FEDERAL REAL PROPERTY

GSA Should Improve Accuracy, Completeness, and Usefulness of Public Data
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What GAO Found

The General Services Administration (GSA) has worked in recent years to improve reliability of the Federal Real Property Profile (FRPP), which tracks federal real property assets. However, numerous errors in the database were carried into the public version. GSA extracted data from the FRPP’s 398,000 civilian federal assets to create a public database to be used, for example, by researchers and real estate developers. However, GSA’s data verification process did not address key errors. GAO found that 67 percent of the street addresses in the public database were incomplete or incorrectly formatted. For example, the database lists “Greenbelt Road” as the address for over 200 buildings at NASA’s Goddard Space Flight Center, but the road stretches over 6.3 miles, thereby reducing a user’s ability to locate specific buildings.

Challenges Mapping Incomplete “Greenbelt Road” Street Address

The public database is not complete because GSA and selected agencies decided not to provide certain useful information. Specifically, GSA withheld assets’ information without consulting those agencies managing the assets and allowed agencies to withhold information that is already publicly available. For example, GSA withheld the name “Goddard Space Flight Center” from the public database, but NASA’s website lists this name and the Center’s location. Unnecessarily withholding information limits the database’s utility and undermines analysis.

The public database’s usefulness is further limited by how GSA presents the information. Because the database does not identify if an asset is part of a secure installation, the public does not know if assets, such as the unnamed buildings at Goddard, are accessible to the public. Unless GSA improves the public database’s accuracy, completeness, and usefulness, its benefits may not be realized.
Figure 2: Incomplete “Greenbelt Road” Street Address Provides the Public with Inaccurate Locations for Buildings at the National Aeronautics and Space Administration’s (NASA) Goddard Space Flight Center

Figure 3: Examples of Data Identified as Anomalous but Validated as Correct by the Department of Energy

Figure 4: Examples of Federal Assets Identified as Anomalous by the General Services Administration’s Validation and Verification Process and Incorrectly Validated

Figure 5: Validation and Verification (V&V) Results for All Agencies as of October 2019

Figure 6: Steps for a User to find National Aeronautics and Space Administration’s (NASA) Goddard Space Flight Center’s Buildings in the Public Database

Figure 7: National Aeronautics and Space Administration’s (NASA) Goddard Space Flight Center Buildings: Current Reporting as Individual Assets Compared to Reporting as a Campus

Figure 8: Frequency of Accessing the General Services Administration’s (GSA) Inventory of Owned and Leased Property Database and Public Real Property Database from December 2017 through July 2019
abbreviations

DHS  Department of Homeland Security
DOD  Department of Defense
DOE  Department of Energy
DOI  Department of Interior
FASTA  Federal Assets Sale and Transfer Act of 2016
FCC  Federal Communications Commission
FRPP  Federal Real Property Profile
GIS  geographic information system
GSA  General Services Administration
ICE  Immigration and Customs Enforcement
ISC  Interagency Security Committee
NASA  National Aeronautics and Space Administration
NPS  National Park Service
OGP  Office of Government-wide Policy
OMB  Office of Management and Budget
PBS  Public Buildings Service
V&V  validation and verification (process)

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February 6, 2020

The Honorable Peter A. DeFazio  
Chairman  
The Honorable Sam Graves  
Ranking Member  
Committee on Transportation and Infrastructure,  
House of Representatives  

The General Services Administration (GSA) reported that in fiscal year 2018 civilian federal agencies spent billions of dollars to operate about 398,000 civilian real property assets (buildings, structures, and land) across every state, including nearly 127,000 buildings covering 1.1-billion square feet. GSA tracks the federal government’s real property assets using a government wide database known as the Federal Real Property Profile (FRPP) Management System, which contains data submitted annually by agencies. We have previously reported on problems with the reliability of the data in the FRPP, and it is one of the main reasons that managing federal real property remains on our high-risk list. The FRPP itself is not available to the public but does not contain any classified national security information. The lack of publicly available data and data quality issues have posed problems for people wanting to use the federal real property data for various purposes, such as leasing or purchasing space that the federal government no longer needs.

The Federal Assets Sale and Transfer Act of 2016 (FASTA) directed GSA to release to the public a single, comprehensive, descriptive database of federal real property. In April 2018, the then-chair of the House Subcommittee on Economic Development, Public Buildings, and Emergency Management stated that a key goal for making the data public was to provide transparency and help hold federal agencies accountable for reporting accurate information. In response to this act, GSA created and released a publicly available version of the FRPP in December 2017.

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1High-risk issues with managing federal real property include: costly leasing; data reliability; excess and underused property; and physical security. We have stated that among other things, OMB and GSA should continue working with federal agencies to improve the reliability of their real property data. See GAO, High-Risk Series: Substantial Efforts Needed to Achieve Greater Progress on High Risk Areas, GAO-19-157SP (Washington, D.C.: March 6, 2019).

You asked that we review GSA’s new public real property database. This report examines:

- GSA’s efforts to improve the reliability of FRPP data and the public database;
- the completeness of the public database; and
- how the data are presented in the public database.

For all objectives, we reviewed applicable laws and the White House’s and the Office of Management and Budget’s (OMB) directives. Additionally, we reviewed GSA guidance to agencies on FRPP data submissions for fiscal years 2016 through 2019. Further, we reviewed prior GAO reports on federal real property. We downloaded and analyzed data in the public database for fiscal years 2017 and 2018 (the most recent data available since FASTA was enacted) and obtained GSA’s original FRPP data on civilian properties for this time period. To determine the reliability of this data, we evaluated the FRPP and public data to identify what agency data were missing per GSA’s annual guidance to agencies. We found the data sufficiently reliable for the purpose of our reporting objectives.

We interviewed GSA officials, as well as a non-generalizable selection of officials from six selected agencies that are required to submit data to the FRPP: the Department of Homeland Security (DHS); Department of Energy (DOE); the Department of Interior (DOI); the Federal Communications Commission (FCC); the National Aeronautics and Space Administration (NASA); and GSA’s office that submits its own FRPP data. We selected these agencies because they were located in areas with enough questionable FRPP data as identified by GSA to analyze. We also interviewed a non-generalizable sample of 14 stakeholders from groups likely to use the public database, identified by their frequent interaction with federal real property issues, among other

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4FASTA allows the exclusion from reporting federal real property for reasons of (1) national security and (2) those exempt from disclosure pursuant to section 552(b) of title 5, United States Code. Pub. L. No. 114-287, § 21(a), (e) (2016).
things, and included real estate brokers, lessors, and developers.\textsuperscript{5}
Specifically, we identified groups to contact from the list of participants at
a congressional roundtable discussion on the uses of the public
database\textsuperscript{6} and by asking officials at GSA and private-sector professionals
who specialize in federal real estate through a snowball-sampling
technique. We then used that list of potential users and search terms
related to real property data to conduct a web search for other groups that
indicated they used federal real property data and confirmed their use of
real property data.

To assess GSA’s efforts to improve the reliability of FRPP data and the
public database, we analyzed data from fiscal years 2017 and 2018 from
GSA’s Validation and Verification effort, which GSA implemented to
improve the quality of FRPP. We determined how the results of this effort
carried over to the public data. We also tested the location information in
the fiscal year 2018 public data to determine the extent to which this
information was consistent with guidance for reporting inventory GSA
provided to agencies and whether the location information was user-
friendly. Specifically, we determined if the data were machine-readable
(directly usable by a computer) and could be displayed in a map using
commercial off-the-shelf, geographic-information system (GIS) software.\textsuperscript{7}
We used the data to select and visit a non-generalizable sample of
properties from the six agencies mentioned above that were located in
proximity to our headquarters and Chicago, Illinois, field offices. We also
selected agency properties in the Los Alamos and Sandia, New Mexico,
areas because they had enough questionable data in those locations to
provide a basis for analysis. We determined if the properties’
characteristics matched reported data and assessed the extent to which
these properties are accessed by the public, through direct observation or
review of agency photographs.

\textsuperscript{5}The 14 stakeholders we interviewed were Bismarck Realty, Carpenter Robbins, Colliers
International, Equus Capital Partners, Federal Real Property Association, Holland and
Knight, Jones Lang, Lasalle, PublicAssets, Public Properties LLC, Reis, RSM US LLP,
Savillis Studley, Seven Properties, and Tower Properties.

\textsuperscript{6}Committee on Transportation and Infrastructure, U. S. House of Representatives,
\textit{Roundtable Policy Discussion on “Saving Taxpayer Dollars and the Federal Real Property
Database”} (Washington, D. C., Apr. 11, 2018).

\textsuperscript{7}A Geographic Information System (GIS) is a computer system that analyzes and displays
geographically referenced information. It uses data that is attached to a unique location,
identified by longitude and latitude, referred to hereafter as “geo-coordinates.”
To assess the completeness of the public database, we reviewed GSA instructions to agencies and a memorandum from DHS’s Interagency Security Committee (ISC) recommending processes and criteria for agencies to follow when determining what, if any, information to withhold from the public database.\(^8\) We also reviewed selected agencies’ guidance and processes, if any, for identifying assets to withhold from the public database. We compared the FRPP to the public database to identify data withheld from the public database for fiscal years 2017 through 2018 to assess how this withholding affected the completeness and usefulness of the database and to analyze trends and consistency in selected agencies’ withholding decisions. We also interviewed GSA, DHS-ISC, and selected agency officials on internal processes for identifying what types of data categories and specific assets they withheld from the public database.

To assess factors that affect the usefulness of the public database, we reviewed GSA’s instructions on presenting data, specifically with regard to how to report individual assets on secure installations that are not open to the public. We analyzed the public database and FRPP database to determine how agencies report assets on secure installations and how this reporting affects the usefulness of the database. We also observed secure federal installations in the Washington, D.C., area and in New Mexico, to assess how the presentation of these assets in the public database affects the usefulness of the data. These sites were among those selected to assess GSA’s efforts to improve the reliability of the database, as described above. We interviewed GSA officials to determine how they communicate the availability of the public database. We also assessed GSA’s website to determine how it communicates the availability of the public database as well as three other real-property databases as they related to the relevant provision of the Open Government Data Act.\(^9\) We analyzed GSA data on the frequency with which the public accessed the public database from December 2017 through July 2019. We also interviewed selected agency officials to determine their views on GSA’s organization of the database, such as reporting by individual assets rather than installations. Lastly, we

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\(^8\)The Interagency Security Committee (ISC) develops physical security policies and standards, promotes key management practices, and facilitates mitigation of threats to employees and the visiting public and is chaired by the DHS Assistant Director of the Infrastructure Security Division within the Cybersecurity and Infrastructure Security Agency. Members include chief security officers and other senior executives from 60 federal agencies and departments.

interviewed the 14 third party stakeholders identified earlier to determine their familiarity with the database and its usefulness to their work.

We conducted this performance audit from September 2018 to February 2020 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.

Two GSA offices have roles in managing data related to federal real property. The Public Buildings Service (PBS) acts as a landlord for the federal government by acquiring new space for government agencies and tracking data on the property it acquires. PBS manages and publishes three databases that provide information to public stakeholders and researchers on federally owned and leased properties, and on properties eligible for disposal. Another office, the Office of Government-wide Policy (OGP), collects, manages, and reports on all federal real-property data through the FRPP database. OGP has managed the FRPP since its inception in fiscal year 2005 by collecting data from federal agencies on their real property assets.10 OGP is also responsible for compiling and managing the public database required by FASTA.

FRPP is the most comprehensive database of federal real property holdings, containing details for about 398,000 assets (buildings, structures, and land). It is not public, but it also does not contain any classified national security information. FRPP data show the range of agency assets, including single buildings in a given location or multiple buildings located on installations, like a national park or research center. The FRPP identifies whether buildings are on installations, but does not identify whether buildings are public-facing or secure (and thus inaccessible by the public).

10Before FASTA was enacted, GSA was directed to establish a single, comprehensive, and descriptive database, which resulted in the FRPP. Exec. Order No. 13327, 69 Fed. Reg. 5897 (Feb. 6, 2004).
We have repeatedly identified reliability issues with the FRPP, and GSA has taken actions to improve the reliability of FRPP data. Specifically, in 2016, GSA established its validation and verification (V&V) process. After agencies submit their data annually to FRPP, GSA identifies questionable entries (called anomalies) from 20 separate categories. Through these categories, GSA flags assets that are very small in size, changed from the previous year, or have unusual financial statistics, among other things. GSA then provides an annual list of anomalies to the agencies that entered the data. Agencies have 10 months to research each anomaly and correct errors or validate that the data are correct. GSA has provided instructions to agencies on how to respond to the V&V process. GSA also requires agencies to certify accuracy of the data and established database rules that require agencies to submit complete information on assets. GSA officials said that it must ultimately rely on agencies to submit correct data.

FASTA required GSA to publish a single, comprehensive, descriptive database of all federal real property by December 16, 2017, while allowing it to exclude assets for reasons of national security, such as those that are secure installations. FASTA also required the database to be made public to the extent its release is consistent with national security and procurement laws. GSA officials said that GSA used the FRPP as the basis for developing the database it released to the public at the end of 2017. GSA presents the data in two ways: as a downloadable spreadsheet or in a searchable mapping application.


12GSA-OGP creates database rules for the FRPP Management System, the software system agencies use to submit FRPP data. The database rules establish what values the system will accept for each data category. For example, the database rules will not allow an agency to submit a blank value for a required data category, such as the asset type (building, land, or structure).


14For example, cost information could be withheld so they don’t affect procurement of assets.

15Although the public database is a subset of the FRPP, they are two separate, distinct databases.
FASTA requires that the public database be machine-readable and permit searching or sorting of data to the extent practicable.\footnote{Pub. L. No. 114-287, § 21. The term ‘machine-readable,’ when used with respect to data, means data in a format that can be easily processed by a computer without human intervention while ensuring no semantic meaning is lost. See 44 U.S.C. § 3502(18).} Further, GSA guidance also calls for agencies to provide accurate and complete data. Specifically, GSA requires agencies to include either a complete street address or geo-coordinates for all 398,000 assets in the FRPP; for example, GSA’s FRPP data dictionary establishes the format agencies are to use when inputting asset addresses—number, street, city, zip code. This requirement carries over to the 305,000 assets included in the public database.\footnote{GSA guidance pertaining to annual FRPP data submittal also applies to the public database.}

We found that almost 214,000 of the assets in the public database included some street address information, but most of the addresses were incomplete or incorrectly formatted. Specifically, only approximately 70,000 (33 percent) fully met the standards. Since another 91,000 assets did not include a street address, a computer would only be able to locate about 23 percent of the 305,000 civilian federal assets using street addresses in the public database (See fig. 1.) GSA officials who manage the FRPP said that they were aware that many street addresses were not readable and have asked agency officials to review the accuracy of address information and correct it in future submissions. They acknowledged, however, that their efforts were not fully successful. As discussed later, GSA is currently taking steps to ensure that agencies provide more complete geo-coordinates when they submit data to the FRPP.

Most Street Addresses in Public Data Are Incomplete or Otherwise Unusable
Agencies are not required to include street addresses for all locations. Agencies can submit street addresses, geo coordinates, or both.

For the remaining 67 percent of the assets (144,000) with some street address information that did not fully meet the standards, we found two types of problems—incomplete addresses and addresses that were not formatted correctly. First, more than 28,000 assets had street addresses that were incomplete. For example, instead of having individual address listings, we found that all 215 buildings at the Goddard Space Flight Center had a single listing of “Greenbelt Road.” This road actually stretches over 6 miles and many other buildings are located along the road. The front gate’s complete address is “8800 Greenbelt Road.” In these instances, GSA officials said that its public-mapping program selects the mid-point of the street, which in this case is over a mile from the public entrance to the installation. (See fig. 2.) As a result, someone using the database would not be able to determine exactly where Goddard is.
Second, we found about 115,000 assets had street address information that was incorrectly formatted based on FRPP instructions. While we did not conduct a complete analysis of all these assets, we found examples of some of the address issues, such as:

- Extra descriptive information about the property in the address field. For example, “N220 AG Science Bldg North U of Kentucky” and “Beltsville AG Research Center, 10300 Baltimore Avenue.” The data in the address field for these two assets—which belong to the Department of Agriculture—could not be directly read by a computer or displayed on a map.

- Unrecognizable text. For example, “2881 F;B Road” and “1-15, Exit 172, 1 Mile East.” The data for these assets, which belong to the Department of Agriculture, could not be directly read by a computer or displayed on a map.

GSA officials said that users may be able to interpret the individual asset addresses in the database but that GSA’s automated computer system could not map unreadable addresses. Similarly, a private-sector user who tried to use the public data to map federal facilities for clients said that he was unable to map many of the assets because addresses were not readable by his computer. As a result, he said that he excluded incomplete or unreadable addresses from the database he created. He noted that incomplete data would reduce clients’ interest.
We also found problems with assets for which agencies provided geo-coordinates (latitude and longitude). Specifically, GSA guidance states that geo-coordinates must include a minimum of four decimal places. Of the 305,000 assets included in the public database, almost 220,000 included geo-coordinates but more than half—about 141,000—did not meet FRPP standards because they were not precise enough to map the location of the assets. GSA officials noted agencies are required to enter some type of information in the field for address or geo-coordinates, but an “open data” format did not prevent agencies from reporting information that was not strictly a street and address number. Consequently, some agencies may have entered incorrect values for the geo-coordinates just to complete the field. Our analysis supports this view; few (550 of about 131,000) of the assets with both sufficiently detailed geo-coordinates and street addresses pointed to the same location. In addition to the open data issue described above, officials also explained that GSA did not have a “business validation rule” in place that prevented agencies from inputting coordinates with less than four decimal places.

GSA has taken a number of actions to correct the issues with geo-coordinates that they say should help address this problem for the next release of the public data in 2020. For example, GSA added V&V anomaly categories for fiscal year 2018 data that identified GPS coordinates pointing to unlikely locations, such as a location in the water, which identified about 80,000 potential anomalies. Agencies are currently checking these. Additionally, GSA added a feature to the fiscal year 2019 FRPP submission form that will force agencies to provide geo-coordinates that are detailed enough for their data to be accepted. GSA officials said that they would consider taking additional steps once they have analyzed the results of the GPS coordinate anomaly categories.

GSA has asked agencies to review addresses for accuracy, and officials indicated that they have discussed plans to improve this data. However,

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18GSA’s requirement that geo-coordinates be a minimum of four decimal places allows precision to plus or minus 11.1 meters.

19GSA’s guidance states that street addresses must be in a “geo-codable” format (i.e., an address that can be mapped by Geographic Information System (GIS) software or used by an overnight delivery service to deliver packages). An example of a geo-codable address is “123 Main Street.” Further, the street address data can contain any combination of letters and numerals up to 100 characters total, which is also called an “open-data” format.
GSA has not taken specific steps to work with agencies to ensure they input correct street addresses in the public database in light of the “open data” format. The lack of correct street addresses can affect users who may be interested in acquiring or leasing assets or who may be interested in installing telecommunications devices on an asset,\(^\text{20}\) from knowing exactly where those assets are located. As a result, until the street address information is complete and correctly formatted, the public may unknowingly pursue assets that are not available or suited to their needs.

We found that while GSA has identified close to 30,000 potential errors in the FRPP database over the first 2 years of the V&V process, agencies confirmed only 5 percent as errors (1,291 of 28,572). Agencies validated the remaining 27,281 anomalies as correct or left them unresolved.\(^\text{21}\) The low number of errors being identified indicates that GSA’s V&V process is not efficiently identifying errors in the data, either in terms of the anomaly categories themselves or the thresholds at which GSA flags data as an anomaly. This situation could ultimately mean that agencies are spending time researching correct information that was flagged as potentially erroneous or not fully actually researching anomalies and allowing mistakes to remain uncorrected.

Agencies identified no anomalies as errors for five of GSA’s 16 anomaly categories in 2017, raising questions about the anomaly categories GSA has identified. OMB guidance suggests that agencies only do extra tasks that are justified by their cost.\(^\text{22}\) GSA officials who manage the V&V process said that the high number of anomaly categories for which agencies found no errors could reflect that the anomaly categories are flagging correct data as anomalies or that agencies are validating data as correct without actively checking it.

We found examples of both. For example, we examined a selected sample of 14 V&V data anomalies at DOE sites in New Mexico. GSA

\(^{20}\)The MOBILE NOW Act amended FASTA to require the federal real property database to include information on the ability of the asset to support private telecommunications infrastructure. See Pub. L. No. 115-141, div. P. § 608(a) (2018).

\(^{21}\)As mentioned previously, GSA identified questionable entries (called anomalies) and flags assets that are very small in size, changed from the previous year, or have unusual financial statistics, among other things.

flagged the buildings for being very small—office buildings less than 400 square feet and warehouses less than 64 square feet—and found that the information in the public database was correct. Figure 3 illustrates how such information flagged as being questionable, is actually correct according to GSA’s reporting rules for agencies, which specify data categories, such as the types of buildings GSA considers to be warehouses. Specifically, GSA flagged assets at DOE’s Los Alamos and Sandia National Laboratories because their square footage fell below certain amounts. But, in reality, these assets met GSA’s criteria for offices and warehouses despite being small.

We also found instances where an agency verified information as correct that was incorrect. Figure 4 illustrates examples data validated as correct that was actually erroneous. Specifically, an agency erroneously reported water towers and antenna arrays as office buildings. Staff responsible for managing the V&V process for their agency’s assets said that they did not always consult the personnel with the best knowledge of the assets in resolving anomalies. Instead, they relied on their own judgment when determining whether to forward the anomalies to asset managers to ultimately check the data and correct any errors. This resulted in some errors going uncorrected.
Figure 4: Examples of Federal Assets Identified as Anomalous by the General Services Administration’s Validation and Verification Process and Incorrectly Validated

Thresholds—the points at which GSA flags data as anomalies—lead to a large number of data elements flagged, which can challenge the resources of affected agencies. Officials at two of our selected agencies said that the number of anomalies that the V&V process produces...
annually overwhelms their ability to validate the data. The large number of unresolved V&V anomalies appears to support this conclusion. GSA’s guidance allows agencies 10 months to validate the anomalous data, but the number of anomalies that remain unresolved after 10 months has risen sharply. Figure 5 shows that while agencies addressed all anomalies in the first year, they have since struggled to keep up. As of October 2019, 106,231 anomalies, or approximately 71 percent, remained unresolved after 10 months.

Figure 5: Validation and Verification (V&V) Results for All Agencies as of October 2019

<table>
<thead>
<tr>
<th>Fiscal year</th>
<th>All anomalies</th>
<th>Data validated</th>
<th>Unresolved</th>
<th>Errors identified</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016</td>
<td>13,210</td>
<td>12,207</td>
<td>0</td>
<td>1,003</td>
</tr>
<tr>
<td>2017</td>
<td>15,362</td>
<td>9,483</td>
<td>5,591</td>
<td>288</td>
</tr>
<tr>
<td>2018</td>
<td>120,812</td>
<td>12,564</td>
<td>100,640</td>
<td>8,266</td>
</tr>
<tr>
<td>Total</td>
<td>149,384</td>
<td>34,654</td>
<td>106,321</td>
<td>9,557</td>
</tr>
</tbody>
</table>

Source: GAO analysis of General Services Administration data. | GAO-20-135

Official who are responsible for resolving anomalies at two selected agencies said that more realistic anomaly categories or thresholds could reduce the number of anomalies and better target actual errors, an approach that could help agencies better prioritize their resources when researching anomalies. GSA staff who manage the FRPP said that they brainstormed internally and used industry standards and policy initiatives to develop anomaly categories. They also explained that they adjust thresholds within each category. However, GSA officials said they had not reviewed the anomaly categories or their thresholds to see if they consistently capture incorrect data. This approach puts the stated goals of the V&V process—which are to improve data accuracy, promote data
consistency among the agencies, and enable OMB to measure data
good processes—resulting risks.\textsuperscript{23} In the absence of better information about
the validity of categories and thresholds, the current process for V\&V is
taking up limited agency resources without efficiently correcting errors in
the data.

\textbf{GSA and Agencies Withheld Information That Reduces the
Completeness of the Public Database}

GSA and reporting agencies decided not to provide certain useful
information from the public database in two ways, thereby reducing the
data’s completeness and ultimately its utility. First, GSA withheld data
from the public database without consulting agencies about their
sensitivity. Second, selected agencies withheld information that was
already publicly available or withheld similar types of information
inconsistently within their agencies.

\textbf{GSA Withheld Data from the Public Database}

GSA chose to withhold 15 categories of data from the public database for
all agencies. FASTA authorized the withholding of information from the
public database for national security or procurement-related issues.\textsuperscript{24}

GSA officials who manage the FRPP said that GSA does not have the
security or intelligence expertise to issue guidance on national security
issues. As a result, they sought input from the ISC on what information to
withhold. ISC reviewed the security risks of FRPP data and provided
written recommendations in a memo to GSA in November 2017.

Specifically, ISC recommended that certain categories of data on assets
be withheld from the public database because of the security risk that
they could pose individually or in combination. ISC also recommended
that agencies use internal guidance on restricting the public release of
real property information and ISC’s mission criticality criteria\textsuperscript{25} to
determine any individual real property assets to withhold entirely from the
public database.

\textsuperscript{23}OMB, Management Procedures Memorandum M-2016-01: Improving Federal Real
Property Data Quality – Required Data Validation and Verification Procedures

\textsuperscript{24}Pub. L. No. 114-287, § 21(c)(2).

\textsuperscript{25}ISC’s “mission criticality criteria” are based on the relative risk involved with the
mission(s) carried out by a facility’s federal tenants. The mission criticality criteria are one
set of criteria derived from ISC guidance. For more information, see ISC, The Risk
GSA implemented ISC’s first recommendation by withholding 15 FRPP data categories for all assets from the public database without consulting the relevant agencies on this decision, considering the specific sensitivity of these categories for all assets, or assessing the effect withholding them would have on the database.\textsuperscript{26} ISC officials acknowledged that the memo that they prepared for GSA could have been clearer as to ISC’s intent that departments and agencies should consider the recommendations in making a final determination. According to ISC officials, they believed that implementation would involve GSA communicating these recommendations and leaving decisions on what to withhold to officials within individual departments and agencies who control real property assets.

Specifically, the following five categories of data were among the 15 withheld by GSA:

- property’s/installation’s name,
- replacement value of an asset,
- annual operating and maintenance costs for owned assets,
- annual-operating and maintenance costs for leased assets, and
- breakdown of annual operating and maintenance costs (e.g., utilities costs, janitorial costs, sewage costs, etc.).

Because GSA did not consult with agencies on this decision, the agencies did not have an opportunity to consider whether or not the 15 data categories GSA withheld included information that is sensitive or already publicly available. As a result, the public database is incomplete in ways that adversely affect users and limits agencies’ public accountability for reporting accurate information. For example, identifying assets in the public database is difficult without the property's name—one of the data categories GSA withheld—especially given the insufficient location data in the database discussed earlier. Returning to the incomplete address example discussed earlier (NASA Goddard Space Flight Center), the public data also do not include the property’s name, “Goddard Space Flight Center,” leaving users with limited information to identify the buildings. As a result, someone using the public database cannot identify assets on NASA’s Goddard Space Flight Center campus without using outside sources for additional information. (See table 1.)

\textsuperscript{26}See Appendix I for a list of the 15 withheld data categories.
### Table 1: Example of Information Included and Not Included in the Public Data for a National Aeronautics and Space Administration (NASA) Building

<table>
<thead>
<tr>
<th>Information</th>
<th>Included in Public Database</th>
<th>Not Included in Public Database</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agency</td>
<td>NASA</td>
<td></td>
</tr>
<tr>
<td>Street Address</td>
<td>Greenbelt Road, Greenbelt, MD 20771</td>
<td></td>
</tr>
<tr>
<td>Real Property Type</td>
<td>Building</td>
<td></td>
</tr>
<tr>
<td>Real Property Use</td>
<td>Warehouse</td>
<td></td>
</tr>
<tr>
<td>Square Feet</td>
<td>8</td>
<td></td>
</tr>
<tr>
<td>Legal Interest</td>
<td>Owned</td>
<td></td>
</tr>
<tr>
<td>Status</td>
<td>Current Mission Need</td>
<td></td>
</tr>
<tr>
<td>Utilization</td>
<td>Utilized</td>
<td></td>
</tr>
<tr>
<td>Year of Asset Construction</td>
<td>2015</td>
<td></td>
</tr>
<tr>
<td>Installation Name</td>
<td>Goddard Space Flight Center</td>
<td></td>
</tr>
<tr>
<td>On Secure Installation Not Open to Public</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Number of Buildings at Same Installation</td>
<td>215</td>
<td></td>
</tr>
<tr>
<td>Operating and Maintenance Costs (actual dollars)</td>
<td>$87</td>
<td></td>
</tr>
<tr>
<td>Replacement Value (actual dollars)</td>
<td>$4,019</td>
<td></td>
</tr>
<tr>
<td>Location of front gate</td>
<td>8800 Greenbelt Road</td>
<td></td>
</tr>
</tbody>
</table>

Source: GAO analysis of General Services Administration data. | GAO-20-135

Note: This table shows a selection of data categories included and not in the Public Database. A list of all categories withheld from the public database is in appendix I.

As discussed in the next section, we found that some of the information from these 15 excluded data categories, such as property names, is often already in the public sphere. For example, “Goddard Space Flight Center” and its address are clearly disclosed on NASA’s public website, but GSA withheld the name for 215 NASA buildings at this address, including Goddard’s public visitors’ center. Using the public database alone, a member of the public would need to go through numerous steps to determine if assets are part of Goddard Space Flight Center and still have no way of being sure. (See fig. 6.)
Moreover, third-party, private sector stakeholders we spoke with such as brokers, lessors, consultants, and a non-profit organization that work in federal real-property markets, noted that some of the data categories GSA withheld would be among the most useful to their work. For example, 10 of 14 stakeholders we spoke to said that financial data, such as operating costs and annual rent, were among the most useful FRPP data categories to their analyses of real property markets and business opportunities. Additionally, four stakeholders cited the property’s name as among the most important data categories for their work in analyzing federal real property.

GSA provided agencies with guidance that explained its decision to withhold the 15 categories of data across all agencies, it allowed each agency to determine if any specific assets should be withheld entirely from the public database, in accordance with ISC’s second recommendation. ISC officials told us that this was appropriate because individual departments and agencies that control real property assets should determine what information to withhold.

GSA provided agencies with guidance that explained its decision to withhold the 15 categories of data across all agencies, it allowed each agency to determine if any specific assets should be withheld entirely from the public database, in accordance with ISC’s second recommendation. ISC officials told us that this was appropriate because individual departments and agencies that control real property assets should determine what information to withhold.

Further, OMB Circular—Management of Reporting and Data Integrity Risk also instructs agencies to integrate a risk-based approach towards meeting reporting objectives,
an approach that requires “management practices that identify, assess, respond, and report on risks.” However, we found that our selected agencies did not consistently identify internal guidance to supplement GSA’s instructions within their agencies.

In September 2018, ISC recommended that GSA not withhold from the public database newly added data categories that provide information already in the public sphere. Additionally, the OPEN Government Data Act requires OMB to foster greater sharing, dissemination, and access to public information and issue guidance that, among other things, takes into account the requirement that data must be disclosed if it would otherwise be made available under a Freedom of Information Act request. For purposes of this report, we refer to this requirement as “assuming openness.”

However, GSA’s instructions to agencies lacked specifics to help agencies apply a consistent, risk-based approach in determining which, if any, assets or asset-specific information should be withheld from public release. As a result, we found that some of the selected agencies withheld asset-related information from the public database that is available on their own public websites or from other official sources. Withholding information that is already publicly available unnecessarily reduces the completeness and utility of the public database that FASTA indicated should be comprehensive. For example:

- DHS’s Immigration and Customs Enforcement (ICE) withheld buildings at five of its publicly-accessible service-processing centers that are shown on a detention facility locator mapping system on its own website. ICE officials told us that they did not consider what information is already publicly available when deciding what information to withhold from the public database.
- FCC withheld all of its real property assets. FCC’s own website and regulations, however, list the locations and functions of FCC offices.
- The U.S. Coast Guard withheld information on its public-recruiting offices and lighthouses that it advertises on its public website.

29 47 C.F.R § 0.121.
buildings and structures that were not specifically used for the purpose of aids to navigation were withheld from the public data set. As a result public users can look up information on the Coast Guard’s aids to navigation, but cannot look up some of its publicly accessible locations, such as recruiting offices and lighthouses.\textsuperscript{30}

In contrast, DOE decided to withhold none of its 20,378 assets from the public database. According to a DOE official responsible for submitting data to FRPP, DOE does not have a specific process for assessing what properties to make public. However, it is aware that much of the information in the public database is also publicly available through other sources. Table 2 shows how selected agencies took different approaches to withholding information from the public database.

<table>
<thead>
<tr>
<th>Withheld in FY 2018</th>
<th>Number of Assets Withheld</th>
<th>Total Number of Assets (overall and by agency)</th>
<th>Percent Withheld</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Overall</td>
<td>93,246</td>
<td>397,993</td>
<td>23%</td>
</tr>
<tr>
<td>By Selected Agency</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Department of Homeland Security</td>
<td>23,611</td>
<td>52,192</td>
<td>45%</td>
</tr>
<tr>
<td>National Aeronautics and Space Administration</td>
<td>3,696</td>
<td>5,370</td>
<td>69%</td>
</tr>
<tr>
<td>Federal Communications Commission</td>
<td>88</td>
<td>88</td>
<td>100%</td>
</tr>
<tr>
<td>Department of the Interior</td>
<td>2,226</td>
<td>151,429</td>
<td>1%</td>
</tr>
</tbody>
</table>

Source: GAO analysis of GSA data. | GAO-20-135

Notes: We did not include our other selected agencies, the Department of Energy and General Services Administration, because they did not withhold any assets.

Under risk-based criteria assuming openness (as mentioned earlier), agencies may consider whether information made public in one instance should be withheld in another instance. However, neither ISC’s mission criticality criteria nor GSA’s instructions addressed the issue of consistency within specific agencies. Specifically, we found that selected agencies withheld

\begin{itemize}
  \item the same assets differently over time, and
  \item similar assets inconsistently.
\end{itemize}

\textsuperscript{30}U.S. Coast Guard officials said that this decision caused information on lighthouses to be released, but not information on other assets at lighthouse sites.
Table 3 shows how reporting agencies made different decisions on whether to withhold the same types of assets. At times, some agencies withheld certain asset types that ISC’s mission criticality criteria did not identify as warranting withholding, resulting in almost 7,000 assets such as parking structures and disposed assets being withheld. This led to inconsistencies as to whether these agency assets were included or not in the public database, limited transparency about these assets, and prevented users from fully analyzing federal real property assets in these categories.

### Table 3: Summary of Selected Information All Agencies Withheld from the Public Database for Fiscal Year (FY) 2018 across All Reporting Agencies

<table>
<thead>
<tr>
<th>Withheld in FY 2018</th>
<th>Number of Assets Withheld</th>
<th>Total Number of Assets in Category</th>
<th>Percent of Assets in Category Withheld</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disposed Assets removed from agency inventory</td>
<td>3,272</td>
<td>6,452</td>
<td>51%</td>
</tr>
<tr>
<td>Parking Structures</td>
<td>1,824</td>
<td>19,003</td>
<td>10%</td>
</tr>
<tr>
<td>Recreational Structures</td>
<td>1,538</td>
<td>26,392</td>
<td>6%</td>
</tr>
<tr>
<td>Monuments/memorials/museums</td>
<td>204</td>
<td>1,899</td>
<td>11%</td>
</tr>
</tbody>
</table>

Source: GAO analysis of General Services Administration (GSA) Data. | GAO-20-135

In other cases, selected agencies withheld similar assets inconsistently, did not always follow written procedures and withheld similar assets. For example:

- DOI headquarters provided its bureaus with GSA’s instructions on withholding assets, but individual bureaus applied the instructions differently. For example:
  - The Fish and Wildlife Service reports that it has 369 publicly accessible national wildlife refuges, but it withheld selected real property assets at 11 of them. However, the withheld assets are the same types as the assets the Service disclosed at other refuges. For example, it reported all but two of 447 restrooms and 10 of 2,066 recreational structures on its national wildlife refuges. The Fish and Wildlife Service told us it will re-evaluate its withholding for the fiscal year 2019 FRPP database.
  - The National Park Service (NPS) reported that it has 374 publicly accessible national parks, monuments, memorials, historic sites,

---

31Disposed assets are no longer in an agency’s inventory.
and recreation areas. NPS withheld some real property assets from 15 of those sites. For example, it reported all but 2 of 1,045 service buildings at its sites. These withheld assets are the same types as those disclosed at other sites.

- NASA withheld assets at a centralized level, but headquarters officials told us that they have not established instructions or policies for these decisions. NASA officials told us that they withhold real property assets shared with agencies working in defense and/or national-security, which led NASA to withhold 1,517 assets in fiscal year 2017. In fiscal year 2018, however, we found that NASA withheld all assets at certain field centers, causing the number to more than double from 1,517 in fiscal year 2017 to 3,696 in fiscal year 2018.

Finally, our comparison of the fiscal year 2018 FRPP and public databases found that seven agencies did not identify whether data on 3,845 assets should be withheld despite GSA guidance to do so for every asset. GSA included these assets in the public database without consulting agencies on the assets’ sensitivity or risks in releasing information on them. GSA officials said that these data should not have been accepted and that they had implemented controls to ensure that agencies identify whether data should be withheld.

- Data Presentation Issues Limit the Usefulness of the Public Database

It is difficult for a user of the public database to determine when assets are located on a secure installation that the public cannot access. For example, returning to the NASA Goddard Space Flight Center illustration from earlier in the report, assets located at the Space Flight Center are listed individually, with no indication that the assets are all located on a secure installation. The public database lists all 215 assets at the same location—Greenbelt Road in Greenbelt, MD, but provides no further indication that the assets are part of a larger, secure facility. (See fig. 7.)
Currently, GSA requires civilian agencies to report individual assets, including those on secure installations. Detailed, asset-specific information could be useful for government decision makers, and GSA applied this approach to the public database. However, asset-level information can cause challenges for users when they are located on secure installations because GSA withheld the installation names from the public database.

Listing assets individually could prompt fruitless public interest in inaccessible secure facilities. One expected use of the public database is for the private sector to identify possible locations for installing commercial telecommunications infrastructure, such as cell towers and antennas. However, as this infrastructure cannot be installed on secure installations, the public database would be more useful to such companies if they could readily determine whether a potential location was on a secure installation or not. For example, officials on a secure installation we visited told us that reporting individual buildings does not make sense because there are few, if any, legitimate reasons for public interest in the individual assets on a secure installation.

32The Mobile Now Act requires that real property database include information on the ability of the asset to support telecommunications infrastructure. Pub. L. No.115-141, § 608 (a).
FASTA required GSA to develop a comprehensive database and provide the public with database access, but recognized the importance of protecting national security. In that respect, a key organizational issue faced by GSA and agencies is how to present data for reporting assets on campuses that are not accessible to the public. While non-disclosure is permitted, such actions to withhold this information may reduce the usefulness of the public database as a whole.

The Department of Defense (DOD) takes a different approach for its secure military bases in the public database. According to GSA officials, DOD submits a separate summary-level report for public release. This summary-level information shields sensitive information and alerts users that those assets are not accessible or of use to private-sector interests. Civilian agencies’ assets located on closed federal installations are similar to those on DOD bases in that the public may have less interest in or reason for knowing about assets that are not available to the public. Officials from NASA and two DHS bureaus said that the installation-level approach to reporting would be more appropriate for their circumstances than the asset-level reporting currently applied to civilian agencies and would likely allow them to release more information to the public. Officials from DHS added that they already release some information to the public on the web site. We found that other selected agencies also release information about secure installations on their public websites, including NASA and its Goddard Space Flight Center.

**Stakeholders’ Lack of Awareness of the Public Database and Confusion with Other Databases Limits Usefulness**

In our interviews with 14 private sector stakeholders, we found varying levels of awareness and understanding of GSA’s publicly available real-property datasets. Of the 14 private sector stakeholders we interviewed, eight told us that they were aware of the public database. Of these, five told us they tried to use it. Several selected stakeholders—regardless of whether or not they had used the database—cited concerns about the usefulness of the data, specifically with its reliability, completeness, formatting, and organization. For example, officials from one brokerage firm told us that, while the information could theoretically be useful for agency consolidation efforts, the database was too cumbersome to analyze for that purpose. Similarly, officials with a federal real-estate-consulting firm told us that they do not refer customers to the public database because they believe that the data are not complete, correct, or intuitive. Moreover, one member of a federal real-property trade association noted serious limitations in the database’s completeness and organization. In addition, one user said that he hoped the public release would allow better access to real property data but that the poor quality,
completeness, and organization of the data means access to data is no better than it was before the release.

Further, six of the private sector stakeholders we interviewed were not aware of the public database, including a stakeholder who confused it with GSA’s Lease Inventory database. The lack of a single location on GSA’s website that contains information about all of GSA’s real property databases may contribute to the awareness, confusion, and usefulness issues expressed by these stakeholders. Specifically, public access to the FRPP public database, the GSA’s Lease Inventory database and two other publicly available real-property databases is found in different places on GSA’s website:

- GSA lease inventory https://www.gsa.gov/real-estate/real-estate-services/leasing-policy-procedures/lease-inventory (managed by GSA’s Office of Leasing)
- GSA disposal inventory https://disposal.gsa.gov/s/ (managed by GSA’s Office of Property Disposal)

The Open Government Data Act requires the Administrator of GSA to maintain a single public interface online as a point of entry dedicated to sharing an agency’s data assets with the public. The databases serve different purposes, some asset-level data are similar, such as location or size. According to a GSA official, these databases are operated by different offices within GSA. This situation poses challenges to listing the database on a consolidated webpage. Nevertheless, GSA officials agreed that there could be clearer links and said that they plan to add them based on our findings. Without a consolidated webpage or clear links showing how the databases relate to each other and how to access each database, users of the various databases may not be aware of what databases do exist to search for assets that could be available to the public.

The public database’s presentation issues, combined with stakeholder confusion and lack of awareness, could contribute to low numbers of people who accessed the database compared to another GSA-managed real property database. GSA data indicate that users accessed civilian agency data from the public database 147 times per month on average from December 2017 through July 2019 and some months fewer than 10 times. However, according to a GSA official, the number of times users access the public database through the GSA website doesn’t necessarily reflect the extent to which people use the data. The official explained that, since GSA only issues the data once a year, users only need to access and save it once for use in a given year and that GSA usually sees a peak in users accessing the data when GSA publishes its annual update to the database. As indicated in figure 8, there was a peak in users accessing the database when GSA first issued the 2016 data in December 2017, and again in March and April 2018 when GSA published 2017 data (28 and 162 times, respectively), and in June 2019 when GSA published the 2018 data (170 times). In comparison, users access another real property database, GSA’s Inventory of Owned and Leased Property database—which is updated weekly—more often than they access the public database. Users access the Inventory of Owned and Leased Property database to search for properties controlled by GSA. Specifically, since the public database was released in December 2017, the public has continued to access GSA’s Inventory of Owned and Leased Property almost 10 times more per month than the public database on average (see fig. 8).

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34 The FRPP Public Database includes data for both civilian and military agencies. Our report focuses on the civilian database and users.
Federal agencies spend billions of dollars annually to operate and maintain hundreds of thousands of real property assets. GSA’s public database, extracted from FRPP data, is a comprehensive, descriptive, database of federal real property. Through the database, the public should be able to learn about federal assets, whether people are conducting research or interested in potential uses such as leasing or purchasing. Issues with the data, however, undermine these uses. GSA has taken a number of actions to improve the accuracy of the data, such as implementing the V&V process for identifying and correcting possible errors. But until GSA has better processes to ensure accuracy of street address information and identify anomalies, the public data will continue to lack the type of database most useful to the public. Moreover, the absence of a risk-based, consistent approach for withholding assets from the public database or reporting assets to it further erodes its utility. Finally, utilization of the data base is low; GSA’s choices on how the
database information is presented and how users find out about and access the public database and other real-property databases may contribute to this lack of use. Unless GSA improves the accuracy, completeness, and usefulness of the public database, its intended benefits—to the public and the federal government—will remain unrealized.

We are making the following six recommendations to GSA:

The Administrator of GSA should coordinate with agencies to ensure that street address information in the public database is complete and correctly formatted. (Recommendation 1)

The Administrator of GSA should coordinate with agencies to review V&V anomaly categories to better target incorrect data. (Recommendation 2)

The Administrator of GSA should work in consultation with agencies to determine which, if any, data should be withheld from public release. (Recommendation 3)

The Administrator of GSA should instruct each agency to apply a consistent, risk-based approach in determining which, if any, assets or asset-specific information should be withheld from public release. (Recommendation 4)

The Administrator of GSA should allow agencies to provide summary data for secure installations. (Recommendation 5)

The Administrator of GSA should link all of GSA’s publicly available real-property data sources. (Recommendation 6)

Agency Comments and Our Evaluation

We provided a draft of this report to GSA, DHS, DOE, DOI, FCC and NASA for comment. GSA provided written comments, which are reprinted in appendix II and summarized below. We received, via email from DOI, technical comments, which we incorporated as appropriate. DOI, in its email comments, also suggested revisions to two recommendations, which we clarified as appropriate. DHS and NASA provided, in email, technical comments, which we incorporated as appropriate. DOE and FCC told us they had no comments.
GSA agreed with five of our six recommendations but disagreed with our third recommendation. GSA wrote that allowing agencies to unilaterally determine which categories of data to withhold from the public would not be useful and would complicate comparisons among agencies.

We did not intend that our recommendation allow agencies to decide without consulting with GSA, and we have clarified our recommendation accordingly. We continue to believe this recommendation, as clarified, is valid.

As we reported, GSA currently withholds 15 variables—categories of data—for all federal assets, including the name of every federal building and structure. While this approach is consistent for all assets, it reduces the overall usefulness of the data by withholding information that federal agencies already make public.

In addition, the ISC told us that the landholding agencies, not GSA, are in the best position to know what data about their assets are sensitive. We amended the recommendation by removing the reference to categories of data and adding that GSA work in consultation with agencies to determine what data to withhold. This change would create a consistent way for agencies to release useful data while withholding sensitive data for individual assets, a step they already take by withholding assets from the public database. GSA plans to work with the ISC and federal agencies to review related guidance and modify it as needed. We support these plans.

In addition, DOI suggested in email comments that we revise our second recommendation to include coordinating with agencies to review V&V anomaly categories to better target incorrect data. Our original recommendation did not preclude coordination, and since we agree that such coordination would help improve the V&V process, we clarified the recommendation accordingly.

We are sending copies of this report to the appropriate congressional committees, the Administrator of the General Services Administration, the Acting Secretary of Homeland Security, the Secretary of Energy, the Secretary of the Interior, Chair of the Federal Communication Commission, the Administrator of the National Aeronautics and Space Administration, and other interested parties. In addition, the report is available at no charge on the GAO website 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. 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.

Lori Rectanus
Director, Physical Infrastructure
## Appendix I: Categories of Data Withheld from the Public Database

### Table 4: The 15 Categories of Data in the Federal Real Property Profile That the General Services Administration (GSA) Withholds from the Public Database

<table>
<thead>
<tr>
<th>Data Category</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reporting bureau</td>
<td>The bureau (within an agency) that reports the asset</td>
</tr>
<tr>
<td>Using organization</td>
<td>The entity that uses the asset</td>
</tr>
<tr>
<td>Replacement value</td>
<td>The cost to replace an existing asset</td>
</tr>
<tr>
<td>Repair needs</td>
<td>Non-recurring costs necessary to restore asset to original state</td>
</tr>
<tr>
<td>Condition index</td>
<td>Condition of the asset based the replacement value and repair needs</td>
</tr>
<tr>
<td>Owned and otherwise managed annual operating and maintenance costs</td>
<td>Costs related to the everyday functions of an asset owned and/or managed</td>
</tr>
<tr>
<td>Leased annual rent to lessor</td>
<td>Rent paid to lessor minus the annual operating and maintenance costs</td>
</tr>
<tr>
<td>Leased annual operating and maintenance costs</td>
<td>Costs related to the everyday functions of a leased asset</td>
</tr>
<tr>
<td>Annual operating and maintenance costs</td>
<td>Costs related to the everyday functions of an asset</td>
</tr>
<tr>
<td>Installation identifier</td>
<td>Code to identify an installation (i.e. buildings, structures, land or any combination of these)</td>
</tr>
<tr>
<td>Sub-installation identifier</td>
<td>Code to identify a part of an installation (i.e. buildings, structures, land or any combination of these)</td>
</tr>
<tr>
<td>Installation name</td>
<td>Building name or the name of an entire installation (such as an agency campus)</td>
</tr>
<tr>
<td>Number of federal employees</td>
<td>Total number of full and part time federal employees</td>
</tr>
<tr>
<td>Number of federal contractors</td>
<td>Total number of full and part time contract employees</td>
</tr>
<tr>
<td>Field office</td>
<td>Identifies whether an asset is part of a field office (any location that is not the headquarters location for the agency)</td>
</tr>
</tbody>
</table>

Source: GAO Analysis of GSA’s federal real property reporting requirements | GAO-20-135
January 21, 2020

The Honorable Gene L. Dodaro
Comptroller General of the United States
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 FEDERAL REAL PROPERTY: GSA Should Improve Accuracy, Completeness, and Usefulness of Public Data (GAO-20-135).

GAO made six recommendations to GSA:

1. Administrator of GSA should coordinate with agencies to ensure that street address information in the public database is complete and correctly formatted.
2. Administrator of GSA should review Validation & Verification (V&V) anomaly categories to better target incorrect data.
3. Administrator of GSA should allow agencies to determine which, if any, categories of data should be withheld from public release.
4. Administrator of GSA should instruct each agency to apply a consistent, risk-based approach in determining which, if any, assets or asset-specific information should be withheld from public release.
5. Administrator of GSA should allow agencies to provide summary data for secure installations.
6. Administrator of GSA should link all of GSA's publicly available real property data sources.

GSA fully agrees with five of the recommendations (1, 2, 4, 5, and 6). In coordination with the Interagency Security Council (ISC), Federal agencies, and the Federal Real Property Council (FRPC), GSA will take necessary actions to address each of the recommendations.

GSA disagrees with recommendation 3. Allowing individual agencies to unilaterally determine which categories of data to withhold from the public would not be as useful as it would make comparisons between agencies more difficult. We would note that GSA already involves agency staff in the discussions on what data should be withheld from the Federal Real Property Profile (FRPP) public data set and will work with these
agencies and the Interagency Security Committee to review related guidance and modify as required.

If you have any questions or concerns, please contact me at (202) 969-7277 or Jeffrey A. Post, Associate Administrator, Office of Congressional and Intergovernmental Affairs, at (202) 501-0563.

Sincerely,

[Signature]

Emily W. Murphy
Administrator

cc: Ms. Lori Rectanus, Director, Physical Infrastructure Issues, GAO
Appendix III: GAO Contact and Staff Acknowledgments

<table>
<thead>
<tr>
<th>GAO Contact</th>
<th>Lori Rectanus, (202) 512-2834 or <a href="mailto:rectanusl@gao.gov">rectanusl@gao.gov</a></th>
</tr>
</thead>
<tbody>
<tr>
<td>Staff Acknowledgments</td>
<td>In addition to the contact named above, Keith Cunningham (Assistant Director), Lynn Filla-Clark (Analyst-in-Charge), Melissa Bodeau, George Depaoli, James Duke, Rami Khalfani, Terence Lam, John Mingus, Joshua Ormond, Crystal Wesco, and Elizabeth Wood made key contributions to this report.</td>
</tr>
</tbody>
</table>
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Chuck Young, Managing Director, [youngc1@gao.gov](mailto:youngc1@gao.gov), (202) 512-4800, U.S. Government Accountability Office, 441 G Street NW, Room 7149, Washington, DC 20548

### Strategic Planning and External Liaison

James-Christian Blockwood, Managing Director, [spel@gao.gov](mailto:spel@gao.gov), (202) 512-4707, U.S. Government Accountability Office, 441 G Street NW, Room 7814, Washington, DC 20548

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