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Comptroller General
of the United States

May 11, 2023

The Honorable Robin Carnahan
Administrator
General Services Administration
1800 F Street, N.W.
Washington, D.C. 20405

Priority Open Recommendations: General Services Administration

Dear Administrator Carnahan:

The purpose of this letter is to provide an update on the overall status of the General Services Administration's (GSA) implementation of GAO's recommendations and to call your continued personal attention to areas where open recommendations should be given high priority.¹ In November 2022, we reported that on a government-wide basis, 77 percent of our recommendations made 4 years ago were implemented.² GSA's recommendation implementation rate was 100 percent.³ As of March 2023, GSA had 26 open recommendations. Fully implementing these open recommendations could significantly improve agency operations.

Since our June 2022 letter, GSA has implemented three of five open priority recommendations that we highlighted to your agency last year. Specifically:

- GSA implemented two priority recommendations by assessing its prospectus process for leases and capital projects and communicating the results of the assessment, including any proposed changes that may require legislative action, to GSA's authorizing committees.⁴ By taking these steps, GSA identified improvements to the process while ensuring that it did not pursue actions that impeded on the committees' oversight activities.

¹Priority recommendations are those that we believe warrant priority attention from heads of key departments or agencies. They are highlighted because, upon implementation, they may significantly improve government operations, for example, by realizing large dollar savings; eliminating mismanagement, fraud, and abuse; or making progress toward addressing a high-risk or duplication issue.

²GAO, *Performance and Accountability Report: Fiscal Year 2022*, [GAO-23-900398](#), (Washington, D.C.: Nov. 15, 2022).

³In our previous letters reporting GSA's 2019, 2020, and 2021 implementation rates, those rates were 100 percent, 81 percent, and 97 percent respectively. GAO, *Priority Recommendations: General Services Administration*, [GAO-22-105718](#), (Washington, D.C.: June 2, 2022); GAO, *Priority Recommendations: General Services Administration*, [GAO-21-495PR](#), (Washington, D.C.: May 19, 2021); GAO, *Priority Recommendations: General Services Administration*, [GAO-20-533PR](#), (Washington, D.C.: May 6, 2020).

⁴GAO, *Federal Real Property: GSA Should Fully Assess Its Prospectus Process and Communicate Results to Its Authorizing Committee*, [GAO-22-104639](#) (Washington, D.C.: Jan. 21, 2022).

- GSA and the Department of Homeland Security (DHS) completed a needs assessment, gap analysis, and analysis of alternatives for leasing and construction alternatives for DHS component agencies to inform DHS’s National Capital Region Real Property Strategy. As a result of these analyses, the agencies are better positioned to demonstrate the justification for the remaining planned construction in the DHS headquarters consolidation project.⁵

We ask that you direct your attention to the remaining priority recommendations. We are also adding four new recommendations related to GSA’s management of real and personal property and information privacy. This brings the total number of priority recommendations to six. (See the enclosure for the list of recommendations and actions needed to implement them.)

The six priority recommendations fall into the following three areas:

Federal real property management: We have identified federal real property management as a high-risk issue since 2003 because of challenges related to managing the federal government’s vast and diverse portfolio that costs billions of dollars annually to operate and maintain. Implementing the four recommendations in this area would improve GSA’s management of real property, ensure greater accuracy in publicly available federal real property data, enhance efforts to reduce the federal government’s real property inventory, and strengthen GSA’s ability to make sound decisions. Two priority recommendations, for example, call for GSA to share information and lessons learned from pilots and other efforts to better manage federal real property.

Federal personal property management: We identified one recommendation related to the management of federal “personal property.” Before purchasing personal property, which ranges from office supplies and food to precious metals, Federal Management Regulation requires executive agencies to consider whether excess property, already owned by the government, can meet their needs. In 2022, we found that such excess property was not a significant source of supply for executive agencies when obtaining personal property. Our recommendation in this area calls for GSA to assess its current efforts to promote the maximum use of excess personal property and take further actions that could increase the use of excess personal property. Implementing this recommendation could help executive agencies more consistently meet the requirement to consider excess property and save millions of taxpayer dollars.

Information privacy: We identified one recommendation related to protecting the privacy of personally identifiable information (PII), an element of our “ensuring the nation’s cybersecurity” high risk area. Federal agencies collect and process large amounts of PII for various government programs. Accordingly, they must ensure that any PII they collect, store, or process is protected from unauthorized access, tampering, or loss. Executive branch agencies must designate a senior agency official with overall responsibility for the agency’s privacy program. We found that GSA had not fully defined and documented the role of its designated privacy official. Doing so would help ensure GSA adequately protects PII from loss or exploitation.

⁵GAO, *Federal Real Property: DHS and GSA Need to Strengthen the Management of DHS Headquarters Consolidation*, [GAO-14-648](#) (Washington, D.C.: Sept. 19, 2014). In June 2022, we briefed Congressional Committees about the DHS headquarters consolidation. In our briefing, we reported that GSA and DHS conducted cost and benefit analyses in accordance with OMB guidance (see GAO, *DHS Headquarters Consolidation: Project Cost and Schedule Estimates Are Not Finalized*, [GAO-22-105970](#), Washington, D.C.: Aug. 30, 2022).

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In April 2023, we issued our biennial update to our [High-Risk List](#). This list identifies government operations with greater vulnerabilities to fraud, waste, abuse, and mismanagement. It also identifies the need for transformation to address economy, efficiency, or effectiveness challenges.⁶ One of our high-risk areas—[managing federal real property](#)—centers directly on GSA.

Several other government-wide, high-risk areas also have direct implications for GSA and its operations. These include (1) [improving the management of IT acquisitions and operations](#), (2) [improving strategic human capital management](#), (3) [ensuring the cybersecurity of the nation](#),⁷ and (4) managing the [government-wide personnel security clearance process](#).

We urge your attention to the GSA and other government-wide, high-risk issues as they relate to GSA. Progress on high-risk issues has been possible through the concerted actions and efforts of Congress, OMB, and the leadership and staff in agencies, including within GSA. In March 2022, we issued a report on key practices to successfully address high-risk areas, which can be a helpful resource as your agency continues to make progress to address high-risk issues.⁸

In addition to your continued attention on these issues, Congress plays a key role in providing oversight and maintaining focus on our recommendations to ensure they are implemented and produce their desired results. Legislation enacted in December 2022 included a provision for GAO to identify any additional congressional oversight actions that can help agencies implement priority recommendations and address any underlying issues relating to such implementation.⁹

There are various strategies Congress can use in addressing our recommendations, such as incorporating them into legislation. Congress can also use its budget, appropriations, and oversight processes to incentivize executive branch agencies to act on our recommendations and monitor their progress. For example, Congress can hold hearings focused on GSA's progress in implementing GAO's priority recommendations, withhold funds when appropriate, or take other actions to provide incentives for agencies to act. Moreover, Congress could follow up during the appropriations process and request periodic updates. Congress also plays a key role in addressing any underlying issues related to the implementation of these recommendations. For example, Congress could pass legislation providing an agency explicit authority to implement a recommendation or requiring an agency to take certain actions to implement a recommendation.

⁶GAO, *High-Risk Series: Efforts Made to Achieve Progress Need to be Maintained and Expanded to Fully Address All Areas*, [GAO-23-106203](#) (Washington, D.C.: Apr. 20, 2023).

⁷With regard to cybersecurity, we also urge you to use foundational information and communications technology supply chain risk management practices set forth in our December 2020 report, GAO, *Information Technology: Federal Agencies Need to Take Urgent Action to Manage Supply Chain Risks*, [GAO-21-171](#) (Washington, D.C.: Dec. 15, 2020).

⁸GAO, *High-Risk Series: Key Practices to Successfully Address High-Risk Areas and Remove Them from the List*, [GAO-22-105184](#) (Washington, D.C.: Mar. 3, 2022).

⁹James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, Pub. L. No. 117-263, § 7211(a)(2), 136 Stat. 2395, 3668 (2022); H.R. Rep. No. 117-389 (2022) (accompanying Legislative Branch Appropriations Act, H.R. 8237, 117th Cong. (2022)).

Copies of this report are being sent to the Director of OMB and the appropriate congressional committees. In addition, the report will be available on the GAO website at <http://www.gao.gov>.

I appreciate GSA's continued commitment to these important issues. If you have any questions or would like to discuss any of the issues outlined in this letter, please do not hesitate to contact me or David Trimble, Managing Director, Physical Infrastructure, at 202-512-2834 or trimbled@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Our teams will continue to coordinate with your staff on all of the 26 open recommendations, as well as those additional recommendations in the high-risk areas for which GSA has a leading role. Thank you for your attention to these matters.

Sincerely yours,

A handwritten signature in black ink that reads "Gene L. Dodaro". The signature is fluid and cursive, with a long horizontal stroke extending to the right from the end of the name.

Gene L. Dodaro
Comptroller General
of the United States
Enclosure

cc: Nina M. Albert, Commissioner, Public Buildings Service

Krystal Brumfield, Associate Administrator and Chief Acquisition Officer, Office of Government-wide Policy

David A. Shive, Chief Information Officer

The Honorable Shalanda Young, Director, Office of Management and Budget

Enclosure

Priority Open Recommendations to General Services Administration

Federal Real Property Management

Federal Real Property: DHS and GSA Need to Strengthen the Management of DHS Headquarters Consolidation. [GAO-14-648](#). Washington, D.C.: September 19, 2014.

Year Recommendation Made: 2014

Recommendation: The Secretary of Homeland Security and the Administrator of the General Services Administration (GSA), after revising the Department of Homeland Security (DHS) headquarters consolidation plans, should work jointly to develop revised cost and schedule estimates for the remaining portions of the consolidation project that conform to GSA guidance and leading practices for cost and schedule estimation, including an independent evaluation of the estimates.

Actions needed: DHS and GSA agreed with this recommendation. The Department of Homeland Security Headquarters Consolidation Accountability Act of 2015 required DHS to submit information to congressional committees regarding the current plan. The Act required that DHS, in coordination with GSA, provide information that was consistent with what we recommended, including a comprehensive needs assessment, a costs and benefits analysis, and updated cost and schedule estimates.¹⁰

In March 2022, DHS—with input from GSA—submitted its report to congressional committees in response to the Act. In August 2022, we found that this report did not contain sufficient information on the costs and schedules of the consolidation project's components for us to perform a comprehensive cost or schedule assessment. At that time, according to GSA officials, GSA was undertaking a planning and funding reset to include detailed cost and schedule estimates for the project's components. GSA officials said they expect to provide updated cost and schedule estimates in spring 2023. Once available, we will assess the extent to which the revised estimates address our recommendation and could thereby enable sound decision making related to DHS's ongoing headquarters consolidation.

High Risk Area: [Managing Federal Real Property](#)

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Acting Director: David Marroni, Physical Infrastructure

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¹⁰Pub. L. No. 114-150, 130 Stat. 366 (2016).

Federal Real Property: GSA Should Improve Accuracy, Completeness, and Usefulness of Public Data. [GAO-20-135](#). Washington, D.C.: February 6, 2020.

Year Recommendation Made: 2020

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

Actions needed: GSA agreed with the recommendation. GSA has taken several actions along with the Federal Real Property Council to improve the quality of the street address information in the Federal Real Property Profile (FRPP) public database, such as publishing a web-based geospatial validation tool to assist agencies in identifying and correcting erroneous geographic data elements. In addition, as of February 2023 GSA and the Office of Management and Budget (OMB) are reviewing the agency submitted Data Quality Improvement Plan documents, as required by OMB Memorandum M-18-21 (Designation and Responsibilities of Agency Senior Real Property Officers). We will continue to monitor their effectiveness as results become available in 2023. An effective validation tool and action plan would improve the accuracy of the street address information in the FRPP database.

High Risk Area: [Managing Federal Real Property](#)

Acting Director: David Marroni, Physical Infrastructure

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Federal Real Property: GSA Could Further Support Agencies' Post-Pandemic Planning for Office Space Use. [GAO-22-105105](#). Washington, D.C.: September 7, 2022.

Year Recommendation Made: 2022

Recommendation: The Administrator of GSA should develop a plan to broadly share with federal agencies, including those that do not use GSA services, information learned from GSA's pilots and other space utilization data collection efforts.

Actions Needed: GSA agreed with this recommendation. In February 2023, GSA took several steps to broadly share information on space utilization data, including pilot programs, through updates to the GSA website and a quarterly newsletter. However, GSA does not have a process to determine whether efforts to publicize this information are reaching agencies that do not use GSA's services. In addition, because pilot programs are ongoing, GSA has not yet shared detailed information on the costs and benefits of different methods for collecting space utilization data. To fully implement this recommendation, GSA needs to develop processes and procedures to ensure all federal agencies, including those that do not typically use GSA space or portfolio-planning services, are aware of the costs and benefits of various methods and technologies for collecting space utilization data. This action could alleviate agency concerns regarding the costs of collecting such data and help agencies make post-pandemic decisions on potential changes to their real property footprints.

High Risk Area: [Managing Federal Real Property](#)

Acting Director: David Marroni, Physical Infrastructure

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Federal Real Property: GSA Should Leverage Lessons Learned from New Sale and Transfer Process. [GAO-23-104815](#). Washington, D.C.: October 7, 2022.

Year Recommendation Made: 2023

Recommendation: The Administrator of GSA, in consultation with relevant stakeholders, should develop a process to collect, share, and apply lessons learned from the implementation of the Federal Assets Sale and Transfer Act of 2016 (FASTA) to improve the final 2024 round and future disposal efforts, including reporting any lessons learned through this process, to Congress.

Actions Needed: GSA agreed with the recommendation. In March 2023, GSA compiled an initial list of lessons learned, including a discussion of underlying assumptions, structural issues, and challenges implementing the FASTA process. While GSA officials noted continuous coordination with stakeholders throughout the FASTA process, GSA did not document its process for working with stakeholders to collect, identify, and assess these lessons learned. As a result, the extent to which GSA solicited feedback and consulted with stakeholders to develop this initial list is unclear.

To fully implement this recommendation, GSA needs to develop a process to work with relevant stakeholders—including the Office of Management and Budget, the Public Buildings Reform Board, and Congress—to identify and implement solutions to address numerous setbacks encountered throughout the FASTA process. This action could leverage stakeholders' knowledge and experiences with FASTA to make and agree upon necessary changes for the final FASTA round, and identify useful concepts to include as part of future efforts to reduce the federal government's real property inventory.

Potential Financial Benefit if Implemented: Millions of dollars

High Risk Area: [Managing Federal Real Property](#)

Acting Director: David Marroni, Physical Infrastructure

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Federal Personal Property Management

Federal Personal Property: Better Internal Guidance and More Action from GSA Are Needed to Help Agencies Maximize Use of Excess. [GAO-22-104626](#). Washington, D.C.: June 28, 2022.

Year Recommendation Made: 2022

Recommendation: The Administrator of GSA should assess its current efforts to promote the maximum use of excess personal property and take further actions that could increase the use of excess personal property; such actions could include promoting additional policies or

methods that will help agencies implement guidance to provide assurance that excess property is considered before purchasing new.

Actions Needed: GSA agreed with this recommendation. As of February 2023, GSA convened the first meeting of an inter-agency working group to assess how agencies acquire personal property, uncover obstacles, and recommend improvements to policies and guidance for acquisition professionals. GSA officials also said that GSA met with offices within GSA to understand how these offices promote excess personal property as the first source of supply. These actions will help inform GSA's internal action plan to address the recommendation.

To fully implement this recommendation, GSA needs to promote recommendations made by the working group that would help improve executive agency policies or guidance to provide assurance that excess property is considered. GSA also needs to complete internal efforts with relevant offices to identify further actions it could take to promote the maximum use of excess property. Implementing this recommendation could help executive agencies more consistently meet the requirement to consider excess property and increase the likelihood that agencies will maximize their use of excess property and save taxpayer dollars.

Potential Financial Benefit if Implemented: Millions of dollars.

Acting Director: David Marroni, Physical Infrastructure

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Information Privacy

Privacy: Dedicated Leadership Can Improve Programs and Address Challenges. [GAO-22-105065](#). Washington, D.C.: September 22, 2022.

Year Recommendation Made: 2022

Recommendation: The Administrator of GSA should fully define and document the role of the senior agency official for privacy or other designated privacy official in reviewing and approving system categorizations, overseeing privacy control assessments, and reviewing authorization packages.

Actions needed: GSA agreed with this recommendation. As of February 2023, GSA had not provided sufficient documentation to show that it had addressed this recommendation. To fully implement this recommendation, the agency needs to document in its policy and procedures how the senior agency official or other privacy officials approve system categorizations, oversee privacy control assessments, and review authorization packages for systems with personally identifiable information. Doing so will help GSA better ensure that privacy protections are adequately incorporated into those systems.

High-risk area: [Ensuring the Cybersecurity of the Nation](#)

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