

### AUDIT REPORT

# **Fleet Management**



Report Number 25-07

March 21, 2025

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Date:

March 21, 2025

To:

Director, U.S. Government Publishing Office

From:

**Inspector General** 

**Subject:** 

Audit Report: Fleet Management, Report Number 25-07

The U.S. Government Publishing Office, Office of the Inspector General conducted an audit of Fleet Management, Project Number A-2024-002.

We reported three findings and made seven recommendations to improve GPO's fleet management. Management agreed with the findings and recommendations. We made no substantive changes to the final report from the draft based on Management's comments. We included a summary and analysis of Management's comments on page 17, and they are included in their entirety in  $\underline{\text{Appendix F}}$ . The planned corrective actions should resolve the issues identified in the report.

We appreciate the cooperation provided by your staff. If you have any questions or need additional information, please do not hesitate to contact Lori Lau Dillard, Assistant Inspector General for Audit, at <a href="mailto:laudillard@gpo.gov">laudillard@gpo.gov</a> or (202) 512-0318.

NATHAN J. DEAHL Inspector General

#### **RESULTS IN BRIEF**

#### What We Did

The Office of the Inspector General conducted an audit to determine the effectiveness of the U.S. Government Publishing Office's (GPO) fleet management and identify opportunities for improvement. We selected 48 vehicles and 50 industrial trucks to assess fleet operations' conformity with GPO's policies and procedures.

GPO's fleet assets consist of vehicles and industrial trucks. Vehicles include vans, trucks, sports utility vehicles, all-terrain vehicles, and tractors. Vehicles are primarily used to transport material to and from Congress. Industrial trucks, mostly battery-powered, are material handling equipment such as forklifts, pallet jacks, pallet turners, and hand trucks.

Two policies govern the management of GPO's fleet assets. GPO Instruction 810.26, *Motor Vehicle Management Program*, issued in May 1987, established policies and standards for operating, maintaining, acquiring, and disposing of vehicles. GPO Instruction 810.11B, *GPO Property Management Program*, issued in June 2003, established authorities, responsibilities, and accountabilities for GPO properties.

## What We Recommended

We made seven recommendations to address dated fleet management policies and procedures, incomplete fleet inventory records in GPO's fixed asset system, lack of a service and repair maintenance program, and untimely fleet asset disposition actions.

#### What We Found

**Finding 1.** GPO should strengthen its internal controls over its fleet fixed asset inventory records. Specifically, we found GPO's official fleet fixed asset system 1) did not always have complete key asset identifiers, 2) was missing some fleet fixed asset records, and 3) did not timely record five new vehicles placed in service in September 2024. This occurred because the current organization structure and business operations did not align with GPO's dated policies. Also, GPO did not conduct an independent physical fleet inventory as required. Consequently, the audit identified that 12 vehicles and 19 industrial trucks were not recorded as inventory in the fixed asset system as of June 2024. Also, because of the untimely in-service recording for five vehicles, the fixed asset system was understated by about \$205,700 as of the end of the fiscal year 2024.

Finding 2. GPO can improve fleet asset maintenance. We assessed and found that 22 vehicles and 24 industrial trucks were either not operational or required repairs and maintenance. Additionally, our analysis of fleet credit card transactions from January 2021 to June 2024 (42 months) revealed that oil changes were likely not performed on six vehicles. Business units rely on individual fleet operators to inspect and report when vehicles or industrial trucks need repairs, but they have not established set schedules or standards for routine maintenance based on miles driven or the date of last service. Without a standardized fleet service and repair maintenance program, GPO will continue to struggle to identify and perform routine and preventative maintenance.

**Finding 3.** GPO did not always dispose of fleet property in a timely manner. We found seven vehicles on GPO property that were returned to the Stores Division, some as early as 2019. Although all seven vehicles were approved for disposition, the Stores Division did not verify whether the approved disposition actions were completed. In addition, we found several industrial trucks in the GPO basement that were no longer in use but had not been returned to the Stores Division for disposal.

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### INTRODUCTION

### **Objective**

This report presents the results of our self-initiated audit of fleet management (Project Number A-2024-002). Our objective was to determine the effectiveness of GPO's fleet management and identify opportunities for improvement. See <a href="Appendix A">Appendix A</a> for additional information about this audit.

# **Background**

GPO's fleet assets consist of vehicles and powered industrial trucks. Vehicles include vans, trucks, sports utility vehicles (SUVs), all-terrain vehicles (ATVs), and tractors. As shown in Figure 1, they are primarily used to transport material to and from Congress. Other uses include physical security and snow removal around GPO property.

Figure 1. Various Types of GPO Vehicles







Source: GPO OIG Photos.

Powered industrial trucks, mostly battery-powered, are material handling equipment such as forklifts, pallet jacks, pallet turners, and hand trucks. As shown in Figure 2, industrial trucks are operated in various ways, such as standing up, sitting down, or by hand.

Figure 2. Various Types of GPO Powered Industrial Trucks







Source: GPO OIG Photos.

Two policies govern the management of GPO's fleet assets. GPO Instruction 810.26, *Motor Vehicle Management Program*, established standards for operating, maintaining, acquiring, and disposing of vehicles. GPO Instruction 810.11B, *GPO Property Management Program*, established authorities, responsibilities, and accountabilities for GPO properties.

GPO Instruction 810.26 was issued in May 1987 in response to the Joint Committee on Printing's (JCP) request for the Agency to centralize its policies and standards for operating its vehicle fleet. As such, GPO Instruction 810.26 stated, among other requirements, that the Engineering Service<sup>1</sup> is responsible for:

- Establishing performance standards for routine preventive maintenance tasks such as checking engine oil levels, cooling system fluids, and tire pressure.
- Creating a vehicle inspection checklist for GPO organizations to use as evidence that the preventive maintenance tasks have been performed.
- Providing to Financial Management Service a list of GPO vehicle numbers for each class of vehicle at the end of each fiscal year.

Established in 1974, GPO's *Property Management Program* encompasses all property owned, leased, rented, loaned, or borrowed by GPO. It includes real property and personal property, such as computers, equipment, furniture, machinery, and vehicles. GPO Instruction 810.11B, last updated in June 2003, designated the Comptroller in the Office of the Comptroller<sup>2</sup> as the Property Management Officer and assigned property management responsibilities to include but not limited to:

- Administering an Agency-wide property management system that maintains information on accountable property by cost center code and records property transactions.
- Maintaining records related to the usage of vehicles and industrial trucks.
- Performing periodic independent physical verifications/observations of capitalized assets.

In March 2023, GPO created a new Fleet Manager position. The non-supervisory position reports to the Safety and Occupational Health Manager in the Agency Force Protection (AFP) Business Unit and was filled in February 2024. According to an AFP official, the vision for the Fleet Manager is to enhance the safety program by performing oversight and

<sup>&</sup>lt;sup>1</sup> The contemporary Engineering Division is staffed with professional Engineers, Architects and Engineering Technicians who have responsibility for all design and engineering services under the leadership of the Managing Director, Agency Support Operations.

<sup>&</sup>lt;sup>2</sup> The Office of the Comptroller was renamed the Agency Financial Management Business Unit under the leadership of the Chief Financial Officer.

investigations that focus on abuse and misuse. One of the first priorities for the Fleet Manager is to create a comprehensive inventory list of vehicles and industrial trucks.

This report identified 48 vehicles (41 active and seven inactive) based on our on-site observations from July through September 2024. Of the 41 active vehicles, 35 are GPO-owned, and six are leased through the General Services Administration (GSA)<sup>3</sup> as shown in Table 1. For powered industrial trucks, we obtained a list of 128 powered industrial trucks<sup>4</sup> from the Fleet Manager that they compiled based on physical observations at GPO facilities located in Washington, DC, and Laurel, MD. We selected all 41 vehicles and judgmentally selected 50 powered industrial trucks to assess fleet operations' conformity with GPO's policies and procedures.

**Table 1. Active Fleet Vehicles** 

Business Unit	Cars/Vans/SUVs	Trucks	Other	Total
Agency Support Operations – Facilities	1	5	6	12
Government Integrated Print Services <sup>5</sup> – Delivery	7	2	0	9
Government Integrated Print Services <sup>5</sup> – Messenger	12	0	0	12
Government Secure and Intelligent Documents <sup>5</sup> (GSID)	1	1	0	2
Agency Force Protection <sup>5</sup>	6	0	0	6
Total	27	8	6	41

Source: Based on OIG observation from July through September 2024.

<sup>&</sup>lt;sup>3</sup> GSID leases two vehicles and Agency Force Protection leases four vehicles from GSA.

<sup>&</sup>lt;sup>4</sup> The list of 128 excludes powered industrial trucks from the Stennis, LA, and Pueblo, CO, GPO locations.

<sup>&</sup>lt;sup>5</sup> GPO implemented new business unit names in January 2025.

### **AUDIT RESULTS**

# Finding 1. Fleet Asset Accountability

GPO should strengthen its internal controls over its fleet fixed asset inventory records. Specifically, through observations, interviews, and analysis, we found GPO's official fleet fixed asset system 1) did not always have complete key asset identifiers, 2) was missing some fleet fixed asset records, and 3) did not timely record five new vehicles placed in service in September 2024. This occurred because current business practices did not align with GPO Instructions 810.26 and 810.11b, last updated in 1987 and 2003, respectively. For example, there was no evidence that the Agency Financial Management Business Unit (Finance) receives a list of GPO vehicle numbers for each applicable business unit at the end of each fiscal year, as required. In addition, Finance stated that they had not performed independent periodic physical inventories of the fleet's fixed assets as required since the early 2000s. These dated policies contributed to a lack of compliance over the fleet's fixed asset accountability. Consequently, the audit identified that 12 of the 41 (29 percent) vehicles and 19 of the 50 (38 percent) powered industrial trucks were not recorded as inventory in GPO's fixed asset system as of June 2024. Also, because of the untimely inservice recording for five vehicles, the fixed asset system was understated by about \$205,700 as of the end of the fiscal year 2024.

## <u>Incomplete Key Fleet Asset Identifier in the Fixed Asset System</u>

We found missing key fleet asset identifiers, such as asset tags and vehicle serial numbers, in the GPO Business Information System (GBIS) fixed asset system, making it difficult to verify the existence of fleet assets during our audit. In June 2024, we requested and received from Finance an inventory list of all current active "in-use" fleet assets generated from the GBIS fixed asset system. According to the June 2024 GBIS fixed asset report, there were 52 vehicles and 141 powered industrial trucks. However, the said report showed that some vehicles were missing key identifiers. For example, of the 52 vehicles, 21 were missing the 17-digit vehicle identification number (VIN), and three were missing the vehicle license plate number.

Due to the missing key identifiers, we could not rely on the June 2024 GBIS fixed asset report for a complete list of active "in-use" fleet assets to select our test samples. Therefore, from July through September 2024,6 we conducted a physical inventory of GPO's vehicles at the Washington, DC, Laurel, MD, and Stennis, MS, facilities and identified 41 vehicles for our test samples. We obtained a list from the Fleet Manager for powered industrial trucks because they conducted a physical inventory verification after joining GPO in February 2024. As of July 2024, the Fleet Manager identified 128 powered industrial trucks assigned to the Washington, DC, and Laurel, MD, facilities. Having accurate asset

<sup>6</sup> Specific date of OIG physical inventory count – July 17, July 22, July 31, August 27, and September 19, 2024.

<sup>&</sup>lt;sup>7</sup> Due to the active use of vehicles and the timing of our physical inventory count, GPO's actual number of vehicles may be greater than 41.

identification is important because it helps GPO ensure they have the right vehicles and industrial trucks on hand to meet mission demands.

## Missing Fleet Assets in the Fixed Asset System

**Vehicles**: We found that 12 of the 41 (29 percent) vehicles were missing from the June 2024 GBIS fixed asset report. One of the 12 missing vehicles we've identified was an enclosed trailer with proper VIN and license plate numbers, as shown in Figure 3. However, when we inquired Finance about the missing asset, Finance did not consider the enclosed trailer a fleet asset, and consequently, they did not assign it an asset number or record it in the GBIS fixed asset system.



For the remaining 11 missing vehicles that we identified, Finance modified existing vehicle records in the GBIS fixed asset system with information (make and model, VIN, and license plate numbers) that we've collected and provided to them. Finance did not retire the unique asset numbers assigned to the 11 existing records in the GBIS fixed asset system. Instead, Finance assigned the same asset numbers to the 11 vehicles we identified during our observations. This action improperly removed the 11 existing vehicle records without documentation, such as proof of sale or scrapping. See Table 2 for changes made in the GBIS fixed asset system's active "in-use" fleet asset inventory from June 2024 and October 2024 for the same 11 asset numbers. Having accurate fleet asset records in GPO's fixed asset system provides increased confidence in the data used to inform management decisions and financial reporting.

**Table 2. Fleet Asset Record Modifications in GBIS Fixed Asset System.** 

Vehicle	Asset #	GBIS report as of June 2024	GBIS report as of October 2024
1	4043	1992 ½ Ton Van – Cargo VIN 2B7FHXXXXXX687948 License Plate 12035 DC	Chevrolet HHR VIN 3GNBAXXXXXX523973 License Plate GP00009
2	8447	1994 ¾ Ton Van – Cargo VIN 2B7HBXXXXXX172524 License Plate 12566 DC	Chevrolet HHR VIN 3GNBAXXXXXX521646 License Plate GP00010
3	6212	1993 ½ Ton Van – Cargo VIN 2B7FHXXXXXX340409 License Plate 12395 DC	Chevrolet HHR VIN 3GNBAXXXXXX523464 License Plate GP00018
4	4612	2009 Dodge Caravan VIN 2D8HNXXXXXX702486 Missing License Plate Number	2009 Dodge Caravan VIN 2D4RNXXXXXX117243 License Plate GP00015
5	4520	2009 Dodge Caravan VIN 2D8HNXXXXXX700950 Missing License Plate Number	2009 Dodge Caravan VIN 2D4RNXXXXXX117236 License Plate GP00016
6	4620	2009 Dodge Caravan VIN 2D8HNXXXXXX702483 Missing License Plate Number	2009 Dodge Caravan VIN 2D4RNXXXXXX117239 License Plate GP00020
7	4626	2009 Dodge Caravan VIN 2D8HNXXXXXX702490 Missing License Plate Number	2009 Dodge Caravan VIN 2D4RNXXXXXX117237 License Plate GP00021
8	8362	2018 Ford Expedition Missing VIN License Plate G624697V	Ford Expedition VIN 1FMJK1XXXXXX78107 License Plate G626086X
9	8351	2010 Dodge Caravan Missing VIN License Plate ACW3459 VA	Ford F350 VIN 1FDRF3XXXXXX11100 License Plate G430402R
10	4260	2019 Ford Transit # 26 Missing VIN Missing License Plate Number	Ford Transit # 19 VIN 1FMZK1XXXXXX98971 License Plate GP00040
11	4257	2016 Ford Transit Missing VIN Missing License Plate Number	2016 Ford Transit VIN 1FBZX2XXXXXX75569 License Plate GP00044

Source: GPO OIG analysis based on comparison of GBIS fixed asset system's June 2024 and October 2024 reports.

Powered-Industrial Trucks: Based on our observations from August through October 2024, we found 19 of the 50 (38 percent) powered industrial trucks were missing in the GBIS fixed asset system. In addition, we found 30 of the 50 (60 percent) powered industrial trucks were either missing GPO property labels or labels were illegible. In one instance, a powered industrial truck had multiple property labels with different asset tag numbers, as shown in Figure 4.

According to GPO policy,<sup>8</sup> property labels should include the accountable property identification

Figure 4. Fleet Asset with Multiple Asset Tags



number (PIN), purchase order, and date. The property label should be visible to facilitate physical inventory, maintenance, and inspection. Unlike vehicles, powered industrial trucks do not have unique and readily identifiable information such as VIN and license plate numbers. Therefore, easily visible property identification labels are essential for physical inventory, maintenance, and inspection.

# <u>Untimely Recording of In-Service Vehicles in the Fixed Asset System</u>

During our audit, a business unit official informed us that, in August 2024, they received, and in September 2024, they placed five new vehicles into service at GPO. These five new vehicles were valued at about \$205,700. Because we did not see these five new vehicles in the GBIS fixed asset system, we followed up with Finance on October 16, 2024. Finance informed us that they were aware of the five vehicle purchases but were unaware that said vehicles had been placed into service. Finance added that the business unit did not notify them that the five vehicles were in service. In a later discussion with the business unit official, they informed us that on October 18, 2024, they notified Finance of receiving the five new vehicles. Because of the untimely in-service recording for these five vehicles, the GBIS fixed asset system was understated by about \$205,700 for vehicles as of the end of the fiscal year 2024.

The process of adding, removing, or tracking fleet assets in the GBIS fixed asset system is overly manual, as Finance relies on business units to notify them. The manual processes and business units' self-determination of fleet reporting and dated policies hamper the quality of data capture and analysis necessary for effective fleet management. Based on our audit, on October 17, 2024, Finance requested a system change requiring input on whether an asset tag is needed when business units submit purchase requests. Finance believes this will help them track purchases requiring asset tags. On January 23, 2025, Finance informed us that the system changes had been completed. In addition, Finance stated that they will begin to perform annual fleet inventories and reconciliations against records in the GBIS fixed asset system. Based on management's planned action to conduct annual inventories, we will not make any recommendations on this matter at this time.

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<sup>&</sup>lt;sup>8</sup> GPO Instruction 810.11B, Section II.4.b

Implementing system changes to track assets during the purchasing phase and conducting fleet inventories are steps in the right direction. However, improvements are still needed in making changes to existing policies or creating new ones and integrating the new role of the Fleet Manager to ensure fleet accountability. With the hiring of the Fleet Manager, the Agency has an opportunity to take a holistic approach to centralize and standardize policies and procedures, automate processes, and define roles and responsibilities across business units to create a robust fleet management program as directed by the JCP over 3 decades ago.

#### **Recommendations for the Director:**

**Recommendation 1**: Review GPO Instructions 810.26, *Motor Vehicle Management Program*, and 810.11B, *GPO Property Management Program*, for applicability and update or replace them with policies and standard operating procedures that align with current organizational structure and business operations.

**Recommendation 2**: Establish clear roles and responsibilities in fleet management policies and standard operating procedures for the Fleet Manager and Agency-wide supervisors and employees.

**Recommendation 3**: Develop procedures to maintain a complete and accurate database of fleet assets. Assess and leverage opportunities to incorporate automation to improve process efficiencies.

## Finding 2. Maintenance of Fleet Assets

GPO can improve the maintenance of its fleet assets. We assessed and found that 22 of 32° (69 percent) vehicles and 24 of 50 (48 percent) powered industrial trucks were not operational or needed repair and maintenance. Additionally, our analysis of fleet credit card transactions from January 2021 to June 2024 (42 months) showed no oil change charges for six vehicles, indicating that oil changes were likely not performed on said vehicles. This occurred because business units rely on individual fleet operators to inspect and report when vehicles or powered industrial trucks need repairs. However, we did not find evidence of established schedules or standards for routine maintenance based on miles driven or the last service date.

In addition to dated requirements in GPO Instruction 810.26, Federal best practice<sup>10</sup> states that each vehicle owned or leased should have a scheduled maintenance program as part of effective vehicle management. The scheduled maintenance program should a) meet Federal and State emissions and safety standards; b) meet manufacturer warranty requirements; c) ensure the safe and economical operating conditions of the vehicle throughout its life; and d) ensure that inspections and servicing occur as recommended by the manufacturer or more often if local operating conditions require.

#### Vehicle Maintenance Issues

We developed a vehicle assessment checklist to assess basic safety and operational functions for 32 vehicles. As shown in Table 3, our assessment covered several categories. Please refer to <a href="Appendix C">Appendix C</a> for the complete OIG vehicle assessment checklist.

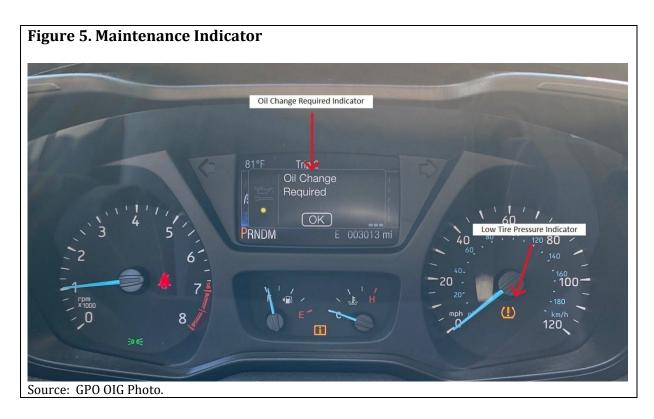
**Table 3. Vehicle Assessment Categories** 

Warning Lights	❖ Seatbelts
Headlights/ Brake Lights/ Turn Signals	<b>❖</b> Horn
Windshield/Wipers	Leaks

During our first assessment from July to August 2024, we found that 22 out of 32 (69 percent) vehicles were either not operational or required repair and maintenance. As detailed in Table 4 below, eight vehicles (numbers 7, 8, 9, 10, 11, 12, 15, and 17) were not operational, and 14 vehicles had repair and maintenance issues such as check engine warnings, nonoperating turn signals, nonoperating brake lights, low tire pressure alerts, and overdue oil change indicators as shown as an example in Figure 5.

<sup>&</sup>lt;sup>9</sup> We did not assess nine out of 41 vehicles that we inventoried because 1) six vehicles were tractor and ATV-type vehicles, and 2) three vehicles had already been returned to GPO's Stores Division for disposition at the time of our assessment.

<sup>&</sup>lt;sup>10</sup> 41 Code of Federal Regulations § 102-34.275, Scheduled Maintenance of Motor Vehicles.



One of the vehicles we found not operational was designated for use during a Continuity of Operations Plan (COOP) situation. This COOP vehicle was parked and secured away from GPO's main campus, but the vehicle's keys could not be readily located. The keys provided to us by an official at the GPO central office did not match the vehicle. A few days after our on-site visit, a business unit official informed us that officials at the COOP site found the keys to the COOP vehicle.

In September and October 2024, we conducted a second (follow-up) assessment on the 14 vehicles we previously identified as operational but had repair and maintenance issues. As summarized below and detailed in Table 4, the results from our two assessments were:

- Nine vehicles (numbers 7, 8, 9, 10, 11, 12, 15, 17, and 19) were not operational.
- Seven vehicles (numbers 2, 3, 4, 16, 18, 20, and 22) had maintenance issues resolved.
- Four vehicles (numbers 5, 6, 13, and 14) still had unresolved maintenance issues.
- Two vehicles (numbers 1 and 21) were under repair.

A GPO official informed us that six of the nine non-operational vehicles from our assessment would be disposed of, as their repair costs were not cost-effective compared to disposal.

**Table 4. OIG Vehicle Assessment Results** 

Vehicle Number	1st Assessment	1st Assessment Results	2nd Assessment	2 <sup>nd</sup> Assessment
1	<b>Date</b> 7/31/2024	Check Engine Light	<b>Date</b> 9/30/2024	<b>Results</b> Under Repair
2	7/31/2024	Change Oil Indicator	9/30/2024	Resolved
3	7/31/2024	Change Oil Indicator	10/10/2024	Resolved
4	7/31/2024	Change Oil Indicator, Check Engine light	10/10/2024	Resolved
5	7/31/2024	Change Oil Indicator, Low Tire Pressure Indicator	10/10/2024	Not Resolved
6	7/31/2024	Change Oil Indicator, Low Tire Pressure Indicator, License plate expired April 2019	10/10/2024	Not Resolved
7	7/31/2024	Not Operational		
8	7/31/2024	Not Operational		
9	8/08/2024	Not Operational		
10	8/27/2024	Not Operational		
11	7/31/2024	Not Operational		
12	7/31/2024	Not Operational		
13	7/31/2024	Change Oil Indicator	9/30/2024	Not Resolved
14	7/31/2024	Change Oil Indicator	9/30/2024	Not Resolved
15	7/31/2024	Not Operational		
16	7/31/2024	Change Oil Indicator, Low Tire Pressure Indicator	9/30/2024	Resolved
17	8/08/2024	Not Operational		
18	7/31/2024	Rear turn signal not working	10/10/2024	Resolved
19	7/31/2024	Service Tire monitor, Rear-brake light, Rear turn signal not working	10/10/2024	Not Operational
20	7/31/2024	Rock Chip on front windshield	9/30/2024	Resolved
21	7/31/2024	Cracked front windshield	9/30/2024	Under Repair
22	7/31/2024	Front Headlight not working	9/30/2024	Resolved

Source: GPO OIG Assessment

# Powered-Industrial Trucks Maintenance Issues

We also assessed a sample of 50 powered industrial trucks at GPO facilities in Washington, DC, and Laurel, MD, and found that 24 trucks (48 percent) were either not operational or needed repairs, to items as shown in Table 5. For our complete assessment checklist, please refer to  $\underline{\mathsf{Appendix}}\ \underline{\mathsf{D}}$ .

**Table 5. OIG's Powered Industrial Truck Assessment Categories** 

❖ Overhead Guard	Tires
<ul><li>Chains and Rollers</li></ul>	<b>❖</b> Lights
Seatbelts	❖ Horn

Based on our assessment, we identified 19 of 24 (79 percent) powered industrial trucks were not operational, and the remaining five trucks had the following maintenance issues:

- Two trucks had rear lights that were not working.
- One truck had rollers that were rusted and squeaking.
- One truck was missing a battery.
- One truck had a significant portion of its tire missing, and its rear lights were not working.

Due to the safety hazard, we notified the business unit supervisor of the one forklift missing a portion of its tire, as shown in Figure 6. The supervisor took corrective actions immediately by taking the truck out of service and scheduling the repair.

According to a business unit official, before 2021, GPO maintained an internal repair shop to handle repairs and maintenance for both powered industrial trucks and GPO-owned vehicles. The official added that if the internal repair shop could not perform the necessary

Figure 6. A portion of Tire Missing from A Powered Industrial Truck



Source: GPO OIG Photo.

repairs, shop personnel would arrange with external vendors to perform the repair. However, with the closure of the repair shop in 2021, each business unit became responsible for assessing and arranging repair work for its fleet with external vendors.

GPO does not have a fleet maintenance program with set schedules or standards for routine maintenance based on miles driven or the date of last service. Even during the operation of the internal repair shop, routine maintenance work was not performed on a scheduled basis. According to a business unit official, the internal repair shop would perform maintenance work, such as changing fluids, if the vehicle or powered industrial truck was brought in for other repair work. The Agency relies on fleet operators to inspect and report to their supervisors when repairs or maintenance are needed. When asked about routine maintenance requirements, a business unit official responsible for managing vehicles responded that they consider drivers' inputs and concerns. Another official indicated that drivers return inspection sheets to their supervisor for necessary repair or maintenance. Similarly, powered industrial trucks are maintained when repairs are needed, and supervisors rely on operators to report when repairs and maintenance are needed.

Many of the nonoperational fleet assets we found in our assessments (nine vehicles and 19 powered industrial trucks) were old and most likely needed to be disposed of. However, without a standardized fleet maintenance program, GPO will continue to struggle to

identify and perform routine and preventative maintenance. Failure to perform routine and preventative maintenance can lead to reduced performance and costly repairs or, worse, accidents. Fleet assets such as powered industrial trucks for many GPO business units are essential for carrying out the Agency's mission. Whether it's used for loading/unloading trucks, pulling stock, or retrieving materials, work cannot be performed without fully operating powered industrial trucks.

#### **Recommendations for the Director:**

**Recommendation 4**: Develop and implement detailed standard operating procedures for a service and repair maintenance program and assign an owner to maintain a centralized tracking system to ensure all fleet assets are routinely inspected, results are documented, and any remedial actions are taken in a timely manner.

**Recommendation 5**: Ensure all vehicles and powered industrial trucks from this report are promptly assessed for repair and/or disposition actions.

# Finding 3. Disposition of Fleet Assets

GPO did not always dispose of accountable fleet property in a timely manner. Specifically, during our on-site inventory of GPO vehicles in July 2024, we found seven vehicles <sup>11</sup> were returned to the Stores Division and approved for disposition, some as early as 2019, but were still parked on GPO property through the date of this report. See Table 6 below.

Table 6. Vehicle Return to Stores Date

Vehicle	Returned to Stores Division Date	Disposition Code	Board of Condemnation Review Date	OIG Observed Date on GPO Premises
1 - Dodge Caravan, 114281	August 2019	Sell. If no acceptable bids are received, salvage to the debris pile	November 2019	July 2024
2 - Dodge Caravan, 117790	August 2019	Sell. If no acceptable bids are received, salvage to the debris pile	November 2019	July 2024
3 - Chevy HHR #16, 521591	September 2020	Sell. If no acceptable bids are received, salvage to the debris Pile	October 2020	July 2024
4 - Dodge Caravan, 11522	December 2023	Sell. If no acceptable bids are received, salvage to the debris pile	January 2024	July 2024
5 - GMC, T7500	December 2023	Sell. If no acceptable bids are received, salvage to the debris pile	January 2024	July 2024
6 - Dodge Caravan, 111498	December 2023	Sell. If no acceptable bids are received, salvage to the debris pile	January 2024	July 2024
7 - Ford Escape #77, 10768	December 2023	Sell. If no acceptable bids are received, salvage to the debris pile	March 2024	July 2024

According to an official, they could not act on these seven vehicles because they did not ensure that business units returned vehicle keys and the disposal paperwork. Based on our audit, the Stores Division began working with business units to retrieve vehicle keys.

In addition, we found several powered industrial trucks in the GPO basement that appeared no longer in use and not operational and were parked in front of the powered industrial truck charging stations. See Figure 7 below. According to an employee, they referred to this part of the basement area as the "graveyard." A GPO official explained that these non-operational industrial trucks were part of a 2021 Government Integrated Print Services initiative to replace aging industrial trucks in the Bindery and Prepress Division.

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<sup>&</sup>lt;sup>11</sup> Nine additional vehicles were returned to the Stores Division for disposition during our audit.

These trucks had not been returned to the Stores Division for disposal through the date of this report.

Figure 7. Not-in-use Powered Industrial Trucks Occupying Space in **Front of Charging Stations** Source: GPO OIG Photo.

Untimely or inaction to dispose of fleet assets occurred because the Stores Division did not verify whether the approved disposition actions were completed, nor did they ensure essential items such as vehicle keys were received to take appropriate action. The Agency's process is shown in Figure 8 below. According to an official, once the Unserviceable or Surplus Property (UPR) form is generated from the UPR system and signed by approving

officials, the disposition is marked as complete without confirming all the necessary actions were actually completed.

# **Figure 8. Property Disposition Process**

## **Return Property to GPO Stores Division**

- •Business Unit completes GPO Form 2051 (including asset information and condition).
- Finance reviews the form to ensure asset number, acquisition value and book value are accurate.

#### Stores Division Review Board Inspection

- •Review board inspects the returned property.
- •Make a recommendation for disposition (scrap, hold, or sell).
- Enter details into the surplus property system and generate a UPR form.

#### **Board of Condemnation Approval**

- •Circulate UPR to Board of Condemnation
- Board of Condemnation approval
- Complete appropriate disposition action

Source: GPO Instruction 805.7B, *Return to Stores and Disposition and/or Sale of Surplus Accountable Government Printing Office Property*, dated June 1993.

Without verification on whether disposition was completed, properties marked for disposition were neglected and left in the parking lot with no action taken. The age of the seven vehicles in Table 6 were 9 years old or greater when they were returned to the Stores Division. Therefore, we were unable to determine whether any of the seven vehicles would have returned any monetary value had they been processed for sale timely. However, as of February 2025, based on a private sector vehicle valuation website, the average estimated value for the six vehicles (Table 6, numbers 1 – 4 and 6) was \$4,000 each, assuming that they are operational and in fair condition. For vehicle number 5, a GMC box truck, we were unable to determine its estimated value. Without improving the process for verifying that approved actions are completed timely, especially for items marked for sale, GPO is at risk of losing a property's recoverable value for future returned items.

#### **Recommendations for the Director:**

**Recommendation 6**: Develop and implement detailed standard operating procedures and checklists to verify that all disposition actions are completed within a defined period before marking a returned item as complete in the surplus property system.

**Recommendation 7**: Assess all non-operating or neglected vehicles and industrial trucks identified in this report to begin timely disposition actions, if needed.

<sup>&</sup>lt;sup>12</sup> Per the private sector vehicle valuation website, they define operational and in fair condition as having some mechanical or cosmetic defects and requiring service but being in a safe running condition with clean title history.

### MANAGEMENT'S COMMENTS

Management agreed with the findings and all recommendations. See <u>Appendix F</u> for management's comments in their entirety.

Regarding recommendation 1, management stated the Fleet Manager, with inputs from business units, will review and make necessary updates to GPO Instruction 810.26 to align with best practices and include periodic reviews. The target implementation date (TID) is December 31, 2025. In addition, Agency Financial Management will review GPO Instruction 810.11B and make necessary revisions to streamline GPO's fleet asset management, business unit input and review. The TID is September 30, 2025.

Regarding recommendation 2, management stated the Fleet Manager will update GPO Instruction 810.26 to define the roles and responsibilities and outline the Agency's expectations and accountabilities for fleet asset management. This will provide the framework for all business units to understand their obligations and document their internal procedures and policies. The TID is December 31, 2025. In addition, business units will develop internal standard operating procedures (SOP) to define roles and responsibilities specific to their fleet assets and activities. These procedures will establish clear expectations for supervisors and employees, ensuring that fleet tasks are carried out efficiently and in compliance with the updated GPO Instruction 810.26. SOPs will be submitted to the Fleet Manager for tracking and enforcement. The TID is March 31, 2026.

Regarding recommendation 3, management stated Agency Financial Management will review and implement procedures to maintain a complete and accurate database of all GPO fleet assets, including establishing a systematic process for data entry, regular updates, and reconciliations. The Agency will also explore automated solutions to reduce manual errors, improve accuracy, and expedite data updates. Procedures will be periodically reviewed to ensure continued accuracy and operational efficiency. The TID is September 30, 2025.

Regarding recommendation 4, management stated all business units will develop and implement internal SOPs for a service and repair maintenance program. A designated person within each business unit will be assigned to maintain a centralized tracking system that records all inspection results, service activities, and follow-up actions. SOPs will be submitted to the Fleet Manager for tracking and enforcement. The TID is March 31, 2026.

Regarding recommendation 5, management stated all business units will assess the needed repairs and required disposition actions for fleet assets under their management. The TID is September 30, 2025.

Regarding recommendation 6, management stated the Stores Division of Agency Support Operations will develop and implement detailed SOPs and associated checklists to ensure all disposition actions are completed before marking any returned item as complete in the surplus property system. SOPs will outline a clear process for verifying that vehicles and industrial trucks are correctly returned, disposed of, and promptly documented. The Stores

Division will relay the status of all disposition actions to the Fleet Manager and Agency Financial Management. The TID is December 31, 2025.

Regarding recommendation 7, management stated that the Fleet Manager completed an assessment of fleet assets, including those identified in the report. The Fleet Manager will coordinate with the Finance Department, Stores Division, and business units to complete timely disposition actions for identified assets and to maintain accurate and up-to-date fleet records. The Safety Manager will be responsible for the disposition of any asset not being tracked or assigned to a business unit. The TID is September 30, 2025.

#### **EVALUATION OF MANAGEMENT'S COMMENTS**

The OIG considers management's comments responsive to recommendations 1 through 7, and the planned corrective actions should resolve the issues identified in the report. All recommendations require OIG concurrence before closure. The OIG requests written confirmation when corrective actions are completed. All recommendations should not be closed until the OIG provides written confirmation that they can be closed.

### **APPENDICES**

## Appendix A. Objective, Scope, and Methodology

Our objective was to determine the effectiveness of GPO's fleet management and identify opportunities for improvement. Our review specifically focused on the inventory and maintenance management aspects of fleet management for vehicles and powered industrial trucks.

To accomplish our objective, we reviewed applicable GPO policies and instructions related to fleet management. We interviewed key personnel to understand the processes and procedures involved in accounting for and maintaining fleet assets. We also obtained and reviewed a report of all in-use motor vehicles and powered industrial trucks from the GBIS fixed asset system as of June 2024.

We initially planned to select a judgmental sample of fleet assets based on the obtained report to verify its existence and to assess the overall condition of the asset. However, due to missing key identifiers on the report, we developed our own listing of vehicles based on our physical observations of motor vehicles at the various GPO locations in Washington DC, Laurel, MD, and Stennis, MS on July 17, July 22, August 27, and September 19, 2024. We reconciled the observed vehicles against the GBIS fixed asset report to verify their existence and accuracy. We also reviewed fleet disposition records.

We developed an assessment checklist (see <a href="Appendix C">Appendix C</a>) and performed a basic safety and operational assessment of the vehicles over multiple days from July through September 2024. Subsequently, for vehicles that were operational but had maintenance or repair issues, we performed a re-assessment in September and October 2024. We did not perform any assessments for vehicles such as tractors and all-terrain vehicles. We also obtained and analyzed fleet credit card statements from January 2021 through June 2024 for repair and maintenance expenses.

For powered industrial trucks, we selected a judgmental sample of 50 assets from an inventory list of powered industrial trucks developed and verified by the Fleet Manager as of July 2024. We conducted a physical inventory for each selected sample to verify its existence throughout multiple days from August to October 2024. We then reconciled the verified powered industrial truck against the GBIS fixed asset report to verify the existence and accuracy of the report. We also developed an assessment checklist (see <a href="Appendix D">Appendix D</a>) and performed a basic safety and operational assessment of each of the selected samples throughout multiple days from August to October 2024. As part of our assessment, we also inspected each powered industrial truck to verify whether they had the required property labels affixed to them.

We conducted this performance audit from March 2024 through March 2025, in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective.

We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. We discussed our observations and conclusions with management on February 12, 2025, and included their comments where appropriate.

### **Computer-Generated Data**

We assessed the reliability of GPO's GBIS fixed asset system by interviewing knowledgeable officials to obtain an understanding of controls, and by conducting walkthroughs of processes relevant to our audit objective. We determined that the data were sufficiently reliable for the purposes of this report.

#### **Internal Controls**

We assessed internal controls and compliance with laws and regulations necessary to satisfy audit objectives.

# **Prior Audit Coverage**

The OIG did not identify any prior audits related to the audit's objective within the last 5 years.

# **Appendix B: Table of Recommendations**

	Recommendation	Management	Status	Return on Investment
_		Response	_	
1.	Review GPO Instructions 810.26, Motor Vehicle Management Program, and 810.11B, GPO Property Management Program, for applicability and update or replace them with policies and standard operating procedures that align with the current organizational structure and business operations.	Concur. TID December 31, 2025.	Open	Nonmonetary – Validate existing processes and improve management controls.  By implementing this recommendation, GPO can updated policies to improve operational effectiveness and efficiencies in fleet management and accountability.
2.	Develop and implement fleet management policies and detailed standard operating procedures that establish clear roles and responsibilities for the Fleet Manager and Agency-wide supervisors and employees.	Concur. TID March 31, 2026.	Open	Nonmonetary – Improve management controls, systems, and processes.  By implementing this recommendation, GPO can reduce ambiguity for all personnel involved in fleet management and operations by providing clear expectations particularly the Fleet Manager's role.
3.	Develop procedures to maintain a complete and accurate database of fleet assets. Assess and leverage opportunities to incorporate automation to improve process efficiencies.	Concur. TID September 30, 2025.	Open	Nonmonetary – improve management controls, systems, and processes.  By implementing this recommendation, GPO will conduct inventory counts and recording in-service activities of fleet assets. This will result in updated and readily available fleet information.

	Recommendation	Management	Status	Return on Investment
		Response		
4.	Develop and implement detailed standard operating procedures for a service and repair maintenance program and assign an owner to maintain a centralized tracking system to ensure fleet assets are routinely inspected, results are documented, and any remedial actions are taken in a timely manner.	Concur. TID March 31, 2026.	Open	Nonmonetary – Improve management controls, systems, and processes.  By implementing this recommendation, GPO will be able to monitor fleet maintenance or repair needs, and maximize vehicle operational lifespan.
5.	Ensure all vehicles and powered industrial trucks from this report are promptly assessed for repair and/or disposition actions.	Concur. TID September 30, 2025.	Open	Nonmonetary – Improve safety, morale, health, and security.  Implementing this recommendation will ensure that the GPO takes timely action to repair or dispose of fleet assets we identified in the report as needing repair.
6.	Develop and implement processes and checklists to verify that the disposition is completed within a defined period before marking it as complete in the surplus property system.	Concur. TID December 31, 2025.	Open	Nonmonetary – Improve management controls, systems, and processes.  By following this recommendation, GPO can ensure that dispositions are marked as completed only after verifying that the disposition action has taken place. Additionally, implementing a set time period for disposition will prevent items from being retained indefinitely.

Recommendation	Management Response	Status	Return on Investment
7. Assess all non-operating or neglected vehicles and industrial trucks identified in this report to begin timely disposition actions, if needed.	Concur. TID September 30, 2025.	Open	Nonmonetary – Improve safety, morale, health, and security.  By implementing this recommendation, GPO can begin selling or scrapping vehicles and industrial trucks and freeing up space throughout the building, particularly near the industrial truck battery charging stations in the basement and parking lot space on Lots 50 and 06.

# Appendix C: OIG's Vehicle Assessment Checklist

Inspection Category	Assessment
	Does the vehicle turn on?
Warning Lights	Does the vehicle display any 'check engine' or other
	warning lights?
	Are both headlights operational?
	Are both rear tail-lights operational?
Headlights and Other Lights	Are both rear brake lights operational?
	Are both rear turn signals operational?
	Are both front turn signals operational?
Windshield / Winers	Is the windshield free from any cracks or scratches?
Windshield/ Wipers	Are the windshield wipers operational?
Seathelt	Is the driver-side seatbelt functional?
Seatbeit	Is the front passenger seatbelt functional?
	Does the horn emit a sound when pressed?
Other	Are both side-view and rear-view mirrors free from
	cracks or scratches?
	Are there any visible leaks?

# Appendix D. OIG's Powered Industrial Truck Assessment Checklist

<b>Inspection Category</b>	Assessment
Overhead Guard	Are there broken welds, missing bolts, or damaged areas?
Lift Chains and rollers	Is there wear or damage or kinks, signs of rust, or any sign that lubrication is needed?
	Is there squeaking?
Forks	Are they cracked or bent, worn, or mismatched?
10713	Is there excessive oil or water on the forks?
	What do the tires look like?
Times	Are there large cuts that go around the circumference of the tire?
Tires	Are there large pieces of rubber missing or separated
	from the rim?
	Are there missing lugs?
Gauges	Are they all working properly?
Lights	If equipped with lights, are they working properly?
Horn	Does the horn work?
Safety seat	If the truck is equipped with a safety seat, is it working?

# **Appendix E: Abbreviations**

AFP Agency Force Protection

ATV All-terrain Vehicle

COOP Continuity of Operations Plan

GPO Government Publishing Office

GBIS GPO Business Information System

GSA General Services Administration

JCP Joint Committee on Printing

OIG Office of Inspector General

PIN Property Identification Number

GSID Government Secure and Intelligent Documents

SOP Standard Operating Procedures

SUV Sports Utility Vehicle

TID Target Implementation Date

UPR Unserviceable or Surplus Property

VIN Vehicle Identification Number

# **Appendix F: Management's Comments**

Management's comments, in their entirety, are presented on the next four pages.



Date: March 12, 2025

To: Inspector General

**Subject:** Agency Response to the OIG Draft Audit Report on Fleet Management dated 13

February 2025

Thank you for the opportunity to offer the Agency's response to the Draft Audit Report on Fleet Management dated 13 February 2025.

# In General

The Fleet Management Audit comprehensively evaluated the Agency's fleet operations, policies, and asset management practices. The audit identified key improvement areas, including policy updates, role clarification, data accuracy, and asset disposition efficiency.

The Agency recognizes the importance of maintaining a well-managed and efficient fleet to support operational needs and ensure compliance with internal controls and industry best practices. In response to the audit's findings, the Agency is conducting internal reviews, engaging with stakeholders, and developing a structured plan to address the recommendations.

This response outlines the Agency's commitment to implementing necessary improvements, ensuring accountability, and enhancing overall fleet management effectiveness. The outlined actions align with best practices, improve asset tracking and maintenance, and optimize the disposition process for non-operational vehicles and industrial equipment.

# Agency Response to Recommendations in the Draft Report

#### **Recommendation 1**

Review GPO Instructions 810.26, Motor Vehicle Management Program, and 810.11B, GPO Property Management Program, for applicability and update or replace them with policies and standard operating procedures that align with current organizational structure and business operations.

GPO concurs with this recommendation.

The Fleet Manager from Agency Force Protection will review GPO Instruction 810.26 (signed in 1987) to ensure it accurately reflects current fleet management operations and the organizational structure. Following review and input from stakeholder business units, the Agency will make necessary updates and a new directive will be introduced following



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review and input from business units. The updated directive will align with best practices and include periodic reviews. This action will be completed by 31 December 2025.

Agency Financial Management will review GPO Instruction 810.11B (signed in 2003) to ensure it aligns with current financial and internal control standards. The Agency will make necessary revisions to streamline sections on GPO's fleet asset management, and stakeholder business unit input and review will be implemented. This action will be completed by 30 September 2025.

### **Recommendation 2**

Establish clear roles and responsibilities in fleet management policies and standard operating procedures for the Fleet Manager and Agency-wide supervisors and employees.

GPO concurs with this recommendation.

The Fleet Manager will update GPO Instruction 810.26 to define the roles and responsibilities and outline the Agency's expectations and accountabilities for fleet asset management. This instruction will provide the framework for all Business Units to understand their obligations and document their internal procedures and policies. The updated instruction will be distributed agency-wide to ensure compliance by 31 December 2025.

Business Units will develop internal standard operating procedures (SOPs) to define roles and responsibilities specific to their fleet assets and activities based on the guidance in GPO Instruction 810.26. These SOPs will establish clear expectations for supervisors and employees within their Business Units, ensuring that fleet tasks are carried out efficiently and comply with the overarching instruction. These SOPs will be submitted to the Fleet Manager for tracking and enforcement. This action will be completed by 31 March 2026.

#### **Recommendation 3**

Develop procedures to maintain a complete and accurate database of fleet assets. Assess and leverage opportunities to incorporate automation to improve process efficiencies.

GPO concurs with this recommendation.

Agency Financial Management will review and implement procedures to maintain a complete and accurate database of all GPO fleet assets. This will include establishing a systematic process for data entry, regular updates, and reconciliations to ensure the database reflects the current statuses of all fleet assets. Agency Financial Management will assess opportunities to incorporate automation tools to streamline data management and enhance process efficiency. The Agency will explore automated solutions to reduce manual errors, improve accuracy, and expedite data updates. These procedures will be periodically reviewed to ensure continued accuracy and operational efficiency. This action will be completed by 30 September 2025.



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#### **Recommendation 4**

Develop and implement detailed standard operating procedures for a service and repair maintenance program and assign an owner to maintain a centralized tracking system to ensure all fleet assets are routinely inspected, results are documented, and any remedial actions are taken in a timely manner.

GPO concurs with this recommendation.

All Business Units will develop and implement internal SOPs for a service and repair maintenance program. These will include procedures for routine inspections, documenting results, and ensuring timely remedial actions are taken when necessary. A designated person within each Business Unit will be assigned to maintain a centralized tracking system that records all inspection results, service activities, and follow-up actions. The Business Units will review and update these SOPs to ensure continued effectiveness and compliance. The Business Units' SOPs will be submitted to the Fleet Manager for tracking and enforcement. This action will be completed by 31 March 2026.

#### **Recommendation 5**

Ensure all vehicles and powered industrial trucks from this report are promptly assessed for repair and/or disposition actions.

GPO concurs with this recommendation.

All Business Units will assess the needed repairs and required disposition actions for the fleet assets under their management. They will ensure timely evaluations, coordinate necessary repairs with the maintenance provider, and initiate disposition actions for unserviceable assets per agency guidelines. They will also maintain thorough documentation of all inspections, repairs, and dispositions, with status updates provided to the Fleet Manager and Agency Financial Management. This action will be completed by 30 September 2025.

#### **Recommendation 6**

Develop and implement detailed standard operating procedures and checklists to verify that all disposition actions are completed within a defined period before marking a returned item as complete in the surplus property system.

GPO concurs with this recommendation.

The Stores Division of Agency Support Operations will develop and implement detailed SOPs and associated checklists to ensure all disposition actions are completed within defined periods before marking any returned item as complete in the surplus property system. These SOPs will outline a clear process for verifying that vehicles and industrial trucks are correctly returned, disposed of, and promptly documented. The Stores Division



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will relay the status of all disposition actions to the Fleet Manager and to Agency Financial Management to ensure accurate and up-to-date fleet records. This action will be completed by 31 December 2025.

#### **Recommendation 7**

Assess all non-operating or neglected vehicles and industrial trucks identified in this report to begin timely disposition actions, if needed.

GPO concurs with this recommendation.

The Stores Division of Agency Support Operations will ensure that all vehicles and industrial trucks already assessed and processed for disposition are finalized and removed from GPO inventory and facility. The Stores Division will also communicate disposition status to the Fleet Manager to maintain accurate and up-to-date fleet records. This action will be completed by 30 September 2025.

All Business Units will assess the assigned non-operating or neglected vehicles and industrial trucks identified in the report and coordinate with the Stores Division to execute timely disposition actions for assigned assets in accordance with agency guidelines. Additionally, Business Units will provide regular status updates to the Fleet Manager to ensure accurate records and compliance with agency policies. This action will be completed by 30 September 2025.

On 3 October 2024, the Fleet Manager began conducting initial assessments of all non-operating or neglected vehicles and industrial trucks, which included those assets identified in the report. On 22 January 2025, the Fleet Manager completed the assessment and published a finalized list of 42 fleet assets recommended for return to the Stores Division for proper disposition, which was distributed to stakeholders. The Fleet Manager will coordinate with the Finance Department, Stores Division, and Business Units to complete timely disposition actions for identified assets. The Safety Manager will be responsible for the disposition of any asset not being tracked or assigned to a Business Unit. This action will be completed by 30 September 2025.

Thank you for the opportunity to provide the Agency's input on this product from your office. The Agency spent approximately 40 hours preparing this response. If you have any questions, please contact me.

HYGH NATHANIAL HALPERN

cc: Deputy Director
Chief of Staff
General Counsel