



United States Government Accountability Office

Report to the Chairman, Subcommittee
on Oversight, Management, and
Accountability, Committee on Homeland
Security, House of Representatives

June 2021

FEDERAL PROTECTIVE SERVICE

Better Documented Cost Estimates Could Help Stakeholders Make Security Decisions

Accessible Version

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GAO@100 Highlights

Highlights of [GAO-21-464](#), a report to the Chairman, Subcommittee on Oversight, Management, and Accountability Committee on Homeland Security, House of Representatives

Why GAO Did This Study

Over one million employees and a range of visitors seeking services at federal facilities depend on FPS to ensure the safety of both people and property at these locations.

This report examines stakeholders' perspectives on FPS's performance of three key activities. GAO identified key activities from FPS data on work hours. GAO held discussion groups with stakeholders from 27 randomly selected facilities where FPS provided guard services and responded to incidents in fiscal year 2019 and analyzed stakeholder responses from 2017-2019 to GSA's and FPS's feedback instruments. These sources of stakeholder views are not representative but collectively provide insight into stakeholders' satisfaction with how FPS is performing key activities. GAO also reviewed agency documents; interviewed FPS officials about FPS's performance; and compared FPS's security assessment reports to criteria in GAO's *Cost Estimating and Assessment Guide*.

What GAO Recommends

GAO recommends that FPS include in its Facility Security Assessment reports both the assumptions and sources used to develop the cost estimate for each security measure it recommends. DHS concurred with the recommendation, but stated that clarifying cost estimates is unlikely to lead to increased adoption of security measures. GAO believes the recommendation is warranted and that the proposed actions DHS outlines in its response to the recommendation, while helpful, are not fully in line with the recommendation.

View [GAO-21-464](#). For more information, contact Catina B. Latham at (202) 512-2834 or lathamc@gao.gov.

June 2021

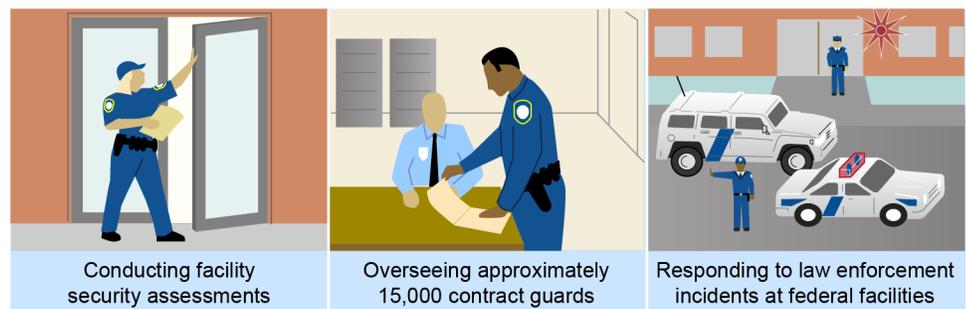
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Better Documented Cost Estimates Could Help Stakeholders Make Security Decisions

What GAO Found

The Federal Protective Service (FPS) provides security and protection at more than 9,000 federal facilities. FPS performs a variety of security activities in conjunction with the General Services Administration (GSA), which functions as the landlord at most of these facilities, and with the federal agencies, which occupy these facilities as tenants. These stakeholders can provide important perspectives on FPS's performance of its key activities (see figure).

The Federal Protective Service's Three Key Security Activities



Source: GAO. | GAO-21-464

Stakeholders expressed satisfaction with many aspects of FPS's performance of key activities but also identified aspects where they thought FPS could make improvements. For example, stakeholders expressed satisfaction with the professionalism of FPS personnel and commended FPS's coordination in responding to law enforcement incidents. However, some stakeholders said they would like to see FPS oversee contract guards more often. In addition, many stakeholders said that FPS could improve the cost estimates in its security assessment reports.

GAO's review of FPS's Facility Security Assessment reports found that cost estimates for the recommended security measures lacked information that could help stakeholders make decisions to accept or reject FPS's recommendations. Specifically, recent reports for 27 selected buildings did not document (1) the assumptions FPS made to produce the cost estimates (e.g., the scope of work) and (2) the sources FPS used to create the estimate. In one report, for example, FPS recommended additional fencing and provided a cost estimate with an exact dollar amount. However, FPS did not document the assumptions it used to develop the estimate, such as the height and linear feet of fence or the fencing material.

According to GAO's *Cost Estimating and Assessment Guide*, cost estimates should provide information about the assumptions and sources used to develop an estimate so that decision-makers can understand the level of uncertainty around the estimate. By providing detailed information about the cost estimates in Facility Security Assessment reports, FPS could better inform stakeholders and potentially increase implementation of recommended security measures, designed to increase the safety of people and property at these facilities.

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Abbreviations

DHS	Department of Homeland Security
DO	designated official
FPS	Federal Protective Service
FSC	Facility Security Committee
FSL	Federal Security Level
GSA	General Services Administration
ISC	Interagency Security Committee
MIST	Modified Infrastructure Survey Tool
MOA	memorandum of agreement
ROM	rough order of magnitude

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June 8, 2021

The Honorable J. Luis Correa
Chairman
Subcommittee on Oversight, Management, and Accountability
Committee on Homeland Security
House of Representatives

Dear Mr. Chairman:

Over one-million federal employees and a wide range of visitors to federal offices depend on the Department of Homeland Security's (DHS) Federal Protective Service (FPS) to provide security and protection at more than 9,000 facilities. The General Services Administration (GSA) serves as the landlord of most of these facilities, with federal agencies renting space from GSA and thus serving as tenants.¹ To ensure the safety of both people and property at these locations, FPS performs a variety of security activities in conjunction with GSA and tenant agencies.

We have designated federal real property management as a high-risk area since 2003, in part because of physical security challenges at federal facilities, including FPS's ability to collaborate with GSA and tenant agencies—which we refer to as “stakeholders” in this report.² You asked us to review what is known about FPS's performance. We reported in March 2019 that FPS had taken several actions to address issues we had previously identified, and that FPS will need time to demonstrate the results of these actions.³ This report examines stakeholders' perspectives on FPS's performance of key activities and any potential improvements.

To define “key activities,” we selected the FPS activities that use the greatest number of personnel hours according to FPS's 2018 workforce planning data, which listed 34 activities. We selected three activities: (1)

¹ Some buildings have a sole tenant agency, while other buildings have multiple tenant agencies.

² 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.

³ GAO, *High Risk Series*, [GAO-19-157SP](#) (Washington, D.C.: March 2019).

conducting facility security assessments; (2) overseeing Protective Security Officers (i.e., contract guards); and (3) responding to law enforcement incidents.⁴ Cumulatively, these three activities accounted for nearly one-third of FPS's personnel hours in fiscal years 2017 and 2018.

To provide stakeholders' perspectives on FPS's performance of these key activities, we obtained and analyzed views from three different sources:

1. "participants" in GAO-led discussion groups of GSA building managers and Facility Security Chairs (i.e., tenant agency representatives) representing 27 selected buildings;⁵
2. "respondents" to GSA's tenant satisfaction survey; and
3. "commenters" from a feedback instrument FPS sent to its tenant agency customers. After analyzing stakeholder feedback from these three sources, we compared FPS's security assessment reports to applicable criteria in GAO's *Cost Estimating and Assessment Guide*.⁶ For more information on our methodology, see appendix I.

We conducted this performance audit from November 2019 to June 2021 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

⁴ For the purposes of this report, we refer to Protective Security Officers as "contract guards." FPS contracts with private security firms to provide Protective Security Officers.

⁵ GSA building managers provide property management services for facilities, including tasks such as space alternations in response to security concerns or equipment maintenance. Facility Security Chairs are the heads of a building's Facility Security Committee (FSC), which votes on whether to implement FPS's recommended security measures from the facility security assessment for any given building. For the purposes of this report, we refer to these officials or their designees as "tenant agency representatives."

⁶ GAO, *Cost Estimating and Assessment Guide: Best Practices for Developing and Managing Program Costs*, [GAO-20-195G](#) (Washington, D.C.: March 2020).

Background

Organizational Responsibilities

FPS is the agency primarily responsible for protecting federal employees and visitors in federally owned or leased facilities that are under the custody and control of GSA. In that capacity, FPS's authorities include: (1) protecting federal employees and visitors at these facilities; (2) enforcing federal laws and regulations aimed at protecting these persons and facilities; and (3) investigating criminal offenses against these persons and facilities. FPS conducts its mission by providing certain security services including:

- **Physical security activities.** FPS conducts facility security assessments and recommends security measures—such as security cameras, physical access control systems, and x-ray screening equipment. These measures are aimed at preventing security incidents. FPS is responsible for installing and maintaining security equipment (e.g., magnetometers and x-ray screening equipment) that is not part of the physical building structure.
- **Law enforcement activities.** FPS personnel respond to incidents, conduct criminal investigations, and can make arrests.

GSA serves as the federal government's civilian landlord and designs, builds, and manages facilities to support the needs of civilian federal agencies. GSA provides maintenance and repair of security fixtures (such as bollards, doors, locks, and blast-resistant windows). When FPS recommends security measures that affect the physical building, GSA takes the lead on implementing those protections if they are approved by the tenant agencies.

Tenants in buildings under the custody and control of GSA are responsible for making facility-specific security decisions, either as members of a Facility Security Committee (FSC) or through a designated official (DO).⁷ The FSC includes representatives from each of the tenant agencies in a given facility and is frequently led by a representative from the agency occupying the most space. Each building's FSC selects and

⁷ The federal agency with funding authority is the decision-maker for a single-tenant facility's security.

implements security measures recommended by FPS and addresses facility-specific security issues, among other responsibilities.

The Interagency Security Committee (ISC)—a DHS-chaired organization comprised of 64 member agencies and departments—is responsible for developing physical security standards to enhance the quality and effectiveness of security in and protection of civilian federal facilities. For example, ISC standards establish the membership parameters for FSCs at federal buildings and determine how often FPS should conduct facility security assessments.⁸

Key FPS Activities

In fiscal years 2017 and 2018, three key activities accounted for approximately one-third of the work hours of FPS personnel: (1) conducting facility security assessments, (2) overseeing contract guards, and (3) responding to law enforcement incidents.⁹

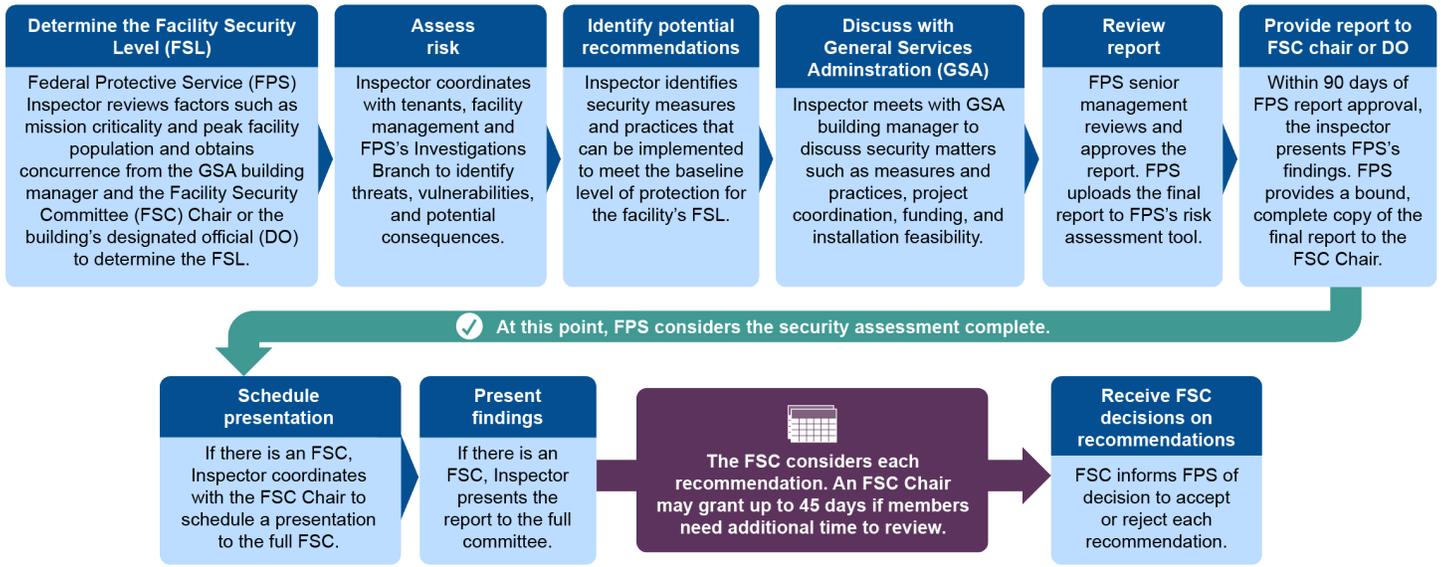
Facility Security Assessments. FPS conducts facility security assessments of federal buildings to identify and evaluate potential risks so that it can recommend security measures and practices to help prevent or mitigate these risks. (See figure 1.) According to FPS's documentation, the Facility Security Assessment report is a means to improve the effectiveness of protection at federal facilities.¹⁰

⁸ According to the ISC, FSC membership should include representatives of all federal tenants in the facility, the security organization (such as FPS), and the owning or leasing department or agency (such as GSA). Only those federal tenants paying rent on space in the facility are to have a vote on the FSC.

⁹ FPS obtains data on work hours related to activities, ranging from administrative tasks to K-9 training, to assist in its workforce planning.

¹⁰ DHS, *FPS Facility Security Assessment Manual* (January 2018).

Figure 1: Federal Protective Service’s (FPS) Process for Facility Security Assessments



Source: GAO analysis of FPS information. | GAO-21-464

Under Executive Order 12977, FPS is required to follow ISC standards, including the ISC’s risk-management process standard, when conducting facility security assessments.¹¹ The standards require FPS to conduct these assessments every 3 to 5 years, depending on the security level of the facility, with all higher level facilities (levels III, IV, and V) being assessed every 3 years.¹² FPS tracks scheduling and completion of security assessments for all facilities at all risk levels using data that the inspectors enter into FPS’s risk assessment tool (i.e., Modified Infrastructure Survey Tool or MIST—see text box). FPS reported that in fiscal years 2017 through 2019 its inspectors completed 100 percent of security assessments for higher-level facilities within the required timeframe.¹³

¹¹ Executive Order 12977, 60 Fed. Reg. 54411 (Oct. 19, 1995), as amended by Executive Order 13286, 68 Fed. Reg. 10619 (March 5, 2003), requires executive branch departments and agencies to cooperate and comply with ISC’s policies and recommendations. See, ISC, *The Risk Management Process: An Interagency Security Committee Standard 2021 Edition* (2021).

¹² Facility security levels, range from level I (lowest risk) to level V (highest risk) based on factors such as mission criticality and facility population. The security level designation determines the facility’s baseline security measures and practices.

¹³ DHS, *FY 2019 – 2021 Annual Performance Report*, (Washington, D.C.: February 2020)

The Federal Protective Service (FPS) Updated Its Modified Infrastructure Survey Tool

In 2012, we found that FPS designed its Modified Infrastructure Survey Tool (MIST) to assess vulnerability and incorporate threat information. However, the tool did not estimate consequence, a critical component of a risk assessment. Therefore, we recommended that FPS incorporate the National Infrastructure Protection Plan's risk management framework, specifically in calculating risk to include threat, vulnerability, and consequence information.

In 2017, we found that FPS had begun incorporating threat and consequence information and using MIST to estimate vulnerability as part of FPS's process for facility security assessments. Due to these changes, FPS provides federal tenant agencies with a more complete assessment of the risks to their facilities.

Source: GAO | GAO-21-464

Note: See GAO, *Federal Protective Service: Actions Needed to Assess Risk and Better Manage Contract Guards at Federal Facilities*, [GAO-12-739](#) (Washington, D.C.: August 2012)

Oversight of contract guards. According to FPS officials, FPS oversees around 15,000 contract guards who provide security and protection at approximately 3,000 federal facilities. Specifically, contract guards are responsible for controlling access to facilities; conducting screening at access points to prevent the introduction of prohibited items, such as weapons and explosives; enforcing property rules and regulations; detecting and reporting criminal acts; and responding to emergency situations involving facility safety and security.

As we have previously reported, while the private sector companies that provide guards are contractually obligated to ensure that the guards are appropriately trained, FPS is ultimately responsible for overseeing the guards.¹⁴ FPS's Contracting Officer Representatives are responsible for gathering input on guards' performance, monitoring and auditing compliance with contractual obligations, and providing administrative support. Additionally, FPS inspectors located in FPS's 11 regions inspect guard posts and provide feedback to guards (see text box). FPS tracks and publishes information about its contract guard oversight in DHS's annual budget justifications. For example, in 2021, FPS reported that it completed 100 percent of the required guard post visits in fiscal years 2017 through 2019.¹⁵

¹⁴ GAO, *Federal Protective Service: Challenges with Oversight of Contract Guard Program Still Exist, and Additional Management Controls Are Needed*, [GAO-13-694](#) (Washington, D.C.: September 2013).

¹⁵ The number of guard post visits conducted per year is set annually, per directives. FPS post visits review the operational readiness of a guard post including identification of the individual on duty, cleanliness and orderly operation of the post, and the contract guards' knowledge of the post orders, among other considerations.

The Federal Protective Service (FPS) Developed Two Systems to Help Oversee Its Contract Guard Workforce

In 2012, we found that FPS experienced difficulty providing training to all guards and determining which guards had received training. We recommended that FPS develop and implement a reliable system for contract guard oversight. In 2019, we found that FPS had developed two separate systems for comprehensively and reliably overseeing its contract guard workforce.

- FPS's Training and Academy Management System is the agency's system of record for all FPS personnel's and contract guards' learning activities. This gives FPS personnel the ability to track, monitor, and verify contract guards' training records.
- FPS's uses the Post Tracking System to verify the identity, suitability, and training completion of guards at federal facilities, as well as to track their time and attendance.

Source: GAO | GAO-21-464

Note: See GAO, *Federal Protective Service: Actions Needed to Assess Risk and Better Manage Contract Guards at Federal Facilities*, [GAO-12-739](#) (Washington, D.C.: August 2012)

Law enforcement incident response. FPS is generally responsible for providing a law enforcement response to security incidents at the facilities it protects.¹⁶ In some cases, FPS officers are the first responders when tenant agencies call one of FPS's four regional dispatch centers (i.e., MegaCenters). However, the MegaCenter may contact local law enforcement to serve as the first responder if, for example, the incident requires an immediate response and FPS personnel are not immediately available. Federal tenants may also contact local law enforcement directly. When local law enforcement serves as the first responder, FPS will coordinate with it on any resulting investigations. FPS collects and analyzes data about incidents requiring a law enforcement response, such as the severity of the offense committed and whether the incident resulted in an arrest (see text box).

The Federal Protective Service Developed a New System to Help Document Incidents

In May 2020, FPS officials characterized its recently replaced systems for tracking information related to FPS's law-enforcement incident response as archaic. The original software limited FPS's ability to analyze nation-wide data. As of July 2019, FPS's new system, the Law Enforcement Information Management System gives FPS personnel the ability to electronically document and search for specific details from interviews, as well as the outcome of all incidents.

Source: GAO | GAO-21-464

¹⁶ Security incidents might include demonstrations, which could increase security risks; verbal, physical, and sexual threats against employees; unruly or disgruntled individuals; burglary; arson; or other situations that pose a risk to people or property.

Stakeholders Were Generally Satisfied with FPS's Performance of Key Activities, but Some Stakeholders Identified Areas for Improvement

Various stakeholders expressed satisfaction with many aspects of FPS's performance conducting facility security assessments, overseeing contract guards, and providing law-enforcement incident response for federal facilities. At the same time, stakeholders identified some aspects of these activities where they thought FPS could make improvements. For example, many stakeholders expressed concerns about the cost estimates in FPS's security assessment reports, and some said they did not see FPS officials at their building performing contractor oversight as often as they would like.

As mentioned previously, the term "stakeholders" includes:

- "participants"—tenant agency customer-participants and GSA building manager-participants who provided information through six discussion groups we held in 2020;¹⁷
- "respondents"—tenant agency customers who responded to GSA's annual tenant satisfaction surveys in fiscal years 2017 through 2019; and
- "commenters"—customers who volunteered feedback to FPS in fiscal years 2017 through 2019.

Stakeholders Generally Held Positive Views of FPS's Security Assessment Process but Raised Concerns about the Cost Estimates That Lacked Important Details

FPS's assessment of facility security. Participants from all six-discussion groups viewed the content of FPS's security assessment reports in a positive light, characterizing them as thorough, comprehensive, timely, and useful. Participants described FPS inspectors

¹⁷ We held three discussion groups with tenant agency customers and three discussion groups with GSA building managers. The six groups totaled 40 individuals across 27 selected buildings. When describing the views of the six groups and individual participants, we use terms "some" to represent 2 to 5 individuals, "several" to represent 6 to 10, and "many" to represent 11 or more participants. See appendix I for additional details on our methodology.

as professional, helpful, and good communicators throughout the assessment process. Some participants in one group said that sometimes the inspector does not find and speak to the facility subject matter experts, but two of these participants said that this situation usually happens when an inspector from outside their geographical area is conducting the assessment.

Communication of security assessment results. Many participants expressed satisfaction with FPS’s communication of the security assessment results. As previously discussed, FPS has established a process for conducting facility security assessments to implement ISC standards for the physical security of civilian federal facilities. One step in FPS’s security assessment process is to work with the FSC chair to schedule and hold a presentation of the security assessment results to the committee. However, several building manager participants, primarily those from the facility-security-level II discussion group, told us that they have not been invited to an FPS presentation of security assessment results. The FSC chair is responsible for inviting members of the committee to meetings.

Improved Coordination between the Federal Protective Service (FPS) and the General Services Administration (GSA)

In 2015, we found that FPS and GSA did not fully agree on their roles and responsibilities related to ensuring the security and protection of federal facilities. We recommended FPS and GSA establish a plan with timeframes for reaching agreement on their respective roles and responsibilities, then update and finalize the two agencies’ outdated memorandum of agreement (MOA) accordingly. In 2018, FPS and GSA finalized the revisions to the MOA, which included identifying, defining, and addressing roles and responsibilities and operational relationships between FPS and GSA concerning the protection of federally-owned and -leased buildings, grounds, and property under the jurisdiction, custody, or control of GSA.

Source: GAO | GAO-21-464

Note: See GAO, *Homeland Security: FPS and GSA Should Strengthen Collaboration to Enhance Facility Security*, GAO-16-135 (Washington, D.C.: December 2015).

Receipt of the security assessment report. While many participants were satisfied with how FPS provides the results of the security assessment report, some of the building manager participants said they did not consistently receive a copy of the report. As previously discussed, FPS tracks the completion of FPS reports—that is, the point at which the inspector has uploaded the final report into FPS’s risk assessment tool and provided a physical, bound copy of the report to the FSC chair. According to FPS officials, FPS also provides a copy to those who attend FPS’s presentation of the report’s results but refers additional requests for copies of the report to the FSC chair. In 2017, a GSA Office of Inspector General’s report found that building managers’ lack of security assessment reports was a persistent issue.¹⁸ Therefore, in a 2018 memorandum of agreement with GSA, FPS committed to provide an electronic or printed copy of security assessment reports to GSA’s Office of Mission Assurance, the building manager, and the FSC chair (see sidebar).

¹⁸ Office of the Inspector General, GSA, *GSA Should Monitor and Track Facility Security Assessments*, Report Number A160101/O7/F18002 (Dec. 4, 2017).

According to FPS and GSA officials, FPS has provided GSA with access to security assessment reports through FPS's electronic risk assessment tool.¹⁹ However, GSA officials said that their agency has restricted access to FPS's tool to staff in the Office of Mission Assurance, because anyone with access to the tool is able to access sensitive information for over 8,000 buildings. To mitigate this risk, GSA officials from the Office of Mission Assurance said they would download security assessment reports for building managers upon request. Officials from GSA's Office of Facilities Management said that they have discussed the process during national directors meetings. FPS officials said that building managers can also obtain the report by requesting a copy from the FSC chair or FPS.

Cost estimates for security recommendations. Many stakeholders expressed concern with the cost estimates FPS provides in its security assessment reports. Participants from all three groups of building managers and one group of tenant agency participants said that FPS's cost estimates are not sufficiently detailed to inform participants' decisions on recommended security measures and practices.²⁰ These participants' comments ranged from a desire for more information about the scope of work FPS recommended to wanting more accurate estimates and concerns about missing cost estimates. One building manager participant stated that lack of details about cost estimates causes delays and results in unimplemented recommendations.²¹ This participant noted that FPS's cost estimates for recommended security measures and practices are important for the FSC to make decisions, budget better, and prioritize repairs. In addition, in 2018, one commenter who volunteered feedback related to the FSA process said that FPS could improve the accuracy of cost estimates, while another said it would

¹⁹ Authorized users may access the risk assessment tool (MIST) through a web-based portal, which is maintained by DHS's National Protection and Programs Directorate, Office of Infrastructure Protection.

²⁰ No participants commented positively about cost estimates in FPS's security assessment reports.

²¹ FPS officials told us that tenant agencies reject about 70 percent of the recommended security measures FPS includes in its security assessment reports. FPS's most recent strategic plan included a strategic objective for increasing the number of implemented security recommendations. See DHS, *Federal Protective Service Strategic Plan FY 2018 – FY 2022*.

help if FPS provided more details about the cost, location, and type of equipment it recommends.²²

We found that selected FPS security assessment reports lacked documentation of important information that would help FSCs use the cost estimates to make decisions. Given concerns expressed by participants about FPS's cost estimates, we reviewed the most recent security assessment reports for the 27 buildings we selected. These reports documented some recommendation-specific cost information and some generic information about cost.²³ However, FPS did not list the sources it used or any assumptions underlying the estimates it provided for specific recommendations, including the scope of work the estimate would cover. For example, in one security assessment report, FPS recommended additional fencing and gates. FPS included a cost estimate for the initial installation and another for annual costs, which it presented as an exact dollar amount. However, FPS did not describe the assumptions it used to develop the cost estimate, such as the number of linear feet of fence, the height of the fence, or the fence material.

According to ISC standards, FPS is required to provide a detailed description of work and cost estimates for each recommended security measure and practice.²⁴ This requirement is reinforced by the 2018 MOA with GSA in which FPS committed to provide cost estimates as part of its security assessment reports.

According to GAO's *Cost Estimating and Assessment Guide*, cost estimates should, among other things:

- be completed with the best available information at the time, and

²² A total of 255 commenters volunteered suggestions for FPS to improve its performance in response to FPS's question, "What would you like to see from FPS that would assist you in your role as FSC Chair and/or designated official in protecting your facility, employees, and visitors?" Of those, 49 commenters volunteered feedback related to the FSA process.

²³ The security assessment reports we reviewed included boilerplate language stating that (1) FPS's estimates are based on "reasonably obtainable" information and (2) while some cost information (e.g., on x-ray screening equipment) is readily available, other costs may require consultation with GSA and market research.

²⁴ ISC, *The Risk Management Process: An Interagency Security Committee Standard* 2021 Edition (2021).

- document the estimates' shortcomings and assumptions with sources and data to provide decision-makers with the information necessary to understand the level of uncertainty around the estimate.²⁵

FPS officials said that FPS intends for the cost estimates FPS provides in security assessment reports to be a rough order of magnitude (ROM) estimate.²⁶ They said FPS used the Project Management Institute's Project Management Body of Knowledge accuracy range for a ROM estimate (i.e., -25 percent to +75 percent), and that therefore FPS did not include documentation about how it arrived at the cost estimates.²⁷ According to FPS officials, at the time of the security assessment report, there can be significant uncertainty about the scope of work for recommended security measures and practices. In addition, FPS officials told us that FPS has less insight into the cost of some projects because buildings and tenants may have different requirements and different scope options, and some customer-participants said FPS has difficulty developing cost estimates.²⁸ Furthermore, FPS officials said it is inefficient to provide a detailed cost estimate for all proposed security measures and practices when on average, tenant agencies reject 70 percent of FPS's recommendations. FPS officials said that the FSC may ask FPS for additional information about the cost estimate or request a more specific cost estimate once more details and parameters are known. Under ISC standards, the FSC chairperson may provide a reasonable period not to exceed 45 days from the receipt of all materials for FSC members' to consult their organizations before voting on any recommendations.²⁹

²⁵ [GAO-20-195G](#).

²⁶ The *Cost Guide* states that a rough order of magnitude estimate is developed when a quick estimate is needed and few details are available but should never be considered a budget-quality cost estimate. See [GAO-20-195G](#).

²⁷ Project Management Institute, Inc., *Guide to the Project Management Body of Knowledge (PMBOK® Guide)*, Sixth Edition (Newtown Square, Pa.:2017). PMBOK is a trademark of Project Management Institute, Inc. The Project Management Institute is a not-for-profit association that provides global standards for, among other things, project and program management.

²⁸ The security assessment reports we reviewed state that FPS has better information about the likely cost of security equipment for which it already has procurement contracts in place (e.g., magnetometers) versus other security equipment (e.g., cameras).

²⁹ The ISC standards state that FSC members may or may not need to obtain guidance from their headquarters to obligate their respective organizations to a financial commitment.

While FPS may be developing cost estimates based on the best available information at the time, it does not provide documentation on how these ROM estimates were developed or the underlying assumptions. Without such documentation, decision-makers lack information needed to understand the inherent uncertainty of the cost estimates. Unless FPS documents and communicates the sources and data used to develop the estimate, it may not present a convincing argument for the estimate's validity or help answer decision-makers' questions. Without an understanding of assumptions FPS made to produce the cost estimates—including the scope of work—FSCs have a limited ability to evaluate whether to pay for the recommended security measures and practices, whether or how they might alter the recommended measures to reduce the estimated cost, or whether to accept the risk of not implementing the recommended measures. Also, without documentation of FPS's additional sources and information, FSC members may not understand the level of uncertainty around the estimate or have confidence in the completeness or quality of the estimate.

Based on the comments from our discussion group participants, stakeholders' concerns with cost estimates may discourage them from implementing security measures intended to reduce security risks. For example, one participant stated that ballpark estimates are not helpful while another said that agencies often feel they are voting on whether to implement FPS's recommendations without good information. Additionally, in 2019, 188 of 387 commenters who volunteered feedback to FPS on why they did not implement every recommendation from their most recent security assessment report indicated that funding was a significant consideration.

Stakeholders Reported Positive Experiences with FPS's Professionalism but Expressed Mixed Views of Contract Guard Oversight

FPS personnel's and contract guards' professionalism. Participants from across the three focus groups with tenant agency customers expressed satisfaction with the professionalism of FPS personnel. In addition, several participants generally expressed satisfaction with the professionalism of contract guards. Similarly, in fiscal years 2017 through 2019, about 80 percent of survey respondents reported that they were satisfied with the professionalism of the FPS personnel and contract guards; about 7 percent reported that they were dissatisfied.

Contract guards' performance of duties. Several participants commented about issues with contract guards' performance of their duties. These participants said guards can be on their cell phones too much, prop open doors that should be secure, or do not always patrol as they should. However, participants generally described these as isolated incidents rather than ongoing problems.

FPS's oversight of contractual agreements with contract guard companies. Customer-participants and commenters expressed mixed views of FPS's management and oversight of contractual agreements with contract guard companies. Some customer-participants expressed dissatisfaction with the contract guard companies' inflexibility. They described difficulties obtaining an additional guard temporarily, difficulty removing poor performing guards, and guards' refusals to take on certain responsibilities, such as temperature checks at entrances. In addition, in 2018, 12 of the 35 commenters who volunteered feedback on FPS's guard services with suggestions for how FPS could better assist them said they would like to see improvements to FPS's oversight of contractual agreements with their guard company. By contrast, one building manager-participant said that FPS worked with the guard company to revise the contract in a timely manner to address an issue with a guard independently canceling one night of construction in response to an employee in the building complaining about the noise. Additionally, one customer-participant told us that he has seen big improvements since FPS revised its contract guard oversight.³⁰

An FPS official said that often customers' dissatisfaction with guard performance can be rooted in misunderstandings of the contractual responsibilities. The official said that because the guards are contractors, FPS cannot immediately remove a guard at the request of tenant agencies or building managers. The official also noted that agencies often

³⁰ In 2010, GAO recommended that FPS rigorously and consistently monitor contractors' and contract guards' performance and step up enforcement against contractors that are not complying with the terms of the contract. In May 2014, FPS officials indicated that FPS had hired an additional 17 full-time Contracting Officer Representatives and revised its guidance to reflect changes in how its Contracting Officer Representative and Contracting Officer responsibilities monitor guard contractors and guards' performance. See GAO, *Homeland Security: Federal Protective Service's Contract Guard Program Requires More Oversight and Reassessment of Use of Contract Guards*, [GAO-10-341](#) (Washington, D.C.: April 2010).

want guards to perform tasks that fall outside of the guard company contracts.

Frequency of FPS oversight visits to facility. Stakeholders' views of the frequency of FPS's visits to their facilities were mixed. Several customer-participants told us FPS visits their buildings often, observing the guards, checking log books, providing training, and conducting covert inspections (see fig. 2). Some other customer-participants said they do not see FPS officials as often as they would like, with one participant characterizing visits as inconsistent. Some participants attributed the infrequent visits to staffing challenges within FPS.³¹

Figure 2: Federal Protective Service's (FPS) Oversight of Contract Guards



FPS officers review records with contract guards and discuss orders, which outline the duties and responsibilities associated with each guard post.

Source: GAO. | GAO-21-464

Past feedback obtained by FPS also noted the frequency of FPS visits or contacts. In 2018, 38 of 255 commenters who volunteered feedback on FPS's activities stated that more frequent contact with FPS personnel would assist them in protecting their facility, employees, and visitors. For example, one commenter said it would be helpful if FPS were more proactive in conducting post inspections to ensure that guards are following contractual requirements as the commenter underreports problems to preserve working relationships with the contract guards. As previously stated, FPS reported that it completed 100 percent of the required guard post visits in fiscal years 2017 through 2019.

³¹ Participants from both facility-security-level III groups commented on FPS's staffing challenges. These participants praised FPS inspectors but said that FPS does not have sufficient staff to do its job.

Group Participants Expressed Satisfaction with FPS's Recent Performance of Law Enforcement Incident Response

Participants from across all six-discussion groups expressed satisfaction with FPS's law enforcement incident response. It should be noted that in any given year, facilities may not experience an incident requiring a law enforcement incident response.³² Also, the types of incidents in which participants required FPS's incident response varied widely, from assistance getting someone to move a car parked in the wrong place to bomb or anthrax scares.

Coordination. Many participants commended FPS personnel's collaboration and coordination both within FPS, as well as with other stakeholders (i.e., tenant agencies, GSA, and other law enforcement personnel). One participant from a facility-security-level IV facility characterized FPS's communication during an incident as "flawless."

Timeliness (speed of response). Stakeholders commented on the timeliness of FPS's response. Participants generally described the timeliness of law enforcement response positively. However, several participants noted the length of time it takes FPS to arrive at their facility after being notified of an incident, describing the large area FPS covers, FPS personnel's distance from the facility, and FPS's staffing challenges as potential reasons for the response time. In 2018, 4 of the 15 commenters who volunteered feedback on FPS's law-enforcement incident response with suggestions for how FPS could better assist them expressed a preference for greater speed of response. According to FPS officials, the agency sets the same expectations for all locations, but how FPS meets those expectations may differ. For example, the officials said that as previously discussed, the agency may rely on local law enforcement to be first on scene in places where FPS personnel are farther from the facility.

³² In our review of FPS data we found that in 2017, 40 percent of buildings did not report a law enforcement incident to the MegaCenters.

Conclusions

Having the appropriate security measures and practices in place is the first line of defense for facilities. Tenant agencies and GSA rely on FPS to recommend security measures and practices as well as provide information on the potential costs of implementing those recommendations. Without sufficient details about how FPS crafted its cost estimate, tenant agencies and GSA may lack confidence in the financial obligations associated with implementation and thereby reject important security recommendations. By providing more detailed cost estimates in its Facility Security Assessment reports, FPS could better inform stakeholders and potentially increase implementation of recommended security measures, designed to increase the safety of people and property at the facilities it protects.

Recommendation for Executive Action

The Director of FPS should ensure that Facility Security Assessment reports document the assumptions and sources used to develop the cost estimate for each recommended security measure. (Recommendation 1)

Agency Comments and Our Evaluation

We provided a draft of this report to DHS for review and comment. In its response, reproduced in appendix II, DHS concurred with our recommendation but also stated that it had no reason to believe that further clarifying the cost estimates by documenting cost estimate assumptions and sources will change stakeholder responses. DHS also stated that on average, tenant agencies reject 70 percent of FPS's recommended security measures and that it does not believe that additional information would improve this rejection rate.

We share DHS's concern with tenant agencies' rejection rate of security recommendations, because FPS makes these recommendations to improve the effectiveness of protection at federal facilities. However, in our discussion groups, many stakeholder participants expressed concern with FPS's cost estimates. One participant explicitly stated that the lack of details about cost estimates causes delays and results in unimplemented recommendations.

In its response, DHS stated that “budget quality” cost estimates are not necessary to help stakeholders identify security requirements. Our recommendation does not ask FPS to develop budget quality cost estimates, but rather to include information in the Facility Security Assessment report on the assumptions and sources used to create each security measure’s cost estimate, regardless of the type of cost estimates FPS provides.

DHS said it would review and update, as appropriate, templates used by FPS to include statements about the accuracy of the cost estimates and the limited expertise and market research used in developing the cost estimates. While these broad statements may be helpful to stakeholders by providing context at a high level, we do not believe that the addition of such statements would fully implement our recommendation. The aim of our recommendation is to ensure that the assumptions and sources used to develop the cost estimates are documented for each recommended security measure. Having this information can help stakeholders consider, and accept or reject, each recommendation individually.

We continue to believe that by documenting crucial information about how FPS developed the individual cost estimates for each security measure recommended in its Facility Security Assessment reports, FPS will better inform stakeholders that are evaluating the use of limited resources, and may help increase implementation of FPS’s recommended security measures.

DHS also provided technical comments on our report, which we have incorporated as appropriate.

We are sending copies of this report to the appropriate congressional committees and the Secretary of the Department of Homeland Security. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff have any questions about this report please contact Catina B. Latham at (202) 512-2834 or lathamC@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 key contributions to this report are listed in appendix III.

Sincerely yours,

Letter

A handwritten signature in black ink that reads "Catina B. Latham". The signature is written in a cursive style with a large, looped initial "C".

Catina B. Latham
Acting Director, Physical Infrastructure

Appendix I: Objectives, Scope, and Methodology

To provide stakeholders' perspectives on FPS's performance of key activities, we obtained and analyzed views from three different sources: (1) GAO-led discussion groups of GSA building managers and tenant agency representatives; (2) GSA's tenant satisfaction survey; and (3) FPS's Voice of the Customer feedback instrument. The three sources do not constitute a representative sample of GSA building managers or FPS customers; however, the perspectives from these three sources collectively provide insight into stakeholders' perspectives on how FPS is performing key activities. The scope of the report was FPS's key activities, which we determined based on FPS data were: (1) conducting facility security assessments, (2) overseeing of contract guards, and (3) responding to law enforcement incidents.

GAO-Led Discussion Groups

We conducted six non-generalizable discussions via Skype in July and August 2020. During these discussion groups, we spoke with 21 tenant agency representatives and 19 GSA building managers about their perspectives on FPS's performance of the three key activities. Each participant was associated with one of 27 selected buildings under FPS protection. To select the 27 buildings, we took a random selection from buildings that:

- had at least one guard post in fiscal year 2018, to increase the likelihood that participants would be able to speak about contract guard oversight, and
- had at least 12 service calls and incident responses in fiscal year 2018, to increase the likelihood that participants would be able to provide a perspective on FPS's response to law enforcement incidents.

We did not include buildings from Facility Security Levels (FSL) I or V in our random selection process due to the limited number of buildings in

those security levels that met the other selection criteria.¹ The FSLs represented in the discussion groups were II, III, and IV.

We identified participants by asking FPS to provide the name and contact information for the Facility Security Committee (FSC) Chair for each selected building, and for GSA to provide the name and contact information of the GSA building manager. We permitted the FSC Chairs to designate different, knowledgeable individuals to participate in their stead if they so desired. Each of these six discussion groups consisted of participants in the same role (i.e., tenant agency representative or GSA building manager) and from buildings with the same security level. Thus, the groups were as follows:

1. Tenant agency representatives from FSL II buildings
2. Tenant agency representatives from FSL III buildings
3. Tenant agency representatives from FSL IV buildings
4. GSA building managers from FSL II buildings
5. GSA building managers from FSL III buildings
6. GSA building managers from FSL IV buildings

Throughout this report when describing the views of the six groups and individual participants, we use terms “some” to represent 2 to 5, “several” to represent 6 to 10, and “many” to represent 11 or more participants. These responses are not generalizable to tenant agency representatives or GSA building managers as a whole.

GSA Tenant Satisfaction Survey

We analyzed customers’ responses from fiscal years 2017 through 2019 to the two questions in GSA’s annual tenant satisfaction survey that related to contract guard oversight and facility security assessments.² We selected these years to focus on recent customer experiences, and 2019 was the most recent year available at the time of our analysis. We

¹ The International Security Committee (ISC) defines facility security levels on a scale from level I (lowest risk) to level V (highly sensitive facilities with significant risk of harm). The levels are based on factors such as mission criticality and facility population.

² The two pertinent questions on the GSA tenant satisfaction survey were: (1) How satisfied are you with the security presence and measures in your building and (2) How satisfied are you with the professionalism of the Federal Protective Service officers and security personnel? According to GSA officials, each year GSA surveys all federal tenants with a few exceptions (such as those in Department of Defense buildings.)

selected 2017 and 2018 as well to provide additional context. GSA’s survey includes responses from customers in both agency-owned and GSA-owned or GSA-leased buildings. To ensure that we only analyzed responses from customers at facilities that FPS protects, we used FPS data to exclude survey responses from customers at buildings without an FPS facility number. See table 1 for the total number of respondents included in our analysis. In addition, we used FPS data to match customers’ survey responses to each building’s facility security level. We evaluated the responses by security level and by region. We used this information to provide insight into customer perspectives. Given how we used the information, we did not attempt to determine if these responses were representative of the entire subset of responses to GSA’s survey.

Table 1: Number of Respondents to the Tenant Satisfaction Survey Administered by the General Services Administration (GSA), by Year, from Facilities That the Federal Protective Service (FPS) Protects

Survey question	2017	2018	2019
Question 1: How satisfied are you with the security presence and measures in your building?	131,485	113,528	105,723
Question 2: How satisfied are you with the professionalism of the Federal Protective Service officers and security personnel?	118,752	102,808	95,724

Source: GAO analysis of GSA data | GAO-21-464

FPS’s *Voice of the Customer* Feedback Instrument

We analyzed responses from FPS’s *Voice of the Customer* feedback instrument in fiscal years 2017 through 2019. We selected this 3-year period to obtain information on recent experiences (2019 was the most recently available year at the time of our analysis).

The feedback instrument is FPS’s *Voice of the Customer* “survey,” which FPS uses to solicit feedback on its performance from FSC Chairs and designated officials. We analyzed the feedback from commenters who affirmed on the instrument that they were the FSC chairperson or designated official for their facility (we did not consider responses from commenters who left this question blank or answered “no.”). However, the *Voice of the Customer* survey does not ask the same questions from year to year, as FPS chooses to solicit feedback on differing topic areas. Moreover, according to FPS officials the response rate for the survey never exceeded 21 percent in any of the 3 years we reviewed. As a result, GAO refers to *Voice of the Customer* as a feedback instrument to distinguish it from a generalizable survey. We reviewed feedback from 1,638 commenters in 2017, 1,059 commenters in 2018, and 699

commenters in 2019, although each commenter did not necessarily answer every question.

We analyzed these commenters' closed-ended responses to those questions that sought tenants' perspectives on the three selected key activities (conducting facility security assessments, overseeing contract guards, or responding to law enforcement incidents). In addition, across all 3 years the feedback instrument provided 32 opportunities for commenters to volunteer open-ended responses on the three selected key activities. We conducted a content analysis of the open-ended responses to the 2 prompts most related to the three key activities under review—one from the 2018 survey and one from the 2019 survey. In 2018, 437 people responded to FPS's open-ended response on how FPS could better assist them—255 people volunteered suggestions for improvement while 182 wrote that they had no complaints or that the question was not applicable. In 2019, 387 people responded to FPS's question as to why they did not implement all of the recommendations from their last security assessment report. Of those, 179 people selected the closed-ended option that tenants lack funding to purchase the countermeasures and an additional 9 wrote in open-ended responses that funding was a significant factor. One analyst reviewed all of the open-ended responses and identified recurring themes. Using the identified themes, the analyst then developed categories for coding the responses and independently coded the responses for each question. To ensure accuracy, a second GAO analyst reviewed the first analyst's coding of the responses, and then the two analysts reconciled any discrepancies.

Additional Analysis

After analyzing the perspectives from these three sources, we interviewed officials from GSA and FPS to discuss concerns expressed during the discussion groups. For example, we asked GSA officials if they were satisfied with their building managers' current options for receiving the Facility Security Assessment reports. We also reviewed agency documents and analyzed the most recent Facility Security Assessment report from each of the 27 buildings that our discussion group participants represented. Specifically, we compared cost estimation documentation from the 27 selected buildings' FPS security assessment reports to applicable best practices laid out in GAO's *Cost Estimating and Assessment Guide*, which states that the ground rules, assumptions, and

rationale to support the cost estimate should be documented.³ We also determined that the control activities and risk assessment components of internal control were significant to this review. Accordingly, we considered the underlying principles that management: (1) should clearly define objectives to enable the identification of risks; (2) define risk tolerances; (3) respond to risks related to the defined objectives; (4) design control activities to achieve its objectives; and (5) respond to risks by implementing policies.

We conducted this performance audit from November 2019 to June 2021 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

³ GAO, *Cost Estimating and Assessment Guide: Best Practices for Developing and Managing Program Costs*, [GAO-20-195G](#) (Washington, D.C.: March 2020). GAO designed the *Cost Guide* to be used by federal agencies to assist them in developing reliable cost estimates and also as an evaluation tool for existing cost estimates. To develop the *Cost Guide*, GAO's cost experts assessed measures applied by cost-estimating organizations throughout the federal government and industry and considered best practices for the development of reliable cost estimates.

Appendix II: Comments from the Department of Homeland Security

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



May 19, 2021

Catina B. Latham
Acting Director, Physical Infrastructure
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Re: Management Response to Draft Report GAO-21-464, "FEDERAL PROTECTIVE SERVICE: Better Documented Cost Estimates Could Help Stakeholders Make Security Decisions"

Dear Ms. Latham:

Thank you for the opportunity to comment on this draft report. The U.S. Department of Homeland Security (DHS or the Department) 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 stakeholder satisfaction with the Federal Protective Services' (FPS) performance of key activities such as Facility Security Assessments (FSAs), contract guard oversight, and response to law enforcement incidents at federal facilities. DHS remains committed to FPS' mission to prevent, protect, respond to and recover from terrorism, criminal acts, and other hazards threatening the U.S. Government's workforce, critical infrastructure, services, and the people who provide or receive them.

The draft report contained one recommendation with which the Department concurs. Attached find our detailed response to the recommendation. DHS previously submitted technical comments under a separate cover for GAO's consideration.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Sincerely,

JIM H CRUMPACKER
Digitally signed by JIM H
CRUMPACKER
Date: 2021.05.19 07:16:04 -0400
JIM H. CRUMPACKER, CIA, CFE
Director
Departmental GAO-OIG Liaison Office

Attachment

**Attachment: Management Response to Recommendation
Contained in GAO-21-464**

GAO recommended that the Director of FPS:

Recommendation 1: Ensure that facility security assessment reports document the assumptions and sources used to develop the cost estimate for each recommended security measure.

Response: Concur. However, it is important to note that the Department believes this recommendation is not conducive to helping Facility Security Committees and others make better security decisions, especially when stakeholders on average reject 70 percent of FPS' recommended security measures. There is no reason to believe that further clarifying the cost estimates, which are of a Rough Order of Magnitude (ROM), for security measures recommended in FSAs, or otherwise documenting estimate assumptions, will change stakeholder responses. Moreover, as FSAs are intended to help stakeholders identify security requirements, rather than define them, the accuracy of the cost estimates contained within FSAs is restricted to a ROM as budget-quality cost estimates are not needed for the intended purpose.

FPS Operations (OPs) will review and update, as appropriate, templates used by FPS personnel to develop FSAs to indicate that the:

1. Costs identified in association with the FSA's recommended security measures are ROM estimates that align with the Project Management Body of Knowledge accuracy range for a ROM estimate (i.e., -25 percent to +75 percent); and
2. Cost estimate was developed with minimal subject matter expertise in the cost estimating of the specific discipline, and was based on minimal market research and/or design engineering specific to the proposed recommendation.

Once developed, reviewed, and cleared by appropriate FPS leadership, FPS OPs will promulgate these FSA template updates to regional personnel to ensure full implementation across the agency.

Estimated Completion Date: April 29, 2022.

Agency Comment Letter

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

Page 1

May 19, 2021

Catina B. Latham
Acting Director, Physical Infrastructure
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

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

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Page 2

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Estimated Completion Date: April 29, 2022.

Appendix III: GAO Contact and Staff Acknowledgments

GAO Contact

Catina B. Latham at (202) 512-2834, or lathamC@gao.gov.

Staff Acknowledgments

In addition to the contacts named above, Maria Edelstein (Assistant Director); Jaclyn Mullen (Analyst-in-Charge); Alison Snyder (Analyst-in-Charge); Melissa Bodeau; Brian Bothwell; Geoffrey Hamilton; Terrence Lam; Grant Mallie; Kelly Rubin; James Russell; and Elizabeth Wood made key contributions to this report.

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