



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

IMPLEMENTATION REVIEW OF CORRECTIVE ACTION PLAN

# Basic Repairs and Alterations Project for the Central Heating Plant in Washington, D.C., Was Not Effectively Managed Report Number A230043/P/R/R24006 August 9, 2024

Assignment Number A260015  
January 29, 2026

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## Introduction

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We have completed an implementation review of the management actions taken in response to the recommendations contained in our August 2024 audit report, *Basic Repairs and Alterations Project for the Central Heating Plant in Washington, D.C., Was Not Effectively Managed*, Report Number A230043/P/R/R24006.

### Objective

The objective of our review is to determine whether the PBS has taken the corrective actions as outlined in the corrective action plan for *Basic Repairs and Alterations Project for the Central Heating Plant in Washington, D.C., Was Not Effectively Managed* (see **Appendix A**).<sup>1</sup> To accomplish our objective, we:

- Met and corresponded with PBS management;
- Reviewed the original audit report to understand the recommendations and provide context for the corrective action plan;
- Examined documentation submitted by PBS personnel to support completion of the corrective action plan steps; and
- Performed limited testing of PBS's implementation of the guidance and procedures contained in these supporting documents.

### Background

PBS's Basic Repairs and Alterations Program, commonly referred to as 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.

In April 1931, the U.S. Department of the Treasury announced its plan to construct the Central Heating Plant, which would provide steam to 26 federal buildings in Washington, D.C. In 1934, the plant started producing steam. As more federal buildings were constructed, the need for an efficient heating system became critical; by 1936, the plant was supporting 71 public buildings. The Central Heating Plant was listed in the National Register of Historic Places in 2007 and is currently supporting 66 buildings.

On September 21, 2020, PBS's National Capital Region (PBS NCR) awarded a sole-source contract to a participant in the U.S. Small Business Administration's 8(a) Business Development Program (8(a) program) to install variable frequency drives (VFDs) at the Central Heating Plant

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<sup>1</sup> On September 18, 2025, GSA issued GSA Order ADM 5440.760, *Changes in the Public Buildings Service*. Under the order, PBS reorganized from a regional structure to a centralized organization. This eliminated PBS's 11 regional offices, including the PBS National Capital Region (PBS NCR). Because our August 2024 audit report, *Basic Repairs and Alterations Project for the Central Heating Plant in Washington, D.C., Was Not Effectively Managed*, preceded the reorganization, we retained all references to PBS NCR in this report.

in Washington, D.C. VFDs are designed to increase efficiency and reduce wear and tear on mechanical components by regulating the start and stop cycles of the motors based on system demand. The total award value of the contract was \$840,596. The period of performance ran from September 25, 2020, through July 31, 2022.

On August 9, 2024, we issued an audit report, *Basic Repairs and Alterations Project for the Central Heating Plant in Washington, D.C., Was Not Effectively Managed*, to PBS. The objective of the audit was to determine whether PBS NCR planned, awarded, administered, and closed out the contract for the installation of VFDs for chilled water pumps and a tower fan at the Central Heating Plant in accordance with the Federal Acquisition Regulation, General Services Administration Acquisition Manual, and other applicable policies.

Our audit found that PBS NCR did not effectively award, administer, or close out the contract for the VFD installation project at the Central Heating Plant in accordance with applicable regulations and GSA policies. Specifically, we found that PBS NCR did not:

- Maintain a complete contract file;
- Verify that the contractor and its subcontractor employees were paid in accordance with Construction Wage Rate Requirements;
- Verify that the contractor complied with subcontracting limitations required for sole-source 8(a) program contracts;
- Follow security requirements for contractor employees; and
- Ensure accurate contract data was reported in the Federal Procurement Data System-Next Generation (FPDS-NG).

To address the finding identified in our report, we recommended that the PBS NCR Regional Commissioner:

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

3. Establish processes or procedures to ensure contractor information changes are communicated to the contracting officer for timely FPDS-NG updates.
4. Conduct a review of PBS NCR's current basic repairs and alterations contracts to ensure that:
  - a. Contract files are complete.
  - b. Contractor and subcontractor employees are paid in accordance with Construction Wage Rate Requirements.
  - c. Contractors are complying with limitations on subcontracting for sole-source 8(a) program contracts.
  - d. Contractor employees have the required security clearances.
  - e. FPDS-NG contains current, complete, and accurate information.

The PBS NCR Regional Commissioner agreed with our report recommendations.

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## ***Results***

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

## Appendix A – Corrective Action Plan for Report Number A230043/P/R/R24006

### Public Buildings Service (PBS) National Capital Region (NCR) Corrective Action Plan A230043PRR24006

**Designated Responding Official:** Melanie Gilbert, Regional

**Commissioner, Public Buildings Service**

**Contact Person:** Shauna Malone (WPM)

**Telephone Number:** (202) 708-4983

**Date:** December 4, 2024

A230043PRR24006 Basic Repairs and Alterations Project for the Central Heating Plant in Washington, D.C. Was Not Effectively Managed.	001(A)	<b>Proposed Recommendation Completion Date (Month/Year)</b>  May 2025
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**Finding(s): Only one per page. Findings are for GSA internal use only.**

PBS NCR did not effectively award, administer, or close out the contract for the Variable Frequency Drive (“VFD”) installation project at the Central Heating Plant in accordance with applicable regulations and GSA policies.

**Root Cause of Finding(s): Root cause determination is for GSA internal use only.**

The root causes were a lack of awareness on who was responsible for uploading the various documents and an oversight on the part of the contracting officers and contracting officer representatives.

**Recommendation: Only one per page**

Improve management oversight to ensure that PBS NCR contracting officers and contracting officer’s representatives by maintaining complete contract files.

Version Date: 3/01/2023

<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to the OCFO BA or BG office</u>	<u>Documentation will be sent Last Duty Day of the month</u>
<b>001</b> Mandatory COR Contract Administration Training for all OFM CORs which included COR Filing - Gmail Tools Workshop Demonstration for file uploads into EASI and how to conduct contract file reviews. Training opened in December 2023.	<b>001</b> Copy of OFM Mandatory Contract and Administration Training presentation and attendance tracker	<b>001</b> May 30, 2025
<b>002</b> Counsel and reinforce the assigned COR on the responsibilities in the Delegation letter via Letter of Reprimand.	<b>002</b> Calendar invite and email to HR	<b>002 COMPLETED</b>
<b>003</b> Provide training to all CORs on the responsibilities assigned by the CO to the COR in the COR Appointment/Delegation letter.	<b>003</b> Copy of Delegation Letter and training attendance tracker	<b>003</b> May 30, 2025
<b>004</b> PBS NCR Office of Acquisition conducted COR File Review training on June 22, 2023 and July 20, 2023. Training video is available on the Office of Acquisition (OOA) website.	<b>004</b> Attendee List, Training COR Contract File Review Tab 37-45 & presentation slides	<b>004</b> May 30, 2025

Version Date: 3/01/2023



<b>005</b> PBS NCR emailed COR Construction and Services Desk Guide Training/resource information to COs & CORs on August 7, 2023, and August 15, 2024, and will annually remind COs and CORs of COR Construction and Services Desk Guide Training/resource information.	<b>005</b> Copy of email	<b>005 - COMPLETED</b>
<b>006</b> PBS NCR will conduct annual Post Award Quality Check contract file reviews on 10% of all awards.	<b>006</b> OOA Maintains Findings/Contract Tracker	<b>006</b> May 30, 2025



Version Date: 3/01/2023

**Public Buildings Service (PBS) National Capital Region (NCR) Corrective Action Plan**

**Designated Responding Official:** Melanie Gilbert, Regional

**Commissioner, Public Buildings Service**

**Contact Person:** Shauna Malone (WPM)

**Telephone Number:** (202) 708-4983

**Date:** December 4, 2024

A230043PRR24006 Basic Repairs and Alterations Project for the Central Heating Plant in Washington, D.C. Was Not Effectively Managed.	001(B)	<b>Proposed Recommendation Completion Date (Month/Year)</b>  <b>May 2025</b>
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**Sub-finding(s): Only one per page. Findings are for GSA internal use only.**

PBS NCR did not effectively award, administer, or close out the contract for the Variable Frequency Drive ("VFD") installation project at the Central Heating Plant in accordance with applicable regulations and GSA policies.

**Root Cause of Finding(s): Root cause determination is for GSA internal use only.**

The Contracting Officer Representative did not obtain the certified payrolls because they stated that the contractor "ignored" their requests.

**Recommendation: Only one per page**

Improve management oversight to ensure that PBS NCR contracting officers and contracting officer's representatives by verifying that contractor and subcontractor employees are paid in accordance with Construction Wage Rate Requirements and verifying the Form WH-347 in EASI Contract Files.

*Version Date: 3/01/2023*

<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to the OCFO BA or BG office</u>	<u>Documentation will be sent Last Duty Day of the month</u>
<b>001 Counsel</b> and reinforce the assigned HOTD COR on the responsibilities in the Delegation letter via Letter of Reprimand.	<b>001</b> Copy of the invite and email to HR	<b>001 COMPLETED</b>
<b>002</b> Verify that contractors and subcontractors are paid the correct wages and included in the EASI contract file.	<b>002</b> Form WH-347	<b>002</b> May 30, 2025

Version Date: 3/01/2023

**Public Buildings Service (PBS) National Capital Region (NCR) Corrective Action Plan**

**Designated Responding Official:** Melanie Gilbert, Regional

**Commissioner, Public Buildings Service**

**Contact Person:** Shauna Malone (WPM)

**Telephone Number:** (202) 708-4983

**Date:** December 4, 2024

A230043PRR24006 Basic Repairs and Alterations Project for the Central Heating Plant in Washington, D.C. Was Not Effectively Managed.	001 (C)	<b>Proposed Recommendation Completion Date (Month/Year)</b>  May 2025
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**Finding(s): Only one per page. Findings are for GSA internal use only.**

PBS NCR did not effectively award, administer, or close out the contract for the Variable Frequency Drive ("VFD") installation project at the Central Heating Plant in accordance with applicable regulations and GSA policies.

**Root Cause of Finding(s): Root cause determination is for GSA internal use only.**

The Contracting Officer Representative did not ensure the contractor submitted a certification of compliance with subcontracting limitations with each payment request. The root causes were a lack of awareness on monitoring and oversight responsibilities with verifying subcontracting limitations due to lack of training.

**Recommendation: Only one per page**

Improve management oversight to ensure that PBS NCR contracting officers and contracting officer's representatives by enforcing contractor compliance with subcontracting limitations required for sole-source 8(a) contracts.

*Version Date: 3/01/2023*

<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to the OCFO BA or BG office</u>	<u>Documentation will be sent Last Duty Day of the month</u>
<b>001</b> Counsel and reinforce the assigned COR on the responsibilities in the Delegation letter via Letter of Reprimand.	<b>001</b> Copy of the calendar invite and email to HR	<b>001 COMPLETED</b>
<b>002</b> Conduct training for COs and CORs that encompasses information and reminders about compliance with subcontracting limitations required for sole-source 8(a) contracts.	<b>002</b> Track completion with a sign in sheet and provide a copy of the training presentation.	<b>002</b> May 30, 2025

Version Date: 3/01/2023

**Public Buildings Service (PBS) National Capital Region (NCR) Corrective Action Plan**

**Designated Responding Official:** Melanie Gilbert, Regional Commissioner, Public Buildings Service

**Contact Person:** Shauna Malone (WPM)

**Telephone Number:** (202) 708-4983

**Date:** December 4, 2024

A230043PRR24006 Basic Repairs and Alterations Project for the Central Heating Plant in Washington, D.C. Was Not Effectively Managed.	001 (D)	<b>Proposed Recommendation Completion Date (Month/Year)</b>  <b>Completed</b>
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**Finding(s): Only one per page. Findings are for GSA internal use only.**

PBS NCR did not effectively award, administer, or close out the contract for the Variable Frequency Drive ("VFD") installation project at the Central Heating Plant in accordance with applicable regulations and GSA policies.

**Root Cause of Finding(s): Root cause determination is for GSA internal use only.**

The Contracting Officer Representative did not follow applicable security requirements to ensure contractors were cleared to access the facility. The root cause was due to lack of awareness that the Central Heating Plant had transitioned from using contractor administrative support staff to process contractors to the HSPD-12 protocols for Contracting Officer Representatives.

**Recommendation: Only one per page**

Improve management oversight to ensure that PBS NCR contracting officers and contracting officer's representatives by enforcing security requirements for contractor employees.

*Version Date: 3/01/2023*

<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to the OCFO BA or BG office</u>	<u>Documentation will be sent Last Duty Day of the month</u>
<b>001</b> Require all Central Heating Plant managers, supervisors and CORs to attend online HSPD-12 training. This training began on 6 June 2024, classes occur bi-monthly and are ongoing.	<b>001</b> Class attendance tracker and copy of training	<b>001 COMPLETED</b>
<b>002</b> Validate the status of "Personal Identity Verification ("PIV") cardholders using the PIV Validation bot on contracts once a year and within 60 days of contract performance period end.	<b>002</b> Report of validation results and PIV BOT Validation Tool guide	<b>002 COMPLETED</b>
<b>003</b> Conduct checks for PIV cards that have not been returned within 90 days of contract performance period end.	<b>003</b> Template email that is sent to COR/responsible office & report of results	<b>003 COMPLETED</b>
<b>004</b> Annually remind the acquisition workforce of the information and requirements of <a href="#">Procurement Instructional Bulletin (PIB) 21-06 Personal Identity Verification (PIV) Card Management</a>	<b>004</b> Copy of email to acquisition workforce and copy of Procurement Instructional Bulletin	<b>004 COMPLETED</b>

Version Date: 3/01/2023

**Public Buildings Service (PBS) National Capital Region (NCR) Corrective Action Plan**

**Designated Responding Official:** Melanie Gilbert, Regional

**Commissioner, Public Buildings Service**

**Contact Person:** Bogdan Vaga

**Telephone Number:** (202) 304-0674

**Date:** December 4, 2024

A230043PRR24006 Basic Repairs and Alterations Project for the Central Heating Plant in Washington, D.C. Was Not Effectively Managed.	002 (A)	<b>Proposed Recommendation Completion Date (Month/Year)</b>  May 2025
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**Finding(s): Only one per page. Findings are for GSA internal use only.**

PBS NCR did not effectively award, administer, or close out the contract for the Variable Frequency Drive ("VFD") installation project at the Central Heating Plant in accordance with applicable regulations and GSA policies.

**Root Cause of Finding(s): Root cause determination is for GSA internal use only.**

The root causes were a lack of awareness on who was responsible for uploading the various documents and an oversight on the part of the contracting officers and contracting officer representatives.

**Recommendation: Only one per page**

Train PBS NCR contracting officers and contracting officer's representatives on their duties and responsibilities with respect to maintaining complete contract files.

*Version Date: 3/01/2023*



<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to the OCFO BA or BG office</u>	<u>Documentation will be sent Last Duty Day of the month</u>
<b>001</b> Mandatory COR Contract Administration Training for all OFM CORs which included COR Filing - Gmail Tools Workshop Demonstration for file uploads into EASi and how to conduct contract file reviews. Training opened in December 2023.	<b>001</b> Copy of OFM Mandatory Contract and Administration Training presentation and attendance tracker	<b>001</b> May 31, 2025
<b>002</b> Counsel and reinforce the assigned COR on the responsibilities in the Delegation letter via Letter of Reprimand.	<b>002</b> Calendar invite and email to HR	<b>002 COMPLETED</b>
<b>003</b> Provide training to all CORs on the responsibilities assigned by the CO to the COR in the COR Appointment/Delegation letter.	<b>003</b> Copy of Delegation Letter, training presentation and training attendance tracker	<b>003</b> May 31, 2025
<b>004</b> PBS NCR Office of Acquisition conducted COR File Review training on June 22nd, 2023, and July 20th, 2023. Training video is available on NCR Office of Acquisitions website	<b>004</b> Attendee List, Training COR Contract File Review Tab 37-45 & presentation slides	<b>004</b> May 31, 2025

Version Date: 3/01/2023

<b>005</b> PBS NCR emailed COR Construction and Services Desk Guide Training/resource information to COs & CORs on August 7, 2023, and August 15, 2024, and will annually remind COs and CORs of COR Construction and Services Desk Guide Training/resource information	<b>005</b> Copy of email	<b>005 COMPLETED</b>
<b>006</b> PBS NCR will conduct annual Post Award Quality Check contract file reviews on 10% of all awards.	<b>006</b> Maintain Findings/Contract Tracker	<b>006</b> May 30, 2025

*Version Date: 3/01/2023*

**Public Buildings Service (PBS) National Capital Region (NCR) Corrective Action Plan**

**Designated Responding Official:** Melanie Gilbert, Regional

**Commissioner, Public Buildings Service**

**Contact Person:** Shauna Malone (WPM)

**Telephone Number:** (202) 708-4983

**Date:** December 4, 2024

A230043PRR24006 Basic Repairs and Alterations Project for the Central Heating Plant in Washington, D.C. Was Not Effectively Managed.	002 (B)	<b>Proposed Recommendation Completion Date (Month/Year)</b>  May 2025
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**Sub-finding(s): Only one per page. Findings are for GSA internal use only.**

Train PBS NCR contracting officers and contracting officer's representatives on their duties and responsibilities with respect to verifying that contractor and subcontractor employees are paid in accordance with Construction Wage Rate Requirements.

**Root Cause of Finding(s): Root cause determination is for GSA internal use only.**

The Contracting Officer Representative did not obtain the certified payrolls. The Contracting Officer Representative did not obtain the certified payrolls because they stated that the contractor "ignored" their requests. The root cause was a lack of awareness and conflicting understanding by the Contracting Officer Representative on enforcing or withholding financial payment due lack of submitting supporting documentation for certified payroll.

**Recommendation: Only one per page**

Train PBS NCR contracting officer representatives on their duties and responsibilities with respect to verifying that contractor and subcontractor employees are paid in accordance with Construction Wage Rate Requirements and verifying the Form WH-347 in EASi Contract Files.

*Version Date: 3/01/2023*

<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to the OCFO BA or BG office</u>	<u>Documentation will be sent Last Duty Day of the month</u>
<b>001</b> Send email in November informing CORs of mandatory training requirements for wage rate online course offerings for COs and CORs.	<b>001</b> Copy of email of course offerings; attendance tracker	<b>001</b> March 31, 2025
<b>002</b> Verify that contractors and subcontractors are paid the correct wages and included in the EASI contract file.	<b>002</b> Form WH-347	<b>002</b> May 30, 2025

Version Date: 3/01/2023

**Public Buildings Service (PBS) National Capital Region (NCR) Corrective Action Plan**

**Designated Responding Official:** Melanie Gilbert, Regional

**Commissioner, Public Buildings Service**

**Contact Person:** Shauna Malone (WPM)

**Telephone Number:** (202) 708-4983

**Date:** December 4, 2024

A230043PRR24006 Basic Repairs and Alterations Project for the Central Heating Plant in Washington, D.C. Was Not Effectively Managed.	002 (C)	<b>Proposed Recommendation Completion Date (Month/Year)</b>  May 2025
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**Finding(s): Only one per page. Findings are for GSA internal use only.**

PBS NCR did not effectively award, administer, or close out the contract for the Variable Frequency Drive ("VFD") installation project at the Central Heating Plant in accordance with applicable regulations and GSA policies.

**Root Cause of Finding(s): Root cause determination is for GSA internal use only.**

The Contracting Officer Representative did not ensure the contractor submitted a certification of compliance with subcontracting limitations with each payment request. The root causes were a lack of awareness and conflicting understanding between PBS NCR personnel on enforcing compliance with subcontracting limitations required for sole-source 8(a) program contracts due to lack of training.

**Recommendation: Only one per page**

Train PBS NCR contracting officers and contracting officer's representatives on their duties and responsibilities with respect to enforcing contractor compliance with subcontracting limitations required for sole-source 8(a) program contracts.

*Version Date: 3/01/2023*

<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to the OCFO BA or BG office</u>	<u>Documentation will be sent Last Duty Day of the month</u>
<b>001</b> Counsel and reinforce the assigned COR on the responsibilities in the Delegation letter via Letter of Reprimand.	<b>001</b> Copy of the calendar invite and email to HR	<b>001 COMPLETED</b>
<b>002</b> Conduct training for COs and CORs that encompasses information and reminders about compliance with subcontracting limitations required for sole-source 8(a) contracts	<b>002</b> Sign in sheet and a copy of the training presentation	<b>002</b> May 31, 2025

Version Date: 3/01/2023

**Public Building Service (PBS) National Capital Region (NCR) Corrective Action Plan**

**Designated Responding Official:** Melanie Gilbert, Regional Commissioner,

**Public Buildings Service**

**Contact Person:** Shauna Malone (WPM)

**Telephone Number:** (202) 708-4983

**Date:** December 4, 2024

A230043PRR24006 Basic Repairs and Alterations Project for the Central Heating Plant in Washington, D.C. Was Not Effectively Managed.	002 (D)	<b>Proposed Recommendation Completion Date (Month/Year)</b>  <b>Completed</b>
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**Finding(s): Only one per page. Findings are for GSA internal use only.**

PBS NCR did not effectively award, administer, or close out the contract for the Variable Frequency Drive ("VFD") installation project at the Central Heating Plant in accordance with applicable regulations and GSA policies.

**Root Cause of Finding(s): Root cause determination is for GSA internal use only.**

The Contracting Officer Representative did not follow applicable security requirements to ensure contractors were cleared to access the facility. The root cause was due to lack of awareness that the Central Heating Plant had transitioned from using contractor administrative support staff to process contractors to the HSPD-12 protocols for Contracting Officer Representatives.

**Recommendation: Only one per page**

Train PBS NCR contracting officer representatives on their duties and responsibilities with respect to enforcing security requirements for contract employees in bi-monthly classes, utilizing the PIV Validation bot on contracts once a year, conducting PIV Checks and providing an annual reminder to PBS NCR contracting officers and contracting officer representatives on PIV Card Management.

*Version Date: 3/01/2023*

<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to the OCFO BA or BG office</u>	<u>Documentation will be sent Last Duty Day of the month</u>
<b>001</b> Require all Central Heating Plant managers, supervisors and CORs to attend online HSPD-12 training. This training began on 6 June 2024, classes occur bi-monthly and are ongoing.	<b>001</b> Class attendance tracker and copy of training	<b>001 COMPLETED</b>
<b>002</b> Validate the status of "Personal Identity Verification ("PIV") cardholders using the PIV Validation bot on contracts once a year and within 60 days of contract performance period end.	<b>002</b> Report of validation results and copy of PIV Validation BOT guide	<b>002 COMPLETED</b>
<b>003</b> Conducts checks for PIV cards that have not been returned within 90 days of contract performance period end.	<b>003</b> Template email that is sent to COR/responsible office & report of results	<b>003 COMPLETED</b>
<b>004</b> Annually remind the acquisition workforce of the information and requirements of <a href="#">Procurement Instructional Bulletin (PIB) 21-06</a> <a href="#">Personal Identity Verification (PIV) Card Management</a>	<b>004</b> Copy of email to acquisition workforce and copy of Procurement Instructional Bulletin	<b>004 COMPLETED</b>

Version Date: 3/01/2023



**Public Buildings Service (PBS) National Capital Region (NCR) Corrective Action Plan**

**Designated Responding Official:** Melanie Gilbert, Regional Commissioner,

**Public Buildings Service Commissioner**

**Contact Person:** Shauna Malone (WPM)

**Telephone Number:** (202) 304-0674

**Date:** December 4, 2024

A230043PRR24006 Basic Repairs and Alterations Project for the Central Heating Plant in Washington, D.C. Was Not Effectively Managed.	003	<b>Proposed Recommendation Completion Date (Month/Year)</b>  <b>Completed</b>
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**Finding(s): Only one per page. Findings are for GSA internal use only.**

PBS NCR did not effectively award, administer, or close out the contract for the Variable Frequency Drive ("VFD") installation project at the Central Heating Plant in accordance with applicable regulations and GSA policies.

**Root Cause of Finding(s): Root cause determination is for GSA internal use only.**

The contractor updated their sam.gov information which auto populates various fields in FPDS-NG. Their updates over time caused different information to be reflected in FPDS-NG. The root cause is a technological/system issue with sam.gov and FPDS.

**Recommendation: Only one per page**

Establish processes or procedures to ensure contractor information changes are communicated to the contracting officer for timely FPDS-NG updates.

*Version Date: 3/01/2023*

<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to the OCFO BA or BG office</u>	<u>Documentation will be sent Last Duty Day of the month</u>
<b>001</b> Sent an email to the contracting staff regarding "Government Furnished Property (GFP) - PIV Cards and FPDS Transaction Use Codes" including a link with directions to verify the vendor information to the "PBS FPDS Reference Guide".	<b>001</b> Copy of email	<b>001 COMPLETED</b>
<b>002</b> Add language instructing the contractors to notify contracting officers of updates to their sam.gov profile to the Kick-Off Meeting agenda.	<b>002</b> Updated agenda template and letter to vendor	<b>002 COMPLETED</b>

Version Date: 3/01/2023

**Public Building Service (PBS) National Capital Region (NCR) Corrective Action Plan**

**Designated Responding Official:** Melanie Gilbert, Regional Commissioner,  
Public Buildings Service  
**Contact Person:** Shauna Malone (WPM)  
**Telephone Number:** (202) 708-4983  
**Date:** December 4, 2024

A230043PRR24006 Basic Repairs and Alterations Project for the Central Heating Plant in Washington, D.C. Was Not Effectively Managed.	004 (A)	<b>Proposed Recommendation Completion Date (Month/Year)</b>  May 2025
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**Finding(s): Only one per page. Findings are for GSA internal use only.**

PBS NCR did not effectively award, administer, or close out the contract for the Variable Frequency Drive ("VFD") installation project at the Central Heating Plant in accordance with applicable regulations and GSA policies.

**Root Cause of Finding(s): Root cause determination is for GSA internal use only.**

The root causes were a lack of awareness on who was responsible for uploading the various documents and an oversight on the part of the contracting officers and contracting officer representatives, due to lack of training.

**Recommendation: Only one per page**

Conduct a review of PBS NCR's current basic repairs and alterations contracts to ensure that contract files are complete.

*Version Date: 3/01/2023*

<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to the OCFO BA or BG office</u>	<u>Documentation will be sent Last Duty Day of the month</u>
<b>001</b> Mandatory COR Contract Administration Training for all OFM CORs which included Gmail tools for file uploads into EASI and how to conduct contract file reviews. Training opened in December 2023.	<b>001</b> OFM Mandatory Contract Administration Training Tracker	<b>001</b> May 30, 2025
<b>002</b> PBS NCR will conduct annual Post Award Quality Check contract file reviews on 10% of all awards.	<b>002</b> OOA Maintains Findings/Contract Tracker	<b>002</b> May 30, 2025

Version Date: 3/01/2023

**Public Buildings Service (PBS) National Capital Region (NCR) Corrective Action Plan**

**Designated Responding Official:** Melanie Gilbert, Regional Commissioner,  
**Public Buildings Service**

**Contact Person:** Shauna Malone (WPM)

**Telephone Number:** (202) 708-4983

**Date:** December 4, 2024

A230043PRR24006 Basic Repairs and Alterations Project for the Central Heating Plant in Washington, D.C. Was Not Effectively Managed.	004 (B)	<b>Proposed Recommendation Completion Date (Month/Year)</b>  May 2025
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**Finding(s): Only one per page. Findings are for GSA internal use only.**

PBS NCR did not effectively award, administer, or close out the contract for the Variable Frequency Drive ("VFD") installation project at the Central Heating Plant in accordance with applicable regulations and GSA policies.

**Root Cause of Finding(s): Root cause determination is for GSA internal use only.**

The Contracting Officer Representative did not obtain the certified payrolls because they stated that the contractor "ignored" their requests.

**Recommendation: Only one per page**

Conduct a review of PBS NCR's current basic repairs and alterations contracts to ensure that contractor and subcontractor employees are paid in accordance with Construction Wage Rate Requirements.

<b><u>Action to be Taken Step by Step</u></b>	<b><u>Supporting Documentation to be sent to the OCFO BA or BG office</u></b>	<b><u>Documentation will be sent Last Duty Day of the month</u></b>
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Version Date: 3/01/2023

<b>001</b> PBS NCR will conduct annual Post Award Quality Check contract file reviews on 10% of all awards.	<b>001</b> Maintains Findings/Contract Tracker	<b>001</b> May 30, 2025
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*Version Date: 3/01/2023*

**Public Buildings Service (PBS) National Capital Region (NCR) Corrective Action Plan**

**Designated Responding Official:** Melanie Gilbert, Regional Commissioner,

**Public Buildings Service**

**Contact Person:** Shauna Malone (WPM)

**Telephone Number:** (202) 708-4983

**Date:** December 4, 2024

A230043PRR24006 Basic Repairs and Alterations Project for the Central Heating Plant in Washington, D.C. Was Not Effectively Managed.	004 (C)	<b>Proposed Recommendation Completion Date (Month/Year)</b>  May 2025
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**Finding(s): Only one per page. Findings are for GSA internal use only.**

PBS NCR did not effectively award, administer, or close out the contract for the Variable Frequency Drive ("VFD") installation project at the Central Heating Plant in accordance with applicable regulations and GSA policies.

**Root Cause of Finding(s): Root cause determination is for GSA internal use only.**

The Contracting Officer Representative did not ensure the contractor submitted a certification of compliance with subcontracting limitations with each payment request. The root causes were a lack of awareness and conflicting understanding between PBS NCR personnel on enforcing compliance with the subcontracting limitations required for sole-source 8(a) program contracts due to lack of training.

**Recommendation: Only one per page**

Conduct a review of PBS NCR's current basic repairs and alterations contracts to ensure that contractors are complying with limitations on subcontracting for sole-source 8(a) contracts.

*Version Date: 3/01/2023*

<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to the OCFO BA or BG office</u>	<u>Documentation will be sent Last Duty Day of the month</u>
<b>001</b> Conduct training for COs and CORs that encompasses information and reminders about compliance with subcontracting limitations required for sole-source 8(a) contracts	<b>001</b> Tracking completion through sign in sheet	<b>001</b> May 30, 2025
<b>002</b> PBS NCR will conduct a review of 10% of the current sole-source 8(a) basic repairs and alterations contracts for limitation on subcontracting compliance for BA54 funded projects.	<b>002</b> Maintains Findings/Contract Tracker	<b>002</b> May 30, 2025

Version Date: 3/01/2023



**Public Buildings Service (PBS) National Capital Region (NCR) Corrective Action Plan**

**Designated Responding Official:** Melanie Gilbert, Regional Commissioner,

**Public Buildings Service**

**Contact Person:** Shauna Malone (WPM)

**Telephone Number:** (202) 708-4983

**Date:** December 4, 2024

A230043PRR24006 Basic Repairs and Alterations Project for the Central Heating Plant in Washington, D.C. Was Not Effectively Managed.	004 (D)	<b>Proposed Recommendation Completion Date (Month/Year)</b>  <b>Completed</b>
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**Finding(s): Only one per page. Findings are for GSA internal use only.**

PBS NCR did not effectively award, administer, or close out the contract for the Variable Frequency Drive ("VFD") installation project at the Central Heating Plant in accordance with applicable regulations and GSA policies.

**Root Cause of Finding(s): Root cause determination is for GSA internal use only.**

The Contracting Officer Representative did not follow applicable security requirements to ensure contractors were cleared to access the facility. The root cause was due to lack of awareness that the Central Heating Plant had transitioned from using contractor administrative support staff to process contractors to the HSPD-12 protocols for Contracting Officer Representatives.

**Recommendation: Only one per page**

Conduct a review of PBS NCR's current basic repairs and alterations contracts to ensure that contractor employees have the required security clearances.

*Version Date: 3/01/2023*



<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to the OCFO BA or BG office</u>	<u>Documentation will be sent Last Duty Day of the month</u>
<b>001</b> Require all Central Heating Plant managers, supervisors and CORs to attend online HSPD-12 training. This training began on 6 June 2024, classes occur bi-monthly and are ongoing.	<b>001</b> Class attendance tracker and copy of the training	<b>001 COMPLETED</b>



Version Date: 3/01/2023

**Public Buildings Service (PBS) National Capital Region (NCR) Corrective Action Plan**

**Designated Responding Official:** Melanie Gilbert, Regional Commissioner,

**Public Buildings Service**

**Contact Person:** Shauna Malone (WPM)

**Telephone Number:** (202) 304-0674

**Date:** December 4, 2024

A230043PRR24006 Basic Repairs and Alterations Project for the Central Heating Plant in Washington, D.C. Was Not Effectively Managed.	004 (E)	<b>Proposed Recommendation Completion Date (Month/Year)</b>  <b>Completed</b>
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**Finding(s): Only one per page. Findings are for GSA internal use only.**

PBS NCR did not effectively award, administer, or close out the contract for the Variable Frequency Drive ("VFD") installation project at the Central Heating Plant in accordance with applicable regulations and GSA policies.

**Root Cause of Finding(s): Root cause determination is for GSA internal use only.**

The contractor updated their sam.gov information which auto populates various fields in FPDS-NG. Their updates over time caused different information to be reflected in FPDS-NG.

**Recommendation: Only one per page**

Conduct a review of PBS NCR's current basic repairs and alterations contracts to ensure that FPDS-NG contains current, complete, and accurate information.

*Version Date: 3/01/2023*

<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to the OCFO BA or BG office</u>	<u>Documentation will be sent Last Duty Day of the month</u>
<b>001</b> PBS NCR conducts and completes a Verification and Validation review of FPDS-NG actions on a quarterly basis.	<b>001</b> Report to OAM	<b>001 COMPLETED</b>
<b>002</b> PBS NCR conducts a review and action on the "FPDS Outstanding Drafts and Errors" report on a monthly basis. The report is generated by the Office of Acquisition Management (OAM).	<b>002</b> Monthly Certification	<b>002 COMPLETED</b>

Version Date: 3/01/2023

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## ***Appendix B – Report Distribution***

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GSA Administrator (A)

Acting PBS Commissioner (P)

Deputy Commissioner (P1)

Deputy Commissioner of Enterprise Strategy (P2)

Acting Chief of Staff (PB)

Acting Deputy Chief of Staff (PB)

Chief Financial Officer (B)

Office of Audit Management and Accountability (BA)

Assistant Inspector General for Auditing (JA)

Deputy Assistant Inspector General for Acquisition Audits (JA)

Deputy Assistant Inspector General for Real Property Audits (JA)

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



## CONTACT US

For more information about the GSA OIG, please visit us online at [www.gsaig.gov](http://www.gsaig.gov).

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(202) 273-7320 (Press Inquiries)

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To report allegations of fraud, waste, abuse, mismanagement, or misrepresentations affiliated with GSA, please submit information to our hotline, [www.gsaig.gov/hotline](http://www.gsaig.gov/hotline), or call (800) 424-5210.

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