



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

Audit of Security Camera and Alarm Systems at GSA-Owned Buildings

Report Number A210033/P/5/R22006
June 22, 2022

Executive Summary

Audit of Security Camera and Alarm Systems at GSA-Owned Buildings

Report Number A210033/P/5/R22006

June 22, 2022

Why We Performed This Audit

This audit was included in our Audit Plan. We included this audit in our plan based on concerns over the condition of security camera equipment in GSA-owned buildings raised by GSA officials and prior GSA Office of Inspector General reports. Our objective was to determine whether the security camera and alarm systems in GSA-owned buildings are effectively protecting the safety of the public, employees, and property.

What We Found

The security camera and alarm systems at GSA-owned buildings are [REDACTED].¹ We found the security camera and alarm systems in the 14 GSA-owned buildings we visited were [REDACTED]. The security cameras at the buildings were often [REDACTED]; in one case, [REDACTED]. We also found that video recording and alarm systems in some buildings were [REDACTED]. Although GSA and the U.S. Department of Homeland Security's Federal Protective Service (FPS) have a memorandum of agreement in place to coordinate on these issues, little action is being taken to address the situation.

What We Recommend

We recommend that the GSA Administrator:

1. In conjunction with the Federal Protective Service:
 - a. Conduct a nationwide assessment of GSA-owned buildings to identify [REDACTED] security camera and alarm systems.
 - b. Develop and implement a plan to repair, replace, and install the security camera and alarm systems identified through the nationwide assessment.
 - c. Revise GSA's memorandum of agreement with FPS to clearly define responsibility for repairing and replacing security camera and alarm systems within an acceptable time frame.

¹ Redactions in this report represent sensitive information related to federal building security.

2. If, in conjunction with FPS, GSA is not able to secure funding to repair, replace, or install security camera and alarm systems, GSA should work with Congress to establish a consistent funding stream to address current and future security camera and alarm system [REDACTED].

The GSA Administrator agreed with Recommendation 1 and partially agreed with Recommendation 2. In response, we made certain revisions to Recommendation 2 as discussed in the **Conclusion** section of the report. GSA's response can be found in its entirety in **Appendix C**.

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Introduction

We performed an audit of security camera and alarm systems in GSA-owned buildings across three GSA regions.

Purpose

This audit was included in our Audit Plan. We included this audit in our plan based on concerns over the condition of security camera equipment in GSA-owned buildings raised by GSA officials and prior GSA Office of Inspector General (OIG) reports.

Objective

The objective of our audit was to determine whether the security camera and alarm systems in GSA-owned buildings are effectively protecting the safety of the public, employees, and property.

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

Background

GSA, through its Public Buildings Service, is the primary federal real property and asset management agency, with a portfolio consisting of more than 9,000 federally owned and leased buildings. GSA, in conjunction with the U.S. Department of Homeland Security's Federal Protective Service (FPS), has an important role in protecting these buildings. The security of these federal buildings affects not only the daily operations of the federal government, but also the health, well-being, and safety of federal building employees and the public.

Federal Building Security Responsibility

The responsibilities for the security of federal buildings are established under an executive order, guidance and standards, a federal law, and a memorandum of agreement (MOA). We discuss these requirements in depth below.

Executive Order. Executive Order 12977, *Interagency Security Committee*, was issued in October 1995 after the bombing of the Alfred P. Murrah Federal Building in Oklahoma City, Oklahoma. Executive Order 12977 formed the Interagency Security Committee (ISC) to:

- (1) Establish policies for security in and protection of federal facilities;
- (2) Develop and evaluate security standards for federal facilities, develop a strategy for ensuring compliance with such standards, and oversee the implementation of appropriate security measures in federal facilities; and

- (3) Take such actions as may be necessary to enhance the quality and effectiveness of security and protection of federal facilities.

Interagency Security Committee Standards. The ISC has established many physical security and risk management standards for federal buildings. Among them, the ISC issued *The Risk Management Process: An Interagency Security Committee Standard* (ISC Standard), and the *Facility Security Committees: An Interagency Security Committee Standard*. Both documents describe the requirements and roles of Facility Security Committees (FSCs) and Facility Security Assessments (FSAs).

- **Facility Security Committees** – An FSC consists of representatives of all federal tenants in a multi-tenant federal facility. The FSC is responsible for addressing facility-specific security issues and approving the implementation of security measures. To do so, the FSC votes on any FPS-presented building security countermeasure recommendations. Votes are prorated based on percentage of building occupancy and a majority vote binds all tenants, regardless of a tenant agency’s desire to fund the recommendation or not. GSA is required to attend all FSC meetings and to serve as a voting member when it is a tenant in the building.
- **Facility Security Assessments** – FPS completes the FSA, which documents an evaluation of the security-related risks to a facility. The process analyzes potential threats, vulnerabilities, and estimated consequences, culminating in an assessment of the risk affecting a facility using a variety of sources and information. When risks are found, security countermeasures are recommended and presented to the FSC. According to a GSA directive, the Public Building Service is required to meet with FPS to review FSAs prior to presentation of findings and recommendations to the FSC.²

The ISC also issued security standards addressing:

- Building entrances, exits, and other access points;
- Identification of employees and visitors; and
- Building security video camera, recording and alarm systems.

The ISC Standard also includes *Appendix B: Countermeasures* and *Appendix C: Child Care Centers Level of Protection Template*. Appendix B [REDACTED]

Appendix C [REDACTED]

Homeland Security Act of 2002. Prior to November 2002, FPS was a division within GSA’s Public Building Service, responsible for GSA’s physical security and law enforcement missions. On

² 1000.3 OMA CHGE 1, *Responsibilities for Implementation of Facility Security Assessment Countermeasures*.

November 25, 2002, Congress passed the *Homeland Security Act of 2002*, which created the U.S. Department of Homeland Security (DHS).³ DHS provides law enforcement and related security services to federal facilities, grounds, and property. The Homeland Security Act transferred FPS to DHS, making DHS responsible for protecting GSA's owned and leased buildings. Under DHS, FPS's responsibilities include: (1) protecting employees and visitors in over 9,000 federally controlled properties; (2) enforcing laws, building rules, and regulations; and (3) investigating crimes.

According to the Homeland Security Act, the transfer of the FPS law enforcement authority does not "restrict the authority of the Administrator of General Services to promulgate regulations affecting property under the Administrator's custody and control."⁴

The buildings that FPS protects are under the jurisdiction, custody, and control of GSA. Therefore, the protection of federal buildings necessitates coordination between GSA and FPS.

Memorandum of Agreement. In 2018, GSA and FPS signed a MOA to identify and address building safety and protection roles and responsibilities between the two parties. Under the MOA, FPS is responsible for implementing approved countermeasures related to security equipment that is not part of the building. For example, FPS is responsible for security monitoring equipment, law enforcement activities, and conducting FSAs. GSA's role under the MOA is to ensure implementation of approved countermeasures related to building security fixtures. For example, GSA is responsible for providing physical access control systems, security barriers and guard booths, and for conducting building maintenance repairs.

The MOA further states that the GSA Administrator retains "all powers, functions, and authorities ... that are necessary for the operation, maintenance, and protection of such buildings and grounds."

GSA's authority to protect its buildings. The Homeland Security Act expressly affirms the Administrator's authority to operate, maintain, and protect federal buildings. The Homeland Security Act provides that:

Nothing in this Act may be construed to affect the functions or authorities of the Administrator of General Services with respect to the operation, maintenance, and protection of buildings and grounds owned or occupied by the Federal Government and under the jurisdiction, custody, or control of the Administrator.

Together, the Homeland Security Act and the 2018 MOA affirm GSA's authority to operate, maintain, and protect its buildings.

³ Homeland Security Act of 2002, Pub. L. 107-296, 116 Stat. 2135.

⁴ 40 U.S.C. 1315(g).

Prior Office of Inspector General Reports

Since Fiscal Year 2020, the GSA OIG has issued two reports that identified deficiencies in security cameras at GSA facilities. In January 2020, we reported on security vulnerabilities in GSA child care centers.⁵ Among other things, we found that 6 of 11 GSA-controlled child care

[REDACTED] In September 2021, the GSA OIG Office of Inspections issued a report identifying significant problems with the [REDACTED]

[REDACTED] .⁶ The inspectors found that [REDACTED] They also found that [REDACTED]

[REDACTED] . Based on these and other GSA OIG reports, we have identified the safeguarding of federal facilities as a management challenge for the past 10 years.⁷

⁵ *Child Care Centers in GSA-Controlled Buildings Have Significant Vulnerabilities* (Report Number A170119/P/6/R20001, January 30, 2020).

⁶ *Unrestricted Summary: Facility Security Inspection of a High-Risk GSA Building*, (Report Number JE21-003, September 30, 2021).

⁷ See, for example, *Assessment of GSA's Management and Performance Challenges for Fiscal Year 2022* (October 15, 2021).

Results

Finding – Security camera and alarm systems at GSA-owned buildings are [REDACTED].

The security camera and alarm systems at GSA-owned buildings are [REDACTED]. We found the security camera and alarm systems in the 14 GSA-owned buildings we visited were [REDACTED]. The security cameras at the buildings were often [REDACTED]; in one case, security cameras were [REDACTED]. We also found that video recording and alarm systems in some buildings were [REDACTED]. Although GSA and FPS, through DHS, have an MOA in place to coordinate on these issues, little action is being taken to address the situation.

Appendix B of this report details the buildings included in the scope of our audit and the condition of the security camera and alarm systems we observed.

Security Cameras at Federal Facilities Are [REDACTED]; in One Case, Security Cameras Were [REDACTED]

The ISC Standard *Appendix B: Countermeasures*, [REDACTED]. During our fieldwork, we visited 14 GSA-owned buildings and assessed the status of the security cameras. We found that, in total, [REDACTED]. As a result, the security systems [REDACTED] and [REDACTED].

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] 8

[REDACTED]	[REDACTED]
------------	------------

[REDACTED]

8 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Video Recording Systems [REDACTED]

The ISC Standard *Appendix B: Countermeasures*, [REDACTED]

[REDACTED]

[REDACTED]

⁹ [REDACTED]

¹⁰ This finding is consistent with our findings in our January 2020 report, *Child Care Centers in GSA-Controlled Buildings Have Significant Security Vulnerabilities* (Report Number A170119/P/6/R20001). In that report, we found that [REDACTED].

[REDACTED]

[REDACTED] ¹¹

[REDACTED]

Security Is Hampered by [REDACTED]

According to the ISC Standard *Appendix B: Countermeasures*; and *Appendix C: Child Care Centers Level of Protection Template*, [REDACTED]

[REDACTED] However, we found that 12 of the 14 alarm systems (86 percent) at the buildings we tested [REDACTED]:

- [REDACTED]

¹¹ [REDACTED]

- [REDACTED]

[REDACTED]

- [REDACTED]
According to ISC Standard *Appendix C: Child Care Center Level of Protection Template*, [REDACTED]

[REDACTED]

Taken together, the examples above demonstrate that the security camera and alarm systems at GSA-owned buildings [REDACTED]. As a result, GSA and FPS [REDACTED].

Although GSA and FPS Have an MOA in Place to Coordinate on These Issues, Little Action Is Being Taken to Address the Situation

Although many of these security deficiencies are long-standing, little action is being taken to address them. Throughout the course of our audit, Agency officials pointed to FPS’s responsibility for maintaining the operational status of the security systems under the MOA between GSA and FPS. However, nothing in the MOA requires FPS to repair or replace deficient security equipment. Notwithstanding FPS’s limited responsibilities for security systems under the MOA, GSA has the authority to maintain the safety and security of its buildings.

Responsibility for security equipment under the FPS-GSA MOA. GSA asserts that the 2018 MOA between FPS and GSA places responsibility for replacement and maintenance of the security camera and alarm systems solely on FPS. However, the MOA does not specifically require FPS to repair or replace deficient security equipment.

The MOA provides that FPS is responsible for security equipment and defines this equipment as:

security countermeasures that are not part of a building and easily removable from the building, such as X-ray machines, magnetometers, closed circuit video systems, and intrusion detection and alarm systems.

While providing that FPS is responsible for this equipment, the MOA does not compel FPS to take timely action to address [REDACTED] security camera and alarm systems. Instead, the MOA provides that:

Upon discovery by FPS or notification by GSA of [REDACTED]
[REDACTED]
[REDACTED]. (emphasis added)

In sum, FPS’s responsibility is limited to attempting to repair or replace the security equipment. If it is not successful, FPS is only required to provide monthly “status updates” to GSA of its progress toward repairing or replacing the equipment. Nothing in the MOA requires repair or replacement of security equipment in a timely manner—either by FPS or GSA—rendering the MOA ineffective on this matter.

The [REDACTED] cited in our report demonstrate the consequences of this ineffective language. Most notably, we cite a [REDACTED]
[REDACTED]

GSA’s authority to maintain the safety and security of its buildings. The *Homeland Security Act of 2002* preserved GSA’s authority to operate, maintain, and protect federal buildings and grounds that fall under GSA’s jurisdiction, custody, and control.¹³ The FPS-GSA MOA recognizes GSA’s authority, noting that in accordance with the Homeland Security Act, GSA retains “all powers, functions, and authorities ... that are necessary for the operation, maintenance, and protection of [its] buildings and grounds.”

GSA’s authority under the Homeland Security Act, coupled with its statutory authority to alter its buildings, allows GSA to independently address [redacted] security systems in its buildings. Otherwise, GSA is accepting the risk caused by these deficiencies.

GSA has four mechanisms available to fund building alterations, including the repair, replacement, and installation of security systems, through the Federal Buildings Fund (FBF)—a revolving fund used to finance GSA’s real property activities.

First, GSA may allocate appropriated funds for alterations without congressional approval as long as the estimated maximum cost does not exceed the prospectus threshold.¹⁴

Second, GSA may request specific appropriations from Congress through the FBF. It is not unprecedented for Congress to specifically authorize GSA to use the FBF for security upgrades to its buildings. For example, the *Omnibus Consolidated Appropriations Act, 1997* authorized GSA to spend \$27.256 million from the FBF for nationwide security enhancements.¹⁵ This law further authorized GSA to spend \$2.7 million for costs associated with implementing security improvements to buildings necessary to meet minimum security standards.

Third, GSA has the authority to reprogram funds in the FBF for security improvements. Specifically, the *Consolidated Appropriations Act, 2021* provides that:

the amounts provided in this or any prior Act for “Repairs and Alterations” may be used to fund costs associated with implementing security improvements to buildings necessary to meet the minimum standards for security in accordance

¹² See page 5.

¹³ 6 U.S.C. 232.

¹⁴ The prospectus threshold for Fiscal Year 2022 is \$3.375 million for construction, alteration, and leased projects. The Fiscal Year 2022 prospectus threshold for alteration in leased buildings is \$1.687 million.

¹⁵ Omnibus Consolidated Appropriations Act, 1997, Pub. L. 104-208, 110 Stat. 3009, 3009-332.

with current law and in compliance with the reprogramming guidelines of the appropriate Committees of the House and Senate....¹⁶

Finally, with congressional approval, GSA may transfer unobligated balances from other budget activities to a repairs and alterations account.

¹⁶ Consolidated Appropriations Act, 2021, Pub. L. 116-220, 134 Stat. 1182, 1411.

Conclusion

The security camera and alarm systems at GSA-owned buildings are [REDACTED]. We found the security camera and alarm systems in the 14 GSA-owned buildings we visited were [REDACTED]. The security cameras at the buildings were often [REDACTED]; in one case, security cameras were [REDACTED]. We also found that video recording and alarm systems in some buildings were [REDACTED].

Although GSA and FPS, through DHS, have an MOA in place to coordinate on these issues, little action is being taken to address the situation. GSA asserts that under the MOA, FPS is responsible for maintaining the operational status of the security systems. However, nothing in the MOA requires FPS to repair or replace deficient security equipment. Notwithstanding FPS's responsibilities under the MOA, GSA has the authority to maintain the safety and security of its buildings and must take action to address security system deficiencies.

GSA should work with FPS to address deficiencies in security systems across its portfolio of owned buildings. It should also work with FPS to strengthen the language in the MOA and clearly define responsibility for addressing security system deficiencies in a timely manner. If GSA and FPS are unable to obtain the necessary funding to address security system deficiencies, GSA should use its own authorities to do so.

Recommendations

We recommend that the GSA Administrator:

1. In conjunction with the Federal Protective Service:
 - a. Conduct a nationwide assessment of GSA-owned buildings to identify [REDACTED] security camera and alarm systems.
 - b. Develop and implement a plan to repair, replace, and install the security camera and alarm systems identified through the nationwide assessment.
 - c. Revise GSA's memorandum of agreement with FPS to clearly define responsibility for repairing and replacing security camera and alarm systems within an acceptable time frame.
2. If, in conjunction with FPS, GSA is not able to secure funding to repair, replace, or install security camera and alarm systems, GSA should work with Congress to establish a consistent funding stream to address current and future security camera and alarm system deficiencies.

GSA Comments

In her written response to our draft report, the GSA Administrator agreed with Recommendation 1 and partially agreed with Recommendation 2.

As included in our draft report, Recommendation 2 was written as:

If GSA is not able to secure funding to [REDACTED] [REDACTED] in conjunction with FPS, GSA should obtain congressionally approved funding to do so.

In partially agreeing with this recommendation, the Administrator wrote that:

Even if GSA requested and received congressionally approved funding to [REDACTED] [REDACTED] those improvements would only represent a single point in time, and the underlying process and responsibility issues that [REDACTED] [REDACTED].

We agree with the Administrator that a one-time request would only [REDACTED] [REDACTED]

Therefore, we revised Recommendation 2 as follows:

If, in conjunction with FPS, GSA is not able to secure funding to repair, replace, or install security camera and alarm systems, GSA should work with Congress to establish a consistent funding stream to address current and future security camera and alarm system deficiencies.

The Administrator also expressed concern that the report “does not recognize that some responsibilities are allocated to DHS by agreement, which are memorialized in the MOA and the ISC process.” However, as we note in the report, nothing in the MOA requires repair or replacement of security equipment in a timely manner—either by FPS or GSA—rendering the MOA ineffective on this matter [REDACTED] [REDACTED]. Moreover, nothing in the Homeland Security Act, the MOA, or the ISC process diminishes GSA’s authority to maintain the safety and security of its buildings. Accordingly, we maintain our position that GSA has the authority to address deficiencies in security camera and alarm systems if FPS is unable to do so.

GSA’s response can be found in its entirety in **Appendix C**.

Audit Team

This audit was managed out of the Great Lakes Region Audit Office and conducted by the individuals listed below:

Michael Lamonica
Terri-Gayl Hoshell

Regional Inspector General for Auditing
Auditor-In-Charge

Appendix A – Objective, Scope, and Methodology

Objective

The objective of our audit was to determine whether the security camera and alarm systems in GSA-owned buildings are effectively protecting the safety of the public, employees, and property.

Scope and Methodology

Our examination covered physical security countermeasures, including security camera and alarm systems, with an initial focus on the [REDACTED]. We conducted our fieldwork site visits between July and November 2021.

To accomplish our objective, we:

- Reviewed legislation, documentation, and regulations related to safety and security at federal buildings;
- Researched and reviewed safety and security regulations and standards specific to security countermeasures and child care centers located in federal buildings;
- Reviewed GSA's portfolio of buildings in the scope regions;
- Selected a judgmental sample of 14 GSA-owned buildings;
- Requested and reviewed the FSAs for the selected sample;
- Interviewed GSA and FPS officials about vulnerabilities listed in the FSAs;
- Visited and observed security countermeasures at all 14 sample properties; and
- Analyzed prior GSA OIG audit reports and corrective actions significant to the audit objective.

Sampling

Our initial scope included [REDACTED]. As a result of risks identified during our fieldwork [REDACTED], we expanded our scope to include GSA [REDACTED]. These additional four buildings were selected based on size and discussions with GSA personnel. While this nonstatistical sample design does not allow for projection of the results to the population, it allowed us to address our audit objective.

Internal Controls

We determined internal controls were not significant within the context of our audit objective. Therefore, we did not assess the design, implementation, or operating effectiveness of internal controls. The results of our audit are not intended to provide assurance on GSA's internal control structure. GSA management is responsible for establishing and maintaining internal controls.

Compliance Statement

We conducted the audit between January and December 2021 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 objective.

Appendix B – Security Countermeasures at Sites Visited

T		+	-	-	+	+
1	[REDACTED]	■	■	■	■	■
1	[REDACTED]	■	■	■	■	■
1	[REDACTED]	■	■	■	■	■
1	[REDACTED]	■	■	■	■	■
1	[REDACTED]	■	■	■	■	■
1	[REDACTED]	■	■	■	■	■
1	[REDACTED]	■	■	■	■ ¹⁷	■
1	[REDACTED]	■	■	■	■	■

¹⁷ In this case, 1 of the 12 tenants in the building fully funded replacement of the [REDACTED] when the other tenant agencies failed to commit funds for replacement.

[REDACTED]	[REDACTED]	+	[REDACTED]	[REDACTED]	[REDACTED]	+
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED] ¹⁸	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Notes:

[REDACTED]

[REDACTED]

¹⁸ While the recording device is functional, as noted in the report, [REDACTED].

[REDACTED]

[REDACTED]

Appendix C – GSA Comments

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The Administrator

June 1, 2022

MEMORANDUM FOR MICHAEL LAMONICA
REGIONAL INSPECTOR GENERAL FOR AUDITING
GREAT LAKES REGION
OFFICE OF INSPECTOR GENERAL
U.S. GENERAL SERVICES ADMINISTRATION (JA-5)

FROM: ROBIN CARNAHAN
ADMINISTRATOR (A) *Robin Carnahan*

SUBJECT: Office of Inspector General Draft Report - *Audit of Security
Camera and Alarm Systems at GSA-Owned Buildings*
(Assignment Number A210033)

The U.S. General Services Administration (GSA) thanks the GSA Office of Inspector General (OIG) for the opportunity to review and comment on the draft audit report. We take this issue very seriously and appreciate OIG's recommendations. While GSA concurs that [REDACTED] security camera systems operated and maintained by the U.S. Department of Homeland Security (DHS) - Federal Protective Service (FPS) at federally owned facilities under the jurisdiction, custody, and control of GSA (GSA-controlled facilities) [REDACTED], the following additional input is provided for your consideration.

GSA is committed to partnering with DHS to ensure security camera and alarm systems at GSA-controlled facilities are functioning properly. GSA agrees with Recommendation 1 and partially agrees with Recommendation 2. While all parties agree that [REDACTED] action must be taken, GSA believes that FPS is the appropriate agency to do so under the terms of the GSA-DHS Security Memorandum of Agreement (MOA) that became effective on September 27, 2018. Even if GSA requested and received congressionally approved funding to repair and replace [REDACTED] security camera and alarm systems at GSA-controlled facilities, those improvements would only represent a single point in time, and the underlying process and responsibility issues [REDACTED] would remain unaddressed. A consistent funding stream, clear understanding of responsibilities, and agreed-upon implementation process are necessary for security camera and alarm systems at GSA-controlled facilities to be consistently maintained, repaired, and, when necessary, replaced. GSA, DHS, and FPS are working collaboratively toward those goals.

Recommendation 1

In conjunction with the Federal Protective Service:

- a. *Conduct a nationwide assessment of GSA-owned buildings to identify [REDACTED] security camera and alarm systems.*
- b. *Develop and implement a plan to repair, replace, and install the security camera and alarm systems identified through the nationwide assessment.*
- c. *Revise GSA's memorandum of agreement with FPS to clearly define responsibility for repairing and replacing security camera and alarm systems within an acceptable time frame.*

U.S. General Services Administration
1800 F Street NW
Washington DC 20405-0002
www.gsa.gov

Recommendation 2

If GSA is not able to secure funding to repair, replace, or install security camera and alarm systems in conjunction with FPS, GSA should obtain congressionally approved funding to do so.

Audit Report Redactions

Due to the sensitive nature of the information included in the draft audit report, GSA requests to work collaboratively with OIG prior to public issuance of the report to ensure such information is appropriately redacted. GSA appreciates the redacted version OIG has shared and has included the attached *GSA Additional Redaction Recommendations* for consideration.

Memorandum of Agreement between GSA and the Department of Homeland Security

The GSA-DHS MOA places responsibility on FPS to install and maintain countermeasures at GSA-controlled facilities that are considered to be security equipment, which includes security camera and alarm systems (subsections 10(B)(2)(a) and (b)). The MOA also makes it clear that it is the responsibility of FPS to coordinate repair or replacement of non-functional countermeasures for which FPS has responsibility, including notification to GSA (subsection 10(A)(2)(h)).

Although FPS is responsible for the security camera systems at GSA-controlled facilities, it is largely reliant on occupant agency funding through the Facility Security Committee in multi-tenant facilities, as described in the Risk Management Process and Interagency Security Committee (ISC) standard. While the draft report focuses heavily on GSA's authorities to alter facilities under its jurisdiction, custody, and control, GSA is concerned that the report does not recognize that some responsibilities are allocated to DHS by agreement, which are memorialized in the MOA and the ISC process.

Notwithstanding the responsibilities placed on FPS in the MOA and the ISC process, and in alignment with Recommendation 1, GSA is committed to partnering with DHS and FPS to keep the security camera and alarm systems at GSA-controlled facilities functioning properly and help enable FPS to fulfill its mission of protecting Federal facilities successfully. In furtherance of that effort, GSA has convened an interagency working group consisting of officials from DHS, FPS, and GSA, as well as an Executive Steering Committee with leadership from those three organizations.

The working group is tasked with the following activities:

- Identification and prioritization of high-risk items for potential short-term action.
- Development of requirements for contract vehicle(s) to support camera installation, operation and maintenance, repair, and replacement.
- Development of options for consistent funding sources to support camera installation, operation and maintenance, repair, and replacement.

In light of the recommendations made in the draft report, the activities of the interagency working group are being revisited to ensure they align appropriately and are responsive.

Additionally, GSA is currently working with FPS to finalize the replacement to the GSA-DHS MOA and will ensure it includes additional clarity regarding the timely repair and replacement of security equipment.

Thank you again for the opportunity to review and comment on the draft report. If you have any questions, please contact Andrew Heller, Assistant Commissioner, Office of Facilities Management, Public Buildings Service, at (202) 501-0772.

Attachment: GSA Additional Redaction Recommendations

Appendix D – Report Distribution

GSA Administrator (A)

GSA Deputy Administrator (AD)

Commissioner (P)

Deputy Commissioner (PD)

Chief of Staff (PB)

Deputy Chief of Staff (PB)

Assistant Commissioner for Strategy & Engagement (PS)

Associate Administrator for Mission Assurance (D)

Deputy Associate Administrator for Mission Assurance (D)

Acting Chief Financial Officer (B)

Office of Audit Management and Accountability (BA)

Assistant Inspector General for Auditing (JA)

Director, Audit Planning, Policy, and Operations Staff (JAO)