



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

IMPLEMENTATION REVIEW OF ACTION PLAN

PBS's Identification and
Management of Environmental
Risks Need Improvement
Report Number
A130131/P/R/R15003
March 20, 2015

*Assignment Number A170008
March 6, 2017*

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Introduction

We have completed an implementation review of the management actions taken in response to the recommendations contained in *PBS's Identification and Management of Environmental Risks Need Improvement, Report Number A130131/P/R/R15003* (see **Appendix A**).

Objective

The objective of our review was to determine whether PBS's Office of Facilities Management and Services Programs has taken the corrective actions as outlined in the action plan for the audit, *PBS's Identification and Management of Environmental Risks Need Improvement*. To accomplish our objective we:

- Met and corresponded with the Office of Facilities Management and Services Programs personnel;
- Examined documentation submitted by the Office of Facilities Management and Services Programs supporting accomplishment of the action plan steps;
- Examined documentation contained in GSA's Internal Controls Audit Tracking System; and
- Performed limited testing of the implementation of the guidance and procedures contained in these supporting documents.

Background

On March 20, 2015, we issued an audit report, *PBS's Identification and Management of Environmental Risks Need Improvement* to PBS. One of PBS's goals is to provide superior workplaces for federal employees across the United States and minimize damage to the environment from its operations. The Environmental Management Program within PBS's Office of Facilities Management and Services Programs supports GSA in maintaining compliance with environmental laws and regulations, minimizing environmental risk and liability, and promoting cost-effective environmental policies to meet PBS's performance goals.

Our audit found:

- PBS Central Office currently does not have a system in place to effectively monitor environmental management risks.
- PBS has not conducted environmental compliance audits on its entire owned building inventory, and lacks policy and guidance for the audits.
- PBS does not have consistent environmental management practices across PBS regional offices.
- Environmental management responsibility in tenant space is unclear.

To address the findings identified in the report, we recommended that the Commissioner, PBS:

1. Develop a system or framework to collect environmental risk data for PBS buildings and facilities to enable the Environmental Division and regional management to manage and report on environmental risks and liabilities.
2. Ensure that environmental compliance audits or equivalent surveys are conducted to identify risk factors for each PBS facility and are updated as needed; and establish policies to ensure the environmental compliance audits or surveys are consistent across the regions and findings are addressed.
3. Establish and enforce consistent environmental management practices across the regions.
4. Incorporate environmental management responsibilities into tenant occupancy agreements, particularly in cases where the tenant's activities pose a greater risk to the environment.

The PBS Commissioner agreed with the report recommendations.

Results

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

Conclusion

Our implementation review determined that PBS addressed the audit recommendations in the action plan, dated April 2015.

Audit Team

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

Kevin Gallagher
Anthony Jones

Audit Manager
Auditor-In-Charge

Appendix A – Action Plan for Report Number A130131/P/R/R15003

PBS Action Plan

Designated Responding Official: [REDACTED]
 Contact Person: [REDACTED]
 Telephone Number: [REDACTED]
 Date: Original - April 2015, Revision - May 2016

Action Report Number/Title:	Recommendation Number:	Proposed Recommendation Completion Date:
A130131/P/R/R15003 PBS's Identification and Management of Environmental Risks Need Improvement	1	June 30, 2016

Recommendation

Develop a system or framework to collect environmental risk data for PBS buildings and facilities to enable the Environmental Division and regional management to manage and report on environmental risks and liabilities.

PBS Action Plan

Action to be Taken Step-by-Step:	Supporting Documentation:	Completion Date:
1. Develop a standard template for conducting and collecting data from environmental compliance surveys.	<ul style="list-style-type: none"> Completed environmental compliance survey template Guidance document on use of environmental compliance survey template 	September 30, 2015
2. Develop a central data repository for the results of environmental compliance surveys	<ul style="list-style-type: none"> IRIS 9.0 User Guide National Consolidated Risk Management Survey Site 	January 31, 2015
3. Analyze quarterly reports from the central data repository to monitor regional completion of environmental compliance surveys	<ul style="list-style-type: none"> Quarterly report example to be provided 	June 30, 2016

Appendix A – Action Plan for Report Number A130131/P/R/R15003 (cont.)

PBS Action Plan

Designated Responding Official: [REDACTED]
Contact Person: [REDACTED]
Telephone Number: [REDACTED]
Date: Original - April 2015, Revision - May 2016

4. Assess 100% of the PBS-owned inventory every 2 years (50% per year) using the PBS Physical Condition Survey containing newly incorporated Environmental Liabilities Question	<ul style="list-style-type: none">Physical Condition Survey list of questions, including Environmental Liabilities Question (question #38)End-of-Year Physical Condition Survey Environmental Liabilities Question (#38) results	Incorporate new environmental liabilities question in Physical Condition Survey – Completed - October 1, 2014 50% of buildings surveyed – October 15, 2015. Remaining buildings to be surveyed the following year.
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Appendix A – Action Plan for Report Number A130131/P/R/R15003 (cont.)

PBS Action Plan

Designated Responding Official: [REDACTED]
 Contact Person: [REDACTED]
 Telephone Number: [REDACTED]
 Date: Original - April 2015, Revision - May 2016

Action Report Number/Title:	Recommendation Number:	Proposed Recommendation Completion Date:
A130131/P/R/R15003 PBS's Identification and Management of Environmental Risks Need Improvement	2	June 30, 2016

Recommendation

Ensure that environmental compliance audits or equivalent surveys are conducted to identify risk factors for each PBS facility and are updated as needed; and establish policies to ensure the environmental compliance audits or surveys are consistent across the regions and findings are addressed.

PBS Action Plan

Action to be Taken Step-by-Step:	Supporting Documentation:	Completion Date:
1. Assess 100% of the PBS owned inventory every 2 years (50% per year) using the PBS Physical Condition Survey containing newly incorporated Environmental Liabilities Question.	<ul style="list-style-type: none"> Physical Condition Survey list of questions, including Environmental Liabilities Question (question #38) End-of-Year Physical Condition Survey Environmental Liabilities Question (#38) results 	Incorporate new environmental liabilities question in Physical Condition Survey – Completed - October 1, 2014 50% of buildings surveyed – October 15, 2015. Remaining buildings to be surveyed the following year.
2. Develop a risk-based list of all PBS owned buildings that will be used to prioritize the order in which environmental compliance surveys will be conducted	<ul style="list-style-type: none"> Listing of all GSA owned buildings in priority order based upon high-level risk analysis 	November 30, 2015

Appendix A – Action Plan for Report Number A130131/P/R/R15003 (cont.)

PBS Action Plan

Designated Responding Official: [REDACTED]
Contact Person: [REDACTED]
Telephone Number: [REDACTED]
Date: Original - April 2015, Revision - May 2016

3. Mandate use of the standard environmental compliance survey template for conducting environmental compliance surveys.	<ul style="list-style-type: none">• Completed environmental compliance survey template• Guidance document on use of environmental compliance survey template and work item summary	September 30, 2015
4. Analyze quarterly reports from the central data repository to monitor regional completion of environmental compliance surveys	<ul style="list-style-type: none">• Quarterly report example to be provided	June 30, 2016

Appendix A – Action Plan for Report Number A130131/P/R/R15003 (cont.)

PBS Action Plan

Designated Responding Official: [REDACTED]
 Contact Person: [REDACTED]
 Telephone Number: [REDACTED]
 Date: Original - April 2015, Revision - May 2016

Action Report Number/Title:	Recommendation Number:	Proposed Recommendation Completion Date:
A130131/P/R/R15003 PBS's Identification and Management of Environmental Risks Need Improvement	3	June 30, 2016

Recommendation

Establish and enforce consistent environmental management practices across the regions.

PBS Action Plan

Action to be Taken Step-by-Step:	Supporting Documentation:	Completion Date:
1. Perform environmental compliance surveys using the same mandatory template nationwide and store the data in the central data repository	<ul style="list-style-type: none"> Copy of quarterly reports from central data repository pulled by headquarters showing regional survey completion during 3rd quarter of FY 2016 	June 30, 2016
2. Introduce new and revised environmental, health, and safety policies, to include: <ul style="list-style-type: none"> - Asbestos management - Occupational safety and health - Fuel storage tank management - Indoor air quality - Water hygiene 	<ul style="list-style-type: none"> Copies of signed policies 	<ul style="list-style-type: none"> Asbestos – complete — March 25, 2015 Occupational safety – 3rd quarter FY 2015 Fuel storage tanks – 4th quarter FY 2015 Indoor air quality – 1st quarter FY 2016 Water hygiene – 1st quarter FY 2016

Appendix A – Action Plan for Report Number A130131/P/R/R15003 (cont.)

PBS Action Plan

Designated Responding Official: [REDACTED]
 Contact Person: [REDACTED]
 Telephone Number: [REDACTED]
 Date: Original - April 2015, Revision - May 2016

Action Report Number/Title:	Recommendation Number:	Proposed Recommendation Completion Date:
A130131 /P/R/R15003 PBS's Identification and Management of Environmental Risks Need Improvement	4	December 31, 2015

Recommendation

Incorporate environmental management responsibilities into tenant occupancy agreements, particularly in cases where the tenant's activities pose a greater risk to the environment.

PBS Action Plan

Action to be Taken Step-by-Step:	Supporting Documentation:	Completion Date:
1. Send a letter to all GSA tenant agencies reminding them of their environmental compliance responsibilities within GSA space	<ul style="list-style-type: none"> Signed Letter Copy of letter sent to National and Regional Account Managers and Client Agencies List of tenant agencies that received the letter 	Completed – January 9, 2015
2. Create new clauses to be used in tenant Occupancy Agreements that will advise tenant of their environmental responsibility, require notifications to GSA of any hazardous materials use or storage, and clearly defining financial responsibility for any required permits, cleanup activities	<ul style="list-style-type: none"> Copies of new clauses that will be used in Occupancy Agreements 	December 31, 2015 – completion of Occupancy Agreement clauses

Appendix A – Action Plan for Report Number A130131/P/R/R15003 (cont.)

PBS Action Plan

Designated Responding Official: [REDACTED]
Contact Person: [REDACTED]
Telephone Number: [REDACTED]
Date: Original - April 2015, Revision - May 2016

and/or associated environmental fines or penalties. (Clauses will be incorporated into existing Occupancy Agreements over a 5-year period as they come due.)		
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Appendix B – Report Distribution

Commissioner, PBS (P)

Deputy Commissioner, PBS (PD)

Chief of Staff, PBS (P)

Regional Administrator (1A, 2A, 3A)

Regional Commissioner, PBS, New England Region (1P)

Regional Commissioner, PBS, Northeast and Caribbean Region (2P)

Regional Commissioner, PBS, Mid-Atlantic Region (3P)

Associate General Counsel, Real Property Division (LR)

Regional Counsel (LD1, LD2, LD3)

Assistant Commissioner, PBS, Office of Facilities Management and
Services Programs (PM)

Director, PBS, Office of Facilities Management and
Services Programs (1PM, 2PM, 3PM)

Chief Administrative Services Officer (H)

Branch Chief, GAO/IG, Audit Management Division (H1G)

Audit Liaison, PBS (BCP)

Assistant Inspector General for Auditing (JA)

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