GSA Responses to the Office of Inspector General's Management Challenges for FY 2018 *(Unaudited)*

Summary

The U. S. General Services Administration (GSA) is committed to continuous improvement as we understand that the better our agency performs, the more time, energy, and resources other Federal agencies are able to dedicate to meeting their missions, goals, and objectives. We welcome and appreciate the comments from the Office of the Inspector General (OIG) and understand this feedback assists GSA with the effective management of the agency. As identified in the report, GSA has already taken many actions to address the challenges identified in the OIG Assessment of GSA's Major Management Challenges.

Challenge 1: Enhancing Government Procurement

Support and Adoption of Category Management

AGENCY ACTION:

Acquisition Gateway. GSA continues to refine the Acquisition Gateway to ensure its usability and content meet the Federal contracting community's needs, adding value with tools and contracting materials to improve spend under management and drive efficient use of taxpayer dollars. GSA agrees that usage-based metrics (such as site visits and time on individual pages) need to be augmented with outcome-driven, goal-based metrics as indicators of user value in fiscal year (FY) 2018. Initial analysis includes the number of users researching Best in Class solutions and leveraging the available data to compare prices against data visualizations. Measures such as these demonstrate the effectiveness of the

portal and will inform future development paths and content needs.

GSA agrees that it is important to provide users quality content on the Acquisition Gateway. The category management teams in coordination with the Federal Acquisition Service (FAS) Government-wide Category Management Project Management Office curate their own content and all material posted is created by or vetted through their designated experts. GSA will continue to work with the customer community to develop and curate valuable content. Further, GSA will examine the current content governance processes to determine what best practices are applicable.

Acquisition Workforce Support. FAS successfully completed a comprehensive workforce reorganization to align with the guiding principles of category management on March 6, 2017. FAS concurs with the OIG findings regarding the potential for duplication of effort or reduced productivity.

To identify and address any unintended consequences, we are monitoring the organization from the following perspectives: workforce, performance measures, culture, and operations. For example, we have been utilizing a pre-reorganization efficiency metric along with other performance measures to understand the productivity and outputs of our business lines. We also have a small team reporting to the Office of the FAS Commissioner that is responsible for Workforce Transformation and management of the Human Capital Strategic Plan. FAS continues to address the OIG recommendations and corrective action the final from audit report, *The Federal Acquisition Service Needs a Comprehensive*

Human Capital Plan for its Contract Specialist Workforce; Report Number A150033/Q/9/P16002, dated July 22, 2016. FAS will continue to monitor the organization comprehensively to ensure sustained efficiency and effectiveness from this change as well as any future organizational changes.

Emphasis on Reducing Government Price Variability

AGENCY ACTION:

GSA is committed to serving as a responsible steward of taxpayer dollars and to providing contracting officials with the policies, tools, data and materials to make best value determinations, including price reasonableness. GSA agrees that it is valuable to reduce price variability to minimize confusion for customers seeking to purchase goods and services through GSA contract vehicles. GSA recognizes two additional key responsibilities in managing billions of dollars of commercial spend: that the agency must maintain diverse and robust competitive pools of varying socio-economic entities able to meet the Government's requirements, and that pricing is measured both at the base contract, prior to order requirements and commitments, and at the order level when funding occurs.

GSA has undertaken several initiatives to reduce price variability and provide greater transparency into what is being offered and purchased and at what price. Principal among these initiatives are the Transactional Data Reporting Rule, the Formatted Product Tool, and the Contract Awarded Labor Category Tool. GSA recognizes that each of these initiatives is relatively early in its deployment. Therefore, GSA continues to assess how and whether each provides value to the agency and Federal contracting officials as well as how best, as appropriate, to harmonize the policies and tools. In FY 2018, GSA will evaluate the investments and delivery of these products and enhancements to generate the most impact on reducing pricing variability and the risk of overpayment.

Delivering the System for Award Management

AGENCY ACTION:

GSA concurs that sound program management is vital to the ongoing success of the modernization to identify and mitigate risks and adhere to cost and deployment schedules.

The GSA Office of Systems Management manages the Integrated Award Environment initiative (IAE) and continues to develop an evolving set of functional capabilities to replace all 10 legacy systems currently used to administer Federal awards. Functionalities of the current systems are being converted into a common, cloud-based, secure business environment that facilitates and supports the cost-effective acquisition of products and services, while fostering transparent, effective management of Federal acquisition and assistance awards. The modernized system will have one home page with a single sign-on, one powerful search tool, one robust reporting tool, and one workspace where users can access the information and tools they need to make, receive, and manage Federal awards. The modernized effort will provide a centralized administration, meaning that administrators for multiple systems will no longer have to log into different systems.

System development and build of the final product continues, using a Scaled Agile Framework; additionally, IAE recently launched the test site for the system, beta.SAM.gov. GSA also continues to work closely with interagency governance committees and sponsors, providing regular updates and input. The decommissioning of systems will begin as approved by the program's interagency governance when all necessary functionality has been brought over to beta.sam.gov. The current systems will remain the authoritative source until decommissioning is approved and properly communicated. Once all 10 systems have been migrated over and decommissioned, the system will be renamed to SAM.gov.

IAE has received quality input and feedback from the stakeholder and user communities to shape the development of the beta.sam.gov testing site

that launched in the fourth quarter of FY 2017. In an effort to remain transparent and communicate effectively with the stakeholder community, four Industry Day sessions have been conducted to address questions and communicate plans to the stakeholders. Focus groups have been reconvened for input on the modernization effort, and additional groups will be created for user testing as new functionalities become available. In addition to regularly scheduled governance meetings, quarterly joint governance sessions have been instituted for detailed information sharing among the Federal community.

Upcoming key initiatives include a tool for expanded reporting in the new platform on the testing site (beta.sam.gov), continuation of the SAM and Federal Procurement Data System modernization, and development of training materials to support users. GSA will also ensure the continuation of identification and validation services regarding recipients of Federal funding.

Challenge 2: Maximizing the Performance of GSA's Real Property Inventory

Reducing and Consolidating Space

AGENCY ACTION:

GSA is undertaking efforts to improve space utilization while weighing the costs and benefits to individual agencies. GSA recognizes that spending less on real estate allows the Government to devote more of its limited dollars to mission critical activities to better serve the American people.

Under the Consolidation Program, GSA analyzes projects aimed to 1) consolidate higher cost leased space into lower cost and underutilized federally owned space, 2) manage space better through workplace strategies and improved office standards, and 3) optimize rents in depressed markets to capture favorable tenant lease rates.

In FY 2017, GSA and Federal agencies reduced

space by approximately 3 million rentable square feet. GSA worked with agencies to validate high-impact opportunities supported by business cases and aligned with the agencies' missions, priorities, and goals. GSA partnered with client agencies to implement projects and dispose or repurpose underutilized real property to achieve savings and space reductions.

GSA also continues to implement workplace strategies to assist client agencies in their efforts to reduce real estate costs, increase efficiencies and manage change. Under the Total Workplace Program, GSA worked closely with 12 customers in FY 2017 to implement agency-wide space standards in their offices, using each agency's benchmark utilization rate for future projects and space actions. In the coming fiscal year, there are plans to continue implementation of this program with an increased focus on cost effectiveness and positive returns on investment.

Disposing and Exchanging Federal Property

AGENCY ACTION:

GSA acknowledges the risks and challenges associated with the speed of the disposal process and pursuing large-scale exchange projects. GSA has developed and initiated implementation of mitigation strategies to avoid and reduce the impact of these risks.

GSA is focused on streamlining the execution of Federal real estate disposal transactions and is actively engaged in helping agencies identify unneeded assets, prepare those identified assets to be divested, and implement strategies to reposition the assets.

Beginning in 2016, GSA developed a 5-year pipeline of assets for disposal. By continuing to work closely with large landholding agencies to identify and continually update the 5-year pipeline, GSA has improved its ability to assess assets, conduct due diligence, and address the regulatory issues

to be resolved prior to disposition. Awareness and identification of environmental, historic, and cultural issues earlier in the disposal preparation process allows GSA to develop disposal strategies that take these issues into account. GSA is also working to develop a tailored marketing plan for disposals to maximize exposure and increase engagement.

With ongoing implementation of the Federal Assets Sale and Transfer Act, GSA expects to continue identifying and maximizing opportunities to improve timeliness in repositioning and disposing of Federal real property assets.

In pursuing large-scale exchange projects, PBS Policy 4065.1, Procedural Guidance for Section 412 Exchanges for In-Kind Consideration, requires that potential exchange projects are supported by a business case analysis that is approved by the GSA Administrator. This guidance strengthened internal controls associated with exchanges, added more structure to the process, and enabled the Public Buildings Service (PBS) to learn from its recent experiences with exchange projects. The business case includes net present value and highest and best use analyses, which are used to determine if the proposed exchange provides the most economically viable solution for the government. GSA has also extended the scope of this guidance to exchanges contemplated using other authorities available to the Administrator.

Given GSA's recent experiences with proposed exchanges, GSA developed a discounted cash flow analysis to further refine value expectations for the property to be exchanged, beyond what would typically be provided from a market value appraisal. GSA uses this discounted cash flow analysis to determine the value of the exchange parcel in the context of the proposed transaction, rather than in the context of a sale for cash. GSA develops the requirements for the in-kind consideration to be as close in value (as practical) to the value derived via the discounted cash flow analysis.

As part of the procurement process for exchange projects, GSA negotiates the specific details of the proposed transaction, including the value of the exchange parcel and the estimated cost of providing the in-kind consideration. GSA will ensure that all funds expended on exchange projects are obligated in full compliance with the agency's policies and Federal law. GSA will only pursue exchange projects that are financially viable, meet the needs of agency customers and stakeholders, and provide best value to the taxpayer.

Reducing Leasing Costs

AGENCY ACTION:
GSA continues to reduce long-term real estate costs, and has made a significant effort to improve advanced planning as well as minimize holdovers and lease extensions. GSA's enacted Rental of Space budget was $5.666 billion in FY 2015, $5.579 billion in FY 2016, and $5.628 billion in FY 2017. The requested amount of Rental of Space funds for FY 2018 is $5.494 billion. During that same period, GSA reduced the rentable square feet of leased space by approximately 6 million rentable square feet. While these figures appear to demonstrate a flattening of lease costs, rather than a reduction, it should be noted that these reductions in GSA's portfolio are offset by the growth in the portfolio as GSA assumes space previously acquired by other Federal agencies.

GSA implemented the Automated Advanced Acquisition Program (AAAP), a nationwide program that allows building owners the opportunity to electronically offer building space for lease. This methodology of space procurement has been shown to reduce procurement cycle time and result in competitive lease rates that are often below market. In FY 2017, 11 percent of GSA's new leases were delivered using the AAAP platform. Further, GSA leverages the commercial real estate industry practice of commission for service through its GSA Leasing Support Services (GLS) contracts. The GLS contracts support GSA leasing through commercial broker support services that are primarily funded through commissions and have the added benefit of providing a rent credit that is used to lower overall

rent costs. To date, GSA issued approximately 500 GLS task orders totaling 15.6 million square feet with an estimated commission of $100 million. Lastly, GSA continually reviews its lease contract documents to assure that they are as streamlined as possible to reduce price risk and administrative burden for potential lessors while promoting competition.

Finally, GSA is focused on reducing holdovers and extensions, and continues to demonstrate progress in this area. GSA reduced holdovers by 33 percent in FY 2017, as compared to FY 2016. This represents a 67 percent reduction in holdovers when compared to FY 2014. Extensions increased in FY 2017 over FY 2016; however, even this increase represents a 16 percent reduction in extensions when compared to FY 2014. The leases for approximately 100 million square feet of leased office space are set to expire over the next 5 years, which is a significant opportunity for GSA to work with Congress and its tenant agencies to get better deals and continue making progress by reducing holdovers and extensions.

Meeting the Operations and Maintenance Needs of Federal Buildings

AGENCY ACTION:

GSA's approach to delivering safe, reliable, and functional work environments is focused on the optimization of the GSA operation and maintenance program to mitigate the inherent risk associated with sustained cost reduction efforts.

GSA has taken steps to 1) ensure consistent delivery of services across its portfolio, 2) strengthen controls to ensure accurate coding of transactions, 3) increase transparency of operation and maintenance expenditures at a granular level, 4) ensure costs associated with above standard services are recovered, 5) institutionalize approaches and tactics that have proven successful, 6) strengthen vendor alliances, 7) leverage acquisition strategies from a portfolio-wide perspective, and 8) enhance program oversight and compliance through GSA's agency-wide

maintenance management system and transactional customer feedback. GSA's business plan for FY 2018 includes formulation of a 5-year plan to gain efficiencies by optimally utilizing acquisition tools and strategies, including aggregation of requirements.

Ensuring Effective Management of Energy Savings Performance Contracts and Utility Energy Service Contracts

AGENCY ACTION:

GSA selects and delivers alternatively financed projects that balance cost-effectiveness against the future energy and water reduction targets as well as infrastructure renewal needs. The Energy Savings and Performance Contracts (ESPC) and Utility Energy Savings Contracts (UESC) programs have successfully funded building improvements by identifying appropriate Energy Conservation Measures (ECMs) in circumstances where utility market conditions allow for sufficient returns on investments.

GSA employs several strategies to drive cost-effective ESPCs. GSA has centralized the procurement of large ESPCs into an ESPC Program Management Office (PMO). The PMO has dedicated program and contracting staff to ensure that lessons learned and best practices are incorporated into the procurement of new ESPC projects. To ensure streamlined and standardized processes are followed, GSA is procuring all new large ESPCs through use of the U.S. Department of Energy (DOE) ESPC Indefinite Delivery/ Indefinite Quantity (IDIQ) contracts. In accordance with DOE contract procedures, selection is based upon a qualifications competition. The qualifications criteria have been adjusted by GSA to include pricing components that affect the price reasonableness of the overall project. Through the ESPC PMO, GSA ensures price reasonableness in ESPCs through the following:

- Primary contractor cost competition: As part of the Energy Service Company (ESCO) selection process, GSA evaluates the ESCOs' historical costs for profit rates, overhead rates, labor rates for key personnel, and project development fees.

- Construction price competition: During the project development phase, price competition occurs at the subcontracting level. ESCOs are required to provide subcontractor bid information to GSA. Wherever possible, a minimum of three subcontractor bids per trade are required.

- Government cost estimates: As a separate pricing check, the PMO contracts with third-party cost estimators to develop detailed cost estimates for all ECMs in the scope of work. The cost estimators have conducted facility site visits and understand constructability issues and other factors influencing construction costs. DOE cost benchmarks, when available, are also used for price reasonableness determinations.

- O&M pricing evaluations: GSA typically retains responsibility for O&M services when ESPC contracts are used. However, in those instances in which an ESCO assumes partial or full facility O&M responsibility, the ESCO's proposed O&M cost is evaluated against one or more of the following: historical pricing, market data, and GSA internal benchmarks.

- Performance verification: In accordance with DOE IDIQ requirements, ESCOs conduct annual measurement and verification protocols to quantify energy and water savings attained.

GSA requires savings guarantees in UESCs pursuant to Office of Management and Budget (OMB) memorandum M-12-21; subject title; Addendum to OMB Memorandum M-98-13 on Federal Use of Energy Savings Performance Contracts (ESPCs) and Utility Energy Service Contracts (UESCs). UESCs procured after October 2012 require the following elements: (1) energy savings performance assurances or guarantees of the savings to be generated by improvements, which must cover the full cost of the Federal investment for the improvements; (2) measurement and verification of savings through commissioning and retro-commissioning; and (3) competition or an alternatives analysis as part of the selection process prior to entering into a UESC.

GSA guidance, entitled Procuring Energy Management Services with the GSA Area-wide Contract, states that language must be included in the negotiated Authorizations (i.e., Performance Assurance Plans) that secure guarantees of the energy and/or cost savings. If more than one franchised utility company is available in the service area or if the area-wide contract is determined to be non-advantageous, the facility is required by the Federal Acquisition Regulation (FAR) to acquire service via competitive acquisition procedures (i.e., separate contract), allowing all utilities the opportunity to bid for service. If the area-wide contract is determined to provide the best value to the Government in response to the need for energy management services, the process must be documented through the justification and approval process as outlined in the FAR.

Challenge 3: Sustaining Technology Transformation Service, FAS

AGENCY ACTION:
The transfer of the Technology Transformation Service (TTS) to FAS combines acquisition and digital expertise into a single organizational and budgetary framework that supports IT modernization across Government. The transfer improves the ability for acquisition and IT modernization to work more closely together. The business model of TTS also emphasizes cross-functional approaches to buy and build IT, making the merger with FAS an expansion of the value that GSA can offer Federal agencies.

The FAS Commissioner launched a rapid Joining Forces initiative with eight defined working groups

across FAS to convene thought leaders to ensure the efficient and effective implementation of GSA Order ADM 5440.712, which aligned TTS to FAS. The working groups addressed issues including, but not limited to: culture, controls, delegations of authority, procurement policies, and workforce. The teams briefed the FAS Commissioner on recommendations that are now being implemented, where appropriate. These working groups enabled leaders to collectively establish new lines of communication and develop opportunities to join together in helping customer agencies meet their missions.

GSA has implemented significant changes in the management approach for 18F to improve the operations of individual business units and TTS as a whole. In addition, TTS has implemented all OIG recommendations. GSA implemented all seven recommendations from JE17-001, Evaluation of 18F, and all six recommendations from JE17-002, Evaluation of 18F's Information Technology Security Compliance , including additional internal controls for hiring, revenue reconciliation, and risk mitigation.

FAS is monitoring the pipeline of actual and potential work orders to ensure that expenses are managed and the workforce is utilized efficiently. Resources are added only when there is assurance of future work and a corresponding need for capacity expansion. Orders, pipeline status, utilization, and expenses are all closely monitored on a weekly and monthly basis. This process is the basis for maintaining a plan for full cost recovery.

As part of the response to the OIG's recommendations, TTS established new technical and procedural controls related to the proper initiation of billable project work and identification of funding sources at the beginning of engagements. To comply with the Federal Information Technology Acquisition Reform Act, TTS ensures review by GSA's Office of the CIO and approval of all IT systems operated by GSA for TTS use. GSA has also developed extensive documentation of the TTS revenue generation, accrual, and reconciliation processes. GSA believes that this overall set of

initiatives addresses the concerns about the management of TTS and the benefits derived from TTS.

Challenge 4: Making Agency Cybersecurity a Priority

Protection of GSA's Building Control Systems against Cyber Threats

AGENCY ACTION:
GSA is implementing several actions to improve its overall information technology security program. These actions include the procurement of cybersecurity technology, the proactive targeting of vulnerable buildings and at-risk building systems, and process improvement, vendor outreach, and employee training efforts.

GSA IT and the PBS Office of Facilities Management (OFM) recently developed a Risk Management Framework scorecard to identify and prioritize at risk building systems. GSA recently made a cybersecurity procurement to address those systems that have been identified as at risk because they are operating End of Life (EOL) versions of software and hardware, or have other identified security vulnerabilities. In coordination with PBS, GSA IT plans to incrementally continue these investments into FY 2018 to mitigate inherent risks. GSA IT also implemented software that will enforce security and access policies for endpoint devices connected to GSA routers and switches. This mandated software will prevent unauthorized users from accessing the network. GSA IT is also continually working on identifying and disconnecting unsecured networks in accordance with the recommendations from the U.S. Government Accountability Office (GAO), as outlined in Federal Facility Cybersecurity: DHS and GSA Should Address Cyber Risk to Building and Access Control Systems (GAO-15-06, December 12, 2014).

Vendor and employee outreach efforts have also been put into place to ensure that products are developed to security standards and employees

understand the risks of building related security vulnerabilities. Vendor outreach commenced in FY 2015, with GSA IT and the PBS OFM holding regular meetings with industry to ensure their awareness of Federal and GSA security policies and processes. These efforts were undertaken to ensure that the manufacturers' products are delivered with security in mind and to discuss upcoming EOL dates. GSA IT is also engaging the workforce in active risk mitigation and partnering with PBS to ensure that building system stakeholders are aware of security requirements and the importance of securing GSA facilities against cyber incidents.

Controlling Access to Sensitive Information in GSA Systems

AGENCY ACTION:

GSA has procured technologies to safeguard sensitive information and has taken action to implement all corrective actions related to breach incidents in FY 2014 and FY 2015. These corrective actions focused on technology improvements, policy updates, and process improvements that decrease the risk of unintentional mishandling of GSA's data and ensure prompt and effective responses to reported breaches. As a specific example, GSA IT implemented a cloud security tool that monitors, alerts, and blocks shared sensitive information based on rules that target at-risk actions. This tool improves GSA's ability to control the release of sensitive information in the cloud environment. The OIG completed its review of the corrective actions related to the 2014 breach and closed the review in the Spring of FY 2017. Corrective actions related to the 2015 breach were completed in July of FY 2017, and the implementation review will commence in November of FY 2018.

To further reduce the likelihood of breach incidents in the future and mitigate currently identified risks, GSA has successfully implemented components of Continuous Diagnostics and Mitigation (CDM) tools and capabilities that support hardware and software asset management, vulnerability management, and

configuration management. The CDM tools and capabilities will provide GSA with faster identification and remediation of vulnerabilities in the areas of risk, configuration and access management, and dashboard risk monitoring. GSA has also implemented agency-specific technical security benchmarks for operating systems, web applications, and databases that will be managed and monitored through CDM tools. The use of these tools will substantially improve GSA's IT security posture, enabling detection and prevention of unauthorized use of sensitive data.

Challenge 5 - Efficiently Managing Human Capital to Accomplish GSA's Mission

AGENCY ACTION:
Broadly, GSA will address this challenge by implementing the agency's Long-Term Workforce Plan, Human Capital Operating Plan, and enterprise-wide Workforce Planning activities.

GSA acknowledges the risks and challenges associated with efficiently managing human capital to accomplish GSA's mission. GSA has begun implementing mitigation strategies to avoid or reduce the impact of these human capital risks, particularly for mission-critical occupations (Acquisition, Financial Management, Information Technology, Program Management, Property Management, Realty, and Human Resources) and to address GSA's high-retirement eligibility.

As part of the Agency Reform Plan submission, GSA submitted a Long-Term Workforce Plan in September 2017 with goals to: obtain, retain, and develop high quality talent; maximize employee performance and engagement; and optimize Human Resources service delivery. GSA is also committed to implementing these long-term workforce planning strategies to address organization-specific human capital risks.

To support the efficient management of human capital to accomplish GSA's mission, GSA has also developed a Human Capital Operating Plan (HCOP) for the agency to implement in FY 2018. In the plan, GSA's Office of Human Resources Management has committed to work with all organizations to implement GSA's enterprise-wide workforce plan to include strategies for succession management, staffing plans, training and development, employee engagement, and employee performance.

Implementation of the Long-Term Workforce Plan (developed as part of the GSA Agency Reform Strategy) and the HCOP will allow GSA to mitigate the risks listed in this challenge. Staffing plans will mitigate the risk of GSA hiring employees without assessing needs and hiring costs, considering turnover rates, and planning for upcoming retirements. GSA also recognizes the risks of high retirement eligibility in mission-critical occupations, which can be addressed through hiring, training and development, and succession management. Succession management will mitigate risks associated with high leadership turnover, ensuring knowledge transfer. Targeted training and development will prepare the workforce to manage the loss of veteran employee expertise. Maximizing employee engagement and employee performance will ensure the GSA workforce is prepared and able to meet GSA's mission through the achievement of goals and objectives.

Challenge 6 - Safeguarding Federal Facilities and Providing a Secure Work Environment

AGENCY ACTION:
During FY 2017, GSA continued to make improvements to securing Federal facilities by issuing new credentialing, escorting, and access control guidance. GSA maintains the integrity of authorized access to its facilities by issuing policy with agency-wide roles and responsibilities, and ensuring the effective tracking and collection of Personal

Identity Verification (PIV) cards from contractors. GSA validates and certifies all active contractor data, and monitors contractor data, validation, and information internally. When an unfit/unfavorable contractor determination is identified, GSA removes the contractor from the contract and the PIV card is returned and destroyed. GSA tracks the collection and destruction of the cards and provides card collection and destruction of PIV data agency-wide on a regular basis. Additionally, GSA's Office of Mission Assurance (OMA) has implemented a zone concept designed to provide real-time assistance to GSA-requesting officials while improving coordination and communication between the Chief Security Office and PBS officials.

GSA issued a directive that addresses the oversight and termination process for GSA issued Facility Access Cards (FAC) in GSA-controlled space. This outlines a phased approach to eliminate the use of FACs while providing alternate access controls and processes. OMA created a contractor report for those that are in 'active' status for updates during the final fitness determination process that is completed by OPM. Lastly, GSA continues to install compliant Physical Access Control Systems across the country that do not accept FACs, further reducing unauthorized contractor access to GSA-controlled facilities.

The GSA OIG has recently conducted an audit regarding GSA's receipt and appropriate use of facility assessment reports. OMA and PBS are working with the U.S. Department of Homeland Security-Federal Protective Service to better track the delivery of the assessments and to ensure Facility Security Assessments are delivered to GSA in a timely manner. OMA and PBS are also working to develop policy that requires requisite GSA employees to complete Interagency Security Committee (ISC) training. The development of a tracking system to monitor ISC training compliance is also underway.