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December 2015

# HOMELAND SECURITY

## FPS and GSA Should Strengthen Collaboration to Enhance Facility Security

Accessible Version

# GAO Highlights

Highlights of [GAO-16-135](#), a report to the Committee on Homeland Security, House of Representatives.

## Why GAO Did This Study

GAO designated federal real-property management as a high-risk area in part because of physical security challenges at federal facilities. FPS and GSA have joint responsibility for protecting federal facilities held or leased by GSA. FPS has primary responsibility for the security and protection of buildings and their occupants, whereas GSA has primary responsibility for security fixtures, maintenance, and building access.

In light of these challenges, GAO was asked to review (1) how the agencies' collaboration reflects key practices to ensure facility security and (2) the impact of their collaboration practices on day-to-day operations at the regional and facility level. GAO analyzed pertinent laws and documents, compared FPS's and GSA's collaboration efforts against GAO's selected key-collaboration practices, and interviewed agency officials at the headquarters and regional levels selected based on various factors. While the results from regions cannot be generalized, they provided illustrative examples.

## What GAO Recommends

GAO recommends that FPS and GSA take actions to improve their collaboration in several areas, including defining common outcomes, agreeing on roles and responsibilities, and communicating compatible policies and procedures. DHS specifically concurred with GAO's recommendations, and GSA agreed to work with FPS to address the findings.

View [GAO-16-135](#). For more information, contact Lori Rectanus at (202) 512-2834 or [rectanusl@gao.gov](mailto:rectanusl@gao.gov)

December 2015

## HOMELAND SECURITY

### FPS and GSA Should Strengthen Collaboration to Enhance Facility Security

#### What GAO Found

The Federal Protective Service (FPS), within the Department of Homeland Security (DHS), and the General Services Administration (GSA) have taken some steps to improve collaboration, such as drafting a joint strategy. While each agency has some individual policies for collaboration, the two agencies have made limited progress in agreeing on several key practices as described below. Reaching agreement on these practices will help to enhance the agencies' ability to protect federal facilities and to improve day-to-day operations at the regional level.

#### Status of the Federal Protective Service's and the General Services Administration's Efforts to Address Key Collaboration Practices

##### Define and articulate a common outcome

While FPS and GSA have drafted a joint strategy that includes a common outcome related to facility protection, they have not reached agreement on the document.

##### Establish mutually reinforcing or joint strategies

FPS's and GSA's draft joint strategy defines an overarching strategic goal of creating a federal-facility critical infrastructure that balances public access, security, and resiliency to enable continuity of operations and rapid recovery from all hazards. However, the two agencies have not reached agreement on the document. In October 2015, FPS and GSA officials told GAO that they intend to put the joint strategy on hold and revisit the document after they address other priorities.

##### Agree on roles and responsibilities

A 2006 memorandum of agreement (MOA) between FPS and GSA addresses their roles, responsibilities, and operational relationships concerning the security of GSA-controlled space. However, some information in the MOA is outdated and incorrect as it does not reflect policy and organizational changes affecting roles and responsibilities. In August 2015, FPS and GSA officials renewed negotiations to update the MOA, but the two have not yet fully agreed on current roles and responsibilities related to facility protection, and they have not set a time frame for completion.

##### Establish compatible policies, procedures, and other means to operate across agencies

In some cases, the two agencies have individual policies, but it is unclear whether they are compatible. FPS and GSA officials have not fully collaborated in communicating policies and procedures to operate across agencies and regions, and regional officials told GAO they rely on informal communication for day-to-day operations.

##### Develop mechanisms to monitor, evaluate, and report on results

FPS and GSA individually monitor specific areas of facility security. However, the two agencies have not developed mechanisms to monitor, evaluate, and report on the results of their related missions regarding facility protection.

##### Reinforce agency accountability for collaborative efforts through agency plans and reports

FPS's and GSA's strategic plans address the importance of collaboration with other agencies in general, but these plans do not reinforce accountability for collaborative efforts.

Source: GAO analysis of the status of FPS's and GSA's collaboration practices. | [GAO-16-135](#)

As a result of not having key practices in place, regional officials said they were not aware of agreed upon collaborative policies and procedures to conduct day-to-day operations. GAO found that this created inefficiencies and security risks. For example, FPS officials told GAO that GSA did not coordinate with them on new construction intended for law enforcement tenants, and as a result, it was not suitable for law enforcement use. GSA officials told GAO that they did not have sufficient information from FPS about security plans for upcoming events and, therefore, were not able to inform tenants of necessary security measures.

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## Abbreviations

BSC	Building Security Committee
DHS	Department of Homeland Security
FPS	Federal Protective Service
FSA	facility security assessment
FSC	Facility Security Committee
FSL	facility security level
GPRA	Government Performance and Results Act
GSA	General Services Administration
ICE	Immigration and Customs Enforcement
ISC	Interagency Security Committee
MOA	memorandum of agreement
MOU	memorandum of understanding
NPPD	National Protection and Programs Directorate
OEP	Occupant Emergency Plan
OMA	Office of Mission Assurance
PBS	Public Buildings Service
PPD-21	Presidential Policy Directive on Critical Infrastructure Security and Resilience

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December 16, 2015

The Honorable Michael T. McCaul  
Chairman  
The Honorable Bennie G. Thompson  
Ranking Member  
Committee on Homeland Security  
House of Representatives

Over one-million employees and a wide range of visitors seeking services depend on the government to provide security and protection at approximately 8,900 facilities held or leased by the General Services Administration (GSA). Two federal agencies—the Federal Protective Service (FPS), an agency within the Department of Homeland Security (DHS),<sup>1</sup> and GSA— are critical to ensuring security.<sup>2</sup> The Homeland Security Act of 2002 vested both the Secretary of DHS and the Administrator of GSA with responsibilities for the protection of these facilities.<sup>3</sup> FPS is the component within DHS that has responsibility for security and protection of the facilities, their occupants, and visitors. GSA also has responsibility for protecting federal facilities and their grounds and is also responsible for taking steps to improve efficiency while managing the government’s real property portfolio and the physical structure of facilities. FPS and GSA are very different agencies with different cultures, approaches to staff training, and perspectives on their missions. Nevertheless, their related missions regarding facility protection require them to collaborate at all levels— agency headquarters, regional, and facility levels. We designated federal

<sup>1</sup>The Homeland Security Act of 2002 (Pub. L. No. 107-296, § 403(3), 116 Stat. 2135, 2178 (2002)) transferred FPS along with its law enforcement and security functions from GSA to DHS.

<sup>2</sup>GSA manages federal facilities, including courthouses, and is responsible for federal courthouse design, construction, and maintenance. The U.S. Marshals Service, a component of the Department of Justice, has primary responsibility for protecting federal judicial facilities and personnel. FPS is responsible for enforcing federal laws and providing building-entry and perimeter security at GSA-held or GSA-leased facilities including facilities housing federal courts. For the purpose of our report, we focus on collaboration between FPS and GSA related to federal facilities. For more information on collaboration issues at federal courthouses, see GAO, *Federal Courthouses: Improved Collaboration Needed to Meet Demands of a Complex Security Environment*, [GAO-11-857](#) (Washington, D.C.: Sept. 28, 2011).

<sup>3</sup>Pub. L. No. 107-296, §§ 422, 1706(b)(1) (codified respectively at 6 U.S.C. § 232(a) and 40 U.S.C. § 1315(b)(1)).

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real property management as a high-risk area in part because of physical security challenges at federal facilities.<sup>4</sup> In particular, we and others have identified physical security of federal facilities as an area facing on-going challenges specifically with regard to collaboration between FPS and GSA.<sup>5</sup> For example, we have reported on FPS's and GSA's difficulty collaborating in areas including sharing information and clearly defining roles and responsibilities.<sup>6</sup> To the extent that collaboration affects these agencies' ability to adequately protect facilities, security may be compromised.

In light of these challenges, you asked us to review progress in how FPS and GSA work together to ensure that federal facilities are adequately protected. We assessed (1) how the agencies' collaboration reflects key practices to ensure facility security and (2) the impact of their collaboration practices on day-to-day operations at the regional and facility levels.

To examine these topics, we conducted a review of pertinent laws and DHS, FPS, and GSA regulations, policy documents, and strategic plans. We also reviewed our prior reports related to FPS and facility security issues published between 2005 and 2015 to identify prior findings and recommendations related to FPS and GSA collaboration that had not been addressed. Additionally, we reviewed our prior work on collaboration among federal agencies. The review identified practices that can help

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<sup>4</sup>We designated the broader area of federal real property management as a high risk area due to overreliance on leasing, the presence of unneeded and underutilized facilities, and security challenges at federal facilities. GAO, *High Risk Series: An Update*, [GAO-15-290](#) (Washington, D.C.: February 2015).

<sup>5</sup>For the purpose of this report we use the term "collaboration" broadly to include interagency activities that others have variously defined as "cooperation," "coordination," "integration," or "networking." Although there is no commonly accepted definition for collaboration, for the purpose of this report we define it as any joint activity by two or more organizations that is intended to produce more public value than could be produced when the organizations act alone. See GAO, *Results-Oriented Government: Practices That Can Help Enhance and Sustain Collaboration among Federal Agencies*, [GAO-06-15](#) (Washington, D.C.: Oct. 21, 2005).

<sup>6</sup>See GAO, *Federal Facility Cybersecurity: DHS and GSA Should Address Cyber Risk to Building and Access Control Systems*, [GAO-15-6](#) (Washington, D.C.: Dec. 12, 2014); GAO, *Federal Protective Service: Better Data on Facility Jurisdictions Needed to Enhance Collaboration with State and Local Law Enforcement*, [GAO-12-434](#) (Washington, D.C.: Mar. 27, 2012); and GAO, *Homeland Security: Greater Attention to Key Practices Would Improve the Federal Protective Service's Approach to Facility Protection*, [GAO-10-142](#) (Washington, D.C.: Oct. 23, 2009).

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enhance and sustain collaboration as well as implementation approaches.<sup>7</sup> For this review, we selected six of the eight practices most relevant to issues we have found in our prior work on facility security and our outstanding recommendations to FPS and GSA. These practices are described later in this report. In addition, we interviewed DHS, FPS, and GSA headquarters officials about how they work together. Finally, we selected four FPS and GSA regions for review of their collaborative efforts: Region 3 (Mid-Atlantic); Region 5 (Great Lakes); Region 7 (Greater Southwest); and Region 10 (Northwest/Arctic).<sup>8</sup> These four regions comprise about one-third of all GSA leased and held facilities, are geographically dispersed, include a mix of urban and rural federal facilities, and a range of facility security levels (FSL).<sup>9</sup> We collected operational documents and plans, and interviewed regional managers and directors, FPS inspectors, and GSA facility managers. We also toured four federal facilities in the Chicago and Dallas Regions, and we judgmentally selected these facilities based on the size and tenant agency composition. The information obtained during the site visits and interviews is not generalizable and cannot be used to represent the opinions of all agency officials. We used the information from these site visits and interviews to provide illustrative examples throughout our report. See appendix I for more details on our scope and methodology.

We conducted this performance audit from January 2015 to December 2015 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

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<sup>7</sup>In 2005, we identified key practices that can help enhance and sustain federal agency collaboration. See [GAO-06-15](#). Since then, we have continued to report on the implementation of these key collaboration practices and collaborative mechanisms. For example, see GAO, *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, [GAO-12-1022](#) (Washington, D.C.: Sept. 27, 2012) and GAO, *Managing for Results: Implementation Approaches Used to Enhance Collaboration in Interagency Groups*, [GAO-14-220](#) (Washington, D.C.: Feb. 14, 2014).

<sup>8</sup>FPS and GSA regional headquarters for these four regions are located in the following cities or areas: Philadelphia, Pennsylvania (Region 3); Chicago, Illinois (Region 5); Dallas/Fort Worth, Texas, area (Region 7); and Seattle/Tacoma, Washington, area (Region 10).

<sup>9</sup>Facility security levels (FSL) range from I to V, I being the lowest risk and V being the highest risk. The levels are categorized based on analysis of several security-related facility factors and serves as the basis for implementing physical security measures specified in the Interagency Security Committee (ISC) standards.

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the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

### FPS and GSA Organization and Responsibilities

FPS and GSA share responsibility for protecting federal facilities. FPS is primarily responsible for protecting federal employees and visitors in federal facilities held or leased by GSA. Specifically, FPS's law enforcement and protective security services authority include: (1) protecting federal employees and visitors in approximately 8,900 federal facilities under the control and custody of GSA; (2) enforcing federal laws and regulations aimed at protecting such property and persons (including proactively patrolling facilities, responding to incidents, and exercising arrest authority); and (3) investigating criminal offenses against these facilities and persons.<sup>10</sup> To fund its operations, FPS collects security fees from the agencies it protects and does not receive a separate appropriation.<sup>11</sup> FPS conducts its mission by providing security services through two types of activities:

- *physical security activities such as conducting facility risk assessments and recommending countermeasures—such as security cameras, bollards, barriers, physical access control systems, magnetometers, and x-ray machines—aimed at preventing incidents.*<sup>12</sup>
- *law enforcement activities such as proactively patrolling facilities, responding to incidents, conducting criminal investigations, and exercising arrest authority.*

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<sup>10</sup>Section 1315(a) of Title 40, United States Code, provides that: "To the extent provided for by transfers made pursuant to the Homeland Security Act of 2002, the Secretary of Homeland Security...shall protect the buildings, grounds, and property that are owned, occupied, or secured by the Federal Government (including any agency, instrumentality, or wholly owned or mixed-ownership corporation thereof) and the persons on the property."

<sup>11</sup>FPS has about 1,370 full-time employees and about 13,000 protective security officers (contract guards) deployed at federal facilities across the country. FPS's fiscal year 2015 budget totaled over \$1.3 billion.

<sup>12</sup>Countermeasure is a term used to describe any set of action/equipment that can be used to mitigate risk, such as preventing incidents. Countermeasures also include ballistic mitigation (windows and façade), guard booths, and heating, ventilation, and air conditioning security and filtration systems.

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GSA serves as the federal government's landlord and designs, builds, and manages facilities to support the needs of other federal agencies. GSA funds security fixtures<sup>13</sup> based on facility security level requirements on a prioritized, funds available basis. GSA, or the entity that leases the facility, provides project execution, maintenance, and repair of the security fixtures. GSA also has primary responsibility for providing facilities maintenance, space for communications equipment, and building plans, among other services.

Both agencies conduct policy making and high-level planning at the headquarters level. At the regional level, FPS and GSA officials serve as the liaisons from headquarters to the facility level and have responsibility for implementing policies and managing communications. At the facility level, FPS recommends the execution of security countermeasures, provides incident response, and supports emergency plans, whereas GSA manages the government properties. There have been a number of changes over the past decade in structure and authority of government security for federal facility security, especially for FPS. For example, FPS was a component of GSA until 2003, when it transferred to DHS.<sup>14</sup> FPS is currently located within DHS's National Protection and Programs Directorate (NPPD).<sup>15</sup> See figure 1 for an overview of key FPS and GSA security and protection roles, responsibilities, and operational relationships as outlined in a 2006 memorandum of agreement (MOA) concerning the security of GSA-controlled space.

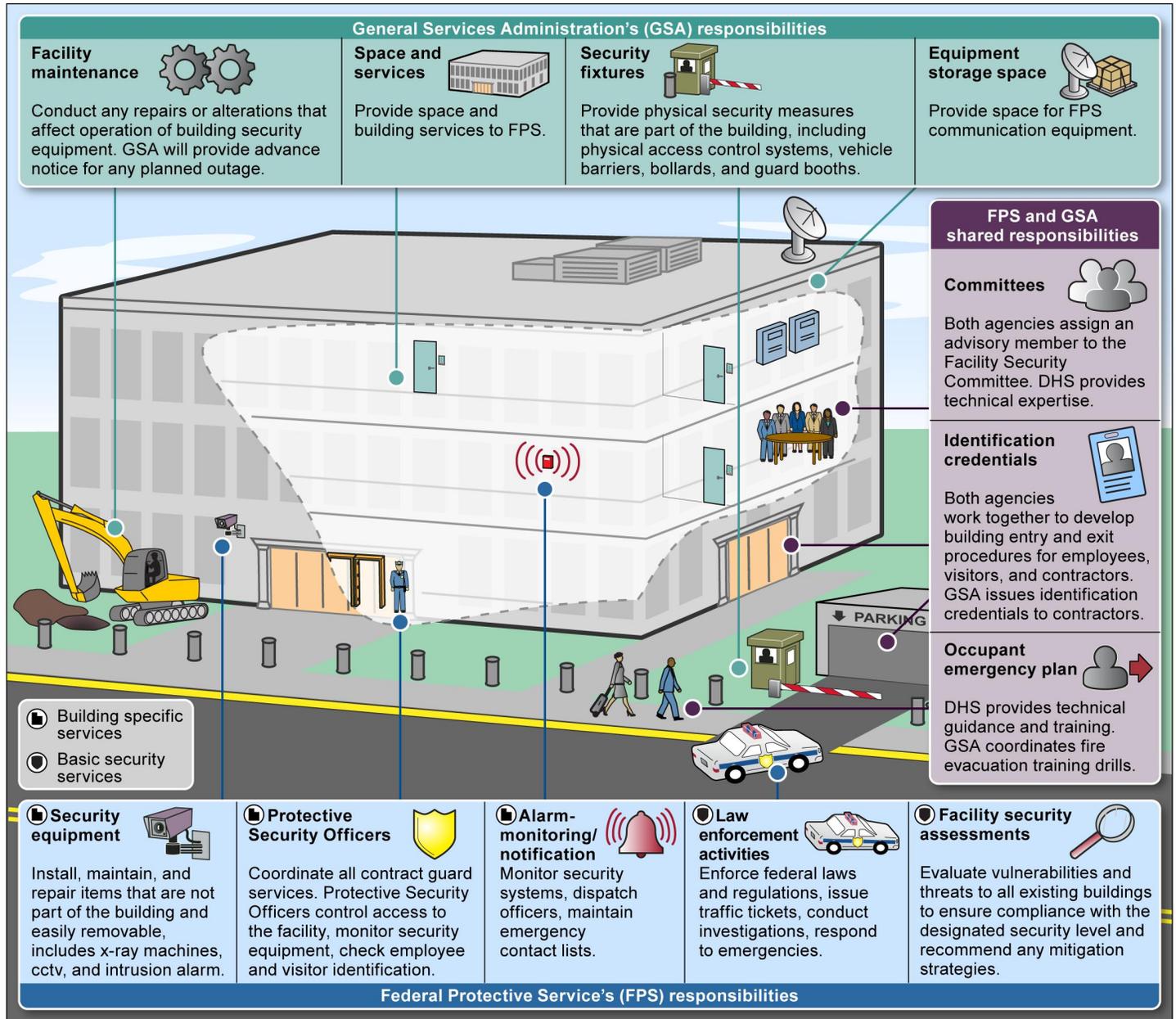
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<sup>13</sup>Security fixtures include, but are not limited to, vehicular barriers such as bollards, gates, pop-up and arm gates, doors, locks, garage doors, parking lot fencing and gates, guard booths (both attached to the facility and free standing), and blast-resistant windows.

<sup>14</sup>After the creation of DHS in 2002, FPS transferred from GSA to DHS under U.S. Immigration and Customs Enforcement (ICE), a component agency of DHS. FPS retained its law enforcement and related security functions for GSA facilities and grounds, while GSA retained its powers, functions, and authorities related to the operation, maintenance, and protection of GSA facilities and grounds.

<sup>15</sup>The President's fiscal year 2010 budget proposal requested the transfer of FPS from ICE to the National Protection and Programs Directorate (NPPD) because FPS's responsibilities, such as providing physical security, policing of federal facilities, establishing facility security policy, and ensuring compliance, better align with NPPD's mission. The transfer of FPS to NPPD took effect as part of DHS's fiscal year 2010 appropriations act.

**Figure 1: Federal Protective Service's (FPS) and the General Services Administration's (GSA) Facility Security Roles and Responsibilities**



Source: GAO analysis of FPS's and GSA's 2006 memorandum of agreement. | GAO-16-135

## Facility Security Challenges

The areas in which our prior work has found facility security challenges that FPS faces in carrying out its mission, and between FPS and GSA, focus on operational issues, such as conducting entrance screenings and

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assessing risk at federal facilities; overseeing FPS's protective security officers;<sup>16</sup> and collaborating with federal, state, and local entities.<sup>17</sup> Further, between FPS and GSA, we have previously found problems with the quality of data exchanged between GSA and FPS on facilities and their locations. As such, we have made previous recommendations to FPS and GSA related to improving their collaboration. For example, in March 2012, we recommended that GSA ensure that efforts to identify the jurisdictions of all GSA facilities are completed and that the data are provided to FPS so that FPS is better equipped to manage jurisdictional roles and responsibilities at GSA facilities. At the time of our 2012 report, FPS lacked complete data from GSA on the jurisdiction of about one-third of the facilities it protects.<sup>18</sup> Since that time, GSA has made progress with identifying facility jurisdictions. Furthermore, in August 2012, we recommended that FPS coordinate with GSA and other federal tenant agencies to reduce any unnecessary duplication in security assessments of facilities held or leased by GSA.<sup>19</sup> According to ISC guidance, as the security organization for such facilities, FPS is required to conduct risk assessments on a scheduled and recurring basis. FPS has reported progress regarding this issue; however, as of November 2015, the agency has not yet provided us with documentation of its efforts to address the recommendation. Therefore, this recommendation remains open. In light of these previously identified operational challenges, in this report, we

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<sup>16</sup>FPS protective security officers are security guards contracted to provide various security functions at federal facilities.

<sup>17</sup>See for example: GAO, *Actions Needed to Better Manage Security Screening at Federal Buildings and Courthouses*, [GAO-15-445](#) (Washington, D.C.: Mar. 31, 2015); GAO, *Federal Protective Service: Protecting Federal Facilities Remains A Challenge*, [GAO-14-623T](#) (Washington, D.C.: May 21, 2014); and GAO, *Homeland Security: Federal Protective Service Continues to Face Challenges with Contract Guards and Risk Assessments at Federal Facilities*, [GAO-14-235T](#) (Washington, D.C.; Dec. 17, 2013).

<sup>18</sup>This report also focused on jurisdictional issues needed to enhance collaboration with state and local law enforcement. These federal facilities are characterized as exclusive, concurrent, or proprietary jurisdictions as follows: Exclusive: the federal government—and federal law enforcement entities—have all of the legislative authority within the land area in question, while the state—and its state and local law enforcement entities—have no residual police powers; Concurrent: both federal and state governments—and law enforcement entities—have jurisdiction over the property; and Proprietary: the federal government has rights—similar to a private landowner—but also maintains its authorities and responsibilities as the federal government. The local government serves as the principal municipal police authority. [GAO-12-434](#).

<sup>19</sup>GAO, *Federal Protective Service: Actions Needed to Assess Risk and Better Manage Contract Guards at Federal Facilities*, [GAO-12-739](#) (Washington, D.C.: Aug. 10, 2012).

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focused on how FPS's and GSA's working relationship reflects key collaboration practices.

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## Practices That Can Enhance and Strengthen Collaboration

In our prior work, we have identified eight key collaboration practices that we have used to assess collaboration at a range of federal agencies.<sup>20</sup> These practices can help agencies to implement actions to operate across boundaries, including developing compatible policies and procedures and fostering open lines of communication. We also found that positive working relationships among participants from different agencies bridge organizational cultures, and these relationships can build trust and foster communication, which facilitates collaboration.<sup>21</sup> Given many federal agencies' long-standing challenges working across organizational lines, following these practices could help agencies to enhance and sustain collaboration at all organizational levels.<sup>22</sup> For this review, to assess FPS and GSA collaboration, we focused on six of eight practices identified in our prior work that are particularly relevant to collaboration between FPS and GSA (see fig. 2). These collaboration practices focus on outcomes and strategies, roles and responsibilities, and policies and procedures to facilitate working across agency boundaries. See appendix II for a detailed overview of all eight collaboration practices.

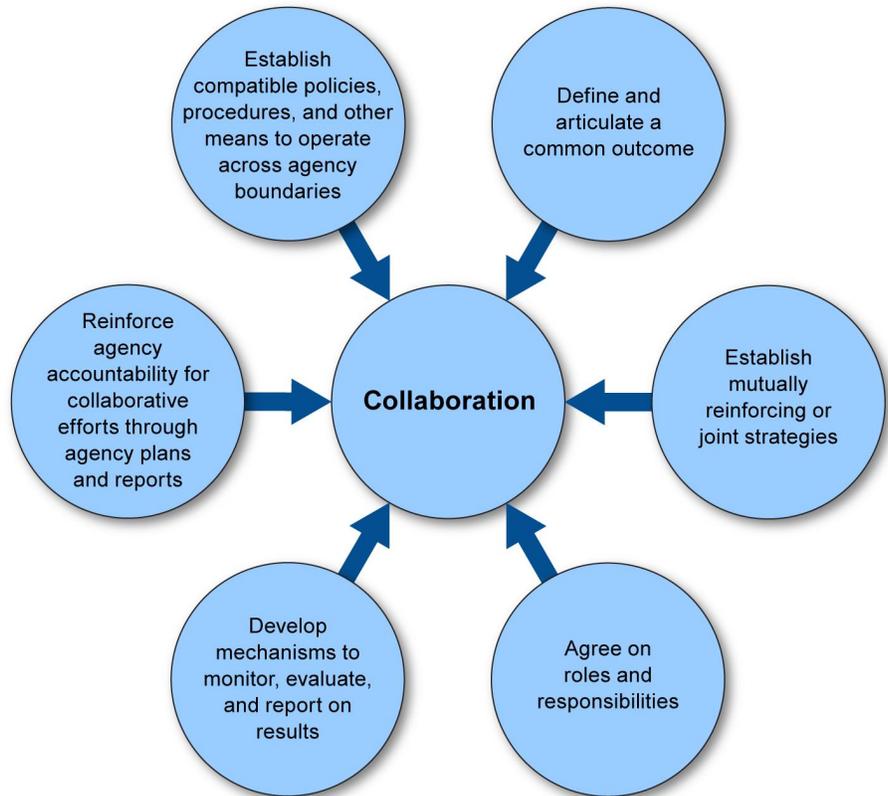
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<sup>20</sup>GAO-06-15; GAO-12-1022; and GAO-14-220.

<sup>21</sup>GAO-12-1022.

<sup>22</sup>GAO-14-220.

**Figure 2: Selected Practices That Can Help Enhance and Sustain Collaboration among Federal Agencies**



Source: GAO. | GAO-16-135

## FPS and GSA Collaborate to Some Extent, but Could Strengthen Efforts in Several Areas

FPS and GSA have taken some steps to improve collaboration over the past year, such as drafting a joint strategy and, in August 2015, resuming negotiations to update the 2006 MOA that outlines FPS's and GSA's facility security roles and responsibilities. However, the two agencies have not reached final agreement in these areas, such as, on a common outcome, a joint strategy for facility security, or roles and responsibilities to accomplish their missions. We found that the two agencies could continue to strengthen collaboration in several other key areas. For example, at the regional level, officials said they were not aware of compatible policies and procedures with which to conduct day-to-day operations and FPS and GSA agency officials have not fully collaborated on communicating established policies and procedures for operating across agency boundaries. Further, while FPS has two performance

measures related to facility security, the two agencies have not developed mechanisms to monitor, evaluate, and report on results. FPS and GSA strategic plans address the importance of collaboration with other agencies, but these plans do not reinforce accountability for collaborative efforts. As of October 2015, the two agencies continue to work toward reaching agreement in these areas. FPS and GSA officials have not previously focused on these areas of collaboration largely because they have not made it a priority to address how they can better work together. Without agreement on these key collaboration practices, FPS and GSA's ability to adequately protect federal facilities may be compromised. We assessed the partner agencies' efforts against selected interagency collaboration practices, and found the following:

**Table 1: Status of Federal Protective Service's (FPS) and General Services Administration's (GSA) Efforts to Address Key Collaboration Practices**

<b>Key collaboration practices</b>	<b>Status of FPS's and GSA's efforts</b>
<i>Define and articulate a common outcome</i>	FPS and GSA officials have drafted a joint strategy (described below) that includes a common outcome related to facility protection, but they have not reached agreement on the document.
<i>Establish mutually reinforcing or joint strategies</i>	FPS's and GSA's draft joint strategy defines an overarching strategic goal of creating a federal facility critical infrastructure that balances public access, security, and resiliency to enable continuity of operations and rapid recovery from all hazards. However, they have not reached agreement on the document. As of October 2015, FPS and GSA officials told us that they intend to revisit the joint strategy after other efforts (described below) are complete.
<i>Agree on roles and responsibilities</i>	A 2006 memorandum of agreement (MOA) between the agencies addresses their roles, responsibilities, and operational relationships concerning the security of GSA-controlled space. However, some information in the MOA is outdated and incorrect as it does not reflect policy and organizational changes affecting roles and responsibilities. In August 2015, FPS and GSA officials renewed negotiations to update the MOA, but they have not yet fully agreed on current roles and responsibilities related to facility protection, and they have not set a timeframe for completion.
<i>Establish compatible policies, procedures, and other means to operate across agencies</i>	In some cases, the two agencies have individual policies, but it is unclear whether they are compatible. FPS and GSA officials have not fully collaborated in communicating policies and procedures to operate across agencies and regions, and regional officials told us they rely on informal communication for day-to-day operations.
<i>Develop mechanisms to monitor, evaluate, and report on results</i>	FPS and GSA individually monitor specific areas of facility security. However, the two agencies have not developed mechanisms to monitor, evaluate, and report on the results of their related missions regarding facility protection.
<i>Reinforce agency accountability for collaborative efforts through agency plans and reports</i>	Agency strategic plans for FPS and GSA address the importance of collaboration with other agencies in general, but these plans do not reinforce accountability for collaborative efforts. Reinforcing accountability depends in part on developing mechanisms to monitor, evaluate, and report on results (described above).

Source: GAO analysis of the status of FPS's and GSA's collaboration practices. | GAO-16-135

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## FPS and GSA Have Not Fully Defined or Articulated a Common Outcome or Established Mutually Reinforcing or Joint Strategies

While FPS and GSA officials have drafted a joint strategy, the agencies have not defined and articulated a common outcome or fully established mutually reinforcing or joint strategies because they have not agreed on how they will work together to achieve their respective missions. In our prior work, we have found that the collaborative effort requires agency staff working across agency lines to define and articulate the common federal outcome or purpose they are seeking to achieve. We also found that collaborating agencies need to establish strategies that work in concert with those of their partners. In 2012, FPS and GSA drafted, and subsequently received comments on, a joint strategy that includes a common outcome. The document defines an overarching strategic goal of having a federal facility critical infrastructure that balances public access, security, and resiliency to enable continuity of operations and rapid recovery from all hazards. The document also includes objectives that focus on priority activities and describes some of the challenges that exist in securing federal facilities. The draft joint strategy establishes priorities for enhancing the security and resilience of federal facilities. The two agencies had not agreed on how to proceed with negotiations on the draft joint strategy until the completion of our audit work in October 2015. At that time, FPS officials told us that before finalizing the joint strategy, they plan to complete the following documents: (1) an updated MOA (which will be discussed in the next section); (2) the Control Systems Cybersecurity Strategy for Federal Facilities;<sup>23</sup> and (3) the Government Facilities Sector Specific Plan.<sup>24</sup> As of October 2015, they have no timeline for completing these other efforts or the joint strategy. Joint strategies help in aligning the partner agencies' activities, core processes, and resources to accomplish a common outcome,<sup>25</sup> and the continuing lack of agreement on common security outcomes and strategies could limit FPS's and GSA's ability to fully protect federal facilities and their tenants and visitors.

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<sup>23</sup>NPPD is currently working with GSA, ISC, and other entities to develop the Control Systems Cybersecurity Strategy for Federal Facilities, a strategy to address cyber security risks to building and access control systems of federal facilities.

<sup>24</sup>The Government Facilities Sector Specific Plan details how the National Infrastructure Protection Plan risk management framework is implemented within the context of the unique characteristics and risk landscape of the sector. Each designated Sector-Specific Agency develops a sector-specific plan.

<sup>25</sup>[GAO-06-15](#).

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## FPS and GSA Have Not Fully Agreed on Roles and Responsibilities

FPS and GSA officials told us that they have not fully agreed on roles and responsibilities for their related missions regarding facility protection because they have not completed discussions on how they will work together based on changes in the facility security environment since 2006. However, as of August 2015, after being stalled for several years, FPS and GSA resumed negotiations on roles and responsibilities. Our prior work supports the value of agencies working together to define and agree on their respective roles and responsibilities.<sup>26</sup> FPS's and GSA's facility security roles and responsibilities are documented in regulation, statutes, and policies, some of which are outdated or incomplete (See app. III for more details on these requirements). Among these documents is the 2006 MOA between the two agencies, which has a stated purpose to address roles, responsibilities, and operational relationships between FPS and GSA concerning the security of GSA-controlled space. The MOA lists services provided by FPS<sup>27</sup> and GSA,<sup>28</sup> outlines law-enforcement and physical-security responsibilities, and identifies the need for the two agencies to share information and jointly address security concerns in specific areas, such as new construction and repair and alteration projects. The MOA remains in effect; however, as a result of policy and organization changes affecting roles and responsibilities not reflected in the 2006 MOA, some information is outdated and incorrect. Figure 3 describes policy and organizational changes affecting roles and responsibilities not reflected in the 2006 MOA. We have previously reported that written agreements are most effective when they are regularly updated and monitored.<sup>29</sup>

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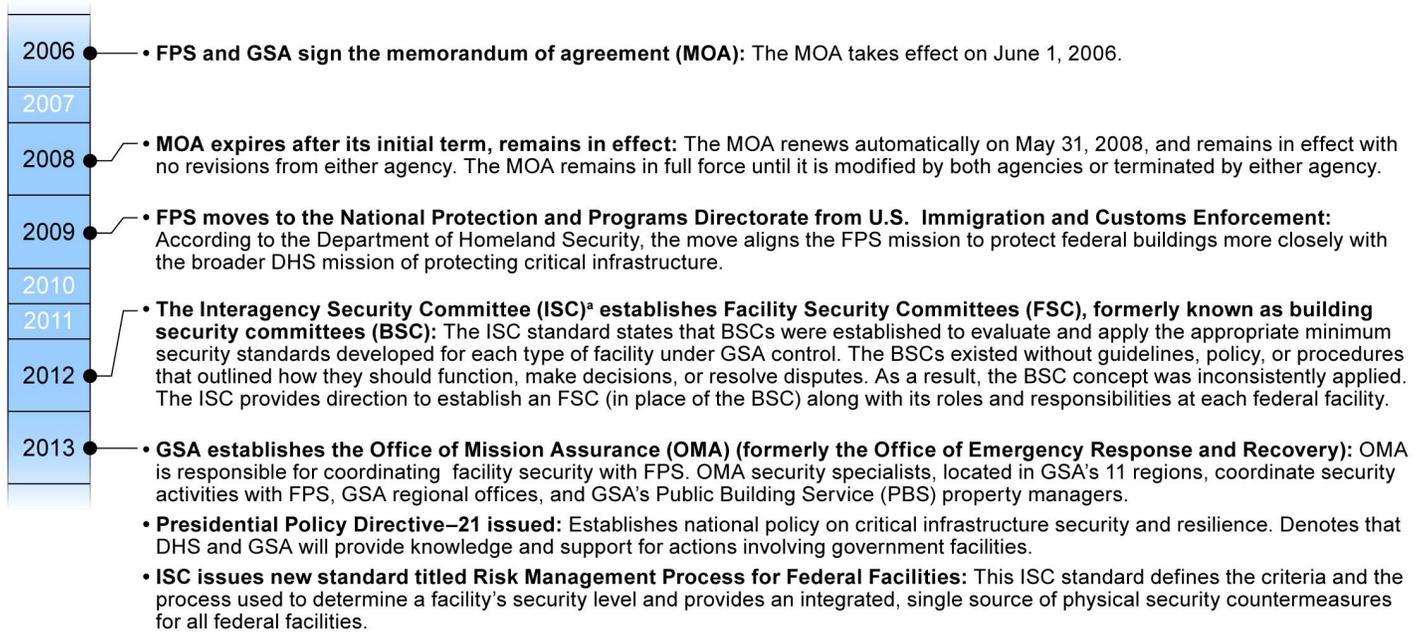
<sup>26</sup>See, for example, [GAO-06-15](#), [GAO-12-1022](#), and [GAO-14-220](#).

<sup>27</sup>FPS's roles and responsibilities described in the MOA include law enforcement patrol and response; criminal investigations; security consultation during new construction, major repairs and renovations and the leasing process; participation with facility security committees; and identification of security risks and countermeasures through facility security assessments and pre-lease security surveys.

<sup>28</sup>GSA's responsibilities include working with FPS on changes to the security assessment tools, and sharing information, such as building and maintenance plans affecting security equipment, and sharing GSA facility contacts with FPS.

<sup>29</sup>[GAO-12-1022](#).

**Figure 3: Changes Affecting Requirements for How the Federal Protective Service (FPS) and General Services Administration (GSA) Protect Federal Facilities, 2006-2013**



Source: GAO analysis of organizational and policy changes affecting the MOA. | GAO-16-135

<sup>a</sup>The ISC was established in 1995 by Executive Order 12977 (60 Fed. Reg. 54411 (Oct. 24, 1995) as amended by Executive Order 13286, Fed. Reg. 10619 (Mar. 5, 2003)) to enhance the quality and effectiveness of security and the protection of facilities occupied by federal employees for nonmilitary activities). The ISC, housed within DHS's Office of Infrastructure Protection and chaired by DHS, is comprised of senior level representative from 54 federal agencies and departments.

In our prior work, we have reported on delays in updating the MOA, and in 2012, we recommended that the Administrator of GSA ensure that the agency identifies the jurisdictions of all GSA buildings and that these data are provided to FPS officials to better equip them to manage roles and responsibilities at GSA buildings,<sup>30</sup> and an updated MOA would help GSA implement the needed changes to address this issue.

FPS and GSA officials at the headquarters level have not been able to agree on the level of detail about roles and responsibilities or the services that should be included in the MOA. After resuming negotiations in August 2015,

<sup>30</sup>See [GAO-10-142](#) and [GAO-12-434](#).

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according to GSA, the issues needing further negotiation include: more detailed information on FPS's billing to GSA for security costs and timely completion of facility security assessments (FSA). According to FPS, the issues needing further negotiations include: more clearly defining roles and responsibilities to improve FPS and GSA collaboration on security matters and clarifying language that may have previously been subject to misinterpretation by parties in the field. As of October 2015, FPS and GSA officials told us that they plan to address the responsibilities for the condition of countermeasures—such as security cameras, magnetometers and x-ray machines—and fixtures—such as bollards, guard booths, and blast-resistant windows—at facilities in updating the MOA. They also told us that GSA plans to add Public Buildings Service (PBS) as a negotiating partner because: (1) FPS normally works with PBS on implementing countermeasures; (2) PBS has engineering expertise; and (3) PBS creates and manages the building system in regard to an agency's portion of the bill. However, FPS and GSA officials also told us that they have not developed a timeframe for completing negotiations on the MOA.

At the regional level, FPS and GSA officials at the four regions we interviewed told us that an updated MOA would be helpful. Generally, officials told us that they often rely on established working relationships and informal means of communicating and that an updated MOA could clarify roles and responsibilities, particularly in the areas that have changed since the 2006 MOA was established. For example, according to these officials, security systems are now more integrated than when the MOA was written. As a result, it is not always clear where the responsibility lies for the purchase and maintenance of certain security countermeasures. GSA owns facility access control systems and, according to FPS officials, has objected to FPS connecting intrusion detection systems to these access control systems. As such, officials told us that some facility access control systems have been inoperable while GSA and FPS determine which agency will do what. In November 2015, GSA headquarters officials told us that GSA is in the process of updating failing physical access control systems and legacy systems nationwide. As security technology advances, lack of clarity on roles and responsibilities for these systems could result in security gaps potentially leaving the tenants, the public, and the facilities at risk. At the completion of our audit work in October 2015, FPS and GSA headquarters officials told us that they plan to work together to integrate countermeasures within facilities as existing technology reaches the end of its lifecycle.

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## FPS and GSA Have Not Fully Collaborated in Communicating Existing Policies and Procedures

We have previously found that as agencies bring diverse cultures to the collaborative effort, it is important to address these differences to enable a cohesive working relationship and to create the mutual trust required to enhance and sustain their working relationship. To facilitate collaboration among agencies with different cultures, agencies need to address the compatibility of policies and procedures that will be used in this effort.<sup>31</sup> However, in this review, we found that the FPS and GSA regional officials we spoke to were not always aware of policies and procedures to operate across agencies and regions because FPS and GSA have not fully collaborated in communicating established policies and procedures. As a result, the regions rely on informal communication between the agencies for day-to-day operations. Our prior collaboration work has found that agencies that articulate their agreements in formal documents can strengthen their commitment to working collaboratively. Once formal agreements are documented, agencies must also have a process in place for implementing such agreements at all organizational levels and across agency boundaries. For example, our work has shown that, by having a process in place to obtain and share information on potential threats to federal facilities, agencies can better understand the risks they face and more effectively determine what preventive measures should be implemented.<sup>32</sup> Without policies and procedures that are well understood at all levels—headquarters, regions, and facilities—it is more difficult to share information and coordinate consistently and effectively.

During our review, we found that, in some cases, FPS and GSA have their own policies and procedures for collaboration with other agencies, such as in the case of FPS's *Regional Information Sharing Plan*. FPS developed this plan in 2009, and it provides policies and procedures for the collection, review, analysis, and dissemination of criminal or national security information within FPS and to stakeholders, and it also requires dissemination to the GSA Regional Officer of Security. However, in the regions we reviewed, several officials said they did not know of formal policies and procedures related to collaborating on facility protection issues. For example, GSA officials at one region told us that their role, as compared with FPS's role, in the protection of federal facilities is not

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<sup>31</sup>[GAO-06-15](#)

<sup>32</sup>GAO, *Homeland Security: Further Actions Needed to Coordinate Federal Agencies' Facility Protection Efforts and Promote Key Practices*, [GAO-05-49](#) (Washington, D.C.: Nov. 30, 2004).

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clearly defined and said that they were unaware of formal security standards, policies, and procedures for GSA. The officials told us it makes it difficult to do their jobs without the ability to link security activities to joint security management procedures. A GSA official at another region we interviewed noted a lack of planning and guidance related to facility security, a lack that could lead to duplicative efforts, confusion regarding roles and responsibilities, and an inability to monitor whether FPS and GSA meet their security requirements. GSA officials from these two regions said that in their previous experience at other agencies, they had more specific policies and procedures that help guide their efforts.

FPS and GSA officials in all four regions we visited told us that policies and procedures related to facility protection are not always clear, in part, because the MOA has not been updated for changes in security practices. An updated MOA would drive needed changes in policies and procedures. The lack of collaboration in communicating compatible policies and procedures makes it difficult for the agencies to effectively implement their security mission and can negatively affect day-to-day operations. For example, we reported in 2009 that in the absence of comprehensive plans, many aspects of homeland-security information sharing can be ineffective and fragmented—a situation that could result in greater vulnerability to security threats.<sup>33</sup>

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**FPS and GSA Have Not Jointly Developed Mechanisms to Monitor, Evaluate, and Report on Results or Reinforce Accountability for Collaboration through Agency Plans and Reports**

FPS and GSA officials have not jointly developed mechanisms to monitor, evaluate, and report on the results of their shared responsibilities or ways to reinforce accountability for collaborative efforts through agency plans and reports. FPS and GSA officials have not yet focused on these areas of collaboration. The officials told us that updating the MOA will provide them an opportunity to develop ways to address these practices. Our prior work has found that when agencies monitor, evaluate, and report on the results of collaboration, they can better identify areas for improvement. Further, agencies contributing to the same or similar results should collaborate to ensure that goals are consistent. The agencies' plans and reports can reinforce accountability by aligning goals and strategies with the collaborative effort, and, in turn, public reporting can reinforce accountability for results.<sup>34</sup> In this review, we found that FPS and

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<sup>33</sup> [GAO-10-142](#)

<sup>34</sup> See, for example, [GAO-06-15](#) and [GAO-12-1022](#).

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GSA individually monitor specific areas of facility security—FPS completes facility security assessments (FSA), and GSA conducts an annual tenant survey on satisfaction with facilities, which includes three questions about security. However, the two agencies have not developed the mechanisms to monitor their shared responsibilities. For example, while the 2006 MOA calls for FPS to provide data to GSA on specific actions, such as completed countermeasures and copies of executive summaries of FSAs, it does not require the two agencies to monitor, evaluate, or report on the results of these efforts.

Further, FPS's and GSA's security-related performance measures, which allow agencies to track progress in achieving their goals, and to assist in monitoring and evaluating results, are limited. For example, NPPD's strategic plan does include two performance measures for FPS; GSA's strategic plan does not include any security-related performance measures. Specifically, NPPD tracks the percentage of tenants satisfied with the level of security provided at federal facilities and the percentage of evaluations conducted at high-risk facilities that found no deficiencies related to countermeasures. FPS has many other security-related responsibilities, as described above, which contribute to the agency's performance. Performance measures that align with agency-wide goals and missions can facilitate developing better mechanisms to monitor and evaluate results. Further, because FPS and GSA have not developed mechanisms to monitor and evaluate their collaboration for facility protection, the agencies do not have the means in place to systematically identify areas for improvement. It may be more challenging for the agencies to develop mechanisms to monitor, evaluate, and report on results, and to incorporate collaborative goals into their respective plans and reports, without having first defined and articulated a common outcome—the first of the key practices we assessed in this review.

With regard to plans and reports, at a high level, both agencies' strategic plans mention the importance of collaboration with other agencies in general and, therefore, can function as a tool to drive collaboration with

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relevant agencies and partners.<sup>35</sup> However, the plans do not align goals and strategies to the agencies' collaborative efforts. As such, the plans do not serve to facilitate reinforcing agency accountability to ensure that FPS and GSA's related missions are accomplished.

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## FPS's and GSA's Incomplete Collaboration Creates Inefficiencies and Security Risks at the Regional Level

FPS's and GSA's incomplete collaboration, particularly with regard to three key collaboration practices—the lack of agreement on roles and responsibilities, communicating compatible policies and procedures, and mechanisms to monitor, evaluate, and report on results—essential elements to organizing joint efforts and facilitating decision making across agency boundaries—makes day-to-day operations more challenging and creates inefficiencies and security risks at the regional level, as discussed below.<sup>36</sup>

In our prior work and in this review, we found cases in which the MOA laid out roles and responsibilities that FPS or GSA did not consistently follow. For example, in 2009, we reported that FPS was not following a requirement of the MOA that it share the results of FSAs with GSA. FPS believed that the FSA executive summary contained sufficient information for GSA to make decisions about purchasing and implementing FPS's recommended countermeasures. However, GSA officials at all levels said that the FSA executive summary did not contain enough information on threats and vulnerabilities. Moreover, GSA security officials told us that FPS does not consistently share FSA executive summaries across all regions. This lack of information sharing highlights the need for additional policies and procedures. We recommended that the Director of FPS reach consensus with GSA and tenant agencies on what information GSA needs to fulfill its

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<sup>35</sup>Under the Government Performance and Results Act (GPRA) of 1993, the GPRA Modernization Act of 2010, and *Office of Management and Budget Circular No. A-11, Part 6: Preparation and Submission of Strategic Plans, Annual Performance Plans, and Annual Performance Reports* (Washington D.C.: June 2015), requires federal departments or agency level organizations, such as DHS and GSA, to develop strategic plans and report on their progress in achieving the goals set out in these plans. However, this is not required at the agency component level. As such, FPS, as an agency component of DHS, is not required to have a strategic plan.

<sup>36</sup>For this section, we focus on three of the six practices that are most closely related to the issues we found in the regions we visited. We did not include the three additional practices that we reviewed at the agency headquarters level: (1) defining and articulating a common outcome; (2) establishing mutually reinforcing or joint strategies; and (3) reinforcing agency accountability for collaborative efforts through agency plans and reports.

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facility security responsibilities.<sup>37</sup> In February 2014, FPS implemented our recommendation by issuing a policy directive on the implementation of FSAs that outlines a policy for sharing FSAs with GSA and ensuring that sensitive information is safeguarded.

Although developing this directive is a positive step toward improving collaboration, in this review, we found that FPS still inconsistently shares FSAs with GSA at the four regions we reviewed. For example, GSA officials at one region told us that although FSAs had not always been shared in the past, FPS now shares the information and provides the assessments. Conversely, GSA officials from another region we visited said that FPS does not always share FSAs. For instance, the GSA officials said that FPS sometimes does not provide facility managers with the appropriate FSA information and that the facility manager first becomes aware of the FSA during the facility security committee (FSC) meeting.<sup>38</sup> Similar to what we found in 2009, GSA officials from this region expressed a need for an updated MOA to help clarify information sharing issues. In October 2015, FPS officials told us that they have addressed GSA's concerns involving sharing FSAs. For example, FPS officials said, as a result of changing their assessment tool, the FSC now receives complete copies of the FSAs. We previously reported that information sharing and coordination among organizations is crucial to producing comprehensive and practical approaches and solutions to address security threats directed at federal facilities.<sup>39</sup> As discussed above, we previously found that written agreements are most effective when they are regularly updated and monitored.<sup>40</sup> In that same work, we found a case in which the ineffective implementation of a written agreement between two federal government agencies likely led to sporadic and limited collaboration

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<sup>37</sup>[GAO-10-142](#).

<sup>38</sup>The FSC consists of representatives of all federal tenants in the facility, the security organization, and the owning or leasing department or agency. The FSC works with the facility security organization and the owning or leasing authority to establish the FSL and determine the minimum standards (security countermeasures) for the facility. At a minimum, the FSCs shall meet annually or as needed, as determined by the committee chairperson. *The Risk Management Process for Federal Facilities: An Interagency Security Committee Standard* (Washington, D.C.: August 2013).

<sup>39</sup>[GAO-05-49](#).

<sup>40</sup>[GAO-12-1022](#).

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among the two agencies.<sup>41</sup> Similarly, without properly implementing written agreements such as the 2006 MOA, FPS and GSA may experience some of these same challenges, and according to one of the key collaboration practices we have identified, the lack of mechanisms to monitor, evaluate, and report on results makes it difficult to identify and remedy cases of inconsistent implementation at the regional level.

During our review, we found that FPS and GSA communicate informally at the regional level in the absence of formal policies and procedures. GSA officials from two of the four regions we interviewed told us that they rely on working relationships to keep things running smoothly because they are not aware of compatible policies and procedures. For example, GSA officials in one region told us that FPS regional officials brief them on security threats quarterly. GSA officials added that FPS and GSA regional officials also meet to discuss security incidents, changes in ISC standards, and new GSA space requirements. The GSA regional officials told us that they are working with their FPS counterparts to create a joint regional-information-sharing strategy. FPS officials in another region told us that they hold quarterly meetings with GSA regional officials to discuss security issues, including upcoming events, such as protests, that could affect facility security, as well as how and when to inform tenant agencies about actions they need to take, such as expanded telework, during the events.

Informal communication is part of a collaborative relationship and may enable the agencies to conduct day-to-day operations, but it may also result in inefficiencies and less than optimal use of resources, as well as security risks. Regional officials provided us with examples of construction and alteration projects, personnel redeployment, security incidents, and threat-based reporting that could have benefitted from policies and procedures and more formal communication to ensure security. We found that these regional examples most closely relate to three of the six collaboration practices we included in our review: (1) agreeing on roles and responsibilities; (2) establishing compatible policies and procedures; and (3) developing mechanisms to monitor, evaluate, and report on results. See table 3 for examples of some of these inefficiencies and security risks and the effect at the regional level.

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<sup>41</sup>This example was in relation to a memorandum of understanding (MOU) between the Small Business Administration (SBA) and the Rural Development offices of the U.S. Department of Agriculture (Rural Development) [GAO-12-1022](#).

**Table 2: Examples of the Effect at the Regional Level of FPS’s and GSA’s Incomplete Collaboration**

Regional examples	Key collaboration practices not met <sup>a</sup>		
	(Agree on roles and responsibilities.)	(Establish compatible policies, procedures, and other means to operate across agency boundaries.)	(Develop mechanisms to monitor, evaluate, and report on results.)
<p><b>Construction project:</b> GSA constructed a facility with more than 180,000 rentable square feet and a project cost of nearly \$75 million. FPS regional officials said the facility was intended to house law enforcement tenants; however, it was built with an energy efficiency system that did not allow for the types of walls that law enforcement agencies typically need to house armories, holding cells, sensitive compartmented information facility space, and other needs. As a result, FPS said that no law enforcement agencies were able to use the facility and that GSA invested resources for a facility that is not usable for its intended tenants. However, GSA regional officials told us that the project was intended for the U.S. Army Corps of Engineers’ district headquarters and said that they consulted with FPS on perimeter security issues through-out the project. As a result of these collaboration issues, FPS regional officials have reached out to GSA regional leadership about hosting a symposium to ensure the needs of law enforcement agencies are considered during future projects. Although the 2006 MOA requires GSA to notify FPS of new construction projects, without GSA developing mechanisms to ensure that notification and consultation occur with FPS, projects may not meet the security needs of facility tenants.</p>	N/A	checked	checked
<p><b>Alteration project:</b> FPS officials identified two cases in which GSA did not notify FPS of projects, an oversight that prevented FPS from reviewing the project for possible security enhancements as part of the renovation. FPS officials said the two projects will total approximately \$1.1 million. FPS was only informed of the two renovation projects when notified by U.S. Marshals Service (USMS) officials. FPS officials told us these are isolated incidents, and that the FPS region will reach out to GSA to ensure that FPS is brought into the process during the early stages of planning, specifically in smaller areas. Better communication between FPS, as security experts, and GSA could have helped to prevent this problem. Although the 2006 MOA requires GSA to notify FPS of alteration projects, without GSA developing mechanisms to ensure that notification and consultation occur with FPS, projects may not include recommended security enhancements.</p>	N/A	N/A	checked
<p><b>Personnel redeployment:</b> GSA regional officials in two regions we reviewed told us that during a recent “Operation Blue Surge”—an event-driven, heightened security effort at federal facilities—FPS did not notify GSA officials that FPS had deployed security staff from one area to another.<sup>b</sup> When this happens, officials told us that certain buildings may be left less secure as staff move from their regular building post to another location. In November 2015, FPS headquarters officials told us that FPS had briefed broad communication of the operation and coordinated with GSA headquarters officials. According to the draft joint strategy, establishing channels to communicate options for both planned and emergent facility-level requirements is needed, and this step would help ensure that national-level priorities do not adversely affect facility-level security requirements.</p>	N/A	checked	N/A

	Key collaboration practices not met <sup>a</sup>		
	(Agree on roles and responsibilities.)	(Establish compatible policies, procedures, and other means to operate across agency boundaries.)	(Develop mechanisms to monitor, evaluate, and report on results.)
<b>Regional examples</b>			
<b>Security events:</b> GSA officials in two different regions told us that they did not have sufficient information from FPS about security plans for upcoming events—a dignitary’s visit and a major world conference—to prepare tenants for changes to security procedures. Without sufficient information, GSA officials said that they could not fully inform their tenants of necessary security measures. Additionally, FPS and GSA officials told us of a bomb threat to a building that houses more than 3,000 tenants. Officials from both agencies said they were uncertain about which agency had responsibility for making building-wide decisions during the event, such as whether or not to evacuate the tenants. The problem resulted, in part, from the building not having an accurate and up-to-date Occupant Emergency Plan (OEP) for addressing such issues. FPS officials said that they commonly discuss incidents and what they would do differently with GSA officials, but they do not consistently document changes they agree to make in formal plans. The 2006 MOA requires FPS to provide technical guidance and security input to assist the designated official of each facility with OEP development including procedures for safeguarding lives and property during emergencies in their respective facilities. Uncertainty about responsibilities could have serious consequences—such as the loss of lives, injuries to tenants and visitors, and property damage in the facility.	checked	checked	checked
<b>Threat-based reports:</b> At one region, a GSA official told us that threat-based reporting can be challenging. The official explained that FPS communicates in-person with the GSA property manager when there is a specific threat or concern with an individual; however, property managers can have responsibility for multiple buildings, and if property managers are not in the building at the time of the threat, they may not be informed of it. Similarly, GSA officials from another region told us that regarding threatening groups and individuals, such as terrorist organizations or anarchists, there is no threat-based information sharing that occurs due to sensitive information. FPS and GSA lack joint policies and procedures to help ensure that GSA and tenants are informed about threats. In addition, FPS and GSA have not formally defined and agreed to each agency’s responsibilities for sharing and safeguarding threat-based information. Without agreed upon policies and procedures, FPS and GSA cannot fully ensure that they inform tenants of necessary security measures.	checked	checked	N/A

Source: GAO analysis of FPS and GSA regional security related examples. | GAO-16-135

<sup>a</sup>For this table on regional examples, we included three of the six practices that are most closely related to the issues we found in the regions. We did not include three other practices that we reviewed at the agency headquarters level: (1) defining and articulating a common outcome; (2) establishing mutually reinforcing or joint strategies; and (3) reinforcing agency accountability for collaborative efforts through agency plans and reports.

<sup>b</sup>FPS headquarters officials told us that there are times when they need to make security personnel adjustments at certain facilities and areas for reasons that are law enforcement sensitive, and for that reason, the officials cannot inform GSA and/or the federal executive boards due to operations security and/or law enforcement sensitivity, or both.

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FPS's and GSA's reliance on informal communication at the regional level and resulting inefficiencies from a lack of information sharing, echo findings from our prior work on FPS's facility protection. We have previously found that in the post-September 11 era, it is crucial that federal agencies work together to share information to advance homeland security and critical infrastructure-protection efforts.<sup>42</sup> The ability to share security-related information can unify the efforts of federal agencies in preventing or minimizing terrorist attacks.<sup>43</sup> However, we found that many aspects of homeland-security information sharing can be ineffective and fragmented.<sup>44</sup> FPS officials are sometimes reluctant to share information that they consider law enforcement sensitive, and this reluctance can have an impact on GSA's ability to manage its facilities and on collaboration between the two agencies to ensure security. As we previously found, GSA has raised strong arguments for having this information, and FPS could do more to resolve this situation. We concluded that FPS and GSA should share information in a timely manner to support homeland security and critical infrastructure-protection efforts and that, without a greater focus on defining the consistency, frequency, and content of communication between the agencies, FPS would be ill-equipped to sufficiently manage facility security as new threats emerge.<sup>45</sup>

In October 2015, FPS and GSA officials acknowledged that communication among the agencies at the regional level can be improved. The officials told us that they will begin monthly meetings between key FPS and GSA officials to develop a strategy for improving communication at the regional level.

The incomplete implementation of key collaboration practices—particularly with regard to agreement on roles and responsibilities, compatible policies and procedures, and mechanisms to monitor, evaluate, and report on results—leaves day-to-day operational decisions to the regional and facility levels, a situation that may result in

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<sup>42</sup>[GAO-10-142](#).

<sup>43</sup>In 2005, we designated information sharing for homeland security as a government-wide high-risk area because of the significant challenges faced in this area, and we continue to designate this area as a high-risk area as these challenges are still evident today.

<sup>44</sup>[GAO-10-142](#).

<sup>45</sup>[GAO-10-142](#).

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inconsistent management practices among regions across the country. As noted in the cases above, this practice could lead to FPS and GSA not making the best use of limited resources to build and renovate facilities, and may increase security lapses, putting facilities, tenants and the public at greater risk.

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## Conclusion

The nature of FPS's and GSA's related missions for federal facility security and protection and the presence of potential threats to these facilities require effective collaboration. At the same time, the agencies have different cultures, training, and ways of operating, which can present additional challenges to working well together. To meet these challenges, FPS and GSA have taken some steps to improve collaboration over the past year, and as of October 2015, FPS and GSA officials stated that they plan to address several of these issues. For example, drafting a joint strategy and, in August 2015, resuming negotiations to update the 2006 MOA that outlines FPS's and GSA's facility security roles and responsibilities represent positive efforts. Agreeing on and articulation of a common outcome that is consistent with the two agencies' related agency goals and missions and finalizing a joint strategy to align their efforts, could help FPS and GSA to improve their working relationship. Reaching agreement in these key areas will help to enhance the agencies' ability to protect federal facilities and has become more pressing given how much has changed in the security environment since the original MOA was put in place nearly 10 years ago. Communicating existing policies and procedures, within both agencies, for operating across agency boundaries could help to improve the inconsistency in day-to-day communication and operations across the regions. Further, establishing mechanisms to monitor, evaluate, and report on the results of the agencies' efforts to accomplish their mission, or a means to ensure agency accountability for collaboration through agency plans and reports can help ensure that agencies achieve intended results. Without working to strengthen these key collaboration practices, FPS and GSA risk their ability to meet their mission to adequately identify and address serious security risks.

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## Recommendations for Executive Action

Given the collaboration challenges that FPS and GSA face in protecting federal facilities, we are making four recommendations to the Secretary of Homeland Security and the Administrator of the General Services Administration. Specifically, we recommend that the DHS Secretary direct FPS to take and that the GSA Administrator take the following actions:

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1. FPS and GSA headquarters officials should establish a plan with timeframes for reaching agreement on a joint strategy and finalizing it in order to define and articulate a common understanding of expected outcomes and align the two agencies' activities and core processes to achieve their related missions.
  2. FPS and GSA headquarters officials should establish a plan with timeframes for reaching agreement on the two agencies' respective roles and responsibilities for federal facility security, and update and finalize the two agencies' MOA accordingly.
  3. FPS and GSA headquarters officials should develop a process to ensure that compatible policies and procedures, including those for information sharing, are communicated at the regional level so that regional officials at both agencies have common information on how to operationalize the two agencies' collaborative efforts.
  4. FPS and GSA headquarters officials should develop mechanisms to monitor, evaluate, and report on their collaborative efforts to protect federal facilities in order to identify possible areas for improvement and to reinforce accountability.

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## Agency Comments and Our Evaluation

We provided a draft of this report to DHS and GSA for their review and comment, and both agencies provided written comments in response. DHS concurred with our recommendations and provided actions and timeframes for completion. DHS's official written response is reprinted in appendix IV. GSA agreed with our findings and agreed to work with FPS to address them. GSA's official written response is reprinted in appendix V. DHS's and GSA's responses are a positive step toward addressing our recommendations, and we look forward to updates on the agencies' progress as these efforts move forward. DHS and GSA also provided technical comments, which we incorporated as appropriate.

DHS officials stated that they are working to update their respective roles and responsibilities and to define a joint strategy and outcome for federal facility protection. Specifically, DHS stated that the MOA will include roles and responsibilities for each organization where there are clear dependencies. DHS also stated that in collaboration with GSA, FPS will document how field personnel can better execute their responsibilities. Furthermore, DHS stated that FPS and GSA headquarters personnel have agreed to meet monthly to review and address identified areas for improvement, and the officials expect to further define mechanisms to

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monitor, evaluate, and report on their collaborative efforts to protect federal facilities during these monthly meetings.

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As agreed with your office, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies to the appropriate congressional committees, the Secretary of Homeland Security, the Administrator of the General Services Administration, and other interested parties. In addition, the report is available at no charge on the GAO web site at <http://www.gao.gov>. If you or your staff have any questions about this report, please contact me at (202) 512-2834 or [rectanusl@gao.gov](mailto:rectanusl@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix VI.



Lori Rectanus  
Director, Physical Infrastructure Issues

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# Appendix I: Objectives, Scope, and Methodology

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The objectives of our report were to assess (1) how the agencies' collaboration reflects key practices to ensure facility security and (2) the impact of their collaboration practices on day-to-day operations at the regional and facility levels. To obtain contextual information and establish criteria for our work, we reviewed our prior reports and other reports and literature related to FPS, collaboration between agencies, and facility security and protection issues published between 2005 and 2015 to identify issues, prior findings, and recommendations related to FPS and GSA collaboration that had not been addressed. We identified eight practices described in our previous work that can help enhance and sustain collaboration as well as implementation approaches.<sup>1</sup> We selected six of the eight practices most relevant to issues we identified in our prior work on facility security and collaboration to assess the status of FPS and GSA collaborative efforts and how they affect the agencies' operations. We selected the following six practices:

- define and articulate a common outcome,
- establish mutually reinforcing or joint strategies,
- agree on roles and responsibilities,
- establish compatible policies, procedures, and other means to operate across agency boundaries,
- develop mechanisms to monitor, evaluate, and report on results, and
- reinforce agency accountability for collaborative efforts through agency plans and reports.

Additional interagency collaboration practices we did not select for our review include: (1) identify and address needs by leveraging resources and (2) reinforce individual accountability for collaborative efforts through performance management systems. We did not select these two practices because they were less relevant to FPS and GSA collaboration issues we have previously identified. See Appendix II for a detailed overview of all eight collaboration practices.

To assess the status of FPS and GSA efforts to collaborate for their related missions of facility security and protection, we reviewed

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<sup>1</sup> See GAO, Results-Oriented Government: Practices That Can Help Enhance and Sustain Collaboration among Federal Agencies, [GAO-06-15](#) (Washington, D.C.: Oct. 21, 2005); Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms, [GAO-12-1022](#) (Washington, D.C.: Sept. 27, 2012); and GAO, Managing for Results: Implementation Approaches Used to Enhance Collaboration in Interagency Groups, [GAO-14-220](#) (Washington, D.C.: Feb. 14, 2014).

Department of Homeland Security (DHS), NPPD, FPS, and GSA regulations, policy documents, and strategic plans. We also reviewed the 2006 Memorandum of Agreement between DHS and GSA that defines the security responsibilities of FPS and GSA at federal facilities, as well as a draft FPS and GSA joint strategic plan for protection of federal facilities. In addition, we reviewed Presidential Policy Directive 21, which refined and clarified roles and responsibilities for critical infrastructure and emphasized overall collaboration among agencies. We also reviewed pertinent laws and presidential executive orders, the Homeland Security Act of 2002, Titles 6, 40, and 41 of the United States Code, and Presidential Executive Orders 12977 and 13286, which describe FPS and GSA protection authorities. In addition, we reviewed the Government Performance and Results Act (GPRA) of 1993, the GPRA-Modernization Act of 2010, and Office of Management and Budget Circular A11, which define federal agencies' responsibilities for creating strategic plans, goals, and measures. We interviewed DHS, FPS, and GSA headquarters officials about their regulations, policies, plans, agreements, regional and facility level operations, and ongoing efforts to improve federal facility security collaboration through implementation of our six selected collaboration practices. We also interviewed Interagency Security Committee officials about their efforts to improve federal facility security collaboration.

To assess how FPS and GSA collaboration affects day-to-day operations at the regional and facility levels, we selected four FPS and GSA regions for review: Region 3 (Mid-Atlantic); Region 5 (Great Lakes); Region 7 (Greater Southwest); and Region 10 (Northwest/Arctic).<sup>2</sup> We selected these four regions because they comprise about 41 percent of all GSA leased and owned facilities, are geographically dispersed, and include a mix of urban and rural federal facilities and a range of FSLs. During our reviews of these four regions, we collected FPS and GSA operational documents, plans, policies, and procedures. We interviewed FPS and GSA regional managers and directors about their respective facility security collaborative efforts and how the status of FPS and GSA collaboration and implementation of our six selected collaboration practices affect their operations. During our visits to the Chicago and Dallas Regions, we

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<sup>2</sup>FPS and GSA regional headquarters for these four regions are located in the following cities or areas: Philadelphia, Pennsylvania (Region 3); Chicago, Illinois (Region 5); Dallas/Fort Worth, Texas area (Region 7); and Seattle/Tacoma, Washington area (Region 10).

judgmentally selected two facilities to tour in each region based on the size and tenant agency composition. During our tours of these four facilities, we observed how FPS and GSA collaborate at the facility level to provide security, and interviewed FPS security officers and GSA facility managers about their collaborative efforts to provide facility security and about how the status of FPS and GSA collaboration and implementation of our six selected collaboration practices affect their operations. We also reviewed Facility Security Committee (FSC) meeting minutes for the four regions we reviewed. We requested the most recent FSC meeting minutes for five facilities at each of the four regions we reviewed based on interviews with FPS and GSA regional officials, facilities we visited, and the tenant make-up and size of a facility. In reporting on how FPS and GSA collaboration affects day-to-day operations at the regional and facility levels, we focus on three of the six practices that most closely related to the issues we found in the regions we visited, including: (1) agreeing on roles and responsibilities; (2) establishing compatible policies, procedures, and other means to operate across agency boundaries; and (3) developing mechanisms to monitor, evaluate, and report on results.<sup>3</sup> The information we obtained during our site visits and interviews is not generalizable and cannot be used to represent the opinions of all agency officials. We used the information from these site visits and interviews to provide illustrative examples throughout our report.

We conducted this performance audit from January 2015 to December 2015 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 the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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<sup>3</sup>The three additional practices that we reviewed at the agency headquarters level include: (1) defining and articulating a common outcome; (2) establishing mutually reinforcing or joint strategies; and (3) reinforcing agency accountability for collaborative efforts through agency plans and reports.

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# Appendix II: Key Collaboration Practices

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In our prior work, we have identified eight key collaboration practices that we have used to assess collaboration at a range of federal agencies.<sup>1</sup> Agencies can enhance and sustain their collaborative efforts by engaging in these eight practices. Running throughout these practices are a number of factors such as leadership, trust, and organizational culture that are necessary elements for a collaborative working relationship. See table 3 below for a detailed overview of all eight collaboration practices.

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**Table 3: Practices That Can Help Enhance and Sustain Collaboration among Federal Agencies**

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<b>Interagency collaboration practices</b>	<b>Description of practice</b>
<i>Define and articulate a common outcome</i>	To overcome significant differences in agency missions, cultures, and established ways of doing business, collaborating agencies must have a clear and compelling rationale to work together. The compelling rationale for agencies to collaborate can be imposed externally through legislation or other directives or can come from the agencies' own perceptions of the benefits they can obtain from working together. In either case, the collaborative effort requires agency staff working across agency lines to define and articulate the common federal outcome or purpose they are seeking to achieve that is consistent with their respective agency goals and mission.
<i>Establish mutually reinforcing or joint strategies</i>	To achieve a common outcome, collaborating agencies need to establish strategies that work in concert with those of their partners or are joint in nature. Such strategies help in aligning the partner agencies' activities, core processes, and resources to accomplish the common outcome.
<i>Identify and address needs by leveraging resources</i>	Collaborating agencies should identify the human, information technology, physical, and financial resources needed to initiate or sustain their collaborative effort. Collaborating agencies bring different levels of resources and capacities to the effort. By assessing their relative strengths and limitations, collaborating agencies can look for opportunities to address resource needs by leveraging each other's resources, thus obtaining additional benefits that would not be available if they were working separately.
<i>Agree on roles and responsibilities</i>	Collaborating agencies should work together to define and agree on their respective roles and responsibilities, including how the collaborative effort will be led. In doing so, agencies can clarify who will do what, organize their joint and individual efforts, and facilitate decision making. Committed leadership by those involved in the collaborative effort, from all levels of the organization, is also needed to overcome the many barriers to working across agency boundaries.
<i>Establish compatible policies, procedures, and other means to operate across agency boundaries</i>	To facilitate collaboration, agencies need to address the compatibility of standards, policies, procedures, and data systems that will be used in the collaborative effort. Furthermore, as agencies bring diverse cultures to the collaborative effort, it is important to address these differences to enable a cohesive working relationship and to create the mutual trust required to enhance and sustain the collaborative effort. Frequent communication among collaborating agencies is another means to facilitate working across agency boundaries and prevent misunderstanding.

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<sup>1</sup>GAO-06-15; GAO-12-1022; and GAO-14-220.

Appendix II: Key Collaboration Practices

Interagency collaboration practices	Description of practice
<i>Develop mechanisms to monitor, evaluate, and report on results</i>	Federal agencies involved in collaborative efforts need to create the means to monitor and evaluate their efforts to enable them to identify areas for improvement. Reporting on these activities can help key decision makers within the agencies, as well as clients and stakeholders, to obtain feedback for improving both policy and operational effectiveness.
<i>Reinforce agency accountability for collaborative efforts through agency plans and reports</i>	A focus on results implies that federal programs contributing to the same or similar results should collaborate to ensure that goals are consistent and, as appropriate, program efforts are mutually reinforcing. Federal agencies can use their strategic and annual performance plans as tools to drive collaboration with other agencies and partners and establish complementary goals and strategies for achieving results. Such plans can also reinforce accountability for the collaboration by aligning agency goals and strategies with those of the collaborative efforts. Accountability for collaboration is reinforced through public reporting of agency results.
Reinforce individual accountability for collaborative efforts through performance management systems	High-performing organizations use their performance management systems to strengthen accountability for results, specifically by placing greater emphasis on fostering the necessary collaboration both within and across organizational boundaries to achieve results. <sup>a</sup> Within the federal government, the Office of Personnel Management (OPM) and the Office of Management and Budget (OMB) now require such emphasis under the new performance-based pay system for agency senior executives. Under this system, agencies are to hold executives accountable for, among other things, collaboration and teamwork across organizational boundaries to help achieve goals by requiring the executives to identify programmatic crosscutting, and partnership-oriented goals through the performance expectations in their individual performance plans.

Source: GAO | GAO-16-135.

<sup>a</sup>GAO, Results-Oriented Cultures: Creating a Clear Linkage between Individual Performance and Organizational Success, [GAO-03-488](#) (Washington, D.C.: Mar. 14, 2003).

# Appendix III: Established Federal Protective Service’s (FPS) and General Services Administration’s (GSA) Roles and Responsibilities

**Table 4: Statutes, Regulations, and Policies Documenting FPS’s and GSA’s Facility Security Roles and Responsibilities**

Source	FPS	GSA
Statutory	Section 403 of the Homeland Security Act of 2002 <sup>a</sup> transferred FPS from GSA to DHS. The Act provides that GSA is to perform protection responsibilities for GSA-controlled facilities and grounds, excluding the FPS law enforcement and related security functions transferred to DHS. The executive order establishing ISC was amended to reflect the transfer of this function from GSA to DHS by, for example, requiring DHS to chair the ISC. <sup>b</sup>	Under section 1706 of the Homeland Security Act of 2002, with the exception of law enforcement and related security functions transferred to the Secretary of Homeland Security, the Administrator of General Services is to retain all powers, functions, and authorities vested in the Administrator under chapter 10 of title 40, United States Code, and other provisions of law that are necessary for the operation, maintenance, and protection of such facilities and grounds. <sup>c</sup>
Regulatory	“Pricing Policy for Occupancy in GSA Space” defines the pricing policy terms of an occupancy agreement between GSA and each customer agency. The price rate for the basic security fee is set annually on a per-square-foot basis, and includes the following services: general law enforcement, physical security assessments, crime-prevention and awareness training, advice and assistance to facility security committees, intelligence-sharing program, criminal investigation, OEP development assistance, coordination of mobilization to terrorist threat or civil disturbance, administration of guard contracts, and mega-center operations. <sup>d</sup>	
Policy directive	The Presidential Policy Directive (PPD-21) on Critical Infrastructure Security and Resilience, issued on February 12, 2013, emphasizes the importance of strong collaboration between infrastructure owners and managers and agencies responsible for their security to strengthening and maintaining a secure, functioning, and resilient critical infrastructure. PPD-21 states that proactive and coordinated efforts are necessary to securing these assets and designates DHS and GSA as the agencies responsible for the security of federal facilities. PPD-21 defines refining and clarifying functional relationships and efficient information exchange between responsible agencies as strategic imperatives for facility security.	
Directive	FPS Directive on Facility Security Assessments (FSA) documents roles and responsibilities for individuals within FPS for FSAs. This includes individuals ranging from the FPS Director to FPS inspectors. The directive also covers information on qualifications, FSL-determinations, FSA timelines, and FSA release.  Note: This does not include any requirement or suggestion for collaboration during the FSA, only after it is complete.	N/A
Memorandum of agreement (MOA)	The 2006 MOA lays out roles and responsibilities for each agency including services provided by FPS and GSA, data sharing, reporting requirements, and financial arrangements.	

Source: GAO analysis of FPS and GSA legal, regulatory, and policy documents. | GAO-16-135

<sup>a</sup>Pub. L. No. 107-296, § 403 116 Stat. 2135, 2168 (codified at 6 U.S.C. § 203).

<sup>b</sup>Executive Order 12977, 60 Fed. Reg. 54411 (Oct. 19, 1995) as amended by Executive Order 13286, 68 Fed. Reg. 10619 (Mar. 5, 2003). The Director of FPS no longer chairs the ISC. Leadership for the ISC is provided by the chair (the Department’s Assistant Secretary for Infrastructure Protection), the Executive Director, and nine standing subcommittees.

<sup>c</sup>Id. at § 1706(b), 116 Stat. 2135, 2316 (codified at 40 U.S.C. § 1315).

<sup>d</sup>41 C.F.R. § 102-85.35.

# Appendix IV: Comments from the Department of Homeland Security

U.S. Department of Homeland Security  
Washington, DC 20528



**Homeland  
Security**

December 2, 2015

Lori Rectanus  
Director, Physical Infrastructure Issues  
U.S. Government Accountability Office  
441 G Street NW  
Washington, DC 20548

Re: Draft Report GAO-16-135, "HOMELAND SECURITY: FPS and GSA Should Strengthen Collaboration to Enhance Facility Security"

Dear Ms. Rectanus:

Thank you for the opportunity to review and comment on this draft report. The U.S. Department of Homeland Security (DHS) appreciates the U.S. Government Accountability Office's (GAO) work in planning and conducting its review and issuing this report.

The Department is pleased to note GAO's positive recognition of the steps the Federal Protective Service (FPS) and the General Services Administration (GSA) have taken to improve collaboration over the past year. For example, they are working to update their respective roles and responsibilities and to define a joint strategy and outcome for Federal facility protection. FPS is committed to protecting the homeland by managing risk and ensuring continuity for one of the most crucial elements of our national critical infrastructure – our Nation's Federal facilities, including those who occupy them.

The draft report contained four recommendations with which DHS concurs. Specifically, GAO recommended that the Secretary of Homeland Security, direct FPS, and the GSA Administrator, take the following actions:

**Recommendation 1:** FPS and GSA headquarters officials should establish a plan with timeframes for reaching agreement on and finalizing a joint strategy in order to define and articulate a common understanding of expected outcomes and align the two agencies' activities and core processes to achieve their related missions.

**Response:** Concur. FPS and GSA have agreed to reengage on reaching an agreement on finalizing a joint strategy upon completing three key documents (listed below) that are already underway.

1. Update of the FPS and GSA Memorandum of Agreement (MOA). This document will broadly define the roles and responsibilities for each organization where there are clear dependencies. Estimated Completion Date (ECD): June 30, 2016.
2. Control Systems Cybersecurity Strategy for Federal Facilities. This document has been well coordinated within the National Protection and Programs Directorate (NPPD) and GSA and is being reviewed by NPPD leadership. It will serve as a model for reengaging on the joint strategy for Federal facility protection as it outlines a shared outcome but also clearly identifies roles and responsibilities for execution. ECD: March 31, 2016.
3. Update to the Government Facilities Sector Specific Plan. The 2013 Update to the National Infrastructure Protection Plan requires the update of sector specific plans for each of the critical infrastructure sectors. As co-sector-specific agencies for the Government Facilities Sector, FPS and GSA jointly updated the plan which is in the final stages of drafting and review. ECD: To Be Determined (TBD).

Once the above actions are completed, FPS and GSA will work together to finalize the joint strategy described in this recommendation. ECD: TBD.

**Recommendation 2:** FPS and GSA headquarters officials should establish a plan with time frames for reaching agreement on the two agencies' respective roles and responsibilities for federal facility security, update, and finalize their MOA accordingly.

**Response:** Concur. FPS and GSA have been working on this document since August 2015. The MOA will broadly define the roles and responsibilities for each organization where there are clear dependencies. The goal is that it will move from a working group level to Headquarters review in the near future. ECD: June 30, 2016.

**Recommendation 3:** FPS and GSA headquarters officials should develop a process to ensure that compatible policies and procedures, including those for information sharing, are communicated at the regional level so that regional officials at both agencies have common information of how to operationalize the two agencies' collaborative effort.

**Response:** Concur. FPS will document for its field personnel how to execute the aforementioned responsibilities. As part of this effort, FPS will reach out to GSA to coordinate alignment with GSA efforts, as appropriate. ECD: November 30, 2016.

**Recommendation 4:** FPS and GSA headquarters officials should develop mechanisms to monitor, evaluate, and report on their collaborative efforts to protect federal facilities in order to identify possible areas of improvement and to reinforce accountability.

**Response:** Concur. FPS and GSA headquarters personnel have agreed to meet monthly to review and address areas of improvement that are identified. Additional action is required to formalize collaborative efforts in the protection of federal facilities. FPS officials expect that these mechanisms will be further defined during the monthly meetings between FPS and GSA. Other opportunities to develop recommended mechanisms will also be explored as part of the on-going FPS collaboration with GSA. ECD: November 30, 2016.

Again, thank you for the opportunity to review and comment on this draft report. Technical comments were previously provided under separate cover. Please feel free to contact me if you have any questions. We look forward to working with you in the future.

Sincerely,



Jim H. Crumpacker, CIA, CFE  
Director  
Departmental GAO-OIG Liaison Office

# Appendix V: Comments from the General Services Administration



The Administrator

December 9, 2015

The Honorable Gene L. Dodaro  
Comptroller General  
U.S. Government Accountability Office  
Washington, DC 20548

Dear Mr. Dodaro:

The U.S. General Services Administration (GSA) appreciates the opportunity to review and comment on the U.S. Government Accountability Office (GAO) draft report entitled, *Homeland Security: FPS and GSA Should Strengthen Collaboration to Enhance Facility Security* (GAO-16-135). GSA has reviewed this draft report in depth, agrees with the findings in the draft report, and will work with the Federal Protective Service to address the findings.

Thank you for the clarity and thoroughness of this draft report. If you have any questions, please contact me or Ms. Lisa Austin, Associate Administrator, Office of Congressional and Intergovernmental Affairs, at (202) 501-0563.

Sincerely,

A handwritten signature in blue ink that reads "Denise T. Roth".

Denise Turner Roth  
Administrator

Cc: Mr. David Wise, Director, Physical Infrastructure Issues, GAO

U.S. General Services Administration  
1800 F Street, NW  
Washington, DC 20405  
Telephone: (202) 501-0800  
Fax: (202) 219-1243

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# Appendix VI: GAO Contact and Staff Acknowledgments

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## GAO Contact

Lori Rectanus, (202) 512-9847 or [rectanusl@gao.gov](mailto:rectanusl@gao.gov)

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## Staff Acknowledgments

In addition to the contact named above, Amelia Shachoy (Assistant Director), Geoffrey Hamilton, Raymond Griffith, Judy Williams-Tapia, Matthew Latour, Michael Mgebhoff, Amy Rosewarne, Kelly Rubin, John Sheehan, and Sarah Veale made significant contributions to this report.

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# Appendix VII: Accessible Data

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## Agency Comment Letter

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Text of Appendix IV:  
Comments from the  
Department of Homeland  
Security

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Page 1

U.S. Department of Homeland Security

Washington, DC 20528

Homeland Security

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Director, Physical Infrastructure Issues

U.S. Government Accountability Office

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Washington, DC 20548

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Page 3

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Director

Departmental GAO-OIG Liaison Office

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Text of Appendix V:  
Comments from the  
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Page 1

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December 9, 2015

The Honorable Gene L. Dodaro

Comptroller General

U.S. Government Accountability Office

Washington, DC 20548

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Sincerely,

Denise Turner Roth

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Administrator

Cc: Mr. David Wise, Director, Physical Infrastructure Issues, GAO

U.S. General Services Administration

1800 F Street, NW

Washington, DC 20405

Telephone : (202) 501-0800

Fax: (202) 219-1243

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