



Office of Inspector General
U.S. General Services Administration

SEMIANNUAL REPORT TO THE CONGRESS

October 2024 to March 2025



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MESSAGE FROM THE INSPECTOR GENERAL



I am pleased to submit to Congress our Semiannual Report for the period of October 1, 2024, through March 31, 2025.

During this reporting period, the GSA OIG issued 18 reports, including 11 contract audit reports, with more than \$282.3 million in financial recommendations for potential cost savings and recoveries for the federal government. In addition, our investigative and legal work yielded \$34.7 million in monetary recoveries.

In February, the GSA OIG completed its review of GSA's site selection process for the relocation of the FBI's headquarters building. We found, among other things, that GSA had provided some inaccurate information related to the site selection cost for one of the locations; that GSA's rationale for increasing the weighting of its cost criterion was not justified; and that GSA failed to properly maintain cell phone text messages related to the project. In a separate inspection of a high-risk GSA building, we found that inadequate security measures, including the building's lack of a functioning Facility Security Committee, put the building and its occupants at risk.

Our auditors issued an alert memorandum after finding that GSA's Public Buildings Service (PBS) allowed the use of a drone, manufactured by a Chinese military company and a prohibited source, to photograph construction at a Land Port of Entry in San Luis, Arizona. Another audit found that GSA is not effectively managing its internal space to reflect occupancy changes – specifically that GSA lacked the accurate and reliable data necessary to determine and monitor its occupancy and space utilization targets. Additionally, after assessing a hotline complaint, we issued an audit memorandum after finding that PBS did not have complete and accurate asbestos information for the Herbert C. Hoover building in Washington, D.C.

Our special agents continued their work in detecting complex procurement fraud schemes. One case resulted in Booz Allen Hamilton Holding Corporation agreeing to pay the United States \$15.875 million to resolve allegations that one of its subsidiaries submitted fraudulent claims in connection with a GSA task order. Another investigation resulted in the criminal convictions of five individuals who schemed to steer housekeeping and janitorial services contracts for personal benefit. The five defendants were sentenced to 12 years of combined incarceration and ordered to pay \$3.7 million in restitution.

Lastly, I would be remiss if I did not highlight the brave actions of one of our special agents who stopped an active shooter situation in February. The gunman, armed with an assault rifle, fired 28 rounds, killing two innocent people at a Virginia shopping center. The gunman was continuing his attack when our special agent stepped in, putting himself in harm's way, engaged the suspect, and stopped the threat before more lives were lost. This event highlighted our special agent's heroism and dedication to public service, as well as the critical federal law enforcement training that our special agents receive. I am proud of and thankful for the special agent's actions in saving lives that day.

Our mission fighting fraud, waste, and abuse would not be possible without the hard work of the men and women of GSA OIG. I am honored to lead this office and am thankful for the continued support of both Congress and GSA management.

Robert C. Erickson
Deputy Inspector General
March 31, 2025

OIG PROFILE

ORGANIZATION

The General Services Administration (GSA) Office of Inspector General (OIG) was established on October 1, 1978, as 1 of the original 12 OIGs created by the Inspector General Act of 1978. The OIG's five components work together to perform the mission mandated by Congress.

The OIG provides nationwide coverage of GSA programs and activities. The OIG's components include:

- **THE OFFICE OF AUDITS**, an evaluative organization staffed with auditors and analysts that provides comprehensive coverage of GSA operations through program, financial, regulatory, and system audits and assessments of internal controls. The office conducts attestation engagements to assist GSA contracting officials in obtaining the best value for federal customers and American taxpayers. The office also provides other services to assist management in evaluating and improving its programs.
- **THE OFFICE OF ADMINISTRATION**, a professional support staff that provides budget and financial management, contracting, facilities and support services, human resources, information technology (IT) services, executive resources, and administration of the OIG's records management program.
- **THE OFFICE OF COUNSEL**, an in-house legal staff that provides legal advice and assistance to all OIG components, represents the OIG in litigation arising out of or affecting OIG operations, and manages the OIG legislative and regulatory review.
- **THE OFFICE OF INSPECTIONS**, a multi-disciplinary organization that analyzes and evaluates GSA's programs and operations through management and programmatic inspections and evaluations that are intended to provide insight into issues of concern to GSA, Congress, and the American public. The office also coordinates quality assurance for the OIG and analyzes potentially fraudulent or otherwise criminal activities in coordination with other OIG components.
- **THE OFFICE OF INVESTIGATIONS**, a statutory federal law enforcement organization that conducts nationwide criminal, civil, and administrative investigations of illegal or improper activities involving GSA programs, operations, and personnel.

OFFICE LOCATIONS

Headquarters:

Washington, D.C.

Field and Regional Offices:

Atlanta, Georgia; Boston, Massachusetts; Chicago, Illinois; Denver, Colorado; Fort Lauderdale, Florida; Fort Worth, Texas; Kansas City, Missouri; New York, New York; Oakland, California; Philadelphia, Pennsylvania; Santa Ana, California; Tacoma, Washington; and Washington, D.C.

STAFFING AND BUDGET

As of March 31, 2025, the OIG's on-board staffing level was 272 employees. The OIG's Fiscal Year (FY) 2025 budget is \$73.837 million in annual appropriated funds plus \$600,000 in reimbursable authority.

GSA's MANAGEMENT CHALLENGES

The Reports Consolidation Act of 2000, Public Law 106-531, requires Inspectors General to report on the most significant management challenges facing their agencies. The following table briefly describes the challenges the OIG identified for GSA for FY 2025. The complete assessment is posted on our website.

MANAGEMENT CHALLENGE	DESCRIPTION
Establishing and Maintaining an Effective Internal Control Environment	GSA continues to face significant challenges in establishing a comprehensive and effective system of internal control. Since 2018, we have cited pervasive internal control weaknesses as a challenge for GSA. This trend continued for GSA. We found that GSA's internal control environment failed to ensure compliance with laws, regulations, and policies; and GSA lacked the oversight needed to ensure and enforce compliance. We also found that GSA did not fully address findings identified in audit reports.
Improving Contract Award and Administration	GSA awards billions of dollars in contracts for products, services, and facilities every year. After the contracts are awarded, GSA's work turns to contract administration, including monitoring contractor performance against contract terms, reviewing and approving requests for payment, addressing change orders, and closing out contracts. Since FY 2020, we have cited deficiencies in contract administration as a challenge for GSA. This area continued to be a concern. While GSA has taken steps to strengthen its policies, address training for its contracting staff, and implement process improvements for its contract administration, weaknesses in GSA's contract award and administration persist.
Developing Efficient and Effective Acquisition Solutions	As the federal government's primary provider of acquisition services, GSA has stated that it is committed to delivering value, innovation, and an exceptional customer experience. To meet these commitments, the Federal Acquisition Service (FAS) is undertaking several initiatives that will have a major impact on its acquisition solutions. These initiatives include transforming the Multiple Award Schedule (MAS) Program and managing supply chain risk. At the same time, recent legislative proposals would fundamentally change the Multiple Award Schedule (MAS) Program by relieving GSA of its responsibility to obtain the best pricing for federal customer agencies ordering from MAS contracts. These initiatives and proposed legislative changes create significant challenges to FAS's ability to meet its mission.
Maximizing the Performance of GSA's Real Property Inventory	The Public Buildings Service (PBS) must maximize the performance of its real property inventory to provide its tenant agencies with space that meets their needs at a reasonable cost to American taxpayers. To achieve this goal, PBS needs to determine the best approach to reduce and consolidate space, reduce leasing costs, and meet operations and maintenance needs of increasingly aging buildings. Further, PBS must properly administer the capital construction program and ensure effective management of energy savings performance and utility energy service contracts.
Managing Agency Cybersecurity Risks	Like all federal agencies, GSA is dependent upon IT to fulfill its mission. However, as cybersecurity threats continue to emerge, sensitive government information and systems must be adequately secured to safeguard against internal and external threats that could compromise critical information and systems. GSA is not immune to these threats. Accordingly, GSA will continue to be challenged to effectively monitor and efficiently identify and respond to cybersecurity threats against Agency systems and data. GSA will need to continuously identify technical solutions and implement controls to mitigate these threats as bad actors find new ways to penetrate and navigate government networks and systems undetected.
Providing a Safe Work Environment	GSA plays a significant role in providing a safe and secure work environment for federal employees and visitors at more than 8,300 federally owned and leased facilities nationwide. Part of GSA's responsibility is implementing its PBS Facility Safety, Health, and Environmental Management Program to ensure compliance with safety and health requirements. GSA's management of building safety measures is critical because problems could pose fire, safety, and health risks to GSA building tenants, visitors, contractors, the public, and federal property. However, our recent reports and memorandums demonstrate that PBS continues to face significant challenges to meet and manage its responsibilities for providing a safe work environment at federally owned and leased facilities.
Securing Federal Facilities	GSA plays a significant role in providing secure federal facilities nationwide. However, our reports demonstrate GSA management's significant challenges in securing federal facilities. Recent audits have found problems with GSA's monitoring and enforcement of its security protocols.

OIG PROFILE

MANAGEMENT CHALLENGE	DESCRIPTION
Managing the Electrification of the Federal Fleet*	Executive Order 14057, <i>Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability</i> , requires 100 percent zero-emission vehicle acquisitions by 2035, including 100 percent zero-emission light-duty vehicle acquisitions by 2027. GSA's Fleet Management faces numerous challenges in transitioning to an all zero-emission vehicle fleet. These challenges include finding available zero-emission vehicles to purchase, managing rising repair costs for the current vehicle fleet, and developing the charging infrastructure to power zero-emission vehicles.
Management of the Technology Transformation Service	GSA's Technology Transformation Service (TTS) was established in 2016 as GSA's third service line to become a "permanent home for innovation and technology modernization inside GSA." However, after significant management issues were identified, TTS was realigned to report to the FAS Commissioner in 2017. TTS relies on two funds, appropriations through the Federal Citizen Services Fund and GSA's Acquisition Services Fund, a revolving fund that requires cost recovery to fund its operations. Initially projected to achieve cost recovery in FY 2019, TTS's latest projections push that date to FY 2027. Since its creation, TTS has been the subject of one GAO report and three reports issued by our office. In all four reports, recommendations were made to improve management controls related to oversight, financial management, performance, and IT. Since as early as 2017, TTS officials have told us that they were establishing internal controls. Despite those assertions, TTS continues to have problems.

*Executive Order 14057, *Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability* was revoked by Executive Order 14154, *Unleashing American Energy* on January 20, 2025. However, it was in effect when we developed our assessment of GSA's management challenges for FY 2025.

SIGNIFICANT AUDITS

The Office of Audits conducts independent and objective audits to improve the effectiveness and efficiency of GSA's management and operations. These audits focus on GSA's programs, internal controls, IT infrastructure, and compliance with federal laws and regulations. Audits are also performed to assist GSA contracting personnel in obtaining the best value and price for federal customers. During this reporting period, we issued 16 audit reports, including 11 contract audits. Our contract audits identified more than \$282.3 million in potential cost savings and recoveries for the federal government.

PREAWARD AUDITS

GSA provides federal agencies with products and services through various contract types. We oversee GSA's procurement program, which generates billions of dollars in annual sales through thousands of contracts, by conducting preaward, postaward, and performance audits. Historically, for every dollar invested in our preaward audits, we recommend at least \$20 in cost savings to the government through lower prices or more favorable contract terms and conditions for the benefit of the American taxpayer.

The predecisional, advisory nature of preaward audits distinguishes them from other audit products. Preaward audits provide vital, current information, enabling contracting officers to significantly improve the government's negotiating position to realize millions of dollars in savings on negotiated contracts.

During this reporting period, three of our more significant preaward audits were of MAS contracts with combined projected government sales of more than \$951.9 million. Through these audits, we identified potential savings and recoveries of more than \$201.3 million. We found, among other things, that Commercial Sales Practices (CSP) information was not current, accurate, and complete; proposed labor rates were overstated; price reduction provisions were ineffective; and unqualified employees were assigned to task orders.

PERFORMANCE AUDITS

ALERT MEMORANDUM: PBS ALLOWED THE USE OF A DRONE FROM A PROHIBITED SOURCE TO PHOTOGRAPH CONSTRUCTION AT A LAND PORT OF ENTRY IN SAN LUIS, ARIZONA

Memorandum Number A220036-5, dated March 13, 2025

We issued this alert memorandum to notify the PBS Commissioner of a security concern that warranted immediate attention. During our *Audit of PBS Pacific Rim Region’s Award and Administration of the San Luis Land Port of Entry Expansion and Modernization Project*, we learned that the project’s construction contractor has frequently taken aerial photographs of the construction progress using a drone manufactured by a company that the U.S. Department of Defense (DOD) has identified as a “Chinese military company” and a potential threat to national security.

The San Luis I Land Port of Entry (LPOE), located on the U.S. international border with Mexico in San Luis, Arizona, was originally constructed in 1984 as a commercial and noncommercial port. It houses the U.S. Department of Homeland Security’s U.S. Customs and Border Protection and U.S. Immigration and Customs Enforcement, which provide a mix of safety and security services for travelers and trade. The LPOE serves as an entry point to the United States for migrant field laborers for Yuma County, Arizona, and processes more than 3 million vehicles and 2.5 million pedestrians each year. Because it contains law enforcement agencies and has a high volume of public traffic, the San Luis I LPOE is considered a Security Level III facility.¹ Accordingly, if the area was compromised, it could result in significant adverse consequences for the facility, operation of the facility, the mission of the Agency, or its occupants and visitors.

In September 2022, the PBS Pacific Rim Region (PBS Region 9) awarded a \$394 million construction contract to modernize and expand the San Luis I LPOE. Construction started in May 2023 and is projected to be completed in 2029. The construction contract requires the construction contractor to photograph the project’s progress from different points of view to demonstrate that the work has been completed. However, PBS Region 9 has not taken the appropriate steps to ensure the construction contractor has complied with applicable security requirements covering the use of drones. This enabled the construction contractor to use a drone manufactured by a prohibited source to photograph construction of the LPOE.

We alerted the PBS Commissioner that this is the second time our office has identified security concerns related to using drones to photograph LPOE construction sites. In September 2024, our office reported similar concerns related to drone usage on a paving project completed by the PBS Northeast and Caribbean Region at New York State’s northern border. Accordingly, we advised that PBS should instruct its San Luis I LPOE construction contractor to immediately discontinue use of the drone and take steps to ensure that contractors for all active and future PBS construction projects comply with applicable security requirements covering the use of drones.

¹ The U.S. Department of Homeland Security defines Facility Security Level as a categorization based on the analysis of several security-related facility factors, which serves as the basis for the identification of preliminary countermeasures and recurring risk assessments.

GSA IS NOT EFFECTIVELY MANAGING ITS INTERNAL SPACE TO REFLECT OCCUPANCY CHANGES

Report Number A240044/P/R/R25001, dated March 19, 2025

We performed this audit to determine if GSA evaluated, managed, and monitored its internal space to reflect occupancy changes in accordance with applicable laws, regulations, policies, and guidance.

We found that GSA is not effectively managing its internal space to reflect occupancy changes. Specifically, GSA's ability to manage its internal space is impaired because it lacks the accurate and reliable data necessary to determine and monitor its occupancy. Further, although GSA established a space utilization target, it has not developed a comprehensive plan to manage its space and meet the target. Finally, we found that GSA did not comply with its own internal space management procedures for releasing space it no longer occupies.

Based on our audit findings, we made four recommendations to the Acting GSA Administrator:

1. Develop and implement a consistent methodology to collect daily occupancy data and implement appropriate controls to ensure that the data produced is consistent, reliable, and accurate.
2. Develop and implement a centralized approach for managing GSA's internal space and to meet its space utilization target.
3. Improve the management of GSA's occupancy agreements. Specifically, GSA should:
 - a. Conduct a comprehensive review of the Occupancy Agreement Space Inventory System (OASIS) and verify and validate that there are no discrepancies in the occupancy agreement space reporting for GSA-occupied space.
 - b. Develop a process to periodically review and verify that occupancy agreements are properly canceled in OASIS and ensure that all notifications and supporting documents are properly tracked in OASIS in accordance with the space release process.
 - c. Correct the \$520,155.69 of imputed rent for the PBS space in the U.S. Department of the Interior headquarters building that GSA no longer occupies.
4. Update PBS's *Standard Operating Procedure, Release of Space Actions* to reflect the current operating environment.

The GSA Chief Administrative Officer agreed with the report recommendations.

AUDIT MEMORANDUM: RECURRING FINDINGS FROM AUDITS OF PBS CONSTRUCTION AND BASIC REPAIRS AND ALTERATIONS PROJECTS

Memorandum Number A240077, dated January 27, 2025

PBS acquires federally owned space by constructing new buildings or acquiring existing buildings. It is also responsible for maintaining 1,600 federally owned buildings nationwide. We prepared this memorandum to detail the recurring findings identified through our audits of

PBS's construction and basic repairs and alterations projects conducted during FYs 2020 through 2024.

Since FY 2020, we have conducted seven audits of PBS construction and basic repairs and alterations projects, totaling more than \$429 million. Through these audits, we have identified recurring findings related to:

- Contractor compliance with security requirements;
- Oversight of small business set-aside contracts awarded through the U.S. Small Business Administration's 8(a) Business Development program (8(a) program);
- Enforcement of Construction Wage Rate Requirements; and
- Completeness and accuracy of contract files.

The recurring nature of the deficiencies indicates the need for additional management attention. Accordingly, PBS management should assess these deficiencies to determine whether programmatic improvements are needed to strengthen oversight of its construction and basic repairs and alterations projects.

The former PBS Commissioner wrote that PBS will be issuing a directive to all Regional Commissioners/Heads of Contracting Authority, outlining the recurring findings and highlighting resources to improve contract administration.

IMPLEMENTATION REVIEW OF CORRECTIVE ACTION PLAN: GSA'S ADMINISTRATION OF PERFORMANCE-BASED CONTRACTS PUTS THE GOVERNMENT AT RISK OF UNSATISFACTORY CONTRACTOR PERFORMANCE AND WASTED FUNDS, REPORT NUMBER A210064/A/3/F23002, FEBRUARY 9, 2023

Assignment Number A240079, dated March 25, 2025

We performed an implementation review of the management actions taken in response to the recommendations contained in our February 9, 2023, audit report, *GSA's Administration of Performance-Based Contracts Puts the Government at Risk of Unsatisfactory Contractor Performance and Wasted Funds, Report Number A210064/A/3/F23002*. The objectives of the audit were to: (1) determine whether GSA administers performance-based service contracts in accordance with regulations, guidance, and internal policies to evaluate contractor performance and ensure conformance with contract requirements; and (2) determine if performance-based contract administration functions vary across GSA and identify best practices, as applicable.

Our February 2023 audit report found that GSA contracting personnel were not administering performance-based service contracts in accordance with regulations, guidance, and internal policies. Specifically, we found that GSA contracting personnel were not always establishing or enforcing quality assurance surveillance plans and were not preparing justified or timely past performance reports. Additionally, we were unable to determine the effectiveness of the FAS's internal policy intended to improve contract administration because FAS's contracting

personnel were not complying with the policy. Based on our audit findings, we made four recommendations to the GSA Administrator.

Our implementation review found that GSA did not fully implement the corrective actions to improve the administration of performance-based contracts and reduce the risk of unsatisfactory contractor performance and wasted funds. Specifically, GSA did not complete corrective actions to:

- Revise or issue Agency policy to ensure contracting personnel have clear, descriptive instruction on how to monitor and enforce quality assurance surveillance plans; and
- Implement management oversight to ensure contracting personnel comply with policies and procedures intended to ensure sufficient government oversight of contractor performance.

IMPLEMENTATION REVIEW OF CORRECTIVE ACTION PLAN: PBS NEEDS TO STRENGTHEN ITS TRAINING AND WARRANTING PROGRAMS FOR CONTRACTING OFFICERS, REPORT NUMBER A210053/P/2/R23002, DECEMBER 30, 2022

Assignment Number A240068, dated October 29, 2024

We performed an implementation review of the management actions taken in response to the recommendations contained in our December 30, 2022, audit report, *PBS Needs to Strengthen Its Training and Warranting Programs for Contracting Officers, Report Number A210053/P/2/R23002*. The objective of the audit was to determine if PBS's method and oversight of training and warranting contracting officers are effective in developing a qualified acquisition workforce that meets GSA's contracting needs, policy, and mission.

Our December 2022 audit report found that PBS is not providing its contracting officers with adequate specialized training necessary to perform their jobs. We also found that PBS does not have a standardized process for qualifying and appointing contracting officers. Additionally, we found that PBS is not effectively managing warrant authority risk, warrant records for some contracting personnel are missing, and acquisition career managers are not properly designated. Based on our audit findings, we made four recommendations to the PBS Commissioner.

Our implementation review found that PBS did not fully implement the corrective actions for these recommendations. Specifically, PBS did not complete corrective actions to:

- Adequately address the training and development needs of its contracting officers at the GS-12 level and above;
- Implement a national policy to establish a standardized process for evaluating and verifying the contracting experience and qualifications of warrant applicants; and
- Mitigate warrant authority risks created by the limitations of the Federal Acquisition Institute Cornerstone OnDemand system.

ASSESSMENT OF A HOTLINE COMPLAINT: PBS DOES NOT HAVE COMPLETE AND ACCURATE ASBESTOS INFORMATION FOR THE HERBERT C. HOOVER BUILDING IN WASHINGTON, D.C.

Memorandum Number A240070, dated October 31, 2024

We issued this memorandum based on our assessment of a complaint received through the GSA OIG hotline. The complaint alleged that damaged asbestos-containing material was present in the mechanical rooms at the Herbert C. Hoover Building (Hoover Building) in Washington, D.C.

GSA owns the Hoover Building. However, it has delegated authority for the operations and maintenance of the building to the U.S. Department of Commerce (Commerce Department)—the building's primary tenant. Accordingly, the Commerce Department is responsible for performing the asbestos inspections required under PBS's asbestos management policy. The Commerce Department must also provide the results of the inspections to PBS for placement into PBS's official repository for asbestos records.

During our assessment, damaged asbestos-containing material that was previously unidentified was found in two of the Hoover Building's mechanical rooms. We also found that PBS does not have complete asbestos inspection records for the building. Based on our findings, we notified PBS that it needs to capture and maintain all asbestos information, including the information identified in our memorandum, to effectively manage the asbestos at the Hoover Building.

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, dated March 31, 2025

We performed an implementation review of the management actions taken in response to the recommendations contained in our November 4, 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*. The objective of the audit was to determine if GSA properly accounts for Personal Identity Verification cards issued to contract employees in accordance with federal regulation, policy, and guidance.

Our November 2020 audit report found that GSA's mismanagement of contract employee Personal Identity Verification cards placed GSA personnel, federal property, and data at risk. Based on our audit findings, we made two recommendations to the GSA Deputy Administrator.

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

IMPLEMENTATION REVIEW OF CORRECTIVE ACTION PLAN: THE GSA PUBLIC BUILDINGS SERVICE'S SPECIAL PROGRAMS DIVISION IS NOT EFFECTIVELY MANAGING REIMBURSABLE WORK AUTHORIZATIONS, REPORT NUMBER A210045/P/2/R23001, DECEMBER 2, 2022

Assignment Number A250038, dated March 28, 2025

We performed an implementation review of the management actions taken in response to the recommendations contained in our December 2, 2022, audit report, *The GSA Public Buildings Service's Special Programs Division Is Not Effectively Managing Reimbursable Work Authorizations, Report Number A210045/P/2/R23001*. The objective of the audit was to determine whether PBS's Special Programs Division has effective controls over its acceptance, management, administration, and funding of reimbursable work authorizations in accordance with all applicable laws, regulations, and GSA policies.

Our December 2022 audit report found that the Special Programs Division was not effectively fulfilling its stewardship responsibilities, resulting in violations of applicable laws, regulations, and GSA policies. Based on our audit findings, we made five recommendations to the PBS Commissioner.

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

OVERSIGHT OF THE INDEPENDENT AUDITOR'S AUDIT ON GSA'S FINANCIAL STATEMENTS FOR FISCAL YEAR 2024

As required by the Chief Financial Officers Act of 1990, Public Law 101-576, as amended, the GSA's FY 2024 Financial Statements Audit was performed by an independent public accounting (IPA) firm. We monitored the audit for compliance with generally accepted government auditing standards and Office of Management and Budget Bulletin No. 24-02, *Audit Requirements for Federal Financial Statements*.

The IPA's audit did not identify any significant deficiencies or material weaknesses in GSA's internal controls.

OVERSIGHT OF THE FISCAL YEAR 2024 INDEPENDENT PERFORMANCE AUDIT ON THE EFFECTIVENESS OF GSA'S INFORMATION SECURITY PROGRAM AND PRACTICES

The Federal Information Security Modernization Act of 2014 (FISMA) requires an annual evaluation of each agency's information security program and practices. For FY 2024, GSA contracted with an IPA to conduct a performance audit for the annual evaluation and complete the FY 2024 Inspector General FISMA Reporting Metrics. We monitored the IPA's work and reviewed its report and documentation for compliance with auditing standards and contractual requirements.

The IPA concluded, based on the Inspector General FISMA Reporting Metrics scoring model, that GSA's overall information security program was "effective." However, the IPA identified

that three of nine FISMA metric domain areas had deficiencies and provided eight recommendations.

SUMMARY OF CONTRACT AUDIT REPORTS

The Office of Audits issues contract audit reports to assist contracting officials in awarding and administering GSA contracts. The two primary types of contract audits include:

- Preaward audits, which provide GSA contracting officials with information to use when negotiating fair and reasonable GSA contract prices.
- Postaward audits, which examine GSA contractors’ adherence to contract terms and conditions.

During the period October 1, 2024, to March 31, 2025, we issued 11 contract audit reports. In these reports, we found that:

- 7 contractors either overcharged GSA customers or overstated their proposed labor rates.
- 6 contractors did not submit current, accurate, and complete information.
- 5 contractors assigned employees who were unqualified for their billable positions to work on GSA schedule task orders.
- 4 contractors did not maintain an adequate system to properly administer the Price Reductions Clause and/or did not comply with price reduction provisions.
- 3 contractors did not accurately report GSA schedule sales or did not pay the associated Industrial Funding Fee.

We also recommended more than \$282.3 million in cost savings. This includes funds that could be put to better use, which is the amount the government could save if our audit findings are implemented. It also includes questioned costs, which is money that should not have been spent, such as overbillings and unreported price reductions.

October 1, 2024 – March 31, 2025

CONTRACT AUDIT REPORTS	
Recommendations That Funds Be Put to Better Use	\$282,043,365
Questioned Costs	\$309,569

FAR DISCLOSURE PROGRAM

The Federal Acquisition Regulation (FAR) requires government contractors to disclose credible evidence of violations of federal criminal law under Title 18 of the United States Code (18 U.S.C.) and the False Claims Act to agencies' OIGs. To facilitate implementation of this requirement, we developed internal procedures to process, evaluate, and act on these disclosures and created a website for contractor self-reporting.

FAR RULE FOR CONTRACTOR DISCLOSURE

FAR 52.203-13(b), *Code of business ethics and conduct*, implements the Close the Contractor Fraud Loophole Act, Public Law 110-252, Title VI, and Chapter 1. Under the rule, a contractor must disclose, to the relevant agency's OIG, certain violations of federal criminal law (within 18 U.S.C.), or a violation of the civil False Claims Act, connected to the award, performance, or closeout of a government contract performed by the government contractor or subcontractor. The rule provides for suspension or debarment of a contractor when a principal knowingly fails to disclose—in writing—such violations in a timely manner.

DISCLOSURES FOR THIS REPORTING PERIOD

As disclosures are made, our Offices of Audits, Investigations, and Counsel jointly examine each disclosure and determine what actions—if any—are warranted. During this reporting period, we received five new disclosures regarding defective pricing, Price Reductions Clause noncompliance, Trade Agreements Act violations, and overcharges. We concluded our evaluation of four disclosures that resulted in more than \$2.1 million in settlements and recoveries to the government. Additionally, we assisted with seven disclosures referred by other agencies because of potential effect on GSA operations, resulting in more than \$498,000 in refunds to federal agencies. Finally, we continued to evaluate eight existing disclosures during this reporting period.

STATISTICAL SUMMARY OF OIG AUDITS

October 1, 2024 – March 31, 2025

OFFICE OF AUDITS	
Total Financial Recommendations	\$282,352,934
These include:	
Recommendations That Funds Be Put to Better Use	\$282,043,365
Questioned Costs	\$309,569
Audit Reports Issued	16
Audit Memorandums Provided to GSA	3
GSA Management Decisions Agreeing with Audit Recommendations	\$281,885,341

SIGNIFICANT INSPECTIONS

The Office of Inspections conducts systematic and independent assessments of GSA's operations, programs, and policies, and makes recommendations for improvement. Reviews involve on-site inspections, analyses, and evaluations to provide information that is timely, credible, and useful for Agency managers, policymakers, and others. Inspections may include an assessment of efficiency, effectiveness, impact, and sustainability of any GSA operation, program, or policy. Inspections are performed in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.

During this reporting period, we issued two reports regarding: (1) our inspection of facility security controls at a high-risk GSA building and (2) our evaluation of GSA's site selection process for relocating the Federal Bureau of Investigation (FBI) headquarters building.

FACILITY SECURITY INSPECTION OF A HIGH-RISK GSA BUILDING

Report Number JE25-001, dated October 16, 2024

We conducted an inspection of a high-risk GSA building to determine whether GSA had assessed, prioritized, and implemented facility security controls for the building. During the inspection, we conducted two site visits of the building, one announced and one unannounced. Our inspection revealed that GSA had not implemented all required facility security controls at the building. We found issues concerning the on-site central security control center, emergency exit doors, the visitor entrance, mechanical and utility rooms, required safety training, required procedural documentation, and the absence of a physical security manager.

We also found that the building did not have a functioning Facility Security Committee. GSA has not fulfilled its responsibilities as the Facility Security Committee chair, effectively ceasing operations of the committee.

The unimplemented facility security controls at the building could lead to security vulnerabilities. Our report, issued on October 16, 2024, made two recommendations for corrective action. The Agency agreed with our report recommendations.

Our report addressed issues categorized as physical security information under GSA Order PBS 3490.3 CHGE 1, *Security for Sensitive Building Information Related to Federal Buildings, Grounds, or Property*, March 22, 2021. Therefore, our report requires safeguarding and dissemination controls and is not available to the public.

EVALUATION OF GSA'S SITE SELECTION PROCESS FOR THE RELOCATION OF THE FEDERAL BUREAU OF INVESTIGATION'S HEADQUARTERS

Report Number JE25-002, date February 3, 2025

We conducted an evaluation of the GSA site selection process for relocating the FBI headquarters, in response to concerns raised by congressional members and the FBI Director. GSA's Site Selection Authority chose Greenbelt, Maryland, as the site for the new FBI's headquarters, deviating from the Site Selection Panel's recommendation of Springfield, Virginia. Following the Site Selection Authority's decision, members of Congress and the FBI Director raised concerns with the transparency of the process and the Site Selection Authority's previous employment with the Washington Metropolitan Area Transit Authority, which owned the Greenbelt, Maryland, site. In February 2025, we issued a comprehensive report on GSA's site selection process with four findings.

In 2022, GSA restarted the process to select a site for the relocation of the FBI's headquarters, from three sites: Greenbelt, Maryland; Landover, Maryland; and Springfield, Virginia. To select between the three sites, GSA, in conjunction with the FBI, established a Site Selection Plan that provided five criteria in September 2022. The Site Selection Plan would be used by a Site Selection Panel, which was made up of two GSA employees and one FBI employee, to evaluate the three sites and determine the most advantageous site. After the initial release, GSA received feedback on the Site Selection Plan from the Maryland and Virginia delegations and made updates to the criteria and weighting of the criteria. GSA issued the final Site Selection Plan in July 2023.

Our evaluation found that GSA's rationale for increasing the weighting of one criterion, the Cost Criterion, was not justified because certain risks that GSA factored into the change were minimal or non-existent. Additionally, GSA provided some inaccurate information to the Site Selection Panel and Site Selection Authority related to the site selection cost for the Springfield, Virginia site. We also found that GSA did not provide specific enough data related to sustainable siting and advancing equity for the Site Selection Panel and Site Selection Authority to differentiate between the sites. Finally, we found that GSA officials failed to properly maintain cell phone text messages related to the relocation of the FBI headquarters project.

We also reviewed the Site Selection Authority's previous employment as the Vice President of Real Estate and Parking at Washington Metropolitan Area Transit Authority and found no evidence that as the Site Selection Authority, the former GSA official, violated federal ethics regulations.

To address these findings, we recommended that the GSA Administrator should require all GSA personnel involved with the FBI headquarters relocation project and any future projects to review and ensure records created via text messages and chats from any device are preserved within a GSA system to comply with the Federal Records Management regulations.

Additionally, we recommended that the PBS Commissioner should:

1. Establish policies on developing, changing, and approving site selection plans to ensure that the criteria and any changes are sufficiently justified and supported.

SIGNIFICANT INSPECTIONS

2. Establish policies and processes to ensure that the site selection data is relevant, accurate, complete, and current.

SIGNIFICANT INVESTIGATIONS

The Office of Investigations conducts independent and objective investigations relating to GSA programs, operations, and personnel. The office consists of special agents with full, statutory law enforcement authority to make arrests, execute search warrants, serve subpoenas, and carry concealed weapons. Special agents conduct investigations that may be criminal, civil, or administrative in nature and often involve complex fraud schemes. Investigations can also involve theft, false statements, counterfeit or substandard products, embezzlement, bribery, antitrust violations, credit card fraud, diversion of excess government property, and digital crimes.

During this reporting period, we opened 66 investigative cases, closed 68 investigative cases, referred 71 subjects for criminal prosecution, and helped obtain 13 convictions. Civil, criminal, and other monetary recoveries resulting from our investigations totaled more than \$34.7 million.

CRIMINAL INVESTIGATIONS

GOVERNMENT CONTRACTING OFFICER AND GIRLFRIEND SENTENCED FOR THEIR ROLES IN A FRAUD SCHEME

A GSA OIG investigation determined that Thomas Bouchard, the former contracting officer in charge of the U.S. Army Natick Contracting Command in Natick, Massachusetts, used his position to influence a government contractor to hire his girlfriend for a “no show” job as an assistant that specifically supported Bouchard. The contractor, Evolution Enterprise, Inc., hired Bouchard’s girlfriend, Chantelle Boyd, to the assistant position, which cost the DOD more than \$490,000.

During Boyd’s time at Evolution Enterprises, Inc., Bouchard and Boyd took numerous government-funded trips, ranging in duration from 2 to 15 days, under the guise that they were work related. For many of the trips, they shared a hotel room and spent most of their time at beaches, hotel pools, and visiting Walt Disney theme parks during business hours. To conceal the personal nature of the trips, Bouchard altered, created, and approved government-funded travel vouchers to reimburse Boyd for out-of-pocket expenses incurred on those trips.

Boyd and Bouchard each pleaded guilty to conspiracy and theft of government funds. Boyd also pleaded guilty to making false statements about the government-funded trips to a grand jury. On October 2, 2024, Boyd was sentenced to 6 months of home confinement, followed by 2 years of supervised release. On August 5, 2024, Bouchard was sentenced to 1 year and 1 day incarceration, followed by 1 year of supervised release. Bouchard and Boyd were both ordered to pay, jointly and severally, \$487,658 in restitution. Boyd and Bouchard were also both debarred and listed as excluded parties in the System for Award Management.

SIGNIFICANT INVESTIGATIONS

GSA OIG investigated this case with Defense Criminal Investigative Service (DCIS) and Army Criminal Investigation Division (CID), and it was prosecuted by the U.S. Attorney's Office for the District of Massachusetts.

FAMILY MEMBERS AND GOVERNMENT EMPLOYEES SENTENCED FOR CONSPIRING TO DEFRAUD THE U.S.

A GSA OIG investigation determined that former government employees Karisa Waysepappy Kelley and John Jordan "Chip" Mathes, who were members of a government procurement Source Selection Evaluation Board, conspired with Kenneth, Christopher, and Irma Flores to steer Army housekeeping and janitorial services contracts for Army hospitals and medical centers to companies owned and operated by the Flores family. In exchange, the Flores family paid gratuities totaling \$216,710 to Mathes's company, C&S Consulting, and \$57,906 to Kelley's company, Waysepappy Consulting.

Kelley and Mathes each pleaded guilty to conspiracy to commit wire fraud. On October 15, 2024, they were both sentenced to 3 years in prison, followed by 3 years of supervised release. Kenneth Flores pleaded guilty to conspiracy to defraud the United States. Christopher and Irma Flores each pleaded guilty to paying gratuities to a public official. On September 6, 2024, Kenneth was sentenced to 4 years in prison, Christopher to 2 years in prison, and Irma to 5 years of probation. All five defendants were ordered to pay \$3.7 million in restitution, jointly and severally. Additionally, Kelley consented to a civil judgment of \$114,193 to resolve allegations surrounding the acceptance of compensation from a contractor.

GSA OIG investigated this case with Army CID, DCIS, VA OIG, and IRS Criminal Investigation (IRS CI). The case was prosecuted by the U.S. Attorney's Office for the Western District of Texas.

DEFENSE DEPARTMENT EMPLOYEE SENTENCED TO PRISON FOR ELABORATE GOVERNMENT PURCHASE CARD FRAUD SCHEME

A GSA OIG investigation revealed that Zelene Charles, a former DOD civilian employee at the Defense Language Institute in Monterey, California, perpetrated a scheme to defraud the government by manipulating GSA SmartPay government purchase card transactions. Charles created fake purchase requests and invoices for items that were never actually purchased or received by the government. Between December 2016 and April 2020, Charles placed approximately 185 fraudulent charges, causing a total loss to the government of \$624,250. To conceal that she was the recipient of the stolen funds, Charles frequently renamed the businesses associated with intermediary accounts and, in total, used at least 78 different account names.

Charles pleaded guilty to wire fraud and theft of government funds. On March 3, 2025, Charles was sentenced to 10 months in prison, followed by 3 years of supervised release, and was ordered to pay \$630,628 in restitution.

GSA OIG investigated this case with DCIS, Army CID, and the U.S. Department of Agriculture (USDA) OIG. The case was prosecuted by the U.S. Attorney's Office for the Northern District of California.

SIGNIFICANT INVESTIGATIONS

CONTRACTOR SENTENCED TO PRISON AND ORDERED TO PAY RESTITUTION FOR A PAYCHECK PROTECTION PROGRAM FRAUD SCHEME

A GSA OIG investigation found that Yaw Ayim used one of his companies, Veteran Communications Group, to apply for and receive Paycheck Protection Program loans using false and forged information. Ayim pleaded guilty to wire fraud. On November 22, 2024, he was sentenced to 27 months in prison, followed by 2 years of supervised release, and he was ordered to pay \$257,633 in restitution.

GSA OIG investigated this case with Homeland Security Investigations. The case was prosecuted by the U.S. Attorney's Office for the Eastern District of Virginia (Norfolk).

MIAMI MAN SENTENCED FOR HIS ROLE IN CREDIT CARD FRAUD SCHEME

A GSA OIG investigation found that Jose Rodriguez Chaviano was involved in a credit card scheme involving numerous victims. Rodriguez Chaviano pleaded guilty to access device fraud and aggravated identity theft. On December 5, 2024, he was sentenced to 52 months in prison, 3 years of supervised release, and ordered to pay restitution of \$1.2 million for the victims of the scheme.

GSA OIG investigated this case with the U.S. Secret Service. The case was prosecuted by the U.S. Attorney's Office for the Southern District of Florida.

CIVIL SETTLEMENTS

BOOZ ALLEN AGREES TO PAY \$15.8 MILLION TO SETTLE FALSE CLAIMS ACT ALLEGATIONS

On December 20, 2024, Booz Allen Hamilton Corporation agreed to pay the United States \$15.8 million to resolve allegations that it violated the False Claims Act by knowingly submitting fraudulent claims to GSA in connection with a GSA task order to supply digital training simulators and systems to DOD agencies, including the Air Force. Two former Booz Allen program managers and a subcontractor allegedly used confidential government contracting information they received from a former Air Force employee, including budget information and competitor bid information, to influence GSA to award the task order and to formulate price quotes for individual modules that were awarded to the subcontractor.

GSA OIG investigated this case with DCIS, Air Force Office of Special Investigations (AFOSI), Army CID, and IRS CI. The case was litigated by the U.S. Attorney's Office for the Western District of Texas and the U.S. Department of Justice (DOJ) Civil Division Commercial Litigation Branch.

MORSECORP, INC., AGREES TO PAY \$4.6 MILLION TO SETTLE FALSE CLAIMS ACT ALLEGATIONS RELATING TO CYBERSECURITY FRAUD

On March 14, 2025, MORSECORP, Inc., agreed to pay the United States \$4.6 million to resolve allegations it violated the False Claims Act by failing to comply with cybersecurity requirements

in its contracts with the U.S. Departments of the Army and Air Force. MORSECORP admitted that it used a third-party company to host MORSECORP's emails without requiring and ensuring that the third-party: (1) met security requirements equivalent to Federal Risk and Authorization Management Program security requirements and (2) complied with DOD cyber incident reporting requirements.

MORSECORP also admitted that it had not fully implemented all of the cybersecurity controls in the National Institute of Standards and Technology Special Publication 800-171, *Protecting Controlled Unclassified Information in Nonfederal Systems and Organizations*, which could have impacted the security of the network and its data. Additionally, MORSECORP did not update its National Institute of Standards and Technology Special Publication NIST SP 800-171 security controls implementation score after being notified that its actual score was much lower than it had previously represented to DOD.

GSA OIG investigated this case with DCIS, AFOSI, and Army CID. The case was litigated by the U.S. Attorney's Office for the District of Massachusetts and the DOJ Civil Division Commercial Litigation Branch.

R&K ENTERPRISES, INC. AGREES TO PAY \$2.6 MILLION TO SETTLE FALSE CLAIMS ACT ALLEGATIONS

On December 31, 2024, R&K Enterprises, Inc. (R&K) agreed to pay the United States \$2.6 million to resolve allegations that it violated the False Claims Act by certifying in its bid that it met the size standards for the GSA One Acquisition Solution for Integrated Services (OASIS) Small Business Pool 1 contract, when it did not. To appear that it met the size standard, R&K allegedly novated a contract to another company that was affiliated with R&K, misrepresenting that the two companies were not affiliated.

GSA OIG investigated this case with the U.S. Department of Transportation OIG and U.S. Small Business Administration (SBA) OIG. The case was litigated by the U.S. Attorney's Office for the Eastern District of Virginia and the DOJ Civil Division Commercial Litigation Branch.

DELL AND IRON BOW AGREE TO PAY \$4.3 MILLION TO SETTLE FALSE CLAIMS ACT ALLEGATIONS RELATING TO SUBMITTING NON-COMPETITIVE BIDS

On November 19, 2024, Dell Technologies, Inc., and Dell Federal Systems, L.P. (collectively Dell) agreed to pay the United States \$2.3 million to resolve allegations that Dell violated the False Claims Act by submitting and causing the submission of non-competitive bids to the U.S. Army and thereby overcharging the Army under the Army Desktop and Mobile Computing 3 contract. Iron Bow Technologies LLC also agreed to pay the United States \$2 million for its alleged role in the scheme and for allegedly colluding with Dell to submit non-competitive bids.

GSA OIG investigated this case with National Aeronautics and Space Administration OIG, DOJ OIG, and Army CID. The case was litigated by the U.S. Attorney's Office for the Northern District of Alabama and the DOJ Civil Division Commercial Litigation Branch.

CONTRACTORS AGREE TO PAY \$1 MILLION TO SETTLE CIVIL FRAUD ALLEGATIONS

On December 20, 2024, S.A.F.E. Structure Designs, U.S.A. Manufacturing, and the companies' owner, Johnny Buscema, Jr., agreed to pay the United States \$1 million to resolve allegations that they violated the False Claims Act. Buscema admitted that between 2014 and 2023, he and his companies manipulated bids as a vendor to Noble Sales Co., Inc., doing business as Noble Supply & Logistics (Noble), a GSA contract holder, on a Defense Logistics Agency contract for Maintenance, Repair, and Operations contracts for the Northeast and Southeast regions.

Under these contracts, the Defense Logistics Agency can place orders for goods and services through Noble, and Noble is required to solicit bids from two independently competing vendors. Noble provided Buscema and his companies with specific bidding instructions, so that no vendors other than S.A.F.E. Structure Designs or U.S.A. Manufacturing won the business on at least 100 occasions. Buscema also paid two other vendors to submit at least 60 courtesy bids so that he and his companies won the business. In addition, Buscema admitted that he occasionally provided competing bids from both S.A.F.E. Structure Designs and U.S.A. Manufacturing for the same solicitation, even though he owned both companies.

GSA OIG investigated this case with DCIS and Army CID. The case was litigated by the U.S. Attorney's Office for the District of Massachusetts and the DOJ Civil Division Commercial Litigation Branch.

COMPANY OWNER FOUND CIVILLY LIABLE IN SCHEME TO DEFRAUD SDVOSB PROGRAM

On February 26, 2025, Michael Padron, a former government contractor, was ordered to pay \$813,244 to the United States. The civil action was based on a GSA OIG investigation that resulted in a successful criminal prosecution of Padron for wire fraud and conspiracy in connection with a service-disabled veteran-owned small business set-aside contract.

GSA OIG investigated the criminal case with the SBA OIG, U.S. Department of Veterans Affairs (VA) OIG, DCIS, Army CID, and the Army Audit Agency. The case was litigated by the U.S. Attorney's Office for the Eastern District of Texas and the DOJ Civil Division Commercial Litigation Branch.

MILLENNIUM SYSTEMS SERVICES, INC. AND OWNER, NILMINI THOMPSON, AGREED TO PAY \$305,666 TO SETTLE FALSE CLAIMS ACT ALLEGATIONS

On February 21, 2025, Millennium Systems Services, Inc., and its owner, Nilmini Thompson, agreed to pay the United States \$305,666 to resolve allegations that they violated the False Claims Act by submitting invoices and ultimately being paid for services at a higher labor rate than the applicable GSA schedule rate.

GSA OIG investigated this case, and it was litigated by the U.S. Attorney's Office for the Northern District of Alabama and the DOJ Civil Division Commercial Litigation Branch.

ADMINISTRATIVE MISCONDUCT

GSA SUPERVISOR TERMINATED FOR MISUSE OF A GOVERNMENT OWNED VEHICLE

GSA OIG initiated an investigation into allegations that GSA government-owned vehicles leased to PBS's Central Support displayed odd odometer entries and telematics discrepancies. The investigation determined that a GSA Supervisory Building Manager used a government vehicle to: (1) stop at various retail stores en route to and from site visits during official duties; (2) stop at their personal residence while en route to site visits during official duties; and (3) to transport their child.

GSA officials terminated the employee based on misuse of the government vehicle, failure to follow established procedures for use of the government vehicle, lack of candor, and failure to follow agency established time reporting procedures.

FLEET CARD FRAUD

The Office of Investigations collaborates with GSA's Fleet Loss Prevention Team to prevent, detect, and investigate fraud involving GSA's government-wide Fleet program. During this reporting period, these investigations uncovered stolen government vehicles, felony credit card theft, identity theft, counterfeit credit cards, and use of GSA Fleet cards for personal gain.

Our work on Fleet card investigations during this reporting period resulted in 6 arrests, 8 convictions, and 7 individuals sentenced to a combined total of 2 years of confinement, 15 years of probation, and 20 hours of community service.

Examples of successful Fleet card fraud cases include the following:

- Andrew Chaves pleaded guilty to aggravated identity theft and was sentenced on January 28, 2025, to 2 years in prison, 1 year of supervised release, and ordered to pay \$25,245 in restitution. Chaves stole a GSA Fleet vehicle leased to the U.S. Army in New Jersey, as well as a U.S. Forest Service vehicle located in Vermont. Chaves used the assigned Fleet cards and other stolen government credit cards to make personal purchases. GSA OIG investigated this case with the U.S. Forest Service Law Enforcement and Investigations, USDA OIG, U.S. Marshals Service, Federal Protective Service, and the Vermont State Police. The case was prosecuted by the U.S. Attorney's Office for the District of Vermont.
- A GSA OIG Fleet card investigation identified two individuals in possession of cloned credit cards in Orlando, Florida. Erik Muinos Cardenas and Ernesto Ruiz both pleaded nolo contendere to unlawful possession of personal identification of another person and fraudulent use of a credit card, respectively, and were adjudicated guilty. Cardenas was sentenced to 2 days of incarceration and ordered to pay court fees. Ruiz was sentenced to 1 day of incarceration and was ordered to pay court fees. GSA OIG investigated this case with Amtrak OIG, and the Florida Department of Agriculture and Consumer Services. The case was prosecuted in the Circuit Court of Orange County, Florida.

- VA employee Octehvion McGee fraudulently used a Fleet card assigned to the VA Medical Center in North Chicago, Illinois, to purchase fuel, general merchandise, and tobacco products for his personal benefit. On March 3, 2025, McGee pleaded guilty to fraudulent use of a credit card and was sentenced to 12 months of supervision and ordered to pay \$1,467 in restitution. GSA OIG investigated this case with VA OIG. The case was prosecuted in the Circuit Court of Lake County, Illinois.
- VA employee Adia Naba fraudulently used a Fleet card assigned to the VA Medical Center in Houston, Texas, to make purchases for her personal benefit. On December 4, 2024, Naba pleaded guilty and was sentenced to a 2-year deferred adjudication and ordered to pay \$3,310 in restitution to the government. GSA OIG investigated this case, and the case was prosecuted in the District Court of Montgomery County, Texas.

NEW DEAL ART INVESTIGATIONS

During the New Deal era, the federal government created and administered four separate art projects that operated from 1933 to 1943 to create employment opportunities. The Works Progress Administration (WPA) was the largest of the New Deal era programs. New Deal artwork was produced by artists who created thousands of paintings, sculptures, and works on paper. The federal government loaned the available art to public agencies and nonprofit institutions throughout the nation.

GSA is responsible for inventorying and cataloging the loaned pieces of art. Over 23,000 pieces of artwork have been located. Some circumstances have contributed to the separation of the borrowers from the artwork, resulting in New Deal art changing hands, with some pieces finding their way into private possession. GSA's Fine Arts Program and GSA OIG work together to locate, identify, and recover lost works of art.

As a direct result of these cooperative efforts, two lost pieces of artwork were recovered and inventoried during this reporting period:

- A citizen located in Bradford, Vermont, contacted GSA OIG informing us they were in possession of "Gray Day on The Marshes," by Ralph Nelson. GSA OIG recovered this painting from the citizen.
- An art center in Chicago, Illinois contacted GSA OIG informing us they were in possession of "Chicago River" by Aaron Bohard. GSA OIG coordinated with GSA and the art center. GSA and the art center agreed upon a formal loan for the art center to display the painting in their facility.

New Deal artwork is not subject to public sale, but the internal estimated value of these recovered and inventoried pieces is \$8,000. Since cooperative efforts began between the OIG and GSA in 2001, 815 pieces of art have been recovered, with an estimated value of \$8,875,550.*

SIGNIFICANT INVESTIGATIONS

Related to the recovery of another piece of New Deal artwork, on March 21, 2025, the United States Court for the Southern District of New York ruled in favor of the government in the recovery of Maxim Lubovsky's "Lights Across the Lake," an oil painting commissioned in 1938 under the WPA. Like many WPA artworks that have been lost, stolen, or misplaced throughout the years, "Lights Across the Lake" ended up in private hands through unauthorized means.

GSA OIG special agents recovered the painting in July 2021, after learning it was being auctioned online. The individual who attempted to sell the painting subsequently brought a lawsuit against the government, asserting that he was the rightful owner of the painting. The Court ruled in favor of the Government, finding that the Government owned the painting. The Court noted that "paintings and other artworks commissioned under the New Deal-era relief programs are cultural artifacts with significant historical value. For the Government to lose title to these works . . . based on little more than conjecture and speculation, would run afoul of well-established precedent governing the disposition of federal property."

GSA OIG worked on this case with GSA Fine Arts, GSA Office of General Counsel, and the U.S. Attorney's Office for the Southern District of New York.

** This number includes all pieces of artwork recovered through the joint publicity/recovery efforts of GSA OIG and GSA. Not all recoveries require direct intervention by GSA OIG; some are direct "turn ins" to GSA as result of our combined public information campaigns and/or internet searches which reveal the claim of ownership by the government. The internal estimated value is for internal use only and is not a formal appraisal or representative of the market value of the artwork.*



"Chicago River," by Aaron Bohard



"Gray Day on The Marshes," by Ralph Nelson



"Lights Across the Lake," by Maxim Lubovsky

OTHER SIGNIFICANT WORK

SUSPENSION AND DEBARMENT INITIATIVE

The FAR authorizes federal agencies to suspend or debar individuals or companies for the commission of any offense indicating a lack of business integrity or business honesty that directly affects the present responsibility of a government contractor or subcontractor. The OIG has made it a priority to refer instances of misconduct by individuals and companies to GSA, so it can take appropriate suspension and debarment actions and protect the government from fraud, waste, and abuse.

During this reporting period, the OIG made 8 referrals for consideration of suspension or debarment to the GSA Office of Acquisition Policy or other federal debarment officials. There were 22 actions issued based on current and previous OIG referrals.

INTEGRITY AWARENESS

The OIG gives Integrity Awareness Briefings nationwide to educate GSA employees and others on the prevention of fraud, waste, and abuse. During this reporting period, we gave 41 briefings, which were attended by 1,428 GSA employees, other government employees, and government contractors. These briefings explain the statutory mission of the OIG and the methods available for reporting suspected instances of wrongdoing. In addition, through case studies, the briefings make GSA employees aware of actual instances of fraud in GSA and other federal agencies and help prevent fraud's recurrence.

HOTLINE

The OIG hotline provides an avenue for employees and other concerned citizens to report suspected wrongdoing. Hotline posters located in GSA-controlled buildings encourage employees to use the hotline. Our hotline also allows online submission of complaints.

During the reporting period, we received 838 hotline contacts. Of these, 111 were referred to GSA program officials for review and appropriate action, 32 were referred to other federal agencies, 32 were referred to the OIG Office of Audits, 2 were referred to the OIG Office of Inspections, 1 was referred to the OIG Office of Counsel, and 65 were referred to investigative field offices for investigation or further review.

STATISTICAL SUMMARY OF OIG INVESTIGATIONS

October 1, 2024 – March 31, 2025

OFFICE OF INVESTIGATIONS	
Referrals for criminal prosecution, civil litigation, administrative action, suspension, and debarment	111
Indictments and informations on criminal referrals*	18
Subjects accepted for criminal prosecution	56
Subjects accepted for civil action	10
Convictions	13
Civil settlements/judgments	11
Contractors/individuals suspended and debarred	22
Employee actions taken on administrative referrals involving government employees	6
Investigative reports**	1
Number of subpoenas	33
Total Investigative Receivables and Recoveries***	\$34,736,284

*The total number of criminal indictments and criminal informations includes all criminal charging documents resulting from any prior referrals to prosecutive authorities.

**The total number of investigative reports includes reports of investigations and letterhead reports, which summarize the results of an official investigation, that were referred to GSA officials for a response in consideration of taking administrative action or for information only.

***This includes civil judgments and settlements; ordered criminal fines, penalties, and restitution; forfeiture; administrative recoveries; and recovered government property.

INVESTIGATIVE WORKLOAD

The OIG opened 66 investigative cases and closed 68 cases during this reporting period.

REFERRALS

The OIG makes criminal and civil referrals to the DOJ or other authorities for prosecutive and litigative consideration. The OIG also makes administrative referrals to GSA officials on certain cases disclosing wrongdoing by GSA employees, contractors, or private individuals doing business with the government.

SIGNIFICANT INVESTIGATIONS

ACTIONS ON OIG REFERRALS

Based on these and prior referrals, 56 subjects were accepted for criminal prosecution and 10 subjects were accepted for civil litigation. Criminal cases originating from OIG referrals resulted in 18 indictments or informations and 13 convictions. OIG civil referrals resulted in 11 subject settlements/judgments. Based on OIG administrative referrals, 15 contractors or individuals were debarred, 7 contractors or individuals were suspended, and 6 personnel actions were taken against a government employee.

Table 1. Summary of OIG Referrals

TYPE OF REFERRAL	CASES	SUBJECTS
Civil	10	12
Criminal (DOJ)*	40	59
Criminal (State/Local)**	11	12
Administrative Referrals for Action/Response	14	20
Suspension	0	0
Debarment	5	8
TOTAL	80	111

*The total number of persons referred to DOJ for criminal prosecution includes both individuals and companies that have been referred to DOJ for criminal prosecutorial consideration.

**The total number of persons referred to state and local authorities includes both individuals and companies that have been referred to authorities, other than DOJ, for criminal prosecution. Referrals to military authority for prosecution under the Uniform Code of Military Justice are also included in this metric.

SIGNIFICANT INVESTIGATIONS

Monetary Results

Table 2 presents the amounts of fines, penalties, settlements, recoveries, forfeitures, judgments, and restitutions payable to the U.S. Government and other victims as a result of criminal and civil actions arising from OIG referrals. Table 3 presents the amount of administrative recoveries and forfeitures as a result of investigative activities. Criminal, civil, and other monetary recoveries arising from our work totaled more than \$34.7 million.

Table 2. Criminal and Civil Results

	CRIMINAL	CIVIL
Fines and Penalties	\$11,769	\$0
Settlements/Judgments		\$29,459,749
Recoveries/Forfeitures	\$0	\$433,257
Restitutions	\$2,709,405	
TOTAL	\$2,721,174	\$29,893,006

Table 3. Non-Judicial Recoveries*

Administrative Recoveries	\$2,122,105
Forfeitures/Restitution	\$0
TOTAL	\$2,122,105

*This total includes the FAR disclosures reported on page 13.

GOVERNMENT-WIDE POLICY ACTIVITIES

We regularly provide advice and assistance on government-wide policy matters to GSA as well as to other federal agencies and committees of Congress.

In addition, as required by the Inspector General Act of 1978, as amended, we review existing and proposed legislation and regulations to determine their effect on the economy and efficiency of GSA's programs and operations and on the prevention and detection of fraud and mismanagement. Because of the central management role of GSA in shaping government-wide policies and programs, most of the legislation and regulations reviewed affect government-wide issues such as procurement, property management, travel, and government management and IT systems.

INTERAGENCY AND INTRA-AGENCY COMMITTEES AND WORKING GROUPS

- Council of the Inspectors General on Integrity and Efficiency. The Deputy Inspector General is a member of the Council of the Inspectors General on Integrity and Efficiency (CIGIE) Investigations and Legislation Committees. Through CIGIE, we also participate in the following:
 - Assistant Inspector Generals for Management Working Group. The Office of Administration participates in this working group with other Assistant Inspector Generals for Management who lead the day-to-day operations of the OIGs. This working group addresses topics covering human resources, facilities, contracting, budget, records management and IT.
 - Technology Committee. The Office of Administration participates in this committee. The mission of the committee is to facilitate effective IT and other technology-related audits, evaluations, and investigations by OIG, and to share best practices and coordinate efforts related to oversight and use of technology by OIGs.
 - Chief Information Officer Subcommittee. The GSA OIG Chief Information Officer (CIO) chairs this subcommittee of the Technology Committee. The CIO Subcommittee facilitates discussion and sharing of strategic level challenges presented to the IG community, offers specific technical expertise and suggestions regarding emerging technology that could assist in improving OIG core mission activities, and provides counsel to the Technology Committee members on technical issues that affect the mission execution for all OIGs.

- **Federal CIO Council.** The GSA OIG CIO represents all OIG CIOs in this council. The CIO Council is the principal interagency forum for improving agency practices related to the design, acquisition, development, modernization, use, sharing, and performance of federal information resources.
- **Federal Audit Executive Council.** The Office of Audits participates in the Federal Audit Executive Council (FAEC). The FAEC’s purpose is to discuss and coordinate issues affecting the federal audit community with special emphasis on audit policy and operations of common interest to FAEC members.
- **Federal Audit Executive Council Information Technology Committee.** The Office of Audits participates in the FAEC IT Committee. This committee provides a forum to share information and coordinate audits of significant IT issues with the OIG community and the federal government. The committee also develops and recommends best practices for OIGs to use when addressing IT issues.
- **Federal Audit Executive Council Contracting Committee.** The Office of Audits participates in the FAEC Contracting Committee. This committee is involved with addressing contract, program, and acquisition management issues that have common interest throughout the OIG community. The committee shares information on audit topics, successful audits, and related techniques.
- **Enterprise Risk Management Working Group.** The Office of Audits participates in CIGIE’s Enterprise Risk Management (ERM) Working Group. This working group’s mission is to contribute to the promotion and implementation of ERM principles in accordance with OMB Circular A-123, Management’s Responsibility for Enterprise Risk Management and Internal Control, within OIGs and their respective agencies. The Office of Audits participates in the working group as part of a collaborative effort with other OIGs to oversee the sharing of processes and best practices used to analyze, prioritize, and address risks identified and relevant to implementing ERM in the federal government.
- **Geospatial Data Act Working Group.** The Office of Audits participates in the Geospatial Data Act (GDA) Working Group. This working group’s mission is to assist the OIG community in understanding and meeting its GDA oversight requirements by: (1) consulting with the Federal Geospatial Data Committee, (2) developing a common review approach and methodology, and (3) coordinating key communications with other stakeholders. The Office of Audits participates to stay abreast of the latest GDA developments to monitor GSA’s compliance with GDA requirements.
- **Legislative Priorities Working Group.** The Office of Counsel participates in the CIGIE Legislation Committee’s Legislative Priorities Working Group. The working group’s mission is to establish a standardized operating procedure for the committee’s Legislative Priorities Letter to Congress for the 119th Congress and beyond.
- **Blue Book Working Group.** The Office of Inspections participates in the CIGIE Blue Book Working Group. This working group is comprised of inspection and evaluation (I&E) professionals from the OIG community who worked to review, update, and revise the

CIGIE *Quality Standards for Inspection and Evaluation* issued in December 2020. The working group continues to provide advisement on the revised Blue Book standards.

- **I&E Peer Review Working Group.** The Office of Inspections participates in the I&E Peer Review Working Group. This working group is comprised of I&E professionals from the IG community who are responsible for promulgating and interpreting the *Guide for Conducting Peer Reviews of Inspection and Evaluation Organizations of Federal Offices* along with administering the 3-year cycle of peer reviews. The working group provides education and instruction on the external peer review process.
- **I&E Roundtable.** The Office of Inspections participates in the I&E Roundtable. The I&E Roundtable provides a forum to share information and coordinate issues of importance within the OIG I&E community.
- **Building I&E Fundamentals Working Group.** The Office of Inspections participates in the Building I&E Fundamentals Special Working Group. This working group is comprised of I&E professionals from the OIG community with varying levels of expertise and diverse perspective. The working group provides assistance in updating the I&E Fundamentals Course, which is designed to equip participants with a strong foundation in the Blue Book standards and essential skills for inspections and evaluations.
- **Data Analytics Working Group.** The Office of Investigations participates in the CIGIE Data Analytics Working Group. This working group's projects include identifying new data analytics methods and techniques, sharing information about data and data sources available to the OIG community, and identifying crosscutting initiatives, such as using data analytics to detect fraud.
- **Investigations Training Subcommittee.** The Office of Investigations participates in the CIGIE Investigations Training Subcommittee. The subcommittee establishes and promotes training resources for investigative staff throughout the OIG community.
- **Investigations Undercover Review Committee.** The Office of Investigations participates in the CIGIE Investigations Undercover Review Committee. This committee provides recommendations and approvals on the suitability of undercover operations involving sensitive circumstances in accordance with CIGIE and the Attorney General guidelines.
- **Pandemic Response Accountability Committee.** The Office of Audits and the Office of Investigations both participate in the Pandemic Response Accountability Committee. The government's coronavirus response includes \$2.6 trillion in economic relief to individual citizens, loans for businesses, and support for hospitals and other medical providers. In addition, this response includes economic relief for affected businesses; industries; and state, local, and tribal governments. The committee's mission is to promote transparency and ensure coordinated, comprehensive oversight of the government's spending and coronavirus response.
- **DOJ Civil Cyber-Fraud Initiative Working Group.** GSA OIG investigators, attorneys, and auditors participate in the OIG's partnership with the Civil Cyber-Fraud Initiative Working Group. This working group leverages the False Claims Act to hold accountable entities or

individuals that put U.S. information or systems at risk by knowingly providing deficient cybersecurity products or services, misrepresenting their cybersecurity practices or protocols, or violating obligations to monitor and report cybersecurity incidents and breaches.

- **DOJ Antitrust Division's Procurement Collusion Strike Force.** The Office of Investigations is a partner agency of the Procurement Collusion Strike Force. The Procurement Collusion Strike Force leads a coordinated national response to combat antitrust crimes and related schemes in government procurement, grant, and program funding at federal, state, and local levels of government.

APPENDIXES

APPENDIX I: ACRONYMS AND ABBREVIATIONS

8(a) program	U.S. Small Business Administration 8(a) Business Development program	FY	Fiscal Year
		GDA	Geospatial Data Act
		GSA	U.S. General Services Administration
AFOSI	Air Force Office of Special Investigations	Hoover	Herbert C. Hoover Building
		I&E	inspection and evaluation
CICA	Competition in Contracting Act of 1984	IPA	independent public accounting
CID	Criminal Investigation Division	IRS CI	IRS Criminal Investigation
CIGIE	Council of the Inspectors General on Integrity and Efficiency	IT	information technology
		LPOE	Land Port of Entry
CIO	Chief Information Officer	MAS	Multiple Award Schedule
Commerce	U.S. Department of Commerce	NCR	National Capital Region
Department		OASIS	Occupancy Agreement Space Inventory System
COVID-19	Coronavirus disease 2019	O&M	Operations and Maintenance
CSP	Commercial Sales Practices	OIG	Office of Inspector General
DCIS	Defense Criminal Investigative Service	PBS	Public Buildings Service
		R&K	R&K Enterprises, Inc.
DOD	Department of Defense	SBA	U.S. Small Business Administration
DOJ	U.S. Department of Justice		
ERM	Enterprise Risk Management	TDR	Transactional Data Reporting
FAEC	Federal Audit Executive Council	TTS	Technology Transformation Services
FAR	Federal Acquisition Regulation		
FAS	Federal Acquisition Service	U.S.C.	United States Code
FBI	Federal Bureau of Investigation	USDA	U.S. Department of Agriculture
FDA	U.S. Food and Drug Administration	VA	U.S. Department of Veterans Affairs
FISMA	Federal Information Security Modernization Act of 2014	WPA	Works Progress Administration

APPENDIX II: UNIMPLEMENTED RECOMMENDATIONS

Section 405(b)(3) of the Inspector General Act of 1978, as amended, requires that this report includes an identification of each recommendation made before the reporting period for which corrective action has not been completed, and that it includes the potential costs savings associated with the recommendation. Additionally, this appendix includes a list of significant recommendations unimplemented due to Agency disagreement.

UNIMPLEMENTED RECOMMENDATIONS ISSUED DURING PRIOR PERIODS

CHILD CARE CENTERS IN GSA-CONTROLLED BUILDINGS HAVE SIGNIFICANT SECURITY VULNERABILITIES (A170119/P/6/R20001, JANUARY 30, 2020)

We recommend that the PBS Commissioner:

- Address the specific vulnerabilities we identified for the child care centers [redacted].
- Conduct a comprehensive assessment to identify security vulnerabilities at each child care center located in a GSA-controlled building and expedite action to upgrade these buildings to the minimum security standards. If PBS cannot address vulnerabilities identified in these buildings, the child care centers should be moved to safer locations.

GSA'S ADMINISTRATION OF PERFORMANCE-BASED CONTRACTS PUTS THE GOVERNMENT AT RISK OF UNSATISFACTORY CONTRACTOR PERFORMANCE AND WASTED FUNDS (A210064/A/3/F23002, FEBRUARY 9, 2023)

We recommend that the GSA Administrator, through the FAS and PBS Commissioners, and the Assistant Administrator for the Office of Administrative Services:

- Revise or issue Agency policy to ensure:
 - The appropriate oversight of acquisition planning activities for performance-based service contracts, including the creation of a quality assurance surveillance plan that complies with applicable regulations; and
 - Contracting personnel have clear, descriptive instruction on how to monitor and enforce quality assurance surveillance plans during contract administration to ensure compliance and improve acquisition outcomes.
- Implement management oversight to ensure contracting personnel comply with policies and procedures intended to ensure sufficient government oversight of contractor performance.

GSA'S FISCAL YEAR 2020 TRANSACTIONAL DATA REPORTING PILOT EVALUATION PROVIDES AN INACCURATE ASSESSMENT OF THE PROGRAM (A210081/Q/3/P23001, MAY 1, 2023)

We recommend that the GSA Administrator, FAS Commissioner, and Associate Administrator of the Office of Government-wide Policy:

- Address the problems with the Transactional Data Reporting (TDR) data and usage as described in this report within 1 year of report issuance. To do so, GSA should, at a minimum:
 - Conduct a comprehensive assessment of all TDR data;

- Verify the accuracy and completeness of all TDR data;
- Implement a verification process to ensure that TDR data is accurate and complete when it is submitted by MAS contractors;
- Require the contractors that are not submitting complete and accurate data to correct their data or suspend their contract;
- Make the data accessible to all MAS contracting personnel; and
- Develop a methodology for pricing using TDR data that will ensure that customer agencies meet the Competition in Contracting Act (CICA) for orders placed through MAS contracts.

GSA LACKS ADEQUATE CONTROL OVER FOREIGN GIFTS AND DECORATIONS (JE24-001, APRIL 18, 2024)

We recommend that the Assistant Commissioner of the Office of General Supplies and Services:

- Conduct a security risk assessment to determine the risks of possible theft or loss of foreign gifts and decorations at both storage locations and throughout the lifecycle of the program.

BUILDING MAINTENANCE CONTRACTS ARE NOT COMPLYING WITH THEIR GSA CONTRACTS DUE TO POOR PERFORMANCE AND INEFFECTIVE OVERSIGHT (A230032/P/2/R24004, MAY 3, 2024)

We recommend that the PBS Commissioner ensure that PBS contracting officials:

- Emphasize the evaluation of operations and maintenance (O&M) contractors' proposed staffing and communicate with onsite PBS staff prior to contract award to ensure contract terms and conditions can be fully met.
- Confirm and enforce O&M contractor compliance with contractual requirements governing:
 - "Personnel" and "Contractor Key Personnel"; and
 - Contingency plans for "Loss of the Contractor's onsite personnel."
- Ensure that the O&M contract language clearly specifies the time requirements for routine service request completion and that the requirements are communicated to O&M contractors.
- Thoroughly review and understand the O&M contracts' quality control plan inspection requirements.
- Improve oversight of O&M contractors' compliance with the terms and conditions of their GSA contracts.

AUDIT OF GSA'S RESPONSE TO COVID-19: PBS FACES CHALLENGES TO ENSURE WATER QUALITY IN GSA-CONTROLLED FACILITIES (A201018/P/4/R24005, JULY 22, 2024)

We recommend that the PBS Commissioner provide appropriate oversight to ensure water is safe to occupants in its buildings by:

- Defining roles and responsibilities for maintaining water quality in GSA-controlled facilities.
- Ensuring that:

- Water quality is maintained through consistent policies and practices nationwide;
 - Deviations to PBS’s *Drinking Water Quality Management* policy and the PBS water safety guidance are approved by PBS’s Central Office; and
 - Any water safety policies or guidance developed by regional offices do not contradict policies and guidance issued at the national level.
- Ensuring that PBS’s water safety activities are incorporated into O&M contracts, recorded in PBS’s National Computerized Maintenance Management System, and overseen by PBS personnel.
- Incorporating PBS’s water safety oversight responsibilities into quality assurance surveillance plans for O&M contracts to ensure contractor compliance with water safety activities.
- Ensuring that PBS personnel and O&M contractors have access to tenant spaces so flushing can be performed.
- Amending O&M and other contracts to ensure that energy efficiency and water conservation requirements do not conflict with PBS’s *Drinking Water Quality Management* policy and the PBS water safety guidance.
- Ensuring water quality test results—especially those above EPA action levels—are communicated timely to building tenants, GSA child care center operators, and parents and guardians of affected children.
- Amending and implementing PBS’s *Drinking Water Quality Management* policy to:
 - Include reduced occupancy or decreased water usage as additional criteria for lead, copper, Legionella bacteria, and other contaminant testing;
 - Ensure requirements in PBS’s *Drinking Water Quality Management* policy, its companion *Desk Guide for Drinking Water Quality Management*, and the PBS water safety guidance are incorporated into the amended policy, unless there are safety reasons why such requirements cannot or should not be incorporated; and
 - Formalize its requirement to complete additional testing at child care centers that close for extended periods of time.

PUBLIC BUILDINGS SERVICE IS NOT EFFECTIVELY ADMINISTERING THE FUEL STORAGE TANK MANAGEMENT PROGRAM (JE24-002, JULY 30, 2024)

We recommended that the PBS Commissioner:

- Complete a thorough and accurate inventory of all fuel storage tanks across GSA’s facilities and ensure that the inventory is updated in the National Computerized Maintenance Management System, to include the proper asset type description in the database.
- Develop Fuel Storage Tank Management Plans in accordance with GSA policies and procedures.

- Develop a quality control system to ensure that the required actions and documentation to maintain fuel storage tanks are completed and included in the National Computerized Maintenance Management System as required by GSA policies.
- Ensure compliance with National Fire Protection Association marking standards.

GSA SHOULD STRENGTHEN THE SECURITY OF ITS ROBOTIC PROCESS AUTOMATION PROGRAM (A230020/B/T/F24004, AUGUST 6, 2024)

We recommend that GSA's Chief Financial Officer and Chief Information Officer:

- Conduct a comprehensive assessment of GSA's CIO-IT Security-19-97, *IT Security Procedural Guide: Robotic Process Automation Security*, (RPA policy) to ensure, among other things, that its monitoring controls are effectively designed and implemented.
- Develop oversight mechanisms to enforce compliance with the RPA policy and ensure that controls are operating effectively.
- Review all system security plans that bots currently interact with to determine if they address bot and non-person entity access. Update the system security plans, as needed.
- Review all system security plans that bots currently interact with to determine if the security controls need to be updated. Update the system security plans, as needed.
- Develop a comprehensive process for removing bot custodian and bot developer access for decommissioned bots and GSA systems that:
 - Aligns with GSA's CIO-IT Security-01-07, *IT Security Procedural Guide: Access Control*;
 - Tracks and documents that access has been removed; and
 - Incorporates the process into the RPA policy.

BASIC REPAIRS AND ALTERATIONS PROJECT FOR THE CENTRAL HEATING PLANT IN WASHINGTON, D.C., WAS NOT EFFECTIVELY MANAGED (A230043/P/R/R24006, AUGUST 9, 2024)

We recommend that the PBS National Capital Region (PBS NCR) Regional Commissioner:

- Improve management oversight to ensure that PBS NCR contracting officers and contracting officer's representatives:
 - Maintain complete contract files.
 - Verify that contractor and subcontractor employees are paid in accordance with Construction Wage Rate Requirements.
 - Enforce contractor compliance with subcontracting limitations required for sole-source 8(a) program contracts.
 - Enforce security requirements for contractor employees.
- Train PBS NCR contracting officers and contracting officer's representatives on their duties and responsibilities with respect to:
 - Maintaining complete contract files.
 - Verifying that contractor and subcontractor employees are paid in accordance with Construction Wage Rate Requirements.
 - Enforcing contractor compliance with subcontracting limitations required for sole-source 8(a) program contracts.

- Enforcing security requirements for contract employees.
- Conduct a review of PBS NCR's current basic repairs and alterations contracts to ensure that:
 - Contract files are complete.
 - Contractor and subcontractor employees are paid in accordance with Construction Wage Rate Requirements.
 - Contractors are complying with limitations on subcontracting for sole-source 8(a) program contracts.
 - Contractor employees have the required security clearances.
 - The Federal Procurement Data System-Next Generation contains current, complete, and accurate information.

FIRE SAFETY AND ACCESSIBILITY DEFICIENCIES AT THE GSA HEADQUARTERS BUILDING IN WASHINGTON, D.C. (A240018/P/R/R24007, AUGUST 12, 2024)

We recommend that the PBS NCR Regional Commissioner:

- Take immediate actions to address the fire safety deficiencies at the GSA headquarters building by:
 - Promptly ensuring that all fire doors are inspected, repaired, or replaced for proper functionality and compliance with safety standards and fire codes.
 - 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.
 - 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.
 - Ensuring that pre-fire planning walk-throughs are regularly scheduled and performed with the local fire department.
- 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 headquarters building by:
 - 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.
 - Addressing the functionality and compliance of all elevators, ensuring that each elevator is equipped with an automatic verbal announcement feature.
 - Stabilizing the handrail for the wheelchair ramp at the entrance of the building.

FAS'S OFFICE OF ASSISTED ACQUISITION SERVICES SHOULD IMPROVE ITS OVERSIGHT AND ADMINISTRATION OF CLASSIFIED CONTRACTS (A230065/Q/3/P24001, SEPTEMBER 16, 2024)

We recommend that the Federal Acquisition Service Commissioner:

- Consolidate and improve contract security classification guidance to provide more detail and clarity for Assisted Acquisition Services (AAS) contracting personnel.

- Update existing controls to monitor and ensure compliance with contract security classifications by:
 - Including a review of the security classification level in contract file transfer checklists;
 - Verifying compliance with AAS security classification policies during existing internal contract reviews; and
 - Updating briefing templates to use consistent terminology.
- Implement Assisted Services Shared Information System controls to ensure accuracy and integrity of contract security classifications by:
 - Prioritizing the development of edit history for immediate visibility of changes to the contract security classification level; and
 - Limiting the ability to edit contract data to only the assigned acquisition personnel and their supervisory chain.
- Strengthen AAS policy to require AAS Level 3 contracting officers to have adequate security clearances and establish a plan to initiate the security clearance process for affected contracting officers.
- Provide AAS contracting personnel with training on any updated policies or guidance implemented in response to the audit findings.

OVERSIGHT OF PBS'S PROJECTS FUNDED BY THE INFRASTRUCTURE INVESTMENT AND JOBS ACT: AUDIT OF PAVING PROJECT AT NEW YORK STATE'S NORTHERN BORDER (A220036/P/2/R24008, SEPTEMBER 24, 2024)

We recommend that the PBS Commissioner:

- Establish supplemental policies, training, and oversight procedures to ensure contractors comply with federal regulations when using drones on federal buildings, grounds, and property, regardless of funding sources.

We also recommend that the PBS Regional Commissioner for the Northeast and Caribbean Region:

- Implement controls and training to ensure that PBS contracting staff use proper contract vehicles to procure construction contracts so that the Competition in Contracting Act is not violated.
- Ensure that the PBS contracting staff are trained on their responsibilities with respect to:
 - Documenting and supporting independent government estimates and price reasonableness determinations; and
 - Segregating duties performed in making price reasonableness determinations.
- Ensure that the PBS contracting staff responsible for the administration of construction contracts and task orders are trained on their responsibilities with respect to:
 - Acquisition planning;
 - Evaluating contractor's experience and past performance prior to awarding a contract to ensure the contractor is qualified to perform the work;
 - Establishing and obtaining a construction warranty and performance and payment bonds for construction contracts; and

- Entering accurate and complete contract information in the Federal Procurement Data System-Next Generation.
- Establish controls to ensure compliance with GSA environmentally preferable material standards and report accurate information to the taxpayers.
- Properly train regional PBS contracting staff on the proper management, usage, and oversight of drones and drone operators on PBS projects in accordance with applicable laws, regulations, and GSA policies.
- Implement controls and training to ensure that PBS contracting staff provide adequate oversight and do not violate small business subcontracting limitations to create “pass-through” environments for large or ineligible businesses.
- Ensure that PBS contracting staff comply with security clearance requirements and that contractors working on government contracts have the appropriate clearances.
- Establish controls to ensure that contracting officer’s representatives review certified payroll records and perform labor interviews, as appropriate, prior to approval of invoices to verify that contractor and subcontractor employees are paid in accordance with federal Construction Wage Rate Requirements.
- Establish controls to ensure that PBS contracting staff properly evaluate independent government estimates to ensure the government is not overpaying for contractor services and provide oversight to ensure contractors perform required services.
- Train PBS contracting staff on their responsibilities with respect to:
 - Closing out the contract files in accordance with the Federal Acquisition Regulation;
 - Completing contractor performance assessment reports within 120 calendar days, in accordance with the Contractor Performance Assessment Reporting System guide; and
 - Preparing and implementing oversight procedures to ensure contract files include complete and accurate contract documentation in accordance with the Federal Acquisition Regulation, the General Services Administration Acquisition Manual, and other applicable policies.

AUDIT OF GSA’S FISCAL YEAR 2023 TRAVEL CARD PROGRAM (A240031/H/5/F24005, SEPTEMBER 24, 2024)

We recommend that the GSA Chief Administrative Services Officer:

- Work with GSA’s Federal Acquisition Service program officials to implement messaging to travel cardholders on the proper use of government rideshare contracts.
- Continue training related to use of the government travel card in rideshare applications.
- Continue to remind travelers in training and in the Concur travel system to not pay sales or occupancy taxes in tax-exempt states.
- Create the questionable charges report according to the requirements of GSA’s Charge Card Management Plan to ensure that all charges are screened and that questionable charges are identified and investigated.
- Update the questionable charges report to ensure the results are complete. These updates should include a higher level of detail to ensure timely resolution and response, and capture employee name changes or separations from the Agency.

AUDIT OF GSA'S COMPLIANCE WITH THE GEOSPATIAL DATA ACT OF 2018 (A240028/I/T/F24006, SEPTEMBER 30, 2024)

We recommend that GSA's Chief Information Officer:

- Correct the geospatial data quality deficiencies identified in our report.
- Implement controls to ensure that the Inventory of Owned and Leased Properties (IOLP) and Federal Real Property Profile Management System (FRPP MS) datasets contain accurate latitude and longitude coordinates based on each property's physical location except for those properties with a clear exemption for national security.
- Strengthen the data validation process for the IOLP and FRPP MS datasets to address the geospatial data quality deficiencies identified in our report.
- Establish a process to ensure GSA searches existing geospatial data before procuring new data, including:
 - Ensuring the Geographic Information Systems Center of Excellence is notified of future geospatial data needs prior to awarding a new contract for geospatial data.
 - Improving Agency-wide awareness of the requirement to search existing geospatial data prior to awarding a new contract for geospatial data.

FAS SHOULD STRENGTHEN ITS PRICE ANALYSES WHEN CONSOLIDATING MULTIPLE AWARD SCHEDULE CONTRACTS (A230040/Q/3/P24002, SEPTEMBER 30, 2024)

We recommend that the FAS Commissioner:

- Establish an oversight process for Commercial Sales Practices (CSP)-based contracts undergoing consolidation to ensure contracting personnel:
 - Comply with General Services Acquisition Regulation 538.270-1, *Evaluation of offers without access to transactional data*, and FAS Policy and Procedure 2021-05, *Evaluation of FSS Program Pricing*; and gather supporting documentation to determine a contractor's most favored customer pricing for use in negotiation objectives.
 - Evaluate supporting documentation to verify a clear and relevant relationship between supporting documentation and each of the proposed prices it is meant to substantiate.
- Establish an oversight process for TDR pilot contracts undergoing consolidation to ensure contracting personnel do not rely solely on contract-level pricing tools; and, if prices paid data is not available, prioritize obtaining recent invoices or other than certified cost or pricing data from the contractor before relying on non-prices paid information.
- Re-evaluate previously consolidated MAS contracts to ensure that added products or services were evaluated to meet federal regulations and GSA policy requirements.

UNIMPLEMENTED RECOMMENDATIONS DUE TO AGENCY DISAGREEMENT

GSA'S DECISIONS TO VACATE AND RENOVATE THE LEASED FEDERAL COURTHOUSE IN PENSACOLA ARE BASED ON FAULTY PREMISES (A150132/P/4/R17001, OCTOBER 25, 2016)

We recommend that the GSA Administrator direct PBS to:

- Reanalyze options for housing the tenants of the 1 North Palafox Street courthouse. As part of this analysis, PBS should:
 - Ensure an equal comparison of the options is reflected;
 - Ensure that the designs for the renovation, new, and leased construction options meet current building standards;
 - Ensure the designs for the new and leased construction options comply with the U.S. Courts Design Guide;
 - Ensure the estimated reversion values of the new and leased courthouse options are developed by an independent appraiser;
 - Ensure lease-buyout and other potential settlement costs are incorporated; and
 - Develop and incorporate realistic project schedules into the financial analysis that are based on historical performance of projects with similar scope or scale.
- Suspend all contracts and procurements for the prospectus project until PBS secures ownership of the 1 North Palafox Street courthouse, if PBS's revised analysis demonstrates that ownership is in the best interest of the government.

PBS NATIONAL CAPITAL REGION'S \$1.2 BILLION ENERGY SAVINGS PERFORMANCE CONTRACT FOR WHITE OAK WAS NOT AWARDED OR MODIFIED IN ACCORDANCE WITH REGULATIONS AND POLICY (A150009/P/5/R17006, AUGUST 24, 2017)

We recommend that the Regional Commissioner, PBS NCR:

- Take immediate action to expedite the procurement of a new O&M contract that adheres to competition requirements specified in the Competition in Contracting Act of 1984 and the FAR;
- Determine and implement the appropriate corrective action needed for PBS NCR personnel's non-compliance with competition requirements; and
- Once the procurement of a new O&M contract is secured, as stated in *Finding 1*, include the Limitation of Government Obligation clause on all non-ESPC O&M services.

EVALUATION OF GSA NONDISCLOSURE POLICY (JE18-002, MARCH 8, 2018)

We recommend that GSA's leadership should:

- Clarify GSA's policy on communications with Members of Congress in GSA's order on congressional and intergovernmental inquiries and relations.

EVALUATION OF GSA'S MANAGEMENT AND ADMINISTRATION OF THE OLD POST OFFICE BUILDING LEASE (JE19-002, JANUARY 16, 2019)

We recommend GSA:

- Determine the purpose of the Interested Parties provision;

- Conduct a formal legal review by Office of General Counsel that includes consideration of the Foreign and Presidential Emoluments Clauses; and
- Revise the language to avoid ambiguity.

GSA's TRANSACTIONAL DATA REPORTING PILOT IS NOT USED TO AFFECT PRICING DECISIONS (A140143/Q/6/P21002, JUNE 24, 2021)

We recommend that the FAS Commissioner:

- Take immediate action to mitigate the risks associated with the TDR pilot by restricting additional contractors from opting into the TDR pilot and restricting access to, and use of, the TDR pilot data; and
- Develop and implement an exit strategy for the TDR pilot and transition participating contractors out of the TDR pilot.

FAS CANNOT PROVIDE ASSURANCE THAT MAS CONTRACT PRICING RESULTS IN ORDERS ACHIEVING THE LOWEST OVERALL COST ALTERNATIVE (A200975/Q/3/P22002, SEPTEMBER 30, 2022)

We recommend that the FAS Commissioner:

- Cancel the TDR pilot in accordance with FAS Policy and Procedures 2016-11, *Transactional Data Reporting – Federal Supply Schedule Program Implementation*, Paragraph 8(G), Pilot Cancellation. We recognize that FAS rejected recommendations made in *GSA's Transactional Data Reporting Pilot Is Not Used to Affect Pricing Decisions*, (Report Number A140143/Q/6/P21002), including that FAS develop and implement an exit strategy for the TDR pilot and transition participating contractors out of the TDR pilot. However, we continue to conclude that the TDR pilot should be canceled. After 6 years, the TDR pilot still has not resulted in a viable pricing methodology that ensures compliance with the CICA's requirement for orders to result in the lowest overall cost alternative to meet the government's needs.
- Inform customer agencies that they should perform separate and independent price determinations because relying on MAS contract pricing and following the ordering procedures in FAR 8.405, *Ordering procedures for Federal Supply Schedules*, may not ensure compliance with the CICA requirement that orders and contracts result in the lowest overall cost alternative. This should continue until the requirements and controls outlined in Recommendation 3 are set in place to ensure compliance with CICA.
- Establish requirements and controls to ensure that FAS contracting personnel adequately analyze CSP information to negotiate pricing consistent with CICA, FAR, and General Services Acquisition Regulation 538.270-1, *Evaluation of offers*, without access to transactional data and to clearly identify and support the determination of most favored customer pricing.
 - FAS should ensure that offerors provide its contracting personnel with detailed information about the sales volumes, terms and conditions of pricing agreements, and any additional transactional discounts or pricing terms offered to individual commercial customers that receive the best pricing for the products and services proposed for the MAS contract.

- FAS should establish protocols that require offerors to submit other than certified cost or pricing data to support proposed pricing when offerors do not have comparable sales to customers outside of its MAS contract.
- FAS should cancel FAS Policy and Procedures 2017-02, *Updated Procedures for Exercising the Option to Extend the Term of a Federal Supply Schedule Contract*, and develop and implement policy and procedures directing FAS's contracting personnel to perform price analyses of CSP disclosures provided by the offeror for MAS contract option extensions.

APPENDIX III: AUDIT AND INSPECTION REPORT REGISTER

				FINANCIAL RECOMMENDATIONS	
DATE OF REPORT	REPORT NUMBER	TITLE	DECISION DATE	FUNDS BE PUT TO BETTER USE	QUESTIONED COSTS
Note: Because some audits pertain to contract awards or actions that have not yet been completed, the financial recommendations related to these reports are not listed in this Appendix.					
PBS PERFORMANCE AUDITS					
10/29/2024	A240068	Implementation Review of Corrective Action Plan: PBS Needs to Strengthen Its Training and Warranting Programs for Contracting Officers, Report Number A210053/P/2/R23002, December 30, 2022	N/A		
03/19/2025	A240044	GSA Is Not Effectively Managing Its Internal Space to Reflect Occupancy Changes			
03/28/2025	A250038	Implementation Review of Corrective Action Plan: The GSA Public Buildings Service’s Special Programs Division Is Not Effectively Managing Reimbursable Work Authorizations, Report Number A210045/P/2/R23001, December 2, 2022	N/A		
FAS CONTRACT AUDITS					
10/11/2024	A240038	Independent Preaward Examination of Multiple Award Schedule Contract	12/17/2024		
10/31/2024	A240021	Independent Preaward Examination of Multiple Award Schedule Contract	12/27/2024		
11/12/2024	A240056	Independent Preaward Examination of Multiple Award Schedule Contract	01/14/2025		\$38,382
12/17/2024	A240050	Independent Preaward Examination of Multiple Award Schedule Contract	02/12/2025		\$180,211
01/23/2025	A240048	Independent Preaward Examination of Multiple Award Schedule Contract	02/06/2025		\$85,196
01/27/2025	A240024	Independent Postaward Examination of Multiple Award Schedule Contract	01/28/2025		
02/13/2025	A240065	Independent Preaward Examination of Multiple Award Schedule Contract			
03/04/2025	A240061	Independent Preaward Examination of Multiple Award Schedule Contract	03/12/2025		
03/07/2025	A240062	Independent Preaward Examination of Multiple Award Schedule Contract			
03/13/2025	A240060	Independent Preaward Examination of Multiple Award Schedule Contract			
03/27/2025	A240040	Independent Preaward Examination of Multiple Award Schedule Contract			\$5,780

APPENDIXES

				FINANCIAL RECOMMENDATIONS	
DATE OF REPORT	REPORT NUMBER	TITLE	DECISION DATE	FUNDS BE PUT TO BETTER USE	QUESTIONED COSTS
OTHER PERFORMANCE AUDITS					
03/25/2025	A240079	Implementation Review of Corrective Action Plan: GSA’s Administration of Performance-Based Contracts Puts the Government at Risk of Unsatisfactory Contractor Performance and Wasted Funds, Report Number A210064/A/3/F23002, February 9, 2023	N/A		
03/31/2025	A250023	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	N/A		
INSPECTIONS AND EVALUATIONS					
10/16/2024	JE25-001	Facility Security Inspection of a High-Risk GSA Building	12/19/2024		
02/03/2025	JE25-002	GSA’s Site Selection Process for the Relocation of the Federal Bureau of Investigation’s Headquarters			

APPENDIX IV: OIG REPORTS OVER 12 MONTHS OLD, FINAL AGENCY ACTION PENDING

Section 6009 of the Federal Acquisition Streamlining Act of 1994, Public Law 103-55, as amended by Section 810 of Public Law 104-106, requires the head of a federal agency to complete final action on each management decision required regarding a recommendation in an OIG's report within 12 months after the date of the report. If the head of the agency fails to complete final action within the 12-month period, the IG shall identify the matter in the semiannual report until final action is complete.

The GSA Office of Audit Management and Accountability provided the following list of reports with action items open beyond 12 months:

DATE OF REPORT	REPORT NUMBER	TITLE	
CONTRACT AUDITS			
02/11/2021	A200986	Independent Examination of a Claim	
06/09/2021	A201000	Independent Examination of a Claim	
08/27/2021	A200997	Independent Examination of a Claim	
07/14/2023	A201027	Independent Limited Scope Postaward Examination of Multiple Award Schedule Contract	
PERFORMANCE AUDITS, INSPECTIONS, AND EVALUATIONS			PROJECTED FINAL ACTION DATE
01/30/2020	A170119	Child Care Centers in GSA-Controlled Buildings Have Significant Security Vulnerabilities*	08/29/2025
02/09/2023	A210064	GSA's Administration of Performance-Based Contracts Puts the Government at Risk of Unsatisfactory Contractor Performance and Wasted Funds*	TBD**
05/01/2023	A210081	GSA's Fiscal Year 2020 Transactional Data Reporting Pilot Evaluation Provides an Inaccurate Assessment of the Program	9/30/2025

*Audit reopened based on the results of an implementation review.

**Corrective action plan or revised corrective action plan is in the approval process.

APPENDIX V: MANAGEMENT DECISIONS

Section 405(c)(2)-(3) of the Inspector General Act of 1978, as amended, requires each semiannual report to include information regarding any management decision made during the reporting period with respect to any audit, inspection, or evaluation issued during a previous reporting period. The table presented below lists all such decisions.

REPORT TITLE	REPORT DATE	DECISION DATE	OIG RECOMMENDATION		GSA DECISION	
			FUNDS BE PUT TO QUESTIONED BETTER USE	COSTS	FUNDS BE PUT TO QUESTIONED BETTER USE	COSTS
Evaluation of the General Services Administration's Use of an Ad Hoc Appraisal Process for an Executive	09/14/2021	10/21/2024				
Audit of GSA's Response to COVID-19: PBS Faces Challenges to Ensure Water Quality in GSA-Controlled Facilities	07/22/2024	01/08/2025				
Independent Preaward Examination of Multiple Award Schedule Contract	07/26/2024	10/01/2024		\$8,272		\$8,272
GSA Should Strengthen the Security of Its Robotic Process Automation Program	08/06/2024	11/07/2024				
Basic Repairs and Alterations Project for the Central Heating Plant in Washington, D.C., Was Not Effectively Managed	08/09/2024	12/11/2024				
Fire Safety and Accessibility Deficiencies at the GSA Headquarters Building in Washington, D.C.	08/12/2024	03/06/2025				
Independent Preaward Examination of Multiple Award Schedule Contract	08/16/2024	11/05/2024		\$71,874		\$71,874
Independent Preaward Examination of Multiple Award Schedule Contract	08/30/2024	10/23/2024				
Independent Preaward Examination of Multiple Award Schedule Contract	09/13/2024	11/12/2024		\$1,084,667		\$1,084,667
FAS's Office of Assisted Acquisition Services Should Improve Its Oversight and Administration of Classified Contracts	09/16/2024	11/26/2024				
Oversight of PBS's Projects Funded by the Infrastructure Investment and Jobs Act: Audit of Paving Project at New York State's Northern Border	09/24/2024	01/14/2025				
Audit of GSA's Fiscal Year 2023 Travel Card Program	09/24/2024	03/03/2025				
Independent Limited Scope Postaward Examination of Multiple Award Schedule Contract	09/30/2024	11/20/2024		\$12,134,718		\$12,134,718

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REPORT TITLE	REPORT DATE	DECISION DATE	OIG RECOMMENDATION		GSA DECISION	
			FUNDS BE PUT TO BETTER USE	QUESTIONED COSTS	FUNDS BE PUT TO BETTER USE	QUESTIONED COSTS
FAS Should Strengthen Its Price Analyses When Consolidating Multiple Award Schedule Contracts	09/30/2024	12/11/2024				
Audit of GSA's Compliance with the Geospatial Data Act of 2018	09/30/2024	01/15/2025				
TOTALS				\$13,299,531		\$13,299,531

APPENDIX VI: PEER REVIEW RESULTS

Section 405(b)(14)-(16) of the Inspector General Act of 1978, as amended, requires each OIG to submit an appendix containing the results of any peer review conducted by another OIG during the reporting period. If no peer review was conducted during the period, the appendix must contain a statement identifying the date of the last peer review that was conducted by another OIG.

The appendix must also contain a list of any outstanding recommendations from any peer review conducted by another OIG that have not been fully implemented, including a description of the status of the recommendations, and an explanation as to why the recommendations have not been completed; and a list of any peer reviews conducted by the Inspector General of another OIG during the reporting period, including a list of any outstanding recommendations made from any previous peer review that have not been fully implemented.

The Federal Deposit Insurance Corporation OIG started its peer review of the Office of Investigations in November 2024. The review is currently ongoing. In the last peer review, which took place in FY 2020, the GSA OIG Office of Investigations received a passing rating, which means that the systems of internal safeguards and management procedures for the Office of Investigations complied with the standards established for investigations by the Attorney General Guidelines and CIGIE. There are no outstanding recommendations from any prior peer reviews.

In FY 2024, the GSA OIG Office of Audits underwent a peer review by the U.S. Agency for International Development OIG. On October 25, 2024, the Office of Audits received a peer review rating of “pass.” The peer review team found that the Office of Audits’ system of quality control is suitably designed and complied with to provide it with reasonable assurance of performing and reporting in conformity with the quality standards established by CIGIE in all material aspects. No outstanding recommendations exist from any peer review conducted by another OIG.

In addition, the GSA OIG Office of Audits completed an external peer review of the U.S. Department of Justice OIG in March 2025. The U.S. Department of Justice OIG has no outstanding recommendations issued by any previous peer review that have not been fully implemented.

In FY 2023, the GSA OIG Office of Inspections underwent a peer review by the AmeriCorps OIG. The peer review team determined that the Office of Inspections’ policies and procedures were consistent with the January 2012 and December 2020 CIGIE Quality Standards for Inspection and Evaluation (Blue Book). The peer review team also found that the selected reports complied with the Office of Inspections’ internal policies and procedures and applicable Blue Book standards. No outstanding recommendations exist for the Office of Inspections.

APPENDIX VII: GOVERNMENT CONTRACTOR SIGNIFICANT AUDIT FINDINGS

The National Defense Authorization Act for FY 2008, Public Law 110-181, Section 845, requires each Inspector General appointed under the Inspector General Act of 1978, as amended, to submit an annex on final, completed contract audit reports issued to the contracting activity as part of its Semiannual Report to the Congress.

The annex addresses significant audit findings—defined as unsupported, questioned, or disallowed costs more than \$10 million—or other significant contracting issues. During this reporting period, there are no GSA OIG reports that met these requirements.

APPENDIX VIII: REPORTING REQUIREMENTS

The table below cross-references the reporting requirements prescribed by the Inspector General Act of 1978, as amended, to the specific pages where they are addressed. The information required by the National Defense Authorization Act for FY 2008 and the Federal Acquisition Streamlining Act of 1994, as amended, are also cross-referenced to the appropriate pages of the report.

REQUIREMENTS		
INSPECTOR GENERAL ACT OF 1978, AS AMENDED (5 U.S.C. CHAPTER 4)		
SECTION		PAGE
405(b)(1)	Significant Problems, Abuses, and Deficiencies	5-29
405(b)(2)	Recommendations for Corrective Action	5-29
405(b)(3)	Unimplemented Prior Period Recommendations	36-46
405(b)(4)	Total Convictions Number	27
405(b)(6)	Report Listing with Dollar Values	47-48
405(b)(7)	Significant Reports	5-29
405(b)(8) and (c)(2)-(3)	Management Decisions Made on Prior Period Recommendations	50-51
405(b)(13)	Federal Financial Management Improvement Milestones	none
405(b)(14)-(16)	Peer Review Information and Results	52
405(b)(17)	Investigative Statistical Tables	27-29
405(b)(18)	Investigative Table Metrics	27-29
405(b)(19)	Investigations of Senior Employees with Substantiated Misconduct	none
405(b)(20)	Whistleblower Retaliation	none
405(b)(21)	Agency Interference with OIG Independence	none
405(b)(22)(a)	Non-Public Audit, Evaluation or Inspection Reports	15
405(b)(22)(b)	Non-Public Investigations of Senior Government Employees	none
OTHERS		
Pub. L. 106-531, Sec. 3	Most Significant Management Challenges	3-4
Pub. L. 103-355, Sec. 6009	Reports Over a Year with Final Agency Action Pending	49
Pub. L. 110-181, Sec. 845	Government Contractor Significant Audit Findings	none
Pub. L. 117-348, 136 Stat. 6211	Trafficking Victims Prevention and Protection Reauthorization Act	none