



Office of Audits
Office of Inspector General
U.S. General Services Administration

Fire Safety and Accessibility Deficiencies at the GSA Headquarters Building in Washington, D.C.

Report Number A240018/P/R/R24007
August 12, 2024

Executive Summary

Fire Safety and Accessibility Deficiencies at the GSA Headquarters Building in Washington, D.C.

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Why We Performed This Audit

We performed this audit because GSA's Public Buildings Service (PBS) plays a significant role in providing a safe, healthy, and secure environment for building occupants at over 8,300 federally owned and leased facilities nationwide. PBS's management of its facilities is critical because deficiencies could pose fire, safety, and health risks to building occupants and the public. Our objective was to assess whether PBS National Capital Region (NCR) complied with applicable laws, regulations, and PBS policies governing fire protection and accessibility for the GSA headquarters (HQ) building in Washington, D.C.

What We Found

PBS NCR did not fully comply with applicable laws, regulations, and PBS policies governing fire protection and accessibility for the GSA HQ building. We found that some fire doors used to access stairwells for emergency egress did not comply with fire protection requirements. Additionally, PBS NCR has not corrected a fire protection deficiency concerning coordination and communication with the local fire department. We also found that the GSA HQ building did not fully comply with accessibility requirements. Specifically, we identified deficiencies in wheelchair-accessible restrooms, one elevator, and the handrail for the building's wheelchair ramp that may make building access difficult or potentially hazardous for people with disabilities.

What We Recommend

We recommend that the PBS NCR Regional Commissioner:

1. Take immediate actions to address the fire safety deficiencies at the GSA HQ building by:
 - a. Promptly ensuring that all fire doors are inspected, repaired, or replaced for proper functionality and compliance with safety standards and fire codes.
 - b. Strengthening oversight to ensure that the building's operations and maintenance contractor is complying with contract requirements, including, but not limited to, fire safety requirements.
 - c. Expediting the corrective action for the fire safety deficiency identified during the Management Analysis and Review System review, dated January 6, 2023, by coordinating pre-fire planning activities with the local fire department.

- d. Ensuring that pre-fire planning walk-throughs are regularly scheduled and performed with the local fire department.
2. Take immediate actions to improve management oversight of its facilities to reassess compliance with Architectural Barriers Act Accessibility Standards and Occupational Safety and Health Administration requirements at the GSA HQ building by:
 - a. Reviewing designated wheelchair-accessible restrooms to ensure individuals with disabilities have easy access and adjusting any restroom doors to fall within the acceptable range for accessibility.
 - b. Addressing the functionality and compliance of all elevators, ensuring that each elevator is equipped with an automatic verbal announcement feature.
 - c. Stabilizing the handrail for the wheelchair ramp at the entrance of the building.

The PBS NCR Regional Commissioner acknowledged our findings and concurred with our recommendations. PBS's response can be found in its entirety in **Appendix B**.

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Introduction

We performed an audit of the GSA Public Buildings Service's (PBS's) facility operations management at the GSA headquarters (HQ) building in Washington, D.C.

Purpose

We performed this audit because PBS plays a significant role in providing a safe, healthy, and secure environment for building occupants at over 8,300 federally owned and leased facilities nationwide. PBS's management of its facilities is critical because deficiencies could pose fire, safety, and health risks to building occupants and the public.

Objective

Our objective was to assess whether PBS National Capital Region (NCR) complied with applicable laws, regulations, and PBS policies governing fire protection and accessibility for the GSA HQ building in Washington, D.C.

See **Appendix A** – Objective, Scope, and Methodology for additional details.

Background

The GSA HQ building is located at 1800 F Street NW, in Washington, D.C. (see *Figure 1* below). The building was constructed in 1917 to house the U.S. Department of Interior. GSA took ownership of the building in 1949. The building consists of nine floors, inclusive of the basement and ground floor. As originally constructed, the building was comprised of four wings. A major repair and alteration project in the early 2010s, using funds from the American Reinvestment and Recovery Act, added a fifth wing to the building.

Figure 1. GSA HQ Building, 1800 F Street NW, Washington D.C.¹



¹ Photograph taken by the audit team, April 23, 2024.

PBS's mission is to design, deliver, and maintain safe and sustainable workspaces that enable employees and agencies to serve the American public. PBS manages over 370 million rentable square feet of workspace for federal employees, operating 11 regions nationwide, including PBS NCR, which services the GSA HQ building.

PBS NCR's Office of Facilities Management is responsible for the day-to-day operations and property management of the GSA HQ building. These responsibilities include programs that safeguard employees, tenants, visitors, and contractors.

Facility Management Requirements Applicable to the GSA HQ Building

Numerous facility management requirements apply to the GSA HQ building. For the purposes of our audit, we focused on the following:

- **National Fire Protection Association 80, *Standard for Fire Doors and Other Opening Protectives*** – This standard regulates the installation, inspection, testing, and maintenance of assemblies and devices used to protect openings in walls, floors, and ceilings against the spread of fire and smoke within, or out of buildings.
- **Architectural Barriers Act Accessibility Standards** – These standards are issued by the U.S. Access Board under the Architectural Barriers Act.² Guidelines for the Architectural Barriers Act Accessibility Standards (ABAAS) contain scoping and technical requirements for accessibility by persons with disabilities. These standards apply to federal buildings, including post offices, social security offices, federal courthouses and prisons, and national parks.
- **29 C.F.R. 1910, *Occupational Safety and Health Standards*** – This federal regulation, issued by the Occupational Safety and Health Administration (OSHA), establishes a wide range of workplace safety and health standards. Among other things, these standards: (1) establish requirements for walking-working surfaces to ensure these surfaces are free from hazards and (2) provide a safe environment to protect employees from falls and falling objects.
- **GSA Order PBS 5921.1, *PBS Fire Protection Program Policy*** – This policy establishes procedures, roles and responsibilities, and program activities for the PBS Fire Protection Program across all PBS regions. It also establishes “clear techniques for how fire and similar risks are managed in GSA-controlled [owned and leased] spaces.”

² 42 U.S.C. 4151–4157.

Hotline Complaint

On September 12, 2023, we received a hotline complaint from an anonymous GSA employee, alleging deficiencies in the fire doors at the GSA HQ building. The complainant asserted that “the fire doors to all floors in the unrenovated wing of the GSA headquarters building do not meet fire codes due to improper door hardware.” They added that “often the knobs stick, the door [sic] stick, and people sometimes must pull with all their might to open them.” The complainant also stated that sometimes the “fire doors get wired opened,” which would cause the exit stairwell to fill with smoke in the event of a fire. Finally, the complainant stated that “GSA oversees their own fire protection so there are no local inspectors ever, therefore normal fire codes are not enforced.”

The complainant asserted that although they informed GSA HQ building management of the safety concerns on “numerous” occasions, the concerns have remained “unaddressed for at least 2 decades.” After our preliminary assessment identified risk areas related to the hotline complaint, we initiated this audit in October 2023.

Results

PBS NCR did not fully comply with applicable laws, regulations, and PBS policies governing fire protection and accessibility for the GSA HQ building. We found that some fire doors used to access stairwells for emergency egress did not comply with fire protection requirements. Additionally, PBS NCR has not corrected a fire protection deficiency concerning coordination and communication with the local fire department. We also found that the GSA HQ building did not fully comply with accessibility requirements. Specifically, we identified deficiencies in wheelchair-accessible restrooms, one elevator, and the handrail for the building's wheelchair ramp that may make building access difficult or potentially hazardous for people with disabilities.

Finding 1 – PBS NCR did not fully comply with fire protection requirements for the GSA HQ building.

PBS NCR did not fully comply with fire protection requirements for the GSA HQ building. We found that some of the building's fire doors are not compliant with fire protection standards because they do not close and latch properly. We also found that PBS NCR has not addressed a fire protection deficiency concerning coordination and communication with the local fire department. Taken together, these deficiencies compromise the safety of building occupants and the public in the event of a fire emergency.

Some Fire Doors at the GSA HQ Building Are Not Compliant with Fire Safety Standards

PBS follows National Fire Protection Association 80, *Standard for Fire Doors and Other Opening Protectives* (NFPA fire door standard), which establishes specific safety requirements for fire doors. However, we found that some fire doors at the GSA HQ building are not compliant with the NFPA fire door standard because they do not close and latch properly.

The NFPA fire door standard requires that all swinging doors must close and latch to prevent smoke or fire from spreading within the building. The standard also requires that fire doors must be inspected at least annually to ensure that they meet applicable requirements for "maintenance of assemblies used to protect openings" and to "close at the time of fire." According to the GSA HQ building manager, the operations and maintenance contractor for the GSA HQ building performs these inspections quarterly.

However, we found that some of the fire doors in the GSA HQ building did not close and latch properly. On December 7, 2023, we conducted a walk-through of the GSA HQ building. During our walk-through, we tested 49 fire doors used to access stairwells for emergency egress and found that 7 (14.3 percent) did not close and latch properly. For example, the closing devices installed on some doors caused the doors to close too slowly. Other doors did not fully latch.

See *Figure 2* on the next page for a breakdown of our test results.

Figure 2. GSA HQ Building Fire Doors That Did Not Close and Latch Properly

Sampled GSA HQ Building Floors	Number of Fire Doors	Number of Fire Doors That Did Not Close and Latch Properly
Basement	15	3
First floor	15	0
Third floor	7	2
Fifth floor	6	2
Seventh floor	6	0
Total:	49	7
Deficiency Percentage:		14.3%

On January 4, 2024, we re-tested the seven deficient fire doors and found that they were still not closing and latching properly. The GSA HQ building manager subsequently told us that all the fire doors at the GSA HQ building were repaired during the week of January 8, 2024. On February 8, 2024, we conducted a third walk-through with the GSA HQ building manager to reassess the functionality of the fire doors. We found that two of the seven fire doors were still not closing and latching properly.

PBS NCR Has Not Coordinated Pre-Fire Planning Activities with the Local Fire Department

GSA Order PBS 5921.1, *PBS Fire Protection Program Policy*, requires PBS field offices to consult and coordinate pre-fire planning activities with the local fire department. The purpose of the pre-fire planning activities is to ensure that the local fire department has sufficient knowledge of the facility to improve its response to fire emergencies.

PBS Management Analysis and Review System (MARS) reviews are internal assessments conducted to determine whether PBS facilities are complying with applicable regulations, standards, and policies. The most recent MARS review report for the GSA HQ building, dated January 6, 2023, found insufficient documentation to verify that building management complied with PBS’s requirement to coordinate pre-fire planning activities with the local fire department.³

In January 2024, we asked PBS NCR officials whether they corrected this deficiency. The GSA HQ building manager told us that the building frequently undergoes fire alarm responses with the fire department; however, they could not provide supporting documentation to demonstrate

³ The January 6, 2023, MARS review report identified a total of four fire protection deficiencies; three of these deficiencies have been corrected by PBS NCR. The corrected deficiencies included the lack of documentation in PBS’s National Computer Maintenance Management System regarding fire safety equipment, absence of operation and maintenance manuals for fire equipment, and outdated emergency plans.

that they have consulted and coordinated with the local fire department for the purpose of pre-fire planning activities. Accordingly, this deficiency has not been addressed.

In sum, the GSA HQ building is not fully compliant with fire protection requirements. PBS NCR should address these deficiencies by ensuring that fire doors meet applicable requirements and providing oversight of the operations and maintenance contractor to ensure that inspections are performed effectively. PBS NCR should also coordinate a pre-fire planning walk-through of the GSA HQ building with the local fire department, document the results, and ensure that these walk-throughs are regularly scheduled and performed going forward.

Finding 2 – PBS NCR did not ensure that the GSA HQ building is fully compliant with accessibility requirements.

PBS NCR did not ensure that property conditions at the GSA HQ building were fully compliant with accessibility requirements. We found the following accessibility deficiencies at the GSA HQ building:

- Restrooms designated for wheelchairs were not easily accessible;
- One elevator did not have an automatic verbal announcement feature; and
- One handrail for a wheelchair accessibility ramp was not stable.

These deficiencies may make building access difficult or potentially hazardous for people with disabilities.

Restrooms Designated for Wheelchairs Were Not Easily Accessible

We observed 35 wheelchair-accessible restrooms within the GSA HQ building. During our walk-throughs of the building, we observed these restrooms to determine ease of wheelchair access using ABAAS guidelines. As described below, we found that most of the restrooms we observed did not fully comply with the ABAAS guidelines.

- **Force Required to Open Doors** – ABAAS guidelines specify that accessible door hardware must allow for one-hand operation and not require tight grasping, pinching, or twisting of the wrist. They also establish a maximum opening force of 5 pounds. However, we observed that 29 restroom doors were relatively heavy and did not allow for one-hand operation, requiring an individual to apply extra force to open them.
- **Door Clearance** – ABAAS guidelines require that door clearances must provide unobstructed space for maneuvering through the doorway. However, during our walk-throughs, we found that the entrances of 23 restrooms were obstructed by a trash can, potentially making it difficult for persons in wheelchairs to maneuver through the doorway.

One Elevator Did Not Have an Automatic Verbal Announcement Feature

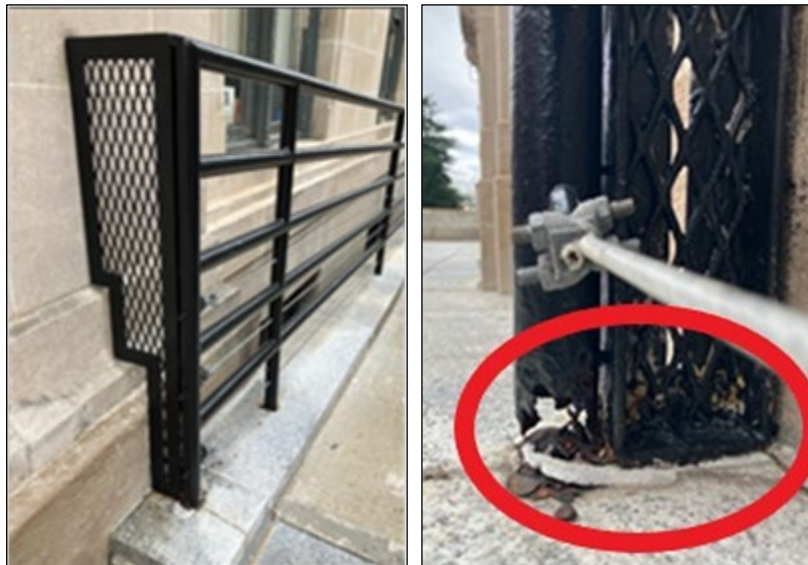
ABAAS guidelines require that elevators provide automatic verbal announcements during each floor stop to allow visually impaired passengers to identify their floor. During our GSA HQ building walk-throughs, we found that 1 out of 13 elevators was equipped with a bell ring instead of the required verbal announcement. GSA could not provide us with any information that waived the ABAAS requirement for an automatic verbal announcement feature in the elevator.

One Handrail for a Wheelchair Accessibility Ramp Was Not Stable

According to OSHA fall protection requirements, handrails and the top rails of stair rail systems must be capable of withstanding, without failure, a force of at least 200 pounds applied in any downward or outward direction within 2 inches (5 cm) of any points along the top edge of the rail.⁴ However, the handrail for the wheelchair accessibility ramp at the GSA HQ building entrance is not stable.

As shown in *Figure 3* below, we found that the handrail is not stable because one of the bottom corner metal rails has corroded to the point that it is no longer connected to the concrete base. Although the railing does not appear in imminent danger of collapse, the deterioration of the metal has compromised the integrity of the railing, making it more susceptible to failure and placing the safety of individuals using the ramp at risk.

Figure 3. Corrosion of GSA HQ Building Wheelchair Accessibility Ramp Railing⁵



⁴ OSHA 1910.29 (f)(7), *Strength criteria*.

⁵ Photographs taken by the audit team, December 7, 2023.

In sum, the GSA HQ building is not fully compliant with accessibility requirements. Accordingly, PBS NCR should ensure that the building meets ABAAS and OSHA requirements. PBS NCR officials told us that some of the deficiencies we identified can be easily addressed. For example, the PBS NCR accessibility specialist stated that the force of the restroom doors can be adjusted to meet accessibility requirements. Additionally, GSA's regional historic preservation officer told us that the trash cans can be easily relocated to create unobstructed space for maneuvering through the doorway. They also stated that the deficient elevator and handrail will be addressed through a future construction project for the unrenovated section of the building. However, because of the safety risks arising from these deficiencies, PBS NCR should take immediate steps to address them.

Conclusion

PBS NCR did not fully comply with applicable laws, regulations, and PBS policies governing fire protection and accessibility for the GSA HQ building. We found that some fire doors used to access stairwells for emergency egress did not comply with fire protection requirements. Additionally, PBS NCR has not corrected a fire protection deficiency concerning coordination and communication with the local fire department. We also found that the GSA HQ building did not fully comply with accessibility requirements. Specifically, we identified deficiencies in wheelchair-accessible restrooms, one elevator, and the handrail for the building's wheelchair ramp that may make building access difficult or potentially hazardous for people with disabilities.

PBS is responsible for ensuring that GSA space is operating and maintained in a safe and accessible manner. Accordingly, PBS NCR should take immediate actions to: (1) address the fire safety deficiencies identified during our audit and (2) improve facility management oversight of the GSA HQ building to ensure compliance with accessibility requirements.

Recommendations

We recommend that the PBS NCR Regional Commissioner:

1. Take immediate actions to address the fire safety deficiencies at the GSA HQ building by:
 - a. Promptly ensuring that all fire doors are inspected, repaired, or replaced for proper functionality and compliance with safety standards and fire codes.
 - b. Strengthening oversight to ensure that the building's operations and maintenance contractor is complying with contract requirements, including, but not limited to, fire safety requirements.
 - c. Expediting the corrective action for the fire safety deficiency identified during the MARS review, dated January 6, 2023, by coordinating pre-fire planning activities with the local fire department.
 - d. Ensuring that pre-fire planning walk-throughs are regularly scheduled and performed with the local fire department.

2. Take immediate actions to improve management oversight of its facilities to reassess compliance with ABAAS and OSHA requirements at the GSA HQ building by:
 - a. Reviewing designated wheelchair-accessible restrooms to ensure individuals with disabilities have easy access and adjusting any restroom doors to fall within the acceptable range for accessibility.
 - b. Addressing the functionality and compliance of all elevators, ensuring that each elevator is equipped with an automatic verbal announcement feature.
 - c. Stabilizing the handrail for the wheelchair ramp at the entrance of the building.

GSA Comments

The PBS NCR Regional Commissioner acknowledged our findings and concurred with our recommendations. PBS's response can be found in its entirety in **Appendix B**.

Audit Team

This audit was managed out of the Real Property Audit Office and conducted by the individuals listed below:

Byron G. Bustos	Associate Deputy Assistant Inspector General for Auditing
Jonathan H. Lee	Audit Manager
Nicole R. Robinson	Auditor-In-Charge
Jianxun Pan	Auditor

Appendix A – Objective, Scope, and Methodology

Objective

Our objective was to assess whether PBS NCR complied with applicable laws, regulations, and PBS policies governing fire protection and accessibility for the GSA HQ building in Washington, D.C.

Scope and Methodology

Our audit scope consisted of the GSA HQ building in Washington, D.C., for overall operation and property conditions related to fire safety and accessibility. We conducted several walk-throughs, which included a review of all wings of the selected floors in the GSA HQ building.

To accomplish our objective, we:

- Reviewed relevant laws, regulations, and PBS policies governing overall operation and property conditions to understand facility operations and management at the GSA HQ building;
- Analyzed prior PBS MARS reviews to evaluate any identified findings and corrective actions pertinent to our audit objective;
- Researched prior GSA Office of Inspector General audit reports related to our objective;
- Interviewed PBS personnel to understand the state of the GSA HQ building and to identify corrective actions pertinent to our audit objective;
- Conducted walk-throughs of the GSA HQ building to observe and evaluate its operation and property conditions related to fire safety and accessibility; and
- Communicated with GSA’s legal staff regarding ABAAS guidelines to better understand applicable laws and requirements.

Sampling

We examined a judgmental sample of floors from the GSA HQ building. Our sample included all the wings of the odd-numbered floors for observation, including the basement, first floor, third floor, fifth floor, and seventh floor. We selected a majority of the floors of the building to ensure sufficient coverage of the building. While this nonstatistical sample design does not allow for projection of the results to the population, it allowed us to address our audit objective.

Internal Controls

We assessed internal controls significant within the context of our audit objective against GAO-14-704G, *Standards for Internal Control in the Federal Government*. The methodology above describes the scope of our assessment, and the report findings include any internal control deficiencies we identified. Our assessment is not intended to provide assurance on GSA's internal control structure as a whole. GSA management is responsible for establishing and maintaining internal controls.

Compliance Statement

We conducted the audit between October 2023 and April 2024 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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Appendix B – GSA Comments



Public Buildings Service

July 19, 2024

MEMORANDUM FOR BYRON G. BUSTOS
ASSOCIATE DEPUTY ASSISTANT INSPECTOR
GENERAL FOR AUDITING (ADAIGA)
REAL PROPERTY AUDIT OFFICE (JA-R)

THROUGH: ELLIOT DOOMES *Elliot Doomes*
COMMISSIONER (P)

FROM: MELANIE F. GILBERT
REGIONAL COMMISSIONER (WP) *Melanie Gilbert*
PUBLIC BUILDINGS SERVICE DocuSigned by:
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SUBJECT: Response to the Office of the Inspector General's ("IG") Draft
Report, *Fire Safety and Accessibility Deficiencies at GSA
Headquarters Building in Washington, D.C. (A240018)*

On June 20, 2024, the Public Building Service ("PBS"), National Capital Region ("NCR"), received the Draft Report, *Fire Safety and Accessibility Deficiencies at GSA Headquarters Building in Washington, D.C.* (the "Report"). NCR reviewed the report, agrees with the recommendations, and appreciates the opportunity to respond with the following information on the findings.

1. **Finding 1:** PBS NCR did not fully comply with fire protection requirements for the GSA HQ building.

PBS NCR acknowledges the finding. PBS NCR is taking action to address the OIG's recommendations as follows:

- A. Promptly ensuring that all fire doors are inspected, repaired, or replaced for proper functionality and compliance with safety standards and fire codes.
 - a. PBS NCR confirmed that all fire doors were functional on May 28, 2024, and reconfirmed that all fire doors are properly functioning on June 4, 2024.
- B. Strengthening oversight to ensure that the building's operations and maintenance contractor is complying with contract requirements, including, but not limited to, fire safety requirements.

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- a. PBS NCR implemented a policy to inspect each fire door in all six stairwells on a daily basis. The Operations and Maintenance ("O&M") contractor increased its preventative maintenance inspections to occur monthly.
- C. Expediting the corrective action for the fire safety deficiency identified during the Management Analysis and Review System review, dated January 6, 2023, by coordinating pre-fire planning activities with the local fire department.
 - a. PBS NCR expedited and corrected the safety deficiencies on March 27, 2024, identified in the Management Analysis and Review System review, dated January 6, 2023.
- D. Ensuring that pre-planning walk-throughs are regularly scheduled and performed with the local fire department.
 - a. PBS was unable to identify a code requirement for local fire department coordination. However, PBS will coordinate with the local fire department during the annual fire alarm testing after completion of the ongoing Presidential Transition Team construction activities in 2024.

2. **Finding 2:** PBS NCR did not ensure that the GSA HQ building is fully compliant with accessibility requirements.

PBS NCR acknowledges the finding. PBS NCR is taking action to address the IG's recommendations as follows:

- A. Reviewing designated wheelchair-accessible restrooms to ensure individuals with disabilities have easy access and adjusting any restroom doors to fall within the acceptable range for accessibility.
 - a. On May 28, 2024, PBS NCR attended a walk through of the twenty-nine (29) bathroom doors identified in the Report. This confirmed that the doors exceeded the 5-pound maximum opening force required by the Architectural Barriers Act Accessibility Standards ("ABAAS") guidelines.
 - b. PBS NCR received funding approval on June 4, 2024, to replace the hardware on the twenty-nine (29) doors identified in the Report to accommodate the maximum opening force of 5 pounds.
 - c. PBS NCR is reviewing options to add automatic door operators in the remaining restrooms or designate a restroom per floor to be ABAAS compliant. Funding is approved.

d. Next Steps: PBS NCR anticipates an award to occur by July 29, 2024.

B. Addressing the functionality and compliance of all elevators with automatic verbal announcement features.

a. PBS NCR requested an estimate to install the automatic verbal announcement feature in the deficient elevator. NCR is currently addressing the automatic verbal announcement features; the installation of the automatic announcement feature is part of the elevator's upgrade project and is scheduled to be completed by July 31, 2024.

C. Stabilizing the handrail for the wheelchair ramp at the entrance of the building.

a. Completed Item: PBS NCR secured the handrail on the accessibility ramp on June 15, 2024.

In summary, NCR appreciates the opportunity to respond to the Draft Report, *Fire Safety and Accessibility Deficiencies at GSA Headquarters Building in Washington, D.C.*

Please contact Shauna Malone, Director, Office of Facilities Management at (202) 302-2140, if anything further is needed.

Appendix C – Report Distribution

GSA Administrator (A)

GSA Deputy Administrator (AD)

PBS Commissioner (P)

Acting Deputy Commissioner (P1)

Deputy Commissioner of Enterprise Strategy (P2)

Acting Chief of Staff (PB)

Acting Deputy Chief of Staff (PB)

Office of Audit Management and Accountability (BA)

Chief Financial Officer (B)

Deputy Chief Financial Officer (B)

Assistant Inspector General for Auditing (JA)

Deputy Assistant Inspector General for Acquisition Audits (JA)

Deputy Assistant Inspector General for Real Property Audits (JA)

Director, Audit Planning, Policy, and Operations Staff (JAO)