



441 G St. N.W.
Washington, DC 20548

Comptroller General
of the United States

May 30, 2024

The Honorable Robin Carnahan
Administrator
General Services Administration
1800 F Street, NW
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 2023, we reported that on a government-wide basis, 75 percent of our recommendations made 4 years ago were implemented.² GSA's recommendation implementation rate was 100 percent.³ As of April 2024, GSA had 27 open recommendations. Fully implementing these open recommendations could significantly improve agency operations.

Since our May 2023 letter, GSA has implemented two of our six open priority recommendations. Specifically:

- GSA implemented one recommendation by updating its guide on cybersecurity risk in June 2023.⁴ The guide defines the GSA cybersecurity risk management process. Among other things, the guide defines and documents the roles of the senior agency official for privacy and other privacy officials in key authorization steps. These steps include system categorization, control assessments, and authorization decisions. As a result of these

¹Priority recommendations are those that GAO believes 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 2023*, [GAO-24-900483](#) (Washington, D.C.: Nov. 15, 2023).

³The implementation rates identified in our 2020, 2021, 2022, and 2023 priority recommendation letters were 100 percent, 81 percent, 97 percent, and 100 percent, respectively. GAO, *Priority Open Recommendations: General Services Administration*, [GAO-20-533PR](#) (Washington, D.C.: May 6, 2020); *Priority Open Recommendations: General Services Administration*, [GAO-21-495PR](#) (Washington, D.C.: May 19, 2021); *Priority Open Recommendations: General Services Administration*, [GAO-22-105718](#) (Washington, D.C.: June 2, 2022); and *Priority Open Recommendations: General Services Administration*, [GAO-23-106474](#) (Washington, D.C.: May 11, 2023).

⁴GAO, *Privacy: Dedicated Leadership Can Improve Programs and Address Challenges*, [GAO-22-105065](#) (Washington, D.C.: Sept. 22, 2022).

efforts, GSA is better positioned to ensure that privacy protections are consistently applied to systems with personally identifiable information.

- GSA implemented one recommendation in April 2024 by taking actions to increase use of excess personal property, or government-owned property available to agencies because other federal agencies do not need it.⁵ GSA must prescribe policies and methods to promote using this excess property, and in response to GAO's recommendation, GSA identified and completed six actions that could increase agencies' use of excess personal property. For example, GSA modified a training module for acquisition personnel to emphasize a statutory requirement that executive agencies obtain excess personal property to the extent practicable. In addition, GSA went beyond GAO's recommendation and led a working group that developed 12 recommendations to increase the promotion and consideration of excess property. By taking these actions, GSA increases the likelihood of agencies obtaining excess property, thereby minimizing new purchases and saving taxpayer dollars.

We ask your continued attention to the remaining four priority recommendations. We are also adding one new recommendation related to GSA addressing deferred maintenance and repair of real property.⁶ This brings the total number of priority recommendations to five. (See the Enclosure for the list of recommendations.)

The five priority recommendations fall into the following area.

Federal real property management. We have identified [federal real property management](#) as a high-risk issue since 2003.⁷ Challenges in this issue area relate to managing the federal government's vast and diverse portfolio of real property that costs billions of dollars annually to operate and maintain. We have found that the federal government could better manage its real property portfolio by collecting reliable real property data and effectively disposing of unneeded real property. We identified five priority recommendations for GSA to help improve management of this portfolio.

Specifically, we recommended that GSA coordinate with agencies to ensure the accuracy, completeness, and usefulness of street address information of federal real property in its public database. We have also previously found other real property data to be unreliable, including on the condition and utilization of federal buildings.⁸ GSA officials told us that they are collaborating with the Office of Management and Budget (OMB) to issue implementing guidance regarding OMB's requirements for agencies to establish a data quality improvement program. GSA needs to continue to work closely with the OMB and federal real property officials to complete its efforts to improve real property data. Improving the reliability of these data would better position the public to conduct research on, or learn about potential uses for, federal real property.

⁵GAO, *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).

⁶GAO, *Federal Real Property: Agencies Should Provide More Information About Increases in Deferred Maintenance and Repair*, [GAO-24-105485](#) (Washington, D.C.: Nov. 16, 2023).

⁷GAO, *High-Risk Series: An Update*, [GAO-03-119](#) (Washington, D.C.: Jan. 1, 2003).

⁸GAO, *Federal Real Property: Improving Data Transparency and Expanding the National Strategy Could Help Address Long-standing Challenges*, [GAO-16-275](#) (Washington, D.C.: Mar. 31, 2016).

Further, our recommendation to GSA on planning for office space directs the agency to develop a plan to share information with other federal agencies on space utilization data. Developing such a plan would help agencies identify cost-effective methods for collecting utilization data, which could be used to make decisions on potential changes to their real property footprints.

We also recommended that GSA develop a process with relevant stakeholders to collect and share lessons from a new, temporary approach for reducing the federal government's real property inventory. This process would provide GSA an opportunity to leverage stakeholders' knowledge and potentially address challenges with disposing of real property. Developing this process would also provide stakeholders, including Congress, with insights into how the federal government could better dispose of its real property.

In addition, we recommended that GSA develop plans to address its deferred maintenance and repair backlog. GSA reported having a \$3.1 billion deferred maintenance and repair backlog in fiscal year 2022—an amount that had grown 126 percent since fiscal year 2017. However, GSA did not communicate in budget documents the amount of funding that would be used to address the backlog or time frames within which GSA would address it. Developing a plan to address the backlog and including it in budget materials or related documents could inform decision makers about how funding levels could affect GSA's backlog and help them evaluate GSA's budget requests.

Finally, our recommendation for both GSA and the Department of Homeland Security (DHS) directs the agencies to jointly develop revised cost and schedule estimates for DHS's headquarters consolidation project. Without reliable cost and schedule estimates, the project risks potential cost overruns, missed deadlines, and performance shortfalls. Developing estimates that fully conform to our leading practices would also help decision makers make informed decisions regarding resource allocations and compare competing priorities.

- - - - -

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.⁹ 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) [strategic human capital management](#), (3) [ensuring the cybersecurity of the nation](#), (4) [government-wide personnel security clearance process](#) and (5) [the U.S. government's environmental liability](#).

In addition to GSA's high-risk area, we urge your continued 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

⁹GAO, *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).

successfully address high-risk areas, which can be a helpful resource as your agency continues to make progress to address high-risk issues.¹⁰

We also recognize the key role Congress plays in providing oversight and maintaining focus on our recommendations to ensure they are implemented and produce their desired results. Legislation enacted in December 2022 includes 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.¹¹

Congress can use various strategies to address 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.

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 [Priority Open Recommendation Letters | U.S. GAO](#).

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 Heather Krause, Managing Director, Physical Infrastructure, at 202-512-2834 or krauseh@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 the 27 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,

A handwritten signature in black ink that reads "Gene L. Dodaro". The signature is fluid and cursive, with a large, stylized "D" at the end.

Gene L. Dodaro
Comptroller General
of the United States

¹⁰GAO, *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).

¹¹James 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)).

Enclosure - 1

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

Elliot Doomes, Commissioner, Public Buildings Service

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

David A. Shive, Chief Information Officer

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 GSA, after revising the 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: GSA agreed with this recommendation (as did DHS). The Department of Homeland Security Headquarters Consolidation Accountability Act of 2015 required DHS to submit information to congressional committees regarding the current consolidation 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.¹²

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 based on GAO's leading practices in this area.

In July 2023, GSA provided us with a report on updated cost and schedule estimates for the project, and in December 2023, DHS provided us with updates for its estimates. As of February 2024, GSA and DHS provided documentation demonstrating some of our leading practices for the updated estimates. To fully implement this recommendation, DHS and GSA need to provide additional documentation demonstrating that the updated cost and schedule estimates fully conform to our leading practices for cost and schedule estimates. Such estimates would support sound decision-making related to DHS's ongoing headquarters consolidation.

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

Director: Christopher P. Currie, Homeland Security and Justice

Contact information: curriec@gao.gov, (202) 512-8777

Acting Director: David Marroni, Physical Infrastructure

Contact information: marronid@gao.gov, (202) 512-2834

¹²Pub. 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 this recommendation. As of March 2024, GSA officials said that they continue to coordinate with OMB and the Federal Real Property Council (FRPC)—made up of real property officials from federal agencies—to improve the quality of address data. For example, GSA officials said that the agency is implementing a phased action plan that requires commitments from FRPC member agencies and assists them in accurately reporting geographic data elements. In addition, GSA officials said that they continue to collaborate with OMB to issue implementing guidance regarding OMB’s requirements for agencies to establish a data quality improvement program and conduct a third-party review every 3 years. According to the officials, this guidance further details the FRPC’s process and guidance for agencies to comply with OMB’s required third-party data validation review.

To fully implement this recommendation, GSA needs to continue to work closely with OMB and FRPC member agencies to complete its efforts to improve real property data. Improving the reliability of these data would increase its usefulness to the public, such as for users who may be interested in acquiring or leasing assets.

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

Acting Director: David Marroni, Physical Infrastructure

Contact information: marronid@gao.gov, (202) 512-2834

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. GSA has taken several steps to broadly share information on space utilization data through updates to the GSA website and a quarterly newsletter. These updates include information from pilot programs on the costs and benefits of different methods for collecting space utilization data. However, as of February 2024, GSA does not have a documented plan to ensure officials continue these efforts to publicize information for federal agencies, including those that do not use GSA’s space or portfolio-planning services.

To fully implement this recommendation, GSA needs to develop a plan to ensure all federal agencies are aware of the costs and benefits of various methods and technologies for collecting space utilization data. This could also help 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

Contact information: marronid@gao.gov, (202) 512-2834

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 this 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. In February 2024, GSA officials provided additional information on ongoing collaboration with stakeholders and how FASTA lessons learned were being applied to identify strategies for disposing of unneeded government properties. However, GSA has not provided documentation of its process for working with stakeholders to collect, share, and apply lessons learned.

To fully implement this recommendation, GSA needs to develop a process—in consultation with relevant stakeholders—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. Such action could also identify useful concepts to include in 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

Contact information: marronid@gao.gov, (202) 512-2834

Federal Real Property: Agencies Should Provide More Information About Increases in Deferred Maintenance and Repair. [GAO-24-105485](#). Washington, D.C.: November 16, 2023.

Year Recommendation Made: 2024

Recommendation: The Administrator of GSA should ensure that the administration develops a plan to address its deferred maintenance and repair backlog and identifies the funding and time frames needed to reduce this backlog in congressional budget requests, related reports to decision-makers, or both.

Actions Needed: GSA agreed with this recommendation. In its fiscal year 2025 budget justification, published in March 2024, GSA provided some information on addressing its deferred maintenance and repair backlog, including through requests for obligational authority and maintenance funding. However, GSA's request did not identify ways to address funding issues or present a longer-term plan for how GSA intends to address its backlog, including needed funding amounts and timeframes.

To fully implement this recommendation, GSA needs to develop a plan for reducing the backlog and include it in congressional budget requests or related reports to decision-makers. Doing so could better inform decision-makers about how funding levels affect GSA's deferred maintenance and repair backlog and help them evaluate GSA's budget requests.

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

Director: Andrew Von Ah, Physical Infrastructure

Contact Information: vonaha@gao.gov, (202) 512-2834

This is a work of the U.S. government and is not subject to copyright protection in the United States. The published product may be reproduced and distributed in its entirety without further permission from GAO. However, because this work may contain copyrighted images or other material, permission from the copyright holder may be necessary if you wish to reproduce this material separately.

GAO's Mission

The Government Accountability Office, the audit, evaluation, and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO's commitment to good government is reflected in its core values of accountability, integrity, and reliability.

Obtaining Copies of GAO Reports and Testimony

The fastest and easiest way to obtain copies of GAO documents at no cost is through our website. Each weekday afternoon, GAO posts on its [website](#) newly released reports, testimony, and correspondence. You can also [subscribe](#) to GAO's email updates to receive notification of newly posted products.

Order by Phone

The price of each GAO publication reflects GAO's actual cost of production and distribution and depends on the number of pages in the publication and whether the publication is printed in color or black and white. Pricing and ordering information is posted on GAO's website, <https://www.gao.gov/ordering.htm>.

Place orders by calling (202) 512-6000, toll free (866) 801-7077, or TDD (202) 512-2537.

Orders may be paid for using American Express, Discover Card, MasterCard, Visa, check, or money order. Call for additional information.

Connect with GAO

Connect with GAO on [Facebook](#), [Flickr](#), [Twitter](#), and [YouTube](#).
Subscribe to our [RSS Feeds](#) or [Email Updates](#). Listen to our [Podcasts](#).
Visit GAO on the web at <https://www.gao.gov>.

To Report Fraud, Waste, and Abuse in Federal Programs

Contact FraudNet:

Website: <https://www.gao.gov/about/what-gao-does/fraudnet>

Automated answering system: (800) 424-5454 or (202) 512-7700

Congressional Relations

A. Nicole Clowers, Managing Director, ClowersA@gao.gov, (202) 512-4400, U.S. Government Accountability Office, 441 G Street NW, Room 7125, Washington, DC 20548

Public Affairs

Sarah Kaczmarek, Acting Managing Director, kaczmareks@gao.gov, (202) 512-4800, U.S. Government Accountability Office, 441 G Street NW, Room 7149, Washington, DC 20548

Strategic Planning and External Liaison

Stephen J. Sanford, Managing Director, spel@gao.gov, (202) 512-4707, U.S. Government Accountability Office, 441 G Street NW, Room 7814, Washington, DC 20548

