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

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**TOP CHALLENGES FACING THE GENERAL SERVICES ADMINISTRATION:  
COVID-19 Emergency Response and Relief Efforts**

This document was prepared for the Pandemic Response Accountability Committee's [Top Challenges Facing Federal Agencies: COVID-19 Emergency Response and Relief Efforts](#).

Included are the General Services Administration, Office of Inspector General's submission to the Committee, as well as GSA's response to the challenges identified by the GSA OIG.

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## **Introduction**

On March 27, 2020, Congress passed, and the president signed, the Coronavirus Aid, Relief, and Economic Security Act (CARES Act). The CARES Act included \$295 million for GSA to prevent, prepare for, and respond to Coronavirus 2019 (COVID-19) domestically or internationally.

According to GSA’s Communicable Disease Pandemic Plan, GSA has four primary responsibilities during a pandemic emergency: (1) protecting the health and safety of GSA employees, contractors, vendors, and visiting public; (2) maintaining mission essential functions; (3) supporting Federal response efforts; and (4) communicating with employees, tenants, and other stakeholders.

This report identifies what we consider to be the most significant challenges facing GSA as the agency seeks to meet the goals of the emergency pandemic response legislation.

### **Challenge 1: Protecting the Health and Safety of Building Occupants**

As of May 7, 2020, 963 GSA owned or leased facilities have reported COVID-19 positive or presumed cases. In order to ensure the health and safety of building occupants and visitors, the Public Buildings Service (PBS) must be able to timely identify and track positive or presumed cases, and notify building occupants of any potential exposure. Once positive or presumed cases are reported, PBS must execute contract actions to ensure that space is cleaned and disinfected in accordance with Centers for Disease Control and Prevention guidelines.

PBS received \$275 million through the Federal Buildings Fund to fund, among other things, deep cleaning actions due to COVID-19. Effectively administering cleaning contracts to ensure the health and safety of building occupants will pose a challenge. GSA’s Communicable Disease Pandemic Plan notes that in-person inspections of this space would be impossible and imprudent, given the health and safety risks involved. Therefore, the plan states that it is important that PBS work with contractors to review, enhance, and modify as appropriate, contract Quality Control Plans and PBS’s Quality Assurance Surveillance Plans to ensure that adequate safeguards provide for the delivery of safe, efficient, and effective custodial services.

However, our audit work has found issues with PBS’s oversight of its cleaning contracts. We found contracts where the contractor Quality Control Plans and PBS Quality Assurance Surveillance Plans were either missing or inadequate, leading to ineffective contract oversight.<sup>1</sup> PBS must provide effective oversight of the applicable quality control processes to limit and

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<sup>1</sup> *GSA’s PBS Northwest/Artic Region Service Center Does Not Effectively Administer Lease and Service Contracts* (Report Number A180053/P/4/R20002, February 20, 2020); *Award and Administration Issues on Task Order GS-P-02-1 0-PC5025 for Construction Services on the Recovery Act Project at the Joseph P. Addabbo Federal Office Building in Jamaica, New York* (Audit Memorandum Number A090184-78, January 8, 2015).

reduce the spread of COVID-19. This will be of considerable importance as federal employees begin to return from extended telework, and buildings reopen to the general public.

### **Challenge 2: Accurate Reporting of CARES Act Spending**

To accurately report CARES Act obligations and commitments, GSA's Office of the Chief Financial Officer must ensure that CARES Act spending is properly identified, and that reporting errors and omissions are eliminated or minimized. Our recent audit of GSA's DATA Act submission found that GSA did not accurately report obligations due to control weaknesses.<sup>2</sup> GSA must ensure that steps it has taken to address these control weaknesses are effective and ensure accurate CARES Act reporting.

### **Challenge 3: Providing Effective Contract Administration for Emergency Procurements**

The CARES Act does not provide direct funding to the Federal Acquisition Service (FAS); however, FAS's Emergency Management Program Office and Office of Assisted Acquisitions may execute contract actions using CARES Act funding on behalf of customer agencies. Past audit work of GSA's emergency contracting for other agencies has identified deficiencies in contract administration resulting in wasteful spending and negative impacts to federal response efforts.<sup>3</sup> FAS must ensure contract administration responsibilities are appropriately delegated and formalized to ensure proper monitoring of contractor performance.

### **Challenge 4: Safeguarding Federal Facilities and Providing a Secure Work Environment**

In multiple audits, we have reported that GSA did not ensure that contract employees received favorable background investigation determinations before providing them with access to sensitive government information, systems, and facilities.<sup>4</sup> As a result, GSA assumed unnecessary risk for itself and its customer agencies.

GSA's Office of Government-wide Policy issued guidance that allows for flexibilities related to standard face-to-face credentialing, termination of credentials/building access, and issuance and collection of government supplied equipment for contractors.<sup>5</sup> While these allowances may be necessary in the short-term, GSA must ensure sufficient controls remain. In addition, in cases where contractors use their own IT equipment, GSA must ensure it is in compliance with the GSA Office of the Chief Information Officer's IT security policy and technical security

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<sup>2</sup> *Audit of the Completeness, Accuracy, Timeliness and Quality of GSA's 2019 DATA Act Submission* (Report Number A190040/B/R/F20001, November 1, 2019).

<sup>3</sup> *Audit of GSA's Response to Hurricane Katrina* (Report Number A060055/A/R/F07009, February 26, 2007).

<sup>4</sup> *FAS Did Not Ensure That Contract Employees Had Background Investigations Before Providing Support to Agencies Transitioning to Enterprise Infrastructure Solutions*, (Interim Memorandum Number A170103-4, June 29, 2018); *PBS is Not Enforcing Contract Security Clearance Requirements on a Project at the Keating Federal Building*, (Report Number A150120/P/2/R16002, March 17, 2016).

<sup>5</sup> Acquisition Letter MV-202-07 *Temporary Policy for Contractor Onboarding and Offboarding During Novel Coronavirus Disease (COVID-19)*, dated April 21, 2020.

guidelines. Failure to do so exposes GSA to potential attacks that could lead to the disruption of Agency operations and the unauthorized disclosure of sensitive information.

**GSA Comments**

GSA's written response is attached and included in its entirety.



U.S. General Services Administration

May 27, 2020

MEMORANDUM FOR: NICHOLAS PAINTER  
REGIONAL INSPECTOR GENERAL FOR AUDITING  
SOUTHEAST SUNBELT REGION  
OFFICE OF INSPECTOR GENERAL (JA-4)

FROM: ROBERT BORDEN  
CHIEF OF STAFF (AC)

A handwritten signature in blue ink, appearing to read "R C Borden".

ROBERT STAFFORD  
CHIEF ADMINISTRATIVE SERVICES OFFICER (H)

DAVID SHIVE  
CHIEF INFORMATION OFFICER (I)

SUBJECT: Response to the Office of Inspector General (OIG) report on GSA's  
Top Challenges (A2020001-2)

Thank you for the opportunity to review and respond to the OIG report titled *Pandemic Response Accountability Committee - GSA's Top Challenges* (Top Challenges), received on May 13, 2020. This report, prepared at the request of the Pandemic Response Accountability Committee (PRAC), summarizes the OIG's assessment of the top challenges that the U.S. General Services Administration (GSA) faces in meeting the goals of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act).

GSA is committed to supporting the varied and evolving missions of the many agencies responding to the pandemic. Please find attached a discussion of actions GSA has and is taking to help ensure effective support of these agencies as Federal, State, and local governments work to protect the public and speed the Nation's recovery. GSA acknowledges and concurs with the Office of Inspector General regarding the overarching importance of protecting the health and safety of building occupants, ensuring accurate reporting of CARES Act spending, providing effective contract administration for emergency procurements, and safeguarding Federal facilities and providing a secure work environment.

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GSA's top priority is operating effectively, efficiently, and in compliance with all laws and regulations. As part of the Administrator's routine management and oversight activities, the Administrator holds Quarterly Performance Reviews with the senior leadership team to discuss program objectives, performance results, and potential obstacles to meeting mission goals. In addition, the Deputy Administrator chairs the Management Oversight and Control Council, which meets quarterly to discuss internal control findings, and members of the Program Audit Leadership Committee meet regularly to discuss corrective action plan implementation status and ensure GSA is on track to complete actions in a timely and thorough manner. GSA is always seeking new and innovative ways to optimize technology, such as dashboards and application of robotic processing automation to streamline processes, reduce costs, and leverage data to foster greater oversight, accountability, and operational efficiency.

Attachment

## **GSA Challenges Pandemic Response Accountability Committee Report**

### **Challenge 1: Protecting the Health and Safety of Building Occupants**

GSA considers the health and safety of tenants in GSA-controlled space as its highest priority and takes seriously our responsibility to provide a safe environment for Federal employees, tenants, and the public. GSA is working closely with Federal Government agencies to respond to reports of COVID-19 suspected cases in a GSA-controlled facility and notify tenants accordingly. In response to any such cases, GSA cleans and disinfects impacted facilities.

GSA continuously monitors and reviews Centers for Disease Control and Prevention (CDC) guidelines and develops strategies to ensure compliance when CDC issues updates; this includes modifying janitorial contracts and working with lessors and customer agencies. Moreover, in coordination with customers and to support their needs, GSA has performed the detailed cleaning and disinfecting of areas when there has been an individual with a confirmed or suspected case of the virus. GSA is also working with customer agencies to determine whether they would like GSA to routinely clean and disinfect personal property in keeping with CDC recommendations, or whether those agencies would prefer to perform the practice of routinely wiping down personal workstations themselves.

Additionally, GSA follows the Federal Acquisition Regulation (FAR) Part 46, Quality Assurance Surveillance Plan, to inspect cleaning and disinfection work performed as a result of a confirmed or suspected case of COVID-19. GSA uses the specification for a National Custodial Quality Assurance Surveillance Plan, which places responsibility with the Contracting Officer's Representative for monitoring, assessing, recording, and reporting on the performance of the Contractor. GSA ensures that inspections safeguard the rights of the Government.

GSA's Pandemic Plan acknowledges that conducting walkthrough inspections may be impossible or imprudent for GSA personnel during a pandemic event. The Office of Management and Budget Memorandum M-20-16 encourages flexibilities to minimize the face-to-face interactions typically associated with inspecting custodial work. Utilizing remote or virtual inspection techniques to verify the work is being conducted properly with the correct products and appropriate personal protective equipment can be an acceptable proxy when the preferred methods of inspection are not feasible.

GSA also is working with lessors to incorporate additional cleaning and disinfecting requirements into its leases consistent with current recommended CDC guidelines. These standards include the routine cleaning and disinfection of high-touch surfaces in common and high traffic areas.

The Office of Inspector General (OIG) report to the Pandemic Response Accountability Committee (PRAC) raises concerns with GSA's oversight of cleaning contracts, Quality Control Plans, and Quality Assurance Surveillance Plans. OIG's report references two previous audit engagements and associated documents: 1) GSA's PBS Northwest/Arctic Region Service Center Does Not Effectively Administer Lease and Service Contracts (A180053) that sampled contracts dating back to FY2015-FY2017, and 2) the Audit Memorandum, Award and Administration Issues for Construction Services on the Recovery Act Project at the Joseph P. Addabbo Federal Office Building in Jamaica, New York (A090184) dated December 2014 regarding a task order awarded in March 2010. Since that time and the release of the audit findings, GSA has made significant improvements in lease administration and acquisition management, with new and implemented systems, processes, and internal controls.

GSA has been, and continues to be, in close contact with our customer agencies, informing them of our efforts and procedures. Furthermore, after learning of a suspected incident, GSA and the customer agency notify building tenants if there is a COVID-19 suspected incident in a GSA-controlled facility.

Critical infrastructure has remained open throughout the pandemic, and our building management teams have remained in close communication with our customer agencies. GSA will continue to work with customer agencies to support and adapt to agency workplace needs as the pandemic continues to evolve and ensure facilities are safe for our tenants and the public.

## **Challenge 2: Accurate Reporting of CARES Act Spending**

GSA concurs with the importance of ensuring accurate reporting of CARES Act spending and does not anticipate issues implementing the CARES Act spending reporting requirements. The OIG, in its Top Challenges report, cites an obligation reporting issue with respect to GSA's DATA Act reporting. That issue was limited to a coding error in the reporting of prior year recoveries. This issue was corrected for all FY 2019 DATA Act reporting and will have no bearing on the accuracy of GSA CARES Act or future DATA Act reporting.

### **Challenge 3: Providing Effective Contract Administration for Emergency Procurements**

GSA concurs with the importance of providing effective contract administration for all procurements including emergency procurements. GSA implemented lessons learned from the response to Hurricane Katrina as exemplified by the Federal Acquisition Service's (FAS) established FAS Emergency Management Program Office (EMPMO). The EMPMO provides an avenue for centralized GSA communications with FEMA, and mitigates fragmented outreach to a variety of GSA sources. This process provides information sharing opportunities and oversight to prevent duplication. In addition to the EMPMO, FAS has established a dedicated Emergency Contracting Support team in the central office to provide FEMA emergency support, ensure strong customer service, and minimize acquisition risk.

In response to COVID-19, GSA centralized guidance and communicated consistently across the agency to ensure the acquisition workforce had the necessary information and tools to effectively execute contract administration during this pandemic. SPE Memo 2020-06, Preparing for Potential Acquisition Performance Impacts Due to Novel Coronavirus (COVID-19), issued on March 8, 2020 established a new Public Health Emergencies topic page for the acquisition workforce, where all guidance could be accessed by the acquisition workforce. The topic page continues to remain fluid where new policy and guidance can be added at any time for the duration of the pandemic.

FAS has centralized oversight over emergency acquisition, and the majority of emergency acquisitions are being processed through existing programs such as Emergency Contracting Support, Global Supply, and Assisted Acquisition Services (AAS) that are leveraging existing contract administration processes. When new processes are required in response to COVID-19, training sessions and resources are made available to the acquisition workforce. For example a National Interest Action (NIA) Code Overview and COVID-19 Emergency Response reference guide was provided to the acquisition workforce on how to properly code all COVID-19 related procurements.

### **Challenge 4: Safeguarding Federal Facilities and Providing a Secure Work Environment**

GSA is working with Facility Security Committees (FSC) and the U.S. Department of Homeland Security–Federal Protective Service to offer screening procedures to accommodate agencies returning to facilities to perform their mission. Under the “Risk Management Process for Federal Facilities: An Interagency Security Committee

Standard (2nd Edition),” the FSC is responsible for addressing facility-specific security issues and approving the implementation of security measures and practices. The FSC consists of representatives of all Federal tenants in the facility, the security organization, and the owning or leasing department or agency. In the case of new construction or pending lease actions, the FSC will also include the project team and the planned tenant(s). This allows each tenant and stakeholder in a facility to have input into modified screening and access control procedures.

GSA is continuing to perform background investigations and credentialing for contractors during the pandemic. On April 21, 2020 GSA issued MV-20-07, “Temporary Policy for Contractor Onboarding and Offboarding during Novel Coronavirus Disease (COVID-19).” This policy provides procedures for the acquisition workforce and security specialists regarding contractor onboarding and offboarding due to the need to limit physical interactions.

In addition, GSA continues to utilize the GSA Credential and Identity Management System (GCIMS) Dashboard to track status updates for both contractor background investigations and contractor access cards. During the offboarding process, the Requesting Official (RO) must ensure the contractor mails all access cards to GSA for destruction when a contractor leaves or a contract ends with GSA. To assist with that access card collection and destruction, GSA built an email communication tool within the GCIMS Dashboard that automatically notifies ROs at the 60-day, 30-day and 0-day contract expiration date so the RO can take appropriate action. GSA is also in the process of creating a ‘RO Roles and Responsibilities’ training that will be available virtually on GSA Online University in FY21.

As a general matter, GSA requires Government Furnished Equipment (GFE) for access to the GSA network. Virtual Private Network (VPN) and/or Virtual Desktop Infrastructure (VDI) solutions are used for secure remote access into the GSA infrastructure for staff and contractors with GSA network accounts. Contractors with GSA accounts but no GFE may access using GSA-provided VDI solutions with any device (contractor purchased or personally owned). Due to a limited supply of GFE early in the pandemic response, flexibilities for nonstandard GSA contractor-supplied IT equipment were reflected in MV-20-07, but have not been used to date. GSA was able to procure required GFE to meet work requirements. Exceptions to GSA GFE requirements require formal review, approval, and risk acceptance.