



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

IMPLEMENTATION REVIEW OF CORRECTIVE ACTION PLAN

# Audit of PBS's Oversight of Lease Periodic Services Report Number A220026/P/R/R23003 February 16, 2023

Assignment Number A260021  
February 12, 2026

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## Introduction

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We have completed an implementation review of the management actions taken in response to the recommendations contained in our February 2023 audit report, *Audit of PBS's Oversight of Lease Periodic Services*, Report Number A220026/P/R/R23003.

### 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 *Audit of PBS's Oversight of Lease Periodic Services* (see **Appendix A**). To accomplish our objective we:

- Met and corresponded with PBS management and service program personnel;
- Examined documentation submitted by PBS personnel to support completion of the corrective action plan steps; and
- Performed limited testing of PBS's implementation of the guidance and procedures contained in the submitted documentation.

### Background

Under the terms of PBS leases, lessors are required to provide a wide range of services. Depending on the lease, these periodic services can vary from basic cleaning and maintenance to repainting, window washing, and carpet replacement.

To ensure that lessors provide the level of services required under the terms of the lease, PBS created a lease management program in its Office of Facilities Management. The intent of this program is to promote effective lease management by enforcing lease provisions; developing action plans to resolve problems; and enhancing communication between GSA, the tenant agency, and the lessor.

At the headquarters level, the Office of Facilities Management establishes nationwide policy and procedures to ensure that lessors comply with the terms and conditions of their lease agreements. At the regional level, lease administration managers (LAMs) are responsible for providing oversight of leases based on these policies and procedures. To do so, LAMs serve as the representative between the tenant agency and the lessor and investigate concerns with leased space reported by tenant agencies. LAMs also verify that the lessor complies with lease terms and conditions by, among other things, ensuring that the lessor provides the periodic services required under the lease.

PBS's *Lease Management Desk Guide* (Desk Guide) establishes lease management guidelines and oversight requirements designed to ensure that PBS consistently manages its nationwide lease portfolio. The Desk Guide states that LAMs should be familiar with the lease and review periodic services requirements. It also requires that LAMs obtain any updates to the lessor's

schedule of periodic services and follow up with the lessor throughout the year to verify the services were completed.

PBS uses the Lease Management Tool (LMT) to record, track, and report on lease management activities. In accordance with the Desk Guide, all documentation related to lease inspections, deficiencies, periodic services, communications with lessors and tenant agencies, and the cure process to address any problems with the lease should be preserved in the LMT. LAMs use the LMT to record all documentation related to the lease and verification of periodic services. In addition, the LAM must document all significant or continuing periodic service failures by the lessor in the LMT and report those failures to the lessor.

On February 16, 2023, we issued an audit report, *Audit of PBS's Oversight of Lease Periodic Services*, to PBS. The objective of the audit was to determine if LAMs are properly verifying and documenting the lessors' completion of periodic services in accordance with PBS and federal requirements.

Our audit found that PBS is not managing periodic services effectively; as a result, tenant agencies are not receiving the periodic services they are paying for.

To address the finding identified in our report, we recommended that the PBS Commissioner:

1. Require LAMs' supervisors to routinely ensure that LAMs are verifying that lessors complete all periodic services.
2. Require that newly hired or assigned LAMs receive sufficient training on lease management requirements within a timely manner after starting in their position and routinely thereafter.
3. Ensure regional offices conduct the required Management Analysis Review System reviews to ensure that LAMs maintain all required records in the LMT, including the annual schedule of periodic services.
4. Require that upon assignment and on a regular basis, LAMs communicate with the lessor and tenant agency to obtain and verify the updated schedule of periodic services.

The PBS Commissioner agreed with our report recommendations.

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## ***Results***

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

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## **Appendix A – Corrective Action Plan for Report Number A220026/P/R/R23003**

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### **Office of Facilities Management (PM) Corrective Action Plan**

**Designated Responding Official:** Courtney Springer

**Signature** \_\_\_\_\_ **Date** \_\_\_\_\_

**Contact Person:** Wendy Williamson (PMEB) and Tracy Talbert (PMEB)

**Telephone Number:** (704) 926-7066 and (312) 848-0167, respectively

**Date:**

<b>Report Number - Title:</b>	<b>Recommendation Number:</b>	<b>Proposed Recommendation Completion Date:</b>
A220026/P/R/R23003 - Audit of PBS's Oversight of Lease Periodic Services	001	January 31, 2024

**Finding(s): (For GSA Internal Use Only)**

PBS Is Not Providing Effective Oversight of the Lease Management Program to Ensure That Tenant Agencies Receive the Periodic Services They Are Paying For. Example: Lease Administration Managers (LAM) Did Not Consistently Verify the Timely Completion of Periodic Services.

**Root Cause of Finding(s): (For GSA Internal Use Only)**

Competing regional and supervisory facilities management priorities, such as addressing evolving sustainability requirements and taking immediate action to manage facilities during the pandemic (COVID-19), reduced the regional focus on the lease management program. PBS recognizes oversight of this program requires continuous attention and awareness.

*Version Date: 2/28/2023*

## Office of Facilities Management (PM) Corrective Action Plan

### Recommendation:

Require LAMs' supervisors to routinely ensure that LAMs are verifying that lessors complete all periodic services.

<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to the OCFQ BA or BG office</u>	<u>Documentation will be sent Last Duty Day of the month</u>
001. Share a summary of A220026/P/R/R23003 - Audit of PBS's Oversight of Lease Periodic Services of the finding and Recommendation 001 with regional management with an emphasis on supervisory oversight of lease administration.	1. Meeting date, agenda topic and meeting attendees. 2. Follow on email to regional management.	January 31, 2024
002. Develop a report containing periodic services frequencies and completion dates for each lease and share the report with the regional lease management representatives for distribution on an annual basis.	Sample report of periodic services	August 31, 2023

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Office of Facilities Management (PM) Corrective Action Plan

Designated Responding Official: Courtney Springer

Signature \_\_\_\_\_ Date \_\_\_\_\_

Contact Person: Wendy Williamson (PMEB) and Tracy Talbert (PMEB)

Telephone Number: (704) 926-7066 and (312) 848-0167, respectively

Date:

Report Number - Title:	Recommendation Number:	Proposed Recommendation Completion Date:
A220026/P/R/R23003 - Audit of PBS's Oversight of Lease Periodic Services	002	January 31, 2024

**Finding(s): (For GSA Internal Use Only)**

PBS Is Not Providing Effective Oversight of the Lease Management Program to Ensure That Tenant Agencies Receive the Periodic Services They Are Paying For. Example: Ineffective training - LAMs did not document the schedule of periodic services in the Lease Management Tool (LMT) and LAMs Are Not Complying with Requirements to Negotiate Cost Savings When Tenant Agencies Waive Substantial Periodic Services.

**Root Cause of Finding(s): (For GSA Internal Use Only)**

Competing regional and supervisory facilities management priorities, such as addressing evolving sustainability requirements and taking immediate action to manage facilities during the pandemic (COVID-19), reduced the regional focus on the lease management program. PBS recognizes oversight of this program requires continuous attention and awareness.

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**Office of Facilities Management (PM) Corrective Action Plan**

**Recommendation:**

Require that newly hired or assigned LAMs receive sufficient training on lease management requirements within a timely manner after starting in their position and routinely thereafter.

<b>Action to be Taken Step by Step</b>	<b>Supporting Documentation to be sent to the OCFO BA or BG office</b>	<b>Documentation will be sent Last Duty Day of the month</b>
001. In conjunction with Recommendation 001, Action Step -001: Emphasize requirement for LAM Contracting Officer's Representatives (COR) to take Essentials of Lease Management training as outlined in the Lease Management Desk Guide soon after onboarding or after reassignment and the requirement for lease management refresher training annually.	001 Meeting date, agenda, and follow on email to regional management.  Note: These items will be included with Recommendation 001, Action Step 001.	July 31, 2023
002. Continue monthly LAM COR community huddles during which various topics related to lease management will be discussed. Periodic services will be included as a topic during an upcoming session.	Memo to the IG containing the slide deck, date of presentation and attendees from the huddle for the discussion on periodic services.	July 31, 2023
003. The Office of Facilities Management will continue to monitor LAM COR Essentials of Lease Management and LAM COR refresher training attendance.	Calendar year 2023 <ol style="list-style-type: none"><li>1. Record of new CORs and Essentials of Lease Management training attendance</li><li>2. Record of existing CORs and LAM</li></ol>	January 31, 2024

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Office of Facilities Management (PM) Corrective Action Plan

	COR refresher training attendance.	
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Office of Facilities Management (PM) Corrective Action Plan

Designated Responding Official: Courtney Springer

Signature \_\_\_\_\_ Date \_\_\_\_\_

Contact Person: Wendy Williamson (PMEB) and Tracy Talbert (PMEB)

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Date:

Report Number - Title:	Recommendation Number:	Proposed Recommendation Completion Date:
A220026/P/R/R23003 - Audit of PBS's Oversight of Lease Periodic Services	003	January 31, 2024

Finding(s): (For GSA Internal Use Only)

PBS Is Not Providing Effective Oversight of the Lease Management Program to Ensure That Tenant Agencies Receive the Periodic Services They Are Paying For. Example: Insufficient monitoring - LAMs Are Not Always Maintaining the Required Periodic Services Documentation.

Root Cause of Finding(s): (For GSA Internal Use Only)

Competing regional and supervisory facilities management priorities, such as addressing evolving sustainability requirements and taking immediate action to manage facilities during the pandemic (COVID-19), reduced the regional focus on the lease management program. PBS recognizes oversight of this program requires continuous attention and awareness. Additionally, regional Management Analysis Review System (MARS) reviews were not mandatory until 2019. At that time, MARS reviews could be conducted virtually due to the pandemic (COVID-19) until fiscal year 2022. Prior to fiscal year 2022, not all regions were performing complete MARS reviews, which may have excluded the review of the lease management program.

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## Office of Facilities Management (PM) Corrective Action Plan

### Recommendation:

Ensure regional offices conduct the required Management Analysis Review System reviews to ensure that LAMs maintain all required records in the Lease Management Tool, including the annual schedule of periodic services.

<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. The modernized MARS tool was released in January 2022 with the requirement that all MARS reviews must be completed in the tool. The new tool improves PBS's capability to monitor regional MARS operations. Section 3.8 of the MARS Desk Guide addresses the review of the Lease Management program and outlines evaluation techniques. PBS will continue to provide oversight of the regional MARS operations to verify that regional offices are establishing MARS schedules and completing MARS reviews (including lease management), as required.	Calendar Year 2023 MARS Tool Analysis of Regional Lease Management Program Review Results, verifying regions are completing lease management reviews.	January 31, 2024

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Signature \_\_\_\_\_ Date \_\_\_\_\_

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Date:

Report Number - Title:	Recommendation Number:	Proposed Recommendation Completion Date:
A220026/P/R/R23003 - Audit of PBS's Oversight of Lease Periodic Services	004	January 31, 2024

**Finding(s): (For GSA Internal Use Only)**

PBS Is Not Providing Effective Oversight of the Lease Management Program to Ensure That Tenant Agencies Receive the Periodic Services They Are Paying For. Example: Inadequate communication - PBS does not ensure that LAMs are establishing and maintaining regular communication with the lessor and tenant agencies.

**Root Cause of Finding(s): (For GSA Internal Use Only)**

Competing regional and supervisory facilities management priorities, such as addressing evolving sustainability requirements and taking immediate action to manage facilities during the pandemic (COVID-19), reduced the regional focus on the lease management program. PBS recognizes oversight of this program requires continuous attention and awareness.

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## Office of Facilities Management (PM) Corrective Action Plan

**Recommendation:**

Require that upon assignment and on a regular basis, LAMs communicate with the lessor and tenant agency to obtain and verify the updated schedule of periodic services.

<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. Essentials of Lease Management training and the annual refresher training for LAM CORs include dedicated topics specific to periodic services, including the requirement to communicate with the lessor and occupant agency. Additionally, in response to OIG's Lease Administration Audit (A201011), PBS instituted monthly LAM COR huddles and LMT training sessions. Prior to each huddle, the LAM COR community is asked to submit questions to serve as topics for the huddle. Periodic services will be a topic during a huddle session.	Memo to the IG containing the slide deck, date of presentation and attendees from the huddle for the discussion on periodic services.	January 31, 2024
002. OFM is continually improving the LMT, including a redesign of the periodic services section. Periodic services auto calculate based on frequencies and users can save the	Memo to the IG containing the list of enhancements to improve the periodic services tracking.	January 31, 2024

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periodic services and frequencies into a template. LAMs email the template directly from the application to the lessor. The application will then upload the data from the lessor's updated template.		
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## ***Appendix B – Report Distribution***

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GSA Administrator (A)

GSA Deputy Administrator (AD)

Acting PBS Commissioner (P)

PBS Deputy Commissioner (P1)

Acting Chief of Staff (PB)

Deputy Commissioner of Enterprise Strategy (P2)

Chief Financial Officer (B)

Acting Deputy Chief Financial Officer (B)

Office of Audit Management and Accountability (BA)

Assistant Inspector General for Auditing (JA)

Deputy Assistant Inspector General for Acquisition Audits (JA)

Deputy Assistant Inspector General for Real Property Audits (JA)

Director (JAO)



## CONTACT US

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