



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

Audit of PBS Basic Repairs and Alterations Project: Fort Lauderdale Federal Building and Courthouse

Report Number A220042/P/6/R23007
April 20, 2023

Executive Summary

Audit of PBS Basic Repairs and Alterations Project: Fort Lauderdale Federal Building and Courthouse

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Why We Performed This Audit

We initiated this audit in response to a hotline complaint that raised concerns over project management in the GSA Public Buildings Service (PBS) Southeast Sunbelt Region's (PBS Region 4's) Gulf Coast Branch. Although we determined that the complaint did not have merit, we identified risks concerning the Gulf Coast Branch's award and administration of contracts that warranted an audit. To conduct our audit, we selected one basic repairs and alterations project from the Gulf Coast Branch. Our audit objective was to determine whether PBS Region 4 planned, awarded, administered, and closed out the task order for water intrusion repairs and mold remediation at the U.S. Federal Building and Courthouse in Fort Lauderdale, Florida (Fort Lauderdale Federal Building and Courthouse), in accordance with the Federal Acquisition Regulation (FAR), GSA Acquisition Manual (GSAM), and other applicable policies.

What We Found

PBS Region 4 did not plan, award, administer, and close out the water intrusion repairs and mold remediation task order for the Fort Lauderdale Federal Building and Courthouse in accordance with the FAR, GSAM, and other applicable policies. We found that PBS Region 4 did not maintain a complete and accurate task order file. PBS Region 4 also did not ensure that contractor and subcontractor employees were paid in compliance with the Davis-Bacon Act. Additionally, PBS Region 4 improperly allowed project managers to perform contracting officer's representative duties without delegation of authority. Finally, PBS Region 4 did not perform the required review to identify and resolve any issues when the task order file was transferred to a new contracting officer.

Our finding and conclusions are based on the evidence we were able to gather during our audit. Due to the extent of incomplete and inaccurate documentation in the task order file, we were unable to evaluate or review many of PBS Region 4's contract decisions.

What We Recommend

We recommend that the PBS Region 4 Regional Commissioner:

1. Provide training to Gulf Coast Branch contracting officials with respect to:
 - a. Maintaining complete and accurate contract file documentation in accordance with the FAR, GSAM, and other applicable policies;

- b. Ensuring employees are paid in accordance with applicable statutory and regulatory labor requirements;
 - c. Designating contracting officer's representatives properly before delegating contract responsibilities; and
 - d. Complying with applicable FAR and GSAM clauses governing the transfer of contract files.
2. Prepare and implement oversight procedures to ensure contract file documentation within the Gulf Coast Branch complies with the FAR, GSAM, and other applicable policies.
3. Perform a review of all certified payroll documentation for this task order and take action to compensate any contractor employees who were underpaid.
4. Perform a review of contracts awarded by the Gulf Coast Branch to ensure that the contract files contain complete and accurate contract documentation in accordance with the FAR, GSAM, and other applicable policies.

The PBS Region 4 Regional Commissioner agreed with our recommendations and provided general comments on PBS Region 4's efforts to improve acquisition processes, oversight, and training. These comments did not affect our finding and conclusions. PBS Region 4's written comments are included in their entirety in **Appendix B**.

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Introduction

We performed an audit of GSA's Public Buildings Service (PBS) Southeast Sunbelt Region (PBS Region 4) Gulf Coast Branch's \$1.2 million basic repairs and alterations project for water intrusion repairs and mold remediation at the U.S. Federal Building and Courthouse in Fort Lauderdale, Florida (Fort Lauderdale Federal Building and Courthouse).

Purpose

We initiated this audit in response to a hotline complaint that raised concerns over project management in PBS Region 4's Gulf Coast Branch. Although we determined that the complaint did not have merit, we identified risks concerning the Gulf Coast Branch's award and administration of contracts that warranted an audit. To conduct our audit, we selected one basic repairs and alterations project from the Gulf Coast Branch.

Objective

Our audit objective was to determine whether PBS Region 4 planned, awarded, administered, and closed out the task order for water intrusion repairs and mold remediation at the Fort Lauderdale Federal Building and Courthouse in accordance with the Federal Acquisition Regulation (FAR), GSA Acquisition Manual (GSAM), and other applicable policies.

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

Background

According to GSA's *2022 Agency Financial Report*, the average age of GSA-owned buildings is 50 years. For Fiscal Year 2022, GSA reported deferred maintenance and repairs cost of approximately \$3.13 billion for critical repairs and upgrades necessary to maintain its buildings in acceptable condition. As defined by federal accounting standards, deferred maintenance and repairs includes preventative maintenance; replacement of parts, systems, or components; and other activities to preserve or maintain the buildings.

PBS funds these repair needs and all of its real property activities through the Federal Buildings Fund (FBF). The FBF operates as a revolving fund; however, unlike typical revolving funds, it is subject to annual enactment of new obligational authority by Congress. As part of the annual appropriations process, Congress authorizes FBF funding for GSA's Basic Repairs and Alterations Program, commonly referred to as the BA54 (FBF Budget Activity 54) program.

The BA54 program is meant to keep federally owned and leased buildings reliably and safely open, operable, tenantable, and in good repair to maximize their value and extend their service lives. It is used to fund the cost of basic repairs and alterations projects between \$25,000 and

the prospectus threshold for federally owned and leased buildings.¹ In its *Fiscal Year 2022 Congressional Justification*, GSA requested \$389 million for the BA54 program.

On December 28, 2018, a PBS Region 4 contracting officer from the Gulf Coast Branch awarded a \$993,313 task order for water intrusion repairs and mold remediation at the Fort Lauderdale Federal Building and Courthouse under the BA54 program. This task order was awarded using a PBS general construction indefinite-delivery/indefinite-quantity contract covering the State of Florida. On March 23, 2020, the PBS contracting officer issued a \$213,946 modification for additional mold remediation scope work, bringing the total task order value to \$1,207,259. This project accounted for 14 percent of the Gulf Coast Branch's BA54 program projects closed out during Fiscal Years 2019 through 2021.

¹ In Fiscal Year 2022, the prospectus threshold was \$3.375 million for work performed on federally owned buildings and \$1.687 million for leased buildings.

Results

Finding – PBS did not plan, award, administer, and close out the water intrusion repairs and mold remediation task order for the Fort Lauderdale Federal Building and Courthouse in accordance with the FAR, GSAM, and other applicable policies.

PBS Region 4 did not plan, award, administer, and close out the water intrusion repairs and mold remediation task order for the Fort Lauderdale Federal Building and Courthouse in accordance with the FAR, GSAM, and other applicable policies. We found that PBS Region 4 did not maintain a complete and accurate task order file. PBS Region 4 also did not ensure that contractor and subcontractor employees were paid in compliance with the Davis-Bacon Act. Additionally, PBS Region 4 improperly allowed project managers to perform contracting officer's representative (COR) duties without delegation of authority. Finally, PBS Region 4 did not perform the required review to identify and resolve any issues when the task order file was transferred to a new contracting officer.

Our finding and conclusions are based on the evidence we were able to gather during our audit. Due to the extent of incomplete and inaccurate documentation in the task order file, we were unable to evaluate or review many of PBS Region 4's contract decisions.

Contracting Officials Did Not Maintain Complete and Accurate Task Order Documentation

The task order file for the water intrusion repairs and mold remediation project at the Fort Lauderdale Federal Building and Courthouse did not comply with the FAR, GSAM, and other applicable policies due to the lack of complete and accurate documentation.

The contents of contract files, including task order files, are governed, in part, by the following requirements:

- FAR 4.802, *Contract files*, states, in part, that the contract file should document the basis for the acquisition and award.
- FAR 4.803, *Contents of contract files*, lists the records that the contract file should contain.
- GSAM 504.802, *Contract files*, states that the contracting officer must place all information and documentation required by FAR 4.802 and 4.803 in the contract file.
- PBS Procurement Instructional Bulletin 18-02, *PBS Contract File Content and Organization*, dated April 19, 2018, outlines the mandatory use of: (1) the Electronic Acquisition System Integrated for contract file documentation and (2) five checklists to provide standardized content for PBS contract files.

As described on the next page, we found that the task order file did not comply with these requirements.

Incomplete task order documentation. At the start of our audit, the task order file did not include key documents, including the following:

- Acquisition plan
- Independent government estimate
- Contractor's proposal
- Notice to proceed
- Security and background review determinations
- Certified payroll records
- Notice of substantial completion
- Payment applications
- Contract file checklists

In response to our audit questions and requests for this documentation, the contract specialist and project manager uploaded 383 documents to the task order file.

While it appears that the contracting officials prepared most of this documentation while planning and administering the contract, the documents were not properly maintained in the task order file. In some cases, we found that the contracting officials did not possess required documents. For example, we had to obtain the independent government estimate directly from the GSA architect who prepared it. Contracting officials also had to contact the contractor to obtain copies of some of the certified payrolls that should have been provided during the performance of the task order.

Despite the significant number of documents added to the task order file during our audit, the following key documents remained missing:

- **Acquisition plan** — This document, required by FAR 7.1, *Acquisition Plans*, is created prior to contract award and is required to address all the technical, business, management, and other significant considerations that will control the acquisition. It is necessary to ensure that the government meets its needs in an effective, economical, and timely manner.
- **Security and background review determinations** — Security reviews are required in order to comply with Homeland Security Presidential Directive-12, *Policy for a Common Identification Standard for Federal Employees and Contractors*. Contractors are required to undergo background investigations to achieve security assurance and proper access to GSA facilities. The task order file did not contain a complete listing of all contractor and subcontractor employees who worked onsite on this project. However, at our request, contracting officials provided documentation from the contractor that

identified at least 58 employees who worked onsite. Contracting officials did not provide documentation of security reviews performed for any of these employees.²

- **Certified payroll records for the contractor and subcontractors** — FAR 22.406-6, *Payrolls and statements*, requires contractors to submit weekly payrolls. It also requires the contracting officer to examine the payroll statements to ensure compliance with the contract and any statutory or regulatory requirements. Even after contacting the contractor in response to our audit requests, contracting officials were unable to produce complete certified payroll records, and we found no evidence that contracting officials performed any of the required examinations of payroll statements.
- **Notice of substantial completion** — The contracting officer is required by GSAM 552.211-70, *Substantial Completion*, to issue a written determination with the date of substantial completion, which signifies that the contractor has completed the work and its contractual obligations.
- **Payment applications** — FAR 52.232-5, *Payments under Fixed-Price Construction Contracts*, requires the contractor's payment application to include a certification confirming, in part, that the amount requested is for performance of the contract and that all payments due to subcontractors have been made. However, only 6 of the 12 payment applications were appropriately certified. Of the remaining payment applications, five were not appropriately certified, and contracting officials could not provide one.
- **PBS contract file checklists** — PBS Procurement Instructional Bulletin 18-02 requires the use of five checklists to provide standardized content for PBS contract files. PBS contracting officers are required to use these checklists to ensure that contract files contain required documentation. However, the task order file did not include a *PBS Modification File Content Checklist* for one of the three modifications. The file also did not include a *System for Award Management Review Memorandum*.³ In addition to these missing documents, the *PBS Contract/Order File Content Checklist* was only partially completed and not signed by the contracting officer.

² Some contractor employees were classified as "escort" on the documentation provided by contracting officials. "Escort," or temporary contractors, who work less than 15 continuous days or on an emergency basis, can be escorted and supervised during their work hours and do not require a background investigation. Due to the many inaccuracies found in this documentation, we could not determine if these employees were classified properly by the contractor.

³ The *System for Award Management Review Memorandum* is a checklist used to ensure that the contracting officer verifies that the contractor is registered in the System for Award Management, has completed all representations and certifications, and is not on the excluded parties list or subject to debt offset. While the checklist was not completed, it appears that the contracting officials performed the required steps.

Inaccurate task order documentation. We also found that the following task order documents contained inaccuracies:

- **Award decision document** — This document, which outlines the contracting officer’s decision for issuance and price of the task order, contained multiple errors. It included the wrong project title, wrong contractor name and representatives, an incorrect independent government estimate amount, and incorrectly stated that cost or pricing data was required.
- **Contract modifications** — The task order’s period of performance end date for construction was not updated. According to the task order, the period of performance was scheduled to end on January 31, 2020; however, the contractor continued to perform work through September 2020. The period of performance has a significant effect on key contract clauses, including FAR 52.211-12, *Liquidated Damages-Construction*; FAR 52.211-10, *Commencement, Prosecution, and Completion of Work*; and GSAM 504.1370, *GSA Credentials and Access Management Procedures*. When performing work outside of a contractual period of performance, a contractor may not be legally responsible to comply with these and other applicable contract clauses.
- **Requesting Official Contractor Approval List (ROCAL)** — This document, which is prepared by the contractor, lists the employees who have received a fitness determination allowing them to work on GSA projects, the dates they are expected to be onsite, and the type of access they have. Contracting officials provided us five versions of this file, updated at various points during the task order period.

Based on our review of the payroll documentation, the ROCAL did not accurately reflect employees cleared to work onsite. Even with incomplete payroll documentation, we found 18 employees who were paid for work on this task order who were never included on any of the versions of the ROCAL. Additionally, the dates when employees were expected to be onsite contained obvious errors, including incorrect years and employees’ end dates that preceded their start dates.

PBS Region 4 officials told us that contracting officials previously assigned to this project were responsible for much of the missing and inaccurate task order file documentation.⁴ Nonetheless, the failure to properly maintain this documentation demonstrates a lack of managerial oversight. A cursory review of the task order file at any point during the task order period could have revealed the significant number of missing documents and inaccuracies.

⁴ None of these previously assigned contracting officials are currently employed by PBS Region 4’s Gulf Coast Branch.

The Contracting Officer Did Not Ensure Employees Were Paid in Compliance with the Davis-Bacon Act

The contracting officer did not ensure contractor and subcontractor employees were paid in compliance with the Davis-Bacon Act. The Davis-Bacon Act requires contractors and subcontractors to pay their employees no less than the locally prevailing wages and fringe benefits as outlined in the wage determination.⁵ The act applies to federally funded contracts in excess of \$2,000 for construction, alteration, or repairs of public buildings.

FAR 22.406-6, *Payrolls and statements*, requires the contracting officer to review certified payrolls for compliance with statutory and regulatory requirements. In addition, FAR 22.406-7, *Compliance checking*, requires the contracting officer to perform regular compliance checks of rate classifications, pay rates, fringe benefit payments, and hours worked by interviewing employees.

We found no evidence that the contracting officer performed these required reviews and compliance checks. As a result, at least seven subcontractor employees on the project were paid less than the Davis-Bacon Act wage rates, including one general laborer who was paid \$12.00 per hour instead of the prevailing wage of \$12.79 per hour.

We were unable to perform a complete analysis of certified payrolls for compliance with the Davis-Bacon Act or determine the extent to which the employees were underpaid for the following reasons:

- PBS Region 4 contracting officials were unable to produce complete certified payroll records, as outlined above;
- The contracting officer did not perform reviews of certified payrolls in accordance with FAR 22.406-6;
- The contracting officer did not perform labor interviews as required by FAR 22.406-7; and
- We were unable to identify the proper Davis-Bacon Act wage rates for many employees because the Davis-Bacon Act wage determination labor category titles did not match either the certified payrolls or the ROCAL.

Project Managers Performed COR Duties without Delegation of Authority

FAR 1.602-2, *Responsibilities*, states that contracting officers shall “designate and authorize, in writing and in accordance with agency procedures, a contracting officer’s representative (COR) on all contracts and orders” and that the COR “shall be certified and maintain certification in accordance with the current Office of Management and Budget memorandum on the Federal Acquisition Certification for Contracting Officer Representatives (FAC-COR) guidance.”

⁵ 40 USC 3142.

The task order file contained a COR designation letter dated the same date as the contract award—December 28, 2018. However, the letter was not signed by the COR or the contractor. The task order file also did not contain documentation to support COR training or certification. Therefore, we could not determine if this delegation of authority was binding, or that the named COR was appropriately trained and certified.

Additionally, based on the progress reports prepared by the construction management company, the original COR moved to another department sometime during January or February 2020.^{6,7} A new project manager joined the project team in February 2020 and performed COR duties for approximately 8 months, but was never designated as the COR. The project manager is responsible for ensuring the project progresses and is completed in a timely manner, while the COR is responsible for monitoring and managing contract operation and performance. If the contracting officer does not officially (i.e., in writing) delegate COR authority to a project manager via the designation letter, then the project manager does not have specific contractual authority to act on behalf of the contracting officer. As a result, the project manager could have made contractual obligations for the government without having the contractual authority to do so.

The Contracting Officer Did Not Follow Regulations and Agency Requirements for Transfer of the Task Order File

FAR 4.803, *Contents of contract files*, states a contract file should contain “a current chronological list identifying the awarding and successor contracting officers, with inclusive dates of responsibility.” In addition, GSAM 504.802 states the following:

When responsibility for a contract transfer [*sic*] from one contracting officer to another contracting officer ...

- (i) The successor contracting officer shall review the files being transferred. The purpose of the review is to identify any issues with the contract file (e.g., missing or incomplete documentation or information).
- (ii) The successor contracting officer shall attempt to resolve any issues identified during their review of the transferred files. The successor contracting officer should write a memo-to-file that documents any issues with the contract file that were not able to be resolved as part of the transfer.

We found that PBS Region 4 did not comply with these requirements. Because of staff turnover, this task order had three contracting officers: one for planning and award, another for administration and modifications, and another for close out. The task order file did not include any documentation related to changes in contracting officer or documentation to show a

⁶ PBS Region 4 contracted with a construction management services company to act as a “Construction Manager as agent” for this task order to assist in ensuring that the GSA requirements governing scope, schedule, budget, quality, and other aspects of the project were met.

⁷ Due to insufficient task order file documentation, we could not verify the effective dates of these changes.

review of the task order file had been performed, despite being required by FAR 4.803 and GSAM 504.802 respectively. Had any of the contracting officers performed this review, the task order file issues we found could have been identified and corrected.

Conclusion

PBS Region 4 did not plan, award, administer, and close out the water intrusion repairs and mold remediation task order for the Fort Lauderdale Federal Building and Courthouse in accordance with the FAR, GSAM, and other applicable policies. We found that PBS Region 4 did not maintain a complete and accurate task order file. PBS Region 4 also did not ensure that contractor and subcontractor employees were paid in compliance with the Davis-Bacon Act. Additionally, PBS Region 4 improperly allowed project managers to perform COR duties without delegation of authority. Finally, PBS Region 4 did not perform the required review to identify and resolve any issues when the task order file was transferred to a new contracting officer.

Our finding and conclusions are based on the evidence we were able to gather during our audit. As outlined in the *Finding*, the task order file was so deficient that we were unable to evaluate or review many of PBS Region 4's contract decisions. Accordingly, PBS Region 4 should provide training and oversight to ensure that contracting officials in the Gulf Coast Branch do not repeat these errors in future procurements. In addition, PBS Region 4 should review certified payroll documentation for this task order and perform a review of contracts awarded by the Gulf Coast Branch to ensure that the contract files contain complete and accurate contract documentation in accordance with the FAR, GSAM, and other applicable policies.

Recommendations

We recommend that the PBS Region 4 Regional Commissioner:

1. Provide training to Gulf Coast Branch contracting officials with respect to:
 - a. Maintaining complete and accurate contract file documentation in accordance with the FAR, GSAM, and other applicable policies;
 - b. Ensuring employees are paid in accordance with applicable statutory and regulatory labor requirements;
 - c. Designating CORs properly before delegating contract responsibilities; and
 - d. Complying with applicable FAR and GSAM clauses governing the transfer of contract files.
2. Prepare and implement oversight procedures to ensure contract file documentation within the Gulf Coast Branch complies with the FAR, GSAM, and other applicable policies.
3. Perform a review of all certified payroll documentation for this task order and take action to compensate any contractor employees who were underpaid.
4. Perform a review of contracts awarded by the Gulf Coast Branch to ensure that the contract files contain complete and accurate contract documentation in accordance with the FAR, GSAM, and other applicable policies.

GSA Comments

The PBS Region 4 Regional Commissioner agreed with our recommendations and provided general comments on PBS Region 4's efforts to improve acquisition processes, oversight, and training. These comments did not affect our finding and conclusions. PBS Region 4's written comments are included in their entirety in **Appendix B**.

Audit Team

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

Michelle Westrup	Regional Inspector General for Auditing
Shane Dunlay	Audit Manager
Erin Kraft	Auditor-In-Charge
Terrace Brown	Auditor

Appendix A – Objective, Scope, and Methodology

Objective

Our audit objective was to determine whether PBS Region 4 planned, awarded, administered, and closed out the task order for water intrusion repairs and mold remediation at the Fort Lauderdale Federal Building and Courthouse in accordance with the FAR, GSAM, and other applicable policies.

Scope and Methodology

Our audit scope consisted of one task order, judgmentally selected based on defined parameters (detailed below in the *Sampling* section). The sample pool consisted of 35 PBS Region 4 Gulf Coast Branch BA54-funded contracts closed out during Fiscal Years 2019 through 2021. Our selected project was a task order awarded using a PBS general construction indefinite-delivery/indefinite-quantity contract covering the State of Florida to address water intrusion repairs and mold remediation at the Fort Lauderdale Federal Building and Courthouse.

To accomplish our objective, we:

- Reviewed the FAR; GSAM; U.S. Government Accountability Office’s GAO-14-704G, *Standards for Internal Control in Federal Government*; PBS Procurement Instructional Bulletin 18-02, *PBS Contract File Content and Organization*; PBS Project Management Practice Guide; and Homeland Security Presidential Directive-12, *Policy for a Common Identification Standard for Federal Employees and Contractors*, to gain an understanding of PBS’s responsibilities as it relates to this subject matter/contract;
- Researched the BA54 program using GSA’s internal website and prior GSA Office of Inspector General audit reports;
- Analyzed prior GSA Office of Inspector General audit reports and corrective action plans that were significant to the audit objective;
- Obtained a listing of all PBS Region 4 BA54-funded projects and selected a judgmental sample of one task order using the parameters outlined in the *Sampling* section on the next page;
- Independently obtained source documentation for our sample from the GSA Electronic Acquisition System Integrated contract file;
- Reviewed all task order file planning, award, administration, and closeout documentation for accuracy and completeness;
- Interviewed the contracting team responsible for the selected task order and corresponded with the contracting specialist and project manager throughout the audit’s duration; and
- Communicated with the PBS building manager about their role in the contracting process.

Data Reliability

We assessed the reliability of a Microsoft Excel database, provided by PBS Region 4 management, of all active PBS Region 4 Gulf Coast Branch BA54-funded projects from Fiscal Years 2019 through 2021, pulled from the PBS project management information system, ePM/ePMXpress, by: (1) performing a data reconciliation against data obtained from GSA's Data to Decisions portal and (2) tracing contract information contained in the database for our selected project to source documents. We determined that the data was sufficiently reliable for the purposes of this audit.

Sampling

The Microsoft Excel database provided by PBS Region 4 management totaled \$176,173,844. We filtered the data based upon the following criteria for sample selection: (1) solely BA54-funded projects, (2) projects awarded by the Gulf Coast Branch, (3) projects with a contract value above \$1 million, (4) projects that contained contract modifications, and (5) projects that were closed out during Fiscal Years 2019 through 2021. The task order we selected had the largest increase from award amount to total contract amount. The total value of the selected project was \$1,207,259, or 14 percent of the \$8,469,393 dataset (with applied criteria outlined above).

Internal Controls

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

Report Limitations and Uncertainties

Our finding and conclusions are based on the evidence we were able to gather during our audit. As outlined in the *Finding*, the task order file was so deficient that we were unable to evaluate or review many of PBS Region 4's contract decisions.

Compliance Statement

We conducted the audit between February 2022 and October 2022 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our finding and conclusions based on our audit objective.

Appendix B – GSA Comments


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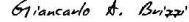


GSA Southeast Sunbelt Region

March 31, 2023

MEMORANDUM FOR MICHELLE L. WESTRUP
REGIONAL INSPECTOR GENERAL FOR AUDITING
HEARTLAND REGION AUDIT OFFICE (JA-6)

THROUGH: NINA M. ALBERT 
COMMISSIONER
PUBLIC BUILDINGS SERVICE (P)

FROM: GIANCARLO BRIZZI 
REGIONAL COMMISSIONER
PUBLIC BUILDINGS SERVICE (4P)

SUBJECT: Response to the Office of Inspector General (OIG) Draft
Report, *Audit of PBS Basic Repairs and Alterations Project:
Fort Lauderdale Federal Building and Courthouse (A220042)*

Thank you for the opportunity to comment on the subject audit report. The PBS Southeast Sunbelt Region (R4) has reviewed the report and agrees with the recommendations.

Region 4 has proactively sought to identify and close gaps in our acquisition program and processes. Since 2018 (when the subject procurement began), R4 has realigned its acquisition management structure, implemented new acquisition oversight and reviews, and, most significantly, in fiscal year 2020 re-trained the entire R4 PBS Acquisition Management Division workforce. This initiative, called *Back to Basics*, consisted of over 50 hours of mandatory training designed to reemphasize and reinforce procurement procedures, policies, and regulatory guidance.

The results of these efforts are demonstrated by our 86% score in the November 2021 Program Management Review, a significant increase from our previous score of 76% in 2017. We look forward to incorporating the OIG recommendations into our ongoing continuous improvement efforts.

If you have any questions, please contact Kendra Turner, R4 PBS, Director, Office of Strategy & Engagement, kendra.turner@gsa.gov.

Appendix C – Report Distribution

GSA Administrator (A)

GSA Deputy Administrator (AD)

PBS Commissioner (P)

PBS Deputy Commissioner (PD)

Chief of Staff (PB)

Deputy Chief of Staff (PB)

Assistant Commissioner for Strategy & Engagement (PS)

Acting Regional Commissioner (7P)

Chief Financial Officer (B)

Deputy Chief Financial Officer (B)

Office of Audit Management and Accountability (BA)

Assistant Inspector General for Auditing (JA)

Deputy Assistant Inspector General for Acquisition Program Audits (JA)

Deputy Assistant Inspector General for Real Property Audits (JA)

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