September 29, 2009

MEMORANDUM FOR ROBERT A. PECK

COMMISSIONER

PUBLIC BUILDINGS SERVICE (P)

FROM:

R. Nicholas How R. NICHOLAS GOCO

DEPUTY ASSISTANT INSPECTOR GENERAL

FOR REAL PROPERTY AUDITS (JA-R)

SUBJECT:

Audit Memorandum – Preliminary Observations on PBS's Major Construction and Modernization Projects Funded by the American Reinvestment and Recovery Act of 2009: Comprehensive Project

Plans

Audit Number A090172

The American Reinvestment and Recovery Act of 2009 (Recovery Act) provides the General Services Administration (GSA) with \$5.55 billion for the Federal Buildings Fund. In accordance with the Recovery Act, the GSA Public Buildings Service (PBS) is using the funds to convert Federal buildings into High-Performance Green Buildings as well as to construct Federal buildings, courthouses, and land ports of entry. The Recovery Act mandates that \$5 billion of the funds must be obligated by September 30, 2010 and that the remaining funds be obligated by September 30, 2011. The GSA Office of Inspector General (OIG) is conducting oversight of the projects funded by the Recovery Act. One objective of this oversight is to determine if PBS is planning, awarding, and administering contracts for major construction and modernization projects in accordance with prescribed criteria and Recovery Act mandates.

Our review of the major construction and modernization projects has found that project management plans, known formally as Comprehensive Project Plans (CPP), have not always been updated or fully developed and approved for major Recovery Act construction and modernization projects. Under PBS's routine project planning process, CPPs are prepared after project initiation and submitted to PBS National Office for approval under the Capital Investment and Leasing Program before the projects advance past the planning stage. However, per discussions with the Program Management Office (PMO), complete project plans had not been required for Recovery Act projects due to time constraints. Instead, "data sheets," or "abbreviated project plans" were required to be submitted. These data sheets provide information on project scope, project schedule, and funding schedules similar to the CPP. However, the "data sheets" do not provide information on how the project will be managed, such as information on the assigned roles and responsibilities of the project management team and the risk mitigation strategies for the project.

The importance of the CPP is discussed in the PBS Office of the Chief Architect's June 2009 "Project Management Guide for the Public Buildings Service" (Guide). This Guide provides a road map on project management and describes the CPP as a document that provides the overall framework for the project execution. The CPP presents the project goals and objectives and establishes the complete project scope, schedule, budget, and implementation strategy. The plan also describes the roles and responsibilities of all the team players and documents the plan for communication between the Project Manager and the customer. The plan is approved at the division director level and is signed by all project team members.

According to the Guide, the initial project plan is completed at the conclusion of the feasibility study, prior to submission for funding, and is continuously updated throughout the life of the project. The initial plan may be less detailed than later versions; however, it is still important for identifying potential project risks and strategies to mitigate them. The CPP should be updated as the project progresses to evaluate the success of the plan to date and to adapt it to the realities of the project.

The CPP should be part of the overall risk mitigation strategy for Recovery Act projects. According to the PMO, it is using a variety of methods to mitigate risk including close oversight by Regional Recovery Executives and project tracking through information systems. However, risk mitigation should start during the project team's planning for a project. The project management information in the CPP provides a tool for both the management of the project as well as for the monitoring and oversight of the project. The CPP ensures efficient and effective project delivery by articulating project goals and implementation strategies for discussion, understanding, and agreement by all participants. It serves as a point of reference, helping the Project Team to keep goals in focus over time, especially if team members change during the life of a project.

We discussed this issue with PMO management on August 19, 2009. These observations will be explored further in our continuing fieldwork and reported in a future audit report. The agency will have the opportunity to respond to the draft report before the final report is issued. Therefore, no written comments or corrective action plan are required at this time. In addition, because this memorandum is not a report nor does it contain formal recommendations, it is not subject to the audit resolution process.

We appreciate the support that has been provided throughout this review. If you have any questions about this memorandum, please contact Nicholas Painter, Audit Manager, on (404) 331-5520 or me on (202) 219-0088.