



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

Alert Memorandum: Concerns Regarding PBS's Communication and Cleaning Procedures for Coronavirus Disease 2019 (COVID-19) Exposures

Memorandum Number A201018-2
September 3, 2020



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

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TO: DANIEL W. MATHEWS
COMMISSIONER
PUBLIC BUILDINGS SERVICE (P)

FROM: NICHOLAS PAINTER *Nicholas V. Painter*
REGIONAL INSPECTOR GENERAL FOR AUDITING
SOUTHEAST SUNBELT REGION AUDIT OFFICE (JA-4)

SUBJECT: Alert Memorandum: Concerns Regarding PBS's Communication and Cleaning
Procedures for Coronavirus Disease 2019 (COVID-19) Exposures
Memorandum Number A201018-2

The purpose of this alert memorandum is to notify you of risks we identified during our ongoing *Audit of PBS's Coronavirus Disease 2019 Communication and Cleaning Procedures* that may lead to increased exposure to and transmission of COVID-19.

During the survey phase of our audit, we found that PBS did not always receive timely notice of COVID-19 incidents from building occupants and did not always provide timely notification of confirmed COVID-19 cases. In addition, because PBS does not have a standard inspection process for COVID-19 cleaning and disinfection services, it does not have assurance that contractors are cleaning and disinfecting space in accordance with PBS and Centers for Disease Control and Prevention (CDC) guidance. Accordingly, PBS should take immediate action to address these matters.

Background

On April 2, 2020, we initiated a project to monitor GSA's activities in response to the nationwide public health emergency resulting from confirmed cases of COVID-19, and GSA's implementation of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act).¹ Based on risks we identified during this monitoring project, we initiated an audit of PBS's COVID-19 communication and cleaning procedures on May 7, 2020. This ongoing audit focuses on whether PBS: (1) provided timely notice to building occupants of COVID-19 cases in accordance

¹ *Monitoring of GSA Activities in Response to the Coronavirus Disease 2019*, Assignment Number A201018.

with CDC and GSA guidance, and (2) provided timely cleaning and disinfection services in buildings with reported COVID-19 cases in accordance with CDC guidance.

During our audit survey, we selected a limited sample of 11 confirmed COVID-19 cases reported in GSA-owned or leased locations between March 23, 2020, and May 14, 2020. For each sampled COVID-19 case, we requested and reviewed documentation provided by PBS to determine whether these cases were reported in accordance with PBS's *Notification Process for Suspected and Confirmed Cases of COVID-19*, and whether impacted space was cleaned in accordance with CDC guidance. Based on our survey work, we have identified a number of concerns that warrant your immediate attention. These issues are described below and will be further explored as we continue with audit fieldwork.

PBS did not always receive timely notice of COVID-19 positive test results from building occupants.

PBS's *Notification Process for Suspected and Confirmed Cases of COVID-19* details the notification process for any COVID-19 incident in a facility under GSA's jurisdiction, custody, or control. The process states that once an individual becomes aware of a COVID-19 incident, they must immediately notify their supervisor, who in turn must notify the chain of command within the individual's organization. The organization must then notify all of its staff in the building, on telework, or elsewhere, and the GSA Facility Manager or the Lease Administration Manager.

However, PBS did not always receive timely notice of COVID-19 positive test results from building occupants. In two cases, we observed significant lags in time between when tenant agencies became aware of an employee's positive COVID-19 test result and when the agencies notified PBS. In both cases, approximately one week passed before PBS was notified.

PBS must ensure that tenant agencies are aware of and follow PBS's facility notification procedures to timely identify COVID-19 incidents so that PBS can notify building occupants of potential exposure, and clean and disinfect impacted space.

PBS did not always provide timely notification of positive COVID-19 cases to building occupants.

The CDC's *Interim Guidance for Businesses and Employers to Plan and Respond to COVID-19* states that if an employee is confirmed to have COVID-19, employers should inform fellow employees of their possible exposure to COVID-19 in the workplace. Consistent with CDC guidance, PBS's *Notification Process for Suspected and Confirmed Cases of COVID-19* requires that all occupants and contractors in a GSA-controlled facility must be notified of COVID-19 incidents no later than 24 hours after the incident is first reported to the GSA Office of Facilities

Management.² In order to meet this requirement, PBS relies on its facility managers, regional administrators, and tenant agencies to disseminate details of COVID-19 incidents. If a tenant agency refuses to notify its staff, the matter is escalated to the PBS Commissioner's office for resolution.

We found that PBS did not always provide timely notice of positive COVID-19 cases to building occupants. In 2 of 7 GSA-owned locations sampled during our survey work, PBS did not notify occupants of the positive COVID-19 cases within 24 hours of the reported incident, as required. In one instance, PBS notified occupants 16 days after receiving notification. In another, PBS notified occupants 7 days after receiving notification. Similarly, in 2 of 4 leased locations sampled, PBS did not confirm that tenant agencies notified their staff within 24 hours of the incident.

In response to our draft alert memorandum, PBS asserted that it is "only responsible for notifying designated points of contact for each of the building occupants (unless the occupants are GSA employees or contractors)." This assertion is based on a recent update to PBS's notification process, which was not in effect at the time of our survey testing.³ Nonetheless, under either version of the policy, PBS failed to provide timely notification of positive COVID-19 cases as required.

PBS should take steps to maximize awareness of COVID-19 incidents in GSA-controlled facilities in order to minimize risk of exposure. Among other things, PBS should issue timely notification of COVID-19 incidents, verify that tenant agencies are informing their staff, and escalate cases to the PBS Commissioner when tenant agencies fail to notify their staff.

In some cases, PBS does not have assurance that contractors are cleaning and disinfecting space in accordance with PBS and CDC guidance.

The *GSA National Custodial Specification* states that evaluations of the contractor's work shall be conducted in accordance with the government's quality assurance surveillance plan (QASP), which details the government's method for monitoring and evaluating the contractor's performance. The specification also states that GSA Form 1181A, *Contract Cleaning Inspection Report* (GSA 1181A), or equivalent forms shall be used to document and evaluate the contractor's performance.

For COVID-19, PBS created the *Cleaning and Disinfecting Work Checklist* to be used along with the GSA 1181A before, during, and after cleaning and disinfection work. PBS's *Custodial Inspection Reminders and Flexibilities During COVID-19* states, "In those regions that do not use

² A COVID-19 incident is one in which an individual with a confirmed or suspected case of COVID-19 has accessed a GSA-controlled facility.

³ The July 28, 2020, revision to the *Notification Process for Suspected or Confirmed Cases of COVID-19* requires that GSA notify each of the designated points of contact for building occupants. Previous versions, which were in effect for the sampled incidents, required that PBS notify all building occupants, contractors, and visitors as appropriate.

the GSA 1181A, it is important to make sure that the region's inspection and surveillance process is at least comparable in ensuring that the government receives the services that are specified in the contract."

The *GSA Communicable Disease Pandemic Plan* states that when a global pandemic manifests itself, it is impossible and imprudent for PBS inspectors to conduct walk-through inspections of GSA building space. The plan also states it is important that PBS work with the contractor to review, enhance, and modify, as appropriate, the contract quality control plan (QCP) and QASP to ensure that adequate safeguards remain in force to provide for the delivery of safe, efficient, and effective custodial services.

However, PBS did not update its contractor oversight plans for COVID-19 cleaning, and as a result, it does not have assurance that contractors are cleaning and disinfecting space in accordance with applicable requirements. We found that PBS did not enhance or modify contractor oversight plans, including QCPs and QASPs, for any of the sampled GSA-owned locations in response to COVID-19. PBS did not institute a quality assurance methodology for pandemic-related cleaning and disinfection services. Further, PBS did not complete the GSA 1181A or equivalent form or the *Cleaning and Disinfecting Work Checklist* in 3 of 7 GSA-owned locations.

In response to our draft alert memorandum, PBS stated that it required all custodial contractors to submit a pandemic plan, but that it was not required to enhance or modify the contractor oversight plans for the custodial contracts we tested. However, PBS's reliance on a contractor-supplied pandemic plan does not absolve PBS of its responsibility to inspect work and ensure that it is performed in accordance with PBS and CDC guidance. Accordingly, PBS should review, enhance, and modify contractor oversight plans to ensure that contractors are performing COVID-19 cleaning and disinfection services in accordance with PBS and CDC guidance.

Conclusion

In sum, we found that PBS did not always receive timely notice of COVID-19 incidents from building occupants and did not always provide timely notification of confirmed COVID-19 cases. Additionally, PBS does not have a standard inspection process for COVID-19 cleaning and disinfection services, thus does not have assurance that contractors are cleaning and disinfecting space in accordance with PBS and CDC guidance. As the cases continue to occur across the country and federal employees return to facilities in greater numbers, it is critical that PBS follow its own procedures and engage in close coordination with its tenant agencies in order to limit exposure to and spread of COVID-19.

PBS Comments

In an August 31, 2020, response to our draft alert memorandum, the PBS Commissioner provided specific comments on the concerns identified in this memorandum regarding PBS's notification and cleaning and disinfection process. We revised the memorandum to address the

Commissioner's comments as indicated; however, these revisions did not affect our conclusions. PBS did not provide timely notice of positive COVID-19 cases and does not have assurance in some cases that contractors are cleaning and disinfecting space in accordance with PBS and CDC guidance.

The PBS Commissioner's response is included in its entirety as an attachment.

Compliance Statement

This alert memorandum complies with the Council of Inspectors General on Integrity and Efficiency's Quality Standards for Federal Offices of Inspector General. The related ongoing audit, when completed, will comply with generally accepted government auditing standards.

Audit Team

This assignment was managed out of the Southeast Sunbelt Region Audit Office and conducted by the individuals listed below:

Nicholas Painter	Regional Inspector General for Auditing
Arthur Edgar	Audit Manager
Alenda Blackwell	Auditor-In-Charge
Renee Davis	Auditor

Attachment: PBS Commissioner's Response to Draft Alert Memorandum Number A201018-2

Memorandum Distribution

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

Attachment – PBS Commissioner's Response to Draft Alert Memorandum Number A201018-2


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Public Buildings Service

August 31, 2020

MEMORANDUM FOR NICHOLAS PAINTER
REGIONAL INSPECTOR GENERAL FOR AUDITING SOUTHEAST
SUNBELT REGION AUDIT OFFICE (JA-4)

FROM: DANIEL W. MATHEWS 
COMMISSIONER
PUBLIC BUILDINGS SERVICE (P)

SUBJECT: *Alert Memo – Concerns Regarding PBS's Communication and Cleaning
Procedures for Coronavirus Disease 2019 (COVID-19) Exposures
Interim Memorandum Number A201018-2*

Thank you for the opportunity to review and discuss the General Services Administration (GSA) Office of Inspector General's (OIG) *Alert Memo: Concerns Regarding PBS's Communication and Cleaning Procedures for Coronavirus Disease 2019 (COVID-19) Exposures* (Interim Memorandum Number A201018-2). The Public Buildings Service (PBS) appreciates OIG raising these concerns during the survey phase of its audit, so that they can be properly addressed now, rather than waiting until the report is finalized and issued.

Since the first COVID-19 incident in GSA-controlled space was reported on March 9, 2020, PBS has addressed 3,409 initial COVID-19 incidents, across 660 owned and 1,093 leased facilities. Throughout that time, the health and safety of every individual accessing GSA-controlled space has been our top priority. Utilizing guidelines from the Centers for Disease Control and Prevention (CDC) as the basis, PBS took several steps to ensure its cleaning and disinfection procedures were effective in response to the COVID-19 pandemic.

PBS developed a notification protocol to ensure building occupants become aware of COVID-19 incidents within 24 hours of PBS becoming aware. PBS incorporated increased cleaning and disinfection of frequently touched surfaces in common and high-traffic areas, excluding occupant agency workstations and personal property, as part of its regular custodial service, and is modifying its custodial and lease contracts to reflect that level of service as agencies return to the physical workplace. Additionally, PBS developed a standard scope of work for cleaning and disinfection in response to confirmed or suspected COVID-19 cases in GSA-controlled space, and has provided that scope to its custodial vendors and lessors for their use. And, PBS developed the *Cleaning and Disinfection Work Checklist* to be used as an additional means of ensuring the cleaning and disinfection work is completed in accordance with its scope.

The OIG sampled 11 COVID-19 incidents which took place between March 13 and May 14, 2020, and found three instances where the inspection documentation was missing. PBS acknowledges that the documentation should have been in place, and is taking proactive steps

1800 F Street, NW
Washington, DC 20405-0002
www.gsa.gov

to ensure compliance moving forward, including additional communication with senior leadership, and by conducting informational sessions with responsible PBS regional officials to identify and share best practices for national implementation. However, PBS firmly believes its cleaning and disinfecting aligns with CDC and GSA guidelines.

Notification Process

PBS agrees that it is important for all building occupants to be timely informed of COVID-19 incidents in GSA-controlled space, which, as specified in PBS's *Notification Process for Suspected or Confirmed Cases of COVID-19*, is considered to be within 24 hours of PBS becoming aware of the incident. It is important to note that PBS is only responsible for notifying the designated points of contact for each of the building occupants, not all of the building occupants (unless the occupants are GSA employees or contractors). Building occupants are responsible for notifying their employees, contractors, and other personnel.

In accordance with PBS's Notification Process for Suspected or Confirmed Cases of COVID-19 policy, PBS relies upon building occupants to notify their Facility Manager (for federally owned buildings) or Lease Administration Manager (for leased space) promptly when an affected individual within their organization has accessed GSA-controlled space, so that the other building occupant designated points of contact can be notified accordingly. To that end, PBS will re-emphasize each building occupant's obligation to notify PBS promptly of all potential COVID-19-related incidents, send to each building occupant's point of contact the PBS notification protocol, as such protocol may be revised over time, and remind these points of contact of their responsibility to notify all individuals within their organization of all such incidents. However, it is the responsibility of building occupants to notify PBS of affected individuals, and to disseminate information related to COVID-19 incidents to their organizations.

Cleaning and Disinfection Process

In May 2020, PBS issued guidance entitled *Custodial Inspection Reminders and Flexibilities During COVID-19*. This guidance set forth standard inspection protocols, including minimum contractor qualifications, product usage, and the application process for cleaning and disinfection. The guidance also requires the use of GSA Form 1181-A, or equivalent, to document the inspection, but recognizes that alternative methods of verification, such as utilizing virtual inspections through the use of photos or approved video technologies, may be needed during the pandemic, since it may not be possible to conduct onsite inspections. This guidance is consistent with Office of Management and Budget Memorandum M-20-16, *Federal Agency Operational Alignment to Slow the Spread of Coronavirus COVID-19* (March 17, 2020) at page 1, which provides that "the Government must immediately adjust operations and services to minimize face-to-face interactions"

PBS appreciates that OIG acknowledged it is difficult to conduct inspections in the current environment, and included excerpts from the *GSA Communicable Disease Pandemic Plan*, which recognizes that it is impossible or imprudent to conduct walkthrough inspections during a global pandemic, and that PBS should work with its contractors to review, enhance and modify, as appropriate, the contract's Quality Control Plan (QCP) and Quality Assurance Surveillance Plan (QASP), so that adequate safeguards remain in place to verify the delivery of safe, effective and efficient custodial services. OIG reported that it reviewed the QCPs and QASPs for the sampled locations and did not see any such enhancements or modifications.

PBS acknowledges that the QCPs and QASPs for the custodial contracts that covered the 11 incidents sampled by OIG were not modified or enhanced; however, the *GSA Communicable*

Disease Pandemic Plan does not require the QCPs and QASPs to be modified or enhanced. The decision whether to modify or enhance these plans is left to the discretion of the Contracting Officer. Moreover, PBS's National Custodial Specification requires each custodial contractor to have a Pandemic Plan that outlines the steps it must take to prevent and reduce the spread, and mitigate the potential effects, of a pandemic on custodial and related services. In lieu of modifying or enhancing its QCP, PBS believes the Pandemic Plan should be used as the mechanism to demonstrate that adequate safeguards are in place to provide for the delivery of safe, effective, and efficient custodial services.

At the onset of the COVID-19 pandemic, PBS took immediate steps to confirm that all of its custodial contracts included the requirement for a contractor Pandemic Plan. For those contracts where the requirement was previously excluded, PBS modified them to include the requirement for a Pandemic Plan. As contractors submitted their Pandemic Plans, responsible PBS officials reviewed them and, as necessary, worked with the contractors to revise them until the plans were acceptable. This resulted in having an up-to-date Pandemic Plan in place for every one of the PBS custodial contracts.

While the QASPs associated with the 11 incidents sampled by OIG were not modified or enhanced, PBS developed the *Cleaning and Disinfection Work Checklist* as an additional means of ensuring quality assurance. PBS will review this issue and determine if broader changes to QASPs, or other forms of enhanced quality assurance, are necessary.

Thank you again for the opportunity to review and discuss OIG's preliminary findings. If you have any questions or would like to discuss further, please contact me on (202) 501-1100.