



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

IMPLEMENTATION REVIEW OF CORRECTIVE ACTION PLAN

**GSA's Mismanagement of
Contract Employee Access Cards
Places GSA Personnel, Federal
Property, and Data at Risk
Report Number
A190085/A/6/F21001
November 4, 2020**

Assignment Number A250023
March 31, 2025

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Introduction

We have completed an implementation review of the management actions taken in response to the recommendations contained in our November 2020 audit report, *GSA's Mismanagement of Contract Employee Access Cards Places GSA Personnel, Federal Property, and Data at Risk*, Report Number A190085/A/6/F21001.

Objective

The objective of our review was to determine whether GSA has taken the corrective actions as outlined in the corrective action plan for *GSA's Mismanagement of Contract Employee Access Cards Places GSA Personnel, Federal Property, and Data at Risk*, Report Number A190085/A/6/F21001, November 4, 2020 (see **Appendix A**). To accomplish our objective, we:

- Reviewed the audit report, *GSA's Mismanagement of Contract Employee Access Cards Places GSA Personnel, Federal Property, and Data at Risk*, Report Number A190085/A/6/F21001;
- Examined documentation submitted by GSA to support completion of the corrective action plan steps; and
- Interviewed GSA officials.

Background

The 2004 Homeland Security Presidential Directive 12, *Policy for a Common Identification Standard for Federal Employees and Contractors*, mandated the development and implementation of a government-wide standard for secure and reliable forms of identification for federal and contract employees. The directive created a federal standard for identification based on specific criteria for verifying an employee's identity that is resistant to identity fraud, tampering, counterfeiting, and terrorist exploitation.

On February 25, 2005, the U.S. Department of Commerce's National Institute of Standards and Technology published the Federal Information Processing Standards Publication 201, *Personal Identity Verification (PIV) of Federal Employees and Contractors* (FIPS 201). FIPS 201-2 (second version of FIPS 201, issued in August 2013) sets standards for implementing identity credentials stored on PIV cards for federal and contract employees.

FIPS 201-2 defines agency requirements for the issuance, maintenance, and termination of PIV cards. It also requires agencies to complete a background investigation prior to issuing a PIV card. In addition, FIPS 201-2 standards establish when a cardholder is no longer eligible to possess a PIV card, including upon: (1) completion of contractual obligations; (2) cancellation of contract; (3) termination of employment; or (4) a failed background check. When a cardholder is no longer eligible for a PIV card, FIPS 201-2 requires agencies to collect and disable the PIV card.

On November 4, 2020, we issued an audit report, *GSA's Mismanagement of Contract Employee Access Cards Places GSA Personnel, Federal Property, and Data at Risk*, to GSA. The objective of the audit was to determine if GSA properly accounts for PIV cards issued to contract employees in accordance with federal regulation, policy, and guidance.

Our audit found that GSA's mismanagement of contract employee PIV cards placed GSA personnel, federal property, and data at risk.

To address the finding identified in our report, we recommended that the GSA Deputy Administrator:

1. Continue to take action to account for and collect the PIV cards identified in our audit that remain outstanding by:
 - a. Updating the GSA Credential and Identity Management System records for contract employees to ensure that they are accurate;
 - b. Terminating and recovering all PIV cards no longer needed by former contract employees; and
 - c. Reporting unauthorized cardholders for any PIV cards that cannot be recovered to the U.S. Department of Homeland Security for unauthorized possession of a United States identification card, in compliance with 18 U.S.C., Section 701.

2. Ensure collaboration between Heads of Services and Staff Offices to require enforcement of current policy and implement new policy to account for all PIV cards issued to contract employees by:
 - a. Establishing PIV card recovery procedures that include specific steps to take for lost, stolen, and non-returned PIV cards, including withholding final payment if PIV cards are not returned, as outlined in Federal Acquisition Regulation 52.204-9, *Personal Identity Verification of Contractor Personnel*;
 - b. Implementing procedures, using the GSA Credential and Identity Management System, that track and monitor GSA's recovery of PIV cards and include communicating the results to the requesting officials and regional leadership;
 - c. Requiring training on PIV card issuance and recovery for personnel with responsibilities in the PIV card process;
 - d. Coordinating with the U.S. Department of Homeland Security to establish emergency procedures (including when unfit determinations are made) for recovery of contract employee PIV cards, in accordance with Federal Information Processing Standards Publication 201-2, *Personal Identity Verification (PIV) of Federal Employees and Contractors*; and
 - e. Implementing the oversight of requesting officials and Office of Mission Assurance personnel to ensure GSA maintains accurate contract employee data in the GSA Credential and Identity Management System and retrieves PIV cards.

GSA agreed with our report recommendations.

Results

Our implementation review determined that GSA has taken appropriate corrective actions to address the recommendations. We determined that no further action is necessary.

Audit Team

This review was managed out of the Heartland Region Audit Office and conducted by the individuals listed below:

Michelle Westrup
Daniel Riggs
Katina Luke

Regional Inspector General for Auditing
Audit Manager
Auditor-In-Charge

Appendix A – Corrective Action Plan for Report Number A190085/A/6/F21001

Updated 2/3/21

A190085A6F21001 Corrective Action Plan

Designated Responding Official: Robert Carter

Contact Person: Jay Moyer

Telephone Number: 720 326 2390

Date: updated 2/3/21

A190085 Corrective Action Plan

Audit report number: A190085A6F21001, GSA's <i>Mismanagement of Contract Employee Access Cards Places GSA Personnel, Federal Property, and Data at Risk</i>	Recommendation Number: 001a	Proposed Recommendation Completion Date: (09/30/2021)
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Recommendation (Only one recommendation per page)

001a. Continue to take action to account for and collect the PIV cards identified in our audit that remain outstanding by: Updating the GCIMS records for contract employees to ensure that they are accurate.

Action to be Taken Step-by-Step	Supporting Documentation to be sent to the GAO/IG Audit Management Division	Documentation Sent or Will Be Sent By
001: OMA created a Working Group with HSSO Stakeholders that will routinely meet to ensure contract and contractor data is accurate and up to date.	Recurring Google calendar meeting including agenda	Completed - 02/18/2020
002: OMA provided a listing of active contractors not on an active contract to HSSO HSPD-12 POCs to validate if the contractor is still working for GSA or not. HSSO HSPD-12 POCs work with the Requesting Officials (ROs) to make contractors inactive if contractors are no longer working on a GSA contract or should update new contract information if contractors are still working at GSA.	Copy of emailed GCIMS monthly report, before and after actions were taken	Completed - 07/31/2020

003: OMA created a Contract Dashboard to help ROs track and monitor the contracts and contractors through the HSPD-12 lifecycle. This tool, and the associated User Guide, will be reviewed to determine if any improvements can be made to reduce any manual process steps in the GSA Access Card process.	Copy of review output (User Guide and Quick Start Guides) was posted on the HSPD-12 InSite page.	Completed - 09/30/2020
004: OMA, PBS, and FAS will work together to correct errors in GCIMS and create a routine process to update incorrect contract data including contract number, contract start date, contract end date, and COR information in the GCIMS. (PBS POCs: Michelle Coleman and Ashley Seffernick; FAS POC Greg Rollins)	Process Documentation Data Reports showing corrected contract data	Completed - 01/31/2021
005: OMA and PBS to create a process to obtain contract data from PBS' Electronic Acquisition System Integration (EASI) program database to update PBS and HSSO contract information in the GCIMS. (PBS POCs: Michelle Coleman and Ashley Seffernick)	Sample File transfer PBS Contract Period of Performance Update Report	02/30/2021
006: OMA and PBS to create a process to increase utilization of EASI data by ensuring the PBS and HSSO contract data matches	Process Documentation	9/30/2021

<p>what is in EASi. Additionally, for agreements (e.g., Child Care, Randolph Sheppard Act, or MOUs) that are not in EASi, OMA and PBS will build a process for identifying non-EASi agreements in creating and updating contract data as needed. (PBS POCs: Michelle Coleman and Ashley Seffernick)</p>		
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<p>Audit report number: A190085A6F21001, GSA's <i>Mismanagement of Contract Employee Access Cards Places GSA Personnel, Federal Property, and Data at Risk</i></p>	<p>Recommendation Number: 001b</p>	<p>Proposed Recommendation Completion Date: (03/31/2021)</p>
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001b. Continue to take action to account for and collect the PIV cards identified in our audit that remain outstanding by: Terminating and recovering all PIV cards no longer needed by former contract employees.

Action to be Taken Step-by-Step	Supporting Documentation to be sent to the GAO/IG Audit Management Division	Documentation Sent or Will Be Sent By
<p>001: OMA provided a listing of inactive contractors where there were no card actions (collected, destroyed, lost/stolen or uncollectable) to HSSO HSPD-12 POCs to recover GSA Access Cards.</p>	<p>Copy of emailed GCIMS weekly report</p>	<p>Completed - 07/31/2020</p>
<p>002: OMA will create a weekly report to be used by OMA to identify any inactive contractors where GSA Access Cards are not terminated. The report will be a check against the current process to verify that GSA Access Cards get terminated.</p>	<p>Copy of emailed GCIMS weekly report</p>	<p>Completed - 01/31/2021</p>
<p>003: OMA will provide a listing of unfit contractors who had a GSA Access Card with no card actions (collected, destroyed,</p>	<p>Copy of emailed GCIMS weekly report</p>	<p>Completed - 01/31/2021</p>

<p>lost/stolen or uncollectable) to HSSO HSPD-12 POCs to recover GSA Access Cards.</p>		
<p>004: OGP developed a sample letter for contracting officers/ROs to send to contractors to collect GSA Access Cards. (OGP POC: Nicholas West)</p>	<p>Email to GSA acquisition management groups with a copy of the sample letter.</p>	<p>Completed - 12/11/2019</p>
<p>005: PBS and FAS contacted contractors to collect outstanding GSA Access Cards. (PBS POCs: Michelle Coleman and Ashley Seffernick; FAS POC Greg Rollins)</p>	<p>PBS and FAS provided email sent to contractors and list of card holders notified.</p>	<p>Completed - 2/1/2020</p>
<p>006 OMA and OCFO run an automated process to notify cardholders (1) inactive and uncollected and (2) active but no valid contract who have not already been contacted.</p>	<p>Script of automated message, list of notifications sent and individuals notified and report final disposition of cards.</p>	<p>3/31/2021</p>

Audit report number: 190085A6F21001, GSA's <i>Mismanagement of Contract Employee Access Cards Places GSA Personnel, Federal Property, and Data at Risk</i>	Recommendation Number: 001c	Proposed Recommendation Completion Date: (09/30/2021)
001c. Continue to take action to account for and collect the PIV cards identified in our audit that remain outstanding by: Reporting unauthorized cardholders for any PIV cards that cannot be recovered to DHS for unauthorized possession of a United States identification card, in compliance with 18 U.S.C., Section 701.		
Action to be Taken Step-by-Step	Supporting Documentation to be sent to the GAO/IG Audit Management Division	Documentation Sent or Will Be Sent By
001: OMA will work with FPS/DHS to develop a process to report inactive contractors with uncollected GSA Access Cards.	Sample file and copy of process flow documentation denoting notification to FPS/DHS that will be posted in the HSPD-12 InSite page.	09/30/2021

Audit report number: A190085A6F21001, GSA's <i>Mismanagement of Contract Employee Access Cards Places GSA Personnel, Federal Property, and Data at Risk</i>	Recommendation Number: 002a	Proposed Recommendation Completion Date (03/31/2021)
002a. Ensure collaboration between Heads of Services and Staff Offices to require enforcement of current policy and implement new policy to account for all PIV cards issued to contract employees by: Establishing PIV card recovery procedures that include specific steps to take for lost, stolen, and non-returned PIV cards, including withholding final payment if PIV cards are not returned, as outlined in FAR 52.204-9, Personal Identity Verification of Contractor Personnel.		
Action to be Taken Step-by-Step	Supporting Documentation to be sent to the GAO/IG Audit Management Division	Documentation Sent or Will Be Sent By
001: OMA drafted additional guidance on the specific steps in the overall GSA Access Card process.	Copy of process flowcharts denoting agency procedures and user role responsibilities on GSA Access Card extension of need, collection at end of individual need, collection at end of contract will be posted in the HSPD-12 InSite page.	Completed - 07/31/2020
002: GSA will establish GSA Access Card recovery procedures that include specific steps to take for lost, stolen, and non-returned GSA Access Card prior to referring outstanding cards to DHS/FPS, including withholding payment to vendors.	Copy of revisions made to GSA policy and guidance as determined or where the regulation has been submitted to OMB for approval in the case of regulatory changes.	03/31/2021

003: OGP has published the following metrics on GSA performance for collecting GSA Access Cards issued to contractors to the Acquisition Dashboard for greater transparency by GSA Heads of Contracting Activities (HCAs) and to monitor the effectiveness of the actions taken above. (OGP POC: Nicholas West)	Email notifying GSA HCAs and Screenshots of the Acquisition Executive Dashboard	Completed - 10/13/2020
<p>1. Contractor GSA Access Cards Outstanding - This metric represents the total number of uncollected GSA Access Cards (where GCIMS lists the contract period as expired or inactive).</p> <p>2. GCIMS Procurement Instruction and Identification % - This metric represents the percentage of contract numbers that match in both GCIMS and FPDS. This metric is intended to measure GSA's ability to improve data quality in the systems of record.</p>		

Audit report number: A190085A6F21001, GSA's <i>Mismanagement of Contract Employee Access Cards Places GSA Personnel, Federal Property, and Data at Risk</i>	Recommendation Number: 002b	Proposed Recommendation Completion Date: (10/31/2021)
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002b. Ensure collaboration between Heads of Services and Staff Offices to require enforcement of current policy and implement new policy to account for all PIV cards issued to contract employees by: Implementing procedures, using the GCIMS, that track and monitor GSA's recovery of PIV cards and include communicating the results to the ROs and regional leadership.

Action to be Taken Step-by-Step	Supporting Documentation to be sent to the GAO/IG Audit Management Division	Documentation Sent or Will Be Sent By
001: OMA created a GCIMS automated email notification to GSA ROs 60 days, 30 days, and 0 days from the contract end date. These notifications allow ROs to identify when their contracts end and take the necessary steps needed for closing them out.	GCIMS summary report for automated emails	Completed - 04/30/2020
002: OMA provided a listing of active contractors not on an active contract to HSSO HSPD-12 POCs to validate if the contractor is still working for GSA or not. HSSO HSPD-12 POCs should make contractors inactive if contractors are no longer working on a GSA contract or should	Copy of emailed GCIMS monthly report, before and after actions were taken	Completed - 07/31/2020

update new contract information if contractors are still working at GSA on a different contract.		
003: OMA created a Contract Dashboard to help ROs track and monitor the contracts and contractors through the HSPD-12 lifecycle. This tool, and associated User Guide, will be reviewed to determine if any improvements can be made to reduce any manual process steps in the GSA Access Card process.	Copy of review output (e.g. User Guide and Quick Guides) posted on the HSPD-12 InSite page.	Completed - 09/30/2020
004: OMA will create a GCIMS automated email notification when a contractor with a GSA Access Card is made inactive. This notification will be sent to ROs, vendor POCs, and contractors so everyone knows the GSA Access Card needs to be returned.	Copy of email	03/30/2021
005: PBS implementation of the PIV Technology Board to effectively support the improvement of data accuracy for GSA Access Cards, GSA Access Card management, retrieval and reassignment. (PBS POCs: Michelle Coleman and Ashley Seffernick)	-PIV Technology Board Charter -Process Mapping Documentation, resulting process improvements implemented to retrieve cards (i.e., Google scripts and other automations) - PIV team Agenda or Minutes	10/31/2021
006: PBS reduced its number of inactive card	PIV Data clean up results	Completed - 12/10/2019

holders by updating contract information for 5700 unique contracts and 17,000 individual cardholders (PBS POCs: Michelle Coleman and Ashley Seffernick)		
007: PBS automated 3,900 contractor notification letters to collect expired/terminated GSA Access Cards. (PBS POCs: Michelle Coleman and Ashley Seffernick)	Contractor Notifications	Completed - 2/1/2020
008: PBS started a monthly review process of PIV data to improve the accuracy of GSA Access Card information. PBS is completing ongoing reviews of data from the GCIMS to ensure GSA Access Cards should be accurately marked as inactive and uncollectible. (PBS POCs: Michelle Coleman and Ashley Seffernick)	Data report indicating increase in contract number accuracy from 40% to 89% Ongoing data cleanup reports to show improvement in data accuracy.	Completed - 9/30/2020
009: PBS will issue policy to improve the management and oversight of GSA Access Cards while further enforcing current policy and procedures. (PBS POCs: Michelle Coleman and Ashley Seffernick)	Issued policy	10/31/2021

Audit report number: A190085A6F21001, GSA's <i>Mismanagement of Contract Employee Access Cards Places GSA Personnel, Federal Property, and Data at Risk</i>	Recommendation Number: 002c	Proposed Recommendation Completion Date: Completed (11/30/2020)
002c. Ensure collaboration between Heads of Services and Staff Offices to require enforcement of current policy and implement new policy to account for all PIV cards issued to contract employees by: Requiring training on PIV card issuance and recovery for personnel with responsibilities in the PIV card process.		
Action to be Taken Step-by-Step	Supporting Documentation to be sent to the GAO/IG Audit Management Division	Documentation Sent or Will Be Sent By
001: GSA developed on-demand HSPD-12 training on OLU.	Copy of training material (e.g. slides, screen shots).	Completed - 11/30/2020
002: GSA mandated training for all personnel involved in the GSA Access carding process	Email notification to GSA individuals required to take the training, which includes all individuals with the role "requesting officials" in GCIMS, that is provided in OLU. Updated curriculum requirements for FAC-COR certifications located on the Acquisition Portal Career Management Insite Page . Completed training report.	9/30/21

Audit report number: A190085A6F21001, GSA's <i>Mismanagement of Contract Employee Access Cards Places GSA Personnel, Federal Property, and Data at Risk</i>	Recommendation Number: 002d	Proposed Recommendation Completion Date: (09/30/2021)
002d. Ensure collaboration between Heads of Services and Staff Offices to require enforcement of current policy and implement new policy to account for all PIV cards issued to contract employees by: Coordinating with DHS to establish emergency procedures (including when unfit determinations are made) for recovery of contract employee PIV cards, in accordance with FIPS 201-2, Personal Identity Verification (PIV) of Federal Employees and Contractors.		
Action to be Taken Step-by-Step	Supporting Documentation to be sent to the GAO/IG Audit Management Division	Documentation Sent or Will Be Sent By
001: OMA will work with FPS/DHS to come up with a process to report unfit contractors that have not returned the GSA Access Card.	Sample file and copy of process flow documentation denoting notification to FPS/DHS that will be posted in the HSPD-12 InSite page.	09/30/2021

Audit report number: A190085A6F21001, GSA's <i>Mismanagement of Contract Employee Access Cards Places GSA Personnel, Federal Property, and Data at Risk</i>	Recommendation Number: 002e	Proposed Recommendation Completion Date: (09/30/2021)
002e. Ensure collaboration between Heads of Services and Staff Offices to require enforcement of current policy and implement new policy to account for all PIV cards issued to contract employees by: Implementing the oversight of ROs and OMA personnel to ensure GSA maintains accurate contract employee data in the GCIMS and retrieves PIV cards.		
Action to be Taken Step-by-Step	Supporting Documentation to be sent to the GAO/IG Audit Management Division	Documentation Sent or Will Be Sent By
001: Establish an enterprise-wide, pre-defined, common critical element in performance plans for ROs.	Copy of the memo establishing mandatory critical performance plan element that defines performance standards for CORs on active delegation.	Completed - 10/31/2020
002: GSA will use the monthly program audit leadership meetings to provide updates to leadership on the status of GSA Access Cards. Progress will be monitored using the dashboard reports. These reports identify the total number of cards that require action by organization.	Snapshot of Monthly PIV Dashboard .	03/31/2021

003: OGP will conduct a Program Management Review (PMR) to assess GSA Access Card key controls (OGP POC: Nicholas West)	PMR Final Report	9/30/2021
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Appendix B – Report Distribution

Acting GSA Administrator (A)

GSA Deputy Administrator (AD)

PBS Commissioner (P)

PBS Deputy Commissioner (P1)

PBS Deputy Commissioner of Enterprise Strategy (P2)

Acting PBS Chief of Staff (PB)

Acting PBS Deputy Chief of Staff (PB)

FAS Commissioner (Q)

FAS Deputy Commissioner (Q1)

FAS Deputy Commissioner (Q2)

FAS Chief of Staff (Q)

Associate Administrator for Mission Assurance (D)

Deputy Associate Administrator for Mission Assurance (D1)

Chief of Staff for Mission Assurance (D2)

Chief Financial Officer (B)

Office of Audit Management and Accountability (BA)

Assistant Inspector General for Auditing (JA)

Deputy Assistant Inspector General for Acquisition Audits (JA)

Deputy Assistant Inspector General for Real Property Audits (JA)

Director (JAO)