting on row 143, addresses IGEs, and technical analyses; and tab 2, starting on row 56, addresses SOWs and other technical documents.)</p>	<p>001. Complete - April 5, 2023</p>
<p>002. R9 contract files are reviewed at the pre-solicitation and pre-award stages at escalating levels (CO, Section Chief, Branch Chief, Procurement Analyst, Division Director, Attorney, HCA) based on contract type and dollar value. This review includes looking at the documents contained in each tab of the electronic contract file to ensure compliance with current policy, regulation and law.</p>	<p>002.R9 Review Approval Matrix; R9 Policy Letter 9PQ-P-22-0001 (requires use of the Matrix, dated 2022); Sample of Review Spreadsheet Template.</p>	<p>002. Complete -April 5, 2023</p>
	<p>003. CM Services Best Practices, Training</p>	

Version Date: 3/1/2023

<p>003. CO PBS developed and provided training to project teams (COs/ CORs, PMs) to ensure PBS personnel understand inherently governmental tasks.</p> <p>004. Calexico Project Team will retake the CM Services Best Practices Training by watching the CM training video from Action Step 003.</p>	<p>video provided in August 2021; Attendance Sheet for Training</p> <p>004. Future attendance sheet</p>	<p>003. Complete - April 5, 2023</p> <p>004. Complete - June 30, 2023</p>
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Version Date: 3/1/2023

R9 Public Buildings Service Corrective Action Plan

Designated Responding Official: **Dan Brown, Regional Commissioner, Pacific Rim Region (R9) Public Buildings Service**

Signature  Date 8/8/2023

Contact Person: **Emma Cocks, AMD Director, 9PQ**

Telephone Number: **415-271-4858**

Date: **June 5, 2023**

Report number A210070/P/9/R23006 Audit of the Calexico West Land Port of Entry Expansion and Modernization Project, Dated March 2, 2023	Recommendation number: 006	Proposed Recommendation Completion Date Complete - April 5, 2023
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Finding(s): Only one per page. Findings are for GSA internal use only.

PBS contract modifications lack essential documents, including support for price reasonableness determinations and regional business clearance reviews.

Root Cause of Finding(s): Root cause determination is for GSA internal use only.

This finding focused on the design contract, awarded in 2007, and the Phase 1 construction contract of the Calexico project, which was awarded in 2015. Much of the staff who worked on these portions of the project have retired. These contracts pre-date PBS's electronic contract file system (EASi) and were therefore kept in paper files. Phase 1 reached substantial completion two months prior to the inception of EASi and therefore was not migrated into the system. PBS also moved office buildings after the award of these contracts. For these reasons, PBS was not able to locate all documentation for all reviewed modifications. With PIBs 19-01 and 18-02, PBS contract files are now maintained electronically. Locating specific documents is no longer dependent on locating a physical file or the knowledge of a particular person.

Recommendation: Only one per page

OIG recommends that the PBS Regional Commissioner for the Pacific Rim Region develop and implement effective controls to ensure contracting officers have performed all acquisition activities necessary to determine fair and reasonable pricing,

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establish the contractors' technical abilities, and authorize funding when awarding contract modifications.

<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to the OCFO BA or BG office</u>	<u>Documentation will be sent Last Duty Day of the month</u>
<p>001. R9 PBS implemented a robust Review and Approval Matrix for all contract actions, including modifications. It is routinely updated to reflect changes in the FAR, GSAM, PIBs and PILs. Modifications are specifically addressed starting on row 44.</p>	<p>001. R9 Review Approval Matrix, see Modifications starting at row 44; R9 Policy Letter 9PQ-P-22-0001 (requires use of the Matrix)</p>	<p>001. Complete - April 5, 2023</p>
<p>002. CO PBS issued PIB 19-01, which requires that all contract files, including documentation for modifications, must be maintained in EASi. Note that Calexico Phase 1 reached substantial completion 2 months before the inception of EASi and was therefore not migrated.</p>	<p>002. PIB 19-01, Migration of Contract File Documentation-EASi/Electronic Data Management System for contracts issued effective as of 2018. See specifically, page 4 of the PIB: "Closed contract files not yet sent to an approved archive location remain in an optional migration status."</p>	<p>002. Complete - April 5, 2023</p>
<p>003. CO PBS issued PIB 18-02 Amendment 1 and Attachment 2, which detail what documents must be in a</p>	<p>003. PIB 18-02, Amendment 1, PBS Contract File Content and Organization; PIB 18-02, Amendment 1, Attachment 2,</p>	<p>003. Complete - April 5, 2023</p>

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contract file relating to modifications.	Modification File Checklist (specifically starting at row 27)	
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Version Date: 3/1/2023

R9 Public Buildings Service Corrective Action Plan

Designated Responding Official: **Dan Brown, Regional Commissioner, Pacific Rim Region (R9) Public Buildings Service**

Signature:  _____ Date 8/8/2023

Contact Person: **Mario Ramirez, Acting D&C Director, 9PC**

Telephone Number: **415-310-9735**

Date: **June 5, 2023**

Report number A210070/P/9/R23006 Audit of the Calexico West Land Port of Entry Expansion and Modernization Project, Dated March 2, 2023	Recommendation number: 007	Proposed Recommendation Completion Date (Month/Year) Complete - July 31, 2023
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Finding(s): Only one per page. Findings are for GSA internal use only.

Oversight of contractor compliance with labor standards requirements is inadequate to ensure PBS responsibilities are met.

Root Cause of Finding(s): Root cause determination is for GSA internal use only.

PBS did not directly review and validate all labor standards interview forms. Additional reminder and enforcement is needed to ensure the construction manager (CM) performs labor interview and verification.

Recommendation: Only one per page

OIG recommends that the PBS Regional Commissioner for the Pacific Rim Region require that PBS officials perform an adequate number of labor standards interviews for the Calexico West LPOE project. In addition, review and validate all labor standards interviews with available data, including payroll, to ensure contractors comply with labor standards requirements.

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<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to the OCFO BA or BG office</u>	<u>Documentation will be sent Last Duty Day of the month</u>
001. R9 PBS will draft a letter to the CM reminding the contractor of their responsibilities under the contract to perform labor interviews and verification.	001. Contract showing requirements for the CM to perform labor interviews and verification; Letter to the CM reminding them of their responsibilities	001. Complete - July 31, 2023
002. R9 PBS COR will review and validate the CM's documentation of labor interviews to ensure it is comprehensive.	002. Example of monthly meeting minutes showing the R9 PBS COR validating the CM's documentation of labor interviews and verification	002. Complete - July 31, 2023

Version Date: 3/1/2023

R9 Public Buildings Service Corrective Action Plan

Designated Responding Official: **Dan Brown, Regional Commissioner, Pacific Rim Region (R9) Public Buildings Service**

Signature:  Date 8/8/2023

Contact Person: **Mario Ramirez, Acting D&C Director, 9PC**

Telephone Number: **415-310-9735**

Date: **June 5, 2023**

Report number A210070/P/9/R23006 Audit of the Calexico West Land Port of Entry Expansion and Modernization Project, Dated March 2, 2023	Recommendation number: 008	Proposed Recommendation Completion Date (Month/Year) Complete - July 31, 2023
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Finding(s): Only one per page. Findings are for GSA internal use only.

Oversight of contractor compliance with labor standards requirements is inadequate to ensure PBS responsibilities are met.

Root Cause of Finding(s): Root cause determination is for GSA internal use only.

PBS did not review and validate all labor labor standards interview forms. Additional reminder and enforcement is needed to ensure the CM performs labor interview and verification.

Recommendation: Only one per page

OIG recommends that the PBS Regional Commissioner for the Pacific Rim Region ensure all contractors working at the Calexico West LPOE are paid prevailing wages and their corresponding benefits.

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<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to the OCFO BA or BG office</u>	<u>Documentation will be sent Last Duty Day of the month</u>
<p>001. R9 PBS will draft a letter to the CM reminding the contractor of their responsibilities under the contract to perform labor interviews, verifications and payment of prevailing wages and corresponding benefits.</p>	<p>001. Contract showing requirements for the CM to perform labor interviews and verification; Letter to the CM reminding them of their responsibilities</p>	<p>001. Complete - July 31, 2023</p>
<p>002. R9 PBS COR will review the CM's documentation of labor interviews, verification, and payment of prevailing wages and corresponding benefits to ensure it is comprehensive.</p>	<p>002. Example of meeting minutes showing the R9 PBS COR validating the CM's documentation of labor interviews, verifications, and payment of prevailing wages and corresponding benefits.</p>	<p>002. Complete - July 31, 2023</p>

Version Date: 3/1/2023

R9 Public Buildings Service Corrective Action Plan

Designated Responding Official: Dan Brown, Regional Commissioner, Pacific Rim Region (R9) Public Buildings Service

Signature  **Date** 8/8/2023

Contact Person: Emma Cocks, AMD Director, 9PQ

Telephone Number: 415-271-4858

Date: June 5, 2023

Report number A210070/P/9/R23006 Audit of the Calexico West Land Port of Entry Expansion and Modernization Project, Dated March 2, 2023	Recommendation number: 009	Proposed Recommendation Completion Date Complete - April 5, 2023
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Finding(s): Only one per page. Findings are for GSA internal use only.

PBS violated federal acquisition procedures and competition requirements by awarding a soil analysis contract without seeking multiple offers and reviewing qualifications.

Root Cause of Finding(s): Root cause determination is for GSA internal use only.

This contract was awarded early in the project in 2015; the team who worked on it retired. PBS cannot confirm if the proper justifications were drafted and approved to award a sole source contract under the Simplified Acquisition Threshold.

Recommendation: Only one per page

OIG recommends that the PBS Regional Commissioner for the Pacific Rim Region ensure all awards below the simplified acquisition threshold comply with Federal Acquisition Regulation simplified acquisition procedures.

<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to</u>	<u>Documentation will be sent Last Duty</u>
001. R9 PBS implemented a robust	the OCFO BA or BG office	Day of the month
	001. R9 Review Approval Matrix, see	001. Complete - April 5, 2023

Version Date: 3/1/2023

<p>Review and Approval Matrix for all contract actions. It is routinely updated to reflect changes in the FAR, GSAM, PIBs and PILs. Justifications for sole source awards under SAT are specifically addressed on row 14.</p>	<p>row 14.</p>	
<p>002. In 2018, R9 PBS, AMD initiated an Acquisition Program Review (APR) for the periodic review of transactions under the Simplified Acquisition Threshold. This process is periodically updated. The most recent edition of the Standard Operating Procedure is provided.</p>	<p>002. Region 9, Acquisition Program Review, Standard Operating Procedure (08/25/22)</p>	<p>002. Complete - April 5, 2023</p>
<p>003. Per the SOP, a monthly sample of up to four contract actions are pulled for each Service Center and logged on a Google Sheet. These awards/contracts are reviewed by a procurement analyst with findings logged in the Review Template in a clear and concise manner using the FAR, GSAM,</p>	<p>003. Example of a monthly pull sample list; the Review Template used to log review findings.</p>	<p>003. Complete - April 5, 2023</p>

Version Date: 3/1/2023

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<p>PIBs and other policies as referenced in the reviews. The completed reviews are shared with the contracting officer and used as training tools.</p>		
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Version Date: 3/1/2023

R9 Public Buildings Service Corrective Action Plan

Designated Responding Official: **Dan Brown, Regional Commissioner, Pacific Rim Region (R9) Public Buildings Service**

Signature  _____ Date 8/8/2023

Contact Person: **Mario Ramirez, Acting D&C Director, 9PC**

Telephone Number: **415-310-9735**

Date: **June 5, 2023**

Report number A210070/P/9/R23006 Audit of the Calexico West Land Port of Entry Expansion and Modernization Project, Dated March 2, 2023	Recommendation number: 010	Proposed Recommendation Completion Date (Month/Year) August 31, 2023
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Finding(s): Only one per page. Findings are for GSA internal use only.

PBS did not ensure that contractors completed required safety orientation training before working onsite, creating the potential for safety incidents.

Root Cause of Finding(s): Root cause determination is for GSA internal use only.

CM did not keep a comprehensive record of safety training attendance as a result, a few contractor personnel working on the Calexico 2A site did not complete required safety training before initiating work. It was the CM's responsibility per contract to ensure all contractors complete the required safety training before beginning to work on site.

Recommendation: Only one per page

OIG recommends that the PBS Regional Commissioner for the Pacific Rim Region implement controls to ensure all contract employees complete required safety orientation training before accessing the Calexico West LPOE site.

<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to the OCFO BA or BG office</u>	<u>Documentation will be sent Last Duty Day of the month</u>
<p>001. R9 PBS will draft a letter to the construction contractor reminding them of their responsibilities under the contract to ensure all contractor employees complete the required safety orientation training and to maintain appropriate records of such before beginning work on the site.</p>	<p>001. Letter to contractor; contract showing responsibility to conduct safety orientation training</p>	<p>001. Complete - July 31, 2023</p>
<p>002. Before allowing contractors onsite, R9 PBS will check the CM-supplied roster of contractors who completed the required safety training.</p>	<p>002. Example of weekly safety meeting minutes with roster submitted by contractor upon completion of safety training</p>	<p>002. August 31, 2023</p>

Notes:

- If there is more than one responsible official, include the names of all officials and obtain the additional signatures.
- If the officials do not share responsibilities, identify which official is responsible for each recommendation.
- Start a new page for every recommendation.
- Action Plan recommendations must be numbered using a three-digit numerical value using leading zeros.
Example: Recommendation 001, 002, 003, etc.

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- If the auditor uses a letter, e.g. A, B, or C, in the recommendation(s), the letter must follow the three digits.
Example: 001A, 001B, 001C, etc.
- Action steps must be numbered consecutively and must also be a three-digit whole number.
Example: Recommendation 001A: Action steps 001, 002, 003, etc.
- The finding and identified root cause are for GSA's internal use only.

Version Date: 3/1/2023

Appendix B – Report Distribution

GSA Administrator (A)

GSA Deputy Administrator (AD)

Acting Commissioner (P)

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Assistant Commissioner Office of Program and Project Management (PX)

Assistant Commissioner Office of Acquisition Management (PQ)

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