



# FEDERAL PROPERTY

## GSA Guidance Needed to Help Agencies Identify Unneeded Property in Warehouses

Accessible Version

December 2019

# GAO Highlights

Highlights of [GAO-20-228](#), a report to congressional requesters

## Why GAO Did This Study

Federal civilian agencies hold and manage billions of dollars in property that is not considered to be real property, such as vehicles, furniture, computers, and scientific instruments. Some of these items are stored in nearly 18,000 warehouses covering more than 90-million square feet. Agencies are required by law to regularly identify and dispose of unneeded items. However, GAO reported in 2018 that agencies often did not do so. The Federal Personal Property Management Act of 2018 requires agencies to use GSA guidance to assess the utilization and ongoing need for property.

GAO was asked to review property stored in warehouses. This report examines: (1) what is known about property in selected agencies' warehouses and how much agencies spend to store it, and (2) the extent to which selected agencies assess the ongoing need for property stored in warehouses. GAO reviewed federal statutes, regulations, and GSA's guidance; analyzed policies from three agencies—FAA, Office of Science, and BOP—which were selected based on total warehouse square footage, among other factors; conducted site visits to agencies' warehouses; and interviewed stakeholders such as agency officials and industry groups.

## What GAO Recommends

GAO recommends that GSA incorporate approaches agencies could use to assess the ongoing need for property in GSA's guidance—such as periodic justifications, use of data, and utilization reviews—and develop a plan for communicating the guidance government-wide. GSA concurred with GAO's recommendation.

View [GAO-20-228](#). For more information, contact Lori Rectanus at (202) 512-2834 or [RectanusL@gao.gov](mailto:RectanusL@gao.gov).

December 2019

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### GSA Guidance Needed to Help Agencies Identify Unneeded Property in Warehouses

## What GAO Found

GAO found that three selected agencies stored a wide variety of property in their warehouses. For example:

- Federal Aviation Administration (FAA) warehouses at four main sites contained items used to build and repair aviation support systems, such as wind shear alert systems. Other sites contained tools and equipment to maintain aviation support systems or housed the systems themselves.
- The Department of Energy's Office of Science warehouses, located primarily at national laboratories, contained items, such as large magnets, for use in scientific experiments.
- Bureau of Prisons (BOP) warehouses, located mainly at federal correctional institutions, contained items, such as food, uniforms, and soap, for inmates.

The above agencies reported spending approximately \$50.1 million in fiscal year 2018 on warehouse rent, operations, and maintenance costs.

#### Examples of Property in Federal Warehouses



Inmate mattresses at a Bureau of Prisons warehouse



Spare antennas at a Federal Aviation Administration warehouse



Spare equipment stored since 1991 at a Department of Energy Office of Science warehouse

Source: Bureau of Prisons and GAO. | GAO-20-228

The three selected agencies generally did not systematically assess the ongoing need for property in their warehouses and had limited guidance for doing so. For example, although two of the agencies had policies about when such an assessment should occur, none of the agencies specified how it should occur for most types of property. Instead, agencies primarily relied on agency officials' professional judgment to assess ongoing need. GAO identified instances where agencies retained unneeded property absent relevant guidance. For example, one agency site had stored obsolete computers dating back to the 1990s. While the General Services Administration (GSA) drafted guidance in response to recent legislation, this guidance does not describe approaches or practices stakeholders identified as potentially useful for assessing ongoing need for property, such as periodic retention justifications, use of data analytics, and utilization reviews. Further, while GSA officials intend to put the final guidance on GSA's website and provide it to agencies that participate in a GSA-chaired committee on property management by December 2019, GSA has not provided a documented plan or a timeline for broader dissemination. Guidance that incorporates such approaches could help agencies avoid retaining property that is no longer needed and, as a result, allow them to better manage their property and use of their warehouse space.

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**Abbreviations**

BOP	Bureau of Prisons
DOE	Department of Energy
FAA	Federal Aviation Administration
FPPMA	Federal Personal Property Management Act of 2018
FRPP	Federal Real Property Profile
GSA	General Services Administration
ICPM	Interagency Committee on Property Management
OMB	Office of Management and Budget

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December 20, 2019

The Honorable Gary Peters  
Ranking Member  
Committee on Homeland Security and Governmental Affairs  
United States Senate  
The Honorable Tom Carper  
United States Senate

Federal civilian agencies hold and manage billions of dollars of property that is not considered real property, such as vehicles, furniture, computers, and scientific instruments.<sup>1</sup> Some of this property is in the nearly 18,000 warehouses that take up over 90-million square feet that these agencies reported holding and leasing in fiscal year 2018. Over the last 4 years, the Office of Management and Budget (OMB) has called for agencies to reduce their physical footprint, including warehouse space. This effort presents an opportunity for agencies to review their property inventory stored within warehouses and dispose of unneeded items. However, we have found that federal agencies do not routinely identify and dispose of unneeded items, which could affect their ability to reduce warehouse space and storage costs.<sup>2</sup> Recently enacted legislation, the Federal Personal Property Management Act of 2018 (FPPMA), requires agencies to regularly assess certain types of property under their control in accordance with guidance from the General Services Administration (GSA).<sup>3</sup> Such assessments are to include evaluating utilization and the extent to which agencies' missions are dependent on the property being assessed.

You asked us to review property stored in warehouses. This report addresses: (1) what is known about property stored in selected federal

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<sup>1</sup>In this report, "property" refers to personal property unless otherwise specified. Real property generally consists of buildings, structures, and land.

<sup>2</sup>GAO, *Federal Personal Property: Opportunities Exist to Improve Identification of Unneeded Property for Disposal*, [GAO-18-257](#) (Washington, D.C.: Feb. 16, 2018). We recommended that OMB provide guidance to executive agencies on managing their property, emphasizing that agencies' policies or processes should reflect the requirement to continuously review and identify unneeded property. The agency did not comment on the recommendation and has not yet taken action to implement it.

<sup>3</sup>Pub. L. No. 115-419 (2019).

agencies' warehouses and how much they spend to store it; and (2) the extent to which selected agencies assess the ongoing need for property stored in warehouses.

There are no government-wide data on the types of government property stored in warehouses. As a result, for both of our objectives we focused on selected departments and agencies. At the department level, to obtain variation among the top 10 agencies by warehouse square footage, we used the following criteria: (1) total warehouse square footage, (2) recent changes in warehouse square footage, and (3) proportion of leased to owned warehouse space as reported in Federal Real Property Profile (FRPP) and Reduce the Footprint data.<sup>4</sup> Within each selected department, we then selected components with the most warehouse square footage, with one exception.<sup>5</sup> These agencies were: (1) the Federal Aviation Administration (FAA) within the Department of Transportation; (2) the Office of Science within the Department of Energy (DOE); and (3) the Bureau of Prisons (BOP) within the Department of Justice.

To determine what is known about property in selected agencies' warehouses, we conducted site visits to at least one site for each agency that was among the largest in terms of warehouse square footage and at least one other site that was near one of the large sites, as described below.

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<sup>4</sup>The FRPP is a single, comprehensive database describing the nature, use, and extent of all real property (e.g., buildings and structures) under the custody and control of executive branch agencies, except when otherwise required for reasons of national security. Reduce the Footprint refers to an initiative OMB introduced in 2015 that directed executive agencies to reduce the total square footage of their domestic office and warehouse inventory relative to an established baseline. We did not include DOD within our selection because we have already done extensive work specifically on DOD property management. See, for example, GAO, *Defense Inventory: Further Analysis and Enhanced Metrics Could Improve Service Supply and Depot Operations*, [GAO-16-450](#) (Washington, D.C.: June 9, 2016) and *Defense Inventory: DOD Needs Additional Information for Managing War Reserve Levels of Meals Ready to Eat*, [GAO-15-474](#) (Washington, D.C.: May 7, 2015).

<sup>5</sup>For the Department of Energy, we selected the Office of Science, which was the third largest in terms of warehouse square footage because of security concerns with one of the offices with more warehouse square footage and because the other office with more warehouse square footage used a greater proportion of the space to store nuclear and nuclear-related material. The Department of Energy tracks such buildings separately as specialized facilities to store such material but reports them in FRPP as warehouses because FRPP does not have categories to track storage of nuclear and nuclear-related materials.

- FAA: Mike Monroney Aeronautical Center in Oklahoma City, Oklahoma; the Staging Area and Mobile Asset Deployment Center in Independence, Missouri; and Charles B. Wheeler Downtown airport in Kansas City, Missouri.
- Office of Science: Argonne National Laboratory and Fermi National Accelerator Laboratory in the Chicago area.
- BOP: U.S. Penitentiary Leavenworth in Leavenworth, Kansas, and Federal Correctional Institution El Reno in El Reno, Oklahoma.

For each agency, we viewed property stored in warehouses at each of the sites and also interviewed officials at the headquarters and regional level. Information obtained from these sites and regional officials is not generalizable to the selected agencies, and information from the selected agencies is not generalizable to other agencies.

To determine how much selected agencies spend to store property in warehouses, including the numbers and square footage of these warehouses, we reviewed fiscal year 2018 FRPP data for information on FAA and BOP because that was the most recent data available when we conducted our analysis. For the Office of Science, we reviewed DOE data because DOE reports most information to FRPP at the department level rather than for specific offices, such as the Office of Science, and we used fiscal year 2018 data to cover the same period covered by the FRPP data. Both FRPP and DOE data included information about direct costs for warehouses such as rent, operations, and maintenance costs. We reviewed documentation related to these data sources, interviewed knowledgeable officials, and determined that these data were sufficiently reliable for providing information about warehouse numbers, square footage, and costs.

To determine the extent to which selected agencies assess the ongoing need for property stored in warehouses, we analyzed their policies and procedures related to property management, including policies for identifying and disposing of unneeded property. We interviewed officials at the sites we visited about their processes for identifying and disposing of unneeded property and challenges in identifying unneeded property. To obtain a government-wide perspective on these issues, we reviewed GSA guidance and relevant industry standards related to property storage and warehousing practices. We also interviewed a standards-setting organization and two industry stakeholders selected based on their knowledge about property management practices to discuss property storage and warehousing processes, practices, and standards that

agencies could use to assess the ongoing need for property.<sup>6</sup> In addition, we invited participants from the Interagency Committee on Property Management (ICPM)—a committee chaired by GSA that consists of executive agency representatives interested in federal property—to speak with us regarding their practices for identifying unneeded property and interviewed the four agencies that volunteered to participate. Finally, we reviewed FPPMA’s requirements and interviewed GSA’s Office of Government-wide Policy officials about GSA’s role in assisting agencies in identifying unneeded federal property, how FPPMA could affect GSA’s roles and responsibilities going forward, and GSA’s progress in implementing FPPMA. For further details on our methodology, see appendix I.

We conducted this performance audit from October 2018 to December 2019 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

Federal law requires executive agencies to:

- maintain adequate inventory controls and accountability systems for property under their control;<sup>7</sup>
- continuously survey property under their control to identify excess;<sup>8</sup> and
- promptly report excess property to GSA and generally dispose of it in accordance with GSA regulations so that it can be made available to other federal agencies and stakeholders for reuse.<sup>9</sup>

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<sup>6</sup>The standards-setting organization we interviewed was ASTM International, formerly known as the American Society for Testing and Materials. The industry stakeholders we interviewed were the Asset Leadership Network and National Property Management Association.

<sup>7</sup>40 U.S.C. § 524(a)(1).

<sup>8</sup>40 U.S.C. § 524(a)(2).



In addition, the FPPMA requires agencies to assess accountable property within their control in accordance with guidance from GSA.<sup>10</sup> Property can be accountable or non-accountable.<sup>11</sup> Accountable property is property with a useful life of at least 2 years that an agency determines should be tracked in its property records.<sup>12</sup> Each agency determines what constitutes accountable property for that agency, and for our selected agencies, consideration is given to an item's acquisition cost and other factors, such as ease of theft and sensitivity. For our three selected agencies, these acquisition cost thresholds ranged from \$5,000 to \$10,000 in fiscal year 2018. Non-accountable property is property that does not meet the agency's definition of accountable property and may include items such as office furniture and printers. Agencies typically do not track non-accountable property unless they need to for specific purposes, such as managing inventory levels.

Some agency property is located in warehouses. For the purpose of this report, we used the definition of "warehouse" in FRPP guidance: "buildings used for storage, such as ammunition storage, covered sheds, and buildings primarily used for storage of vehicles or materials."<sup>13</sup> This term encompasses a broad array of property that agencies may classify differently for internal purposes but classify as warehouses for FRPP reporting in the absence of more precise categories. For example, some buildings that DOE reports as warehouses in FRPP are specialized facilities for storing nuclear and nuclear-contaminated material. In the absence of an FRPP category for nuclear storage, these buildings are classified in FRPP as warehouses. In a similar manner, FAA classified as warehouses in FRPP buildings used to house air traffic support systems,

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<sup>9</sup>40 U.S.C. § 524(a)(3), (a)(5). Agencies typically report property as excess by entering information about it into GSA's web-based system for facilitating property disposal.

<sup>10</sup>Pub. L. No. 115-419 (2019). Additional reporting and utilization requirements apply to some types of property such as vehicles and aircraft. See GAO, *Federally Owned Vehicles: Agencies Should Improve Processes to Identify Underutilized Vehicles*, [GAO-17-426](#) (Washington, D.C.: Apr. 25, 2017) and *Reported Inventory: Use and Cost of Federally Owned Aircraft*, [GAO-17-73R](#) (Washington, D.C.: Oct. 31, 2016).

<sup>11</sup>For selected agencies, accountable property includes capitalized property, which is property reported as an asset in an agency's annual financial statement and depreciated. Selected agencies' established thresholds for capitalized property were higher than those for accountable property and ranged from \$10,000 to \$500,000.

<sup>12</sup>41 C.F.R. § 102-35.20.

<sup>13</sup>General Services Administration, *Federal Real Property Council: 2019 Guidance for Real Property Inventory Reporting Version 3* (Washington, D.C. Sept. 24, 2019).

such as approach lighting systems,<sup>14</sup> because no other category in FRPP was a better fit.

GSA's role in agencies' management of property they have acquired, whether in warehouses or elsewhere, is limited until an agency declares that property as excess.<sup>15</sup> Once property is declared excess, it can be transferred to another agency or certain non-federal recipients, donated, sold, abandoned, or destroyed. GSA has issued regulations that govern agencies' actions in the property disposal process, and it administers a web-based system that facilitates property disposal. However, prior to an agencies' identifying property as excess, GSA's authority to issue regulations or formal guidance regarding agencies' management of property is limited to topics that have been specifically assigned to the GSA Administrator, according to GSA officials.<sup>16</sup>

GSA distinguishes between formal guidance and informal guidance, and GSA officials explained this distinction as follows. Formal guidance, such as a Federal Management Regulation bulletin, must be reviewed by GSA management and general counsel officials. For example, in 2017 GSA issued a Federal Management Regulation bulletin on warehousing that summarized industry perspectives from two voluntary consensus standards, which were published by ASTM International's asset management committee and which GSA had participated in developing.<sup>17</sup> One standard addressed storage of property and the other addressed strategic warehousing. GSA officials stated they were authorized to include content on property management in the bulletin under the authority of GSA's real-property policy program because the content supported the real property goal of reducing the federal government's real property footprint. In contrast, informal guidance does not require review by GSA management or general counsel officials but may be published

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<sup>14</sup>An approach lighting system is an airport runway lighting facility radiating light in a directional pattern by which the pilot visually aligns the aircraft with the extended centerline of the runway.

<sup>15</sup>Agencies declare property as excess after determining that the property is not required to meet agency needs or responsibilities.

<sup>16</sup>According to GSA officials, GSA may only issue regulations and formal guidance on topics assigned to the GSA Administrator. See 40 U.S.C. § 121.

<sup>17</sup>General Services Administration, *Federal Warehousing and Storage of Assets*, Bulletin FMR B-44 (Washington, D.C.: May 2, 2017).

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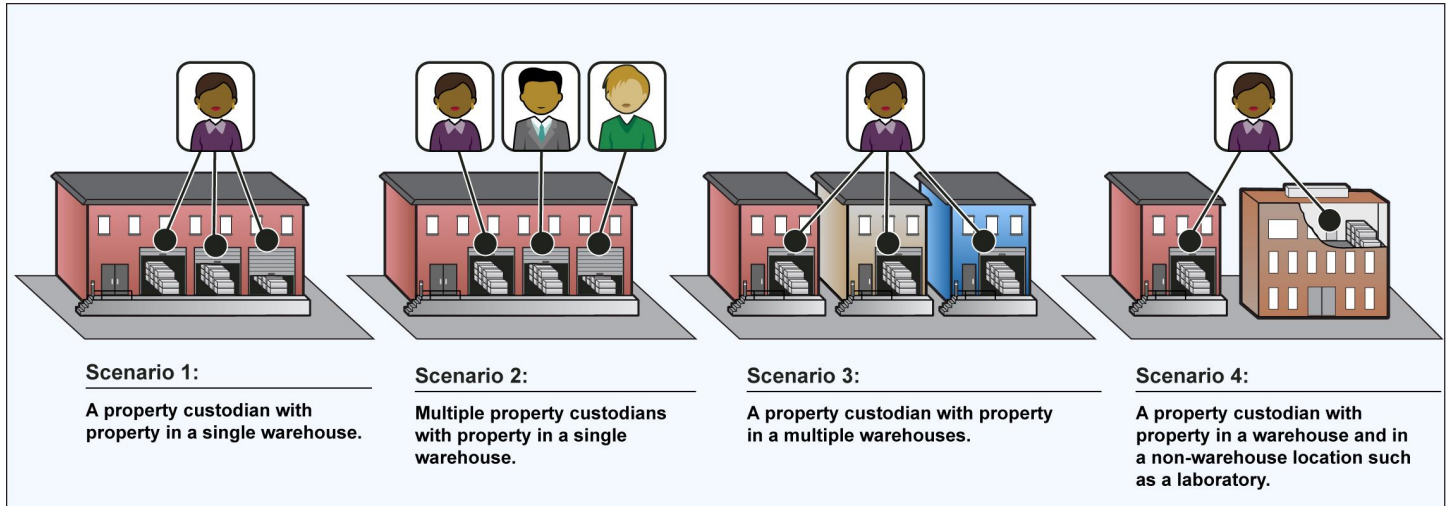
on GSA's website or disseminated at GSA trainings. Whether formal or informal, agencies are not required to adhere to such guidance.

Typically, within agencies, responsibility for managing property is generally shared between property officials and property custodians.<sup>18</sup> Property officials' primary responsibilities relate to property management. For example, they may be responsible for updating property data systems, providing property lists and instructions for property inventories, resolving issues that arise with property management, and managing the disposal process after a property custodian has determined that an item is no longer needed. Property custodians are generally program managers who are assigned responsibility for specific property items associated with the program they manage as an ancillary duty. For example, property custodians may be required to conduct physical inventories of property assigned to their program and work with a property official to resolve any issues arising during the inventory. Depending on how an agency uses its warehouses and property, property custodians may be responsible for property in a single warehouse, in multiple warehouses, or in a variety of locations. Moreover, multiple property custodians may be responsible for property in a single warehouse, as depicted in figure 1.

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<sup>18</sup>As in other DOE offices, contractors manage Office of Science sites and associated property. Contractual terms regarding property management roles may vary among contractors. For example, at Fermi National Accelerator Laboratory, the property control manager functions as a property official for items stored at the site's centrally managed warehouses and conducts site-wide oversight to assure appropriate and compliant property management, while program managers with property in other warehouses on the campus serve as property custodians for items in those locations. In contrast, at Argonne National Laboratory, designated individuals within each division perform tasks associated with both property officials and property custodians.

**Figure 1: Property Custodians' Responsibility for Property in Warehouses**



Source: GAO. | GAO-20-228

## Selected Agencies Stored Various Types of Property in Warehouses but Had Limited Information about Storage Costs

### Selected Agencies Stored a Variety of Property in Warehouses

The three selected agencies had a total of 1,221 warehouses, with over 6.4-million square feet, that contained a broad array of property.<sup>19</sup> Although comprehensive data on property in these agencies' warehouses were unavailable, interviews, site visits, and agencies' data on warehouses themselves provided some information on the types of property in them. We found that the agencies had some commonalities in the contents of their warehouses. For example, all three had warehouses that contained material-handling equipment, such as fork lifts, as well as

<sup>19</sup>Warehouse square footage includes some buildings that may contain no property and some buildings that have been severely damaged. For example, we viewed three buildings classified as warehouses in FRPP at a BOP site, one of which had been used as an inmate dormitory for inmates operating a farm and two of which had been associated buildings, but have since been severely damaged in a fire and are no longer in use.

excess property being processed for disposal. However, much of the property in agencies' warehouses was specific to their missions, according to agency officials and our observations. Table 1 includes information about the agencies' warehouses and examples of the types of agency-specific property in them.

**Table 1: Total Warehouse Numbers and Square Feet by Selected Agency in Fiscal Year 2018 with Examples of Property Contents**

Agency	Number of warehouses	Total warehouse square feet in millions	Examples of property in warehouses
Federal Aviation Administration	669	2.1	<ul style="list-style-type: none"> <li>• Components, spare parts, and material for fabricating, maintaining, and repairing aviation support systems—such as antennas and cables</li> <li>• Spare and replacement parts for legacy systems still in use while being phased out, such monitors from the 1980s</li> <li>• Mobile assets, such as housing units and air traffic control towers to support FAA mobile response efforts during natural disasters and other service disruptions</li> </ul>
Department of Energy's Office of Science <sup>a</sup>	357	1.6	<ul style="list-style-type: none"> <li>• Project components being staged for assembly and installation into scientific experiments, such as large magnets from overseas</li> <li>• Equipment held for future projects</li> <li>• Spare parts for laboratory use</li> <li>• Nuclear-contaminated material, nuclear waste, and other items stored in specialized storage facilities such as hazardous, secure, and environmentally controlled facilities<sup>b</sup></li> </ul>
Bureau of Prisons	224	3.1	<ul style="list-style-type: none"> <li>• Consumable items for inmate use, such as uniforms, mattresses, soap, toilet paper, and food</li> <li>• Spare food service equipment, such as ovens and serving carts</li> <li>• Equipment to support institution-specific activities, such as dairy equipment for a correctional institution that includes an inmate-managed farm</li> </ul>

Sources: GAO analysis of Federal Real Property Profile and Department of Energy data and interviews with selected agencies. | GAO-20-228

Note: Warehouse numbers and square footage included some buildings that had been misclassified. Specifically, two of the three selected agencies indicated that some of the buildings we inquired about in the course of our review had been misclassified as warehouses and stated their intention to change the classifications. However, we determined that the data were sufficiently reliable to present information on warehouse numbers and square footage for the selected agencies.

<sup>a</sup>Number of warehouses and total square footage for the Office of Science included 12 warehouses that are owned or leased by Office of Science contractors.

<sup>b</sup>In the absence of a more precise category for government-wide reporting purposes, the Department of Energy classified specialized facilities used to store nuclear material, nuclear-contaminated material, and nuclear waste as warehouses. In the Department of Energy real property data, these types of specialized facilities were tracked separately. Moreover, nuclear waste was not tracked as Office of Science property and was instead managed according to guidelines specific to nuclear material.

We also visited warehouses at each of the selected agencies to obtain additional information about and view the types of property stored within them, as described below.

**FAA.** FAA had warehouses at four main sites that contained property specific to the sites' missions, and most of the remaining warehouses were buildings that contained equipment, tools, or materials to maintain aviation support systems or housed support systems, such as approach lighting systems, according to our analysis of FAA warehouse data, FAA officials, and sites we visited. For example, we visited FAA's warehouses at the Mike Monroney Aeronautical Center, including the Logistics Support Facility, FAA's largest warehouse and central location for maintaining and repairing aviation support systems deployed throughout the national airspace system. Most items in the warehouse were spare parts, materials, and systems or system components that had been sent to the facility for repair. We also visited FAA's Staging Area, which supports FAA's manufacture and assembly of new systems to be deployed throughout the country. Accordingly, much of the property at the two warehouses that comprise this facility was equipment, parts, and material, along with the machines and tools to manufacture and assemble the material. For example, we viewed components of a wind shear alert system that were being prepared to be shipped. FAA's Mobile Asset Deployment Center stored and maintained FAA's mobile assets, such as air traffic control towers and housing units that FAA deploys to maintain service during disruptions such as natural disasters. Finally, we visited a 96-square-foot shack—identified in FRPP as a warehouse and pictured below—that housed an approach lighting system. (See fig. 2 for examples of FAA warehouses and property.)

**Figure 2: Examples of Federal Aviation Administration Warehouses and Property**



Spare antennas in the Logistics Support Facility at the Mike Monroney Aeronautical Center in Oklahoma City, Oklahoma



Components for wind shear alert system at the Staging Area in Independence, Missouri



Mobile air traffic control tower at the Mobile Asset Deployment Center in Independence, Missouri



A shack that houses a medium-intensity approach lighting system with sequenced flashers at the Charles B. Wheeler Downtown Airport in Kansas City, Missouri



Source: GAO. | GAO-20-228

**Office of Science.** Most Office of Science warehouses were located at Office of Science national laboratories. Warehouses at the two national laboratories we visited—Argonne National Laboratory and Fermi National Accelerator Laboratory—contained a broad variety of equipment, including equipment being staged for near-term use and equipment in longer-term storage specifically designated for future projects. For example, one warehouse at Fermi National Accelerator Laboratory contained a cryogenic system acquired by CERN, the European Organization for Nuclear Research, as its contribution to a planned experiment. This cryogenic system will be used for cooling purposes. A warehouse at the same site also contained some decades-old items kept as replacements for items still in use. According to officials, many of these older items would be difficult to obtain in a reasonable time frame for a reasonable price if a replacement were needed. In addition, at Fermi National Accelerator Laboratory, we saw a large, out-of-use calorimeter—a device commonly used in physics experiments—that was being stored

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for eventual use in an educational display. Warehouses also contained parts, materials, and supplies for laboratory use. (See fig. 3 for examples of Office of Science warehouses and property.)



Figure 3: Examples of Department of Energy's Office of Science Warehouses and Property



Exterior of a warehouse at Argonne National Laboratory in Lemont, Illinois



Interior of a warehouse at Argonne National Laboratory



Spare equipment held as a replacement part since 1991 in a warehouse at Fermi National Accelerator Laboratory in Batavia, Illinois



Gloves stocked in a warehouse for laboratory use at Fermi National Accelerator Laboratory



Out-of-use device that had been used in experiments and was being stored for eventual display in a warehouse at Fermi National Accelerator Laboratory

Source: GAO. | GAO-20-228

**BOP.** Most of the BOP warehouses were located at correctional institutions throughout the country, served similar functions, and contained similar types of property for inmate use, according to BOP headquarters officials and our review of BOP real property data. The two correctional institutions we visited each had a warehouse that served as a distribution center, where items arriving at the institution were received, processed, and sent to the appropriate personnel within the institution, and a food service warehouse, where food items used to feed the inmate population were stored. At one institution, non-perishable items for inmate use, such as uniforms, mattresses, soap, and toilet paper were stored at the distribution center, while the other institution we visited stored less property at the distribution center and expedited delivery to the relevant division. Additionally, one institution used a warehouse to store dairy equipment in support of an inmate-run dairy. (See fig. 4 for examples of BOP warehouses and property.)

**Figure 4: Examples of Bureau of Prisons Warehouses and Property**



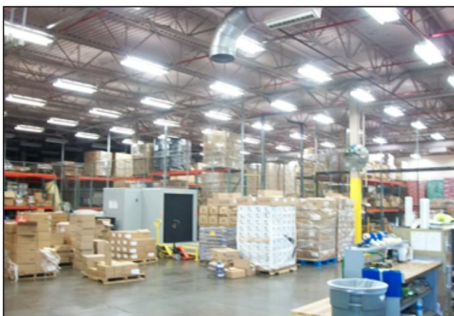
Exterior of a distribution center warehouse at Federal Correctional Institution El Reno in El Reno, Oklahoma



Interior of a food services warehouse at Federal Correctional Institution El Reno



Exterior of a warehouse used to store dairy equipment and materials at Federal Correctional Institution El Reno



Interior of a distribution center warehouse at United States Penitentiary Leavenworth in Leavenworth, Kansas



Mattresses for inmates in a warehouse at Federal Correctional Institution El Reno



Non-perishable food in a food services warehouse at United States Penitentiary Leavenworth

Source: Bureau of Prisons. | GAO-20-228

## Selected Agencies Tracked Warehouse Costs but Lacked Information on Property Storage Costs

All three selected agencies tracked certain direct costs for owned and leased warehouses, including operations and maintenance costs for owned warehouses and some leased warehouses, and the rental cost for leased warehouses (see table 2).

**Table 2: Warehouse Annual Rent and Operations and Maintenance Costs by Selected Agency in Fiscal Year 2018**

Dollars in millions

Agency	Annual Rent	Operations and Maintenance Costs <sup>a</sup>	Sum of Costs
Federal Aviation Administration	\$6.3	\$8.9	\$15.2
Department of Energy's Office of Science <sup>b</sup>	\$0.8	\$13.7	\$14.5
Bureau of Prisons	\$0.6	\$19.8	\$20.4
<b>Total</b>	<b>\$7.7</b>	<b>\$42.4</b>	<b>\$50.1</b>

Source: GAO analysis of Federal Real Property Profile and Department of Energy data. | GAO-20-228

Note: Cost information may have included data for some buildings that had been misclassified. Specifically, two of the three selected agencies indicated that some of the buildings we inquired about in the course of our review had been misclassified as warehouses and stated their intention to change the classifications in Federal Real Property Profile data. However, we determined that the data were sufficiently reliable to present the overall rent and cost information for the selected agencies' warehouses.

<sup>a</sup>Operations costs refer to costs for services related to the normal performance of functions for which the facility is used, such as utilities and cleaning services. Maintenance costs refer to costs for activities needed to maintain an asset's functionality and capacity such as inspections, preventative maintenance, and painting. This column presents operations and maintenance costs for both owned and, to the extent these costs are not included in annual rent, leased warehouses.

<sup>b</sup>Cost totals included costs for 12 warehouses that are owned or leased by Office of Science contractors.

Although the agencies had this cost information, they did not use it to systematically determine how much it costs to store their property in warehouses, whether at an aggregate or per-item level. Two features of how these agencies track property and warehouse costs would make it difficult to do so. First, as mentioned above, selected agencies did not have comprehensive information on items in warehouses, information that would be needed to determine per-item storage costs. Second, selected agencies generally incurred direct costs—rent, operations costs, and maintenance costs—at a warehouse level. However, because a warehouse may have had some of its square footage dedicated to other uses, such as office or laboratory space, it would be difficult to ascertain what percentage of costs would be allocated to storage versus these

other uses. Moreover, in some cases, operations costs, such as utilities, were incurred at a multi-building level, making it difficult to determine what portion of the bill is attributable to a single warehouse. Finally, selected agencies generally did not track indirect costs, such as personnel costs for conducting regular inventories and other administrative costs associated with storing property in their warehouses, according to agency officials.<sup>20</sup>

While none of the selected agencies systematically tracked property storage costs, we did identify one Office of Science site, one Department of Transportation site, and one Department of Justice site that analyzed the use of specific portions of warehouses for cost allocation purposes. Officials at these agencies said that this approach may create incentives for property custodians to identify excess property in a timelier manner.

- Argonne National Laboratory, within the DOE's Office of Science, annually analyzes direct costs for each building, including warehouses, and charges each division within the laboratory for the space it occupies. A report assessing contractor performance at DOE's Fermi National Accelerator Laboratory noted that implementation of such a system could be an effective way to hold divisions accountable for the number of items they have in storage.<sup>21</sup>
- The Department of Transportation and the Department of Justice each manage a warehouse near their respective headquarters that they use to store property for various divisions within each department. The departments charge users for the portions of the warehouses they occupy.

While these approaches may create incentives to identify unneeded property in a timely manner, they may not be applicable for all circumstances. For example, staff at Fermi National Accelerator Laboratory stated that they explored the cost and benefits of analyzing space use to allocate costs by user but had not found it to be cost-

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<sup>20</sup>Although selected agencies generally did not track indirect costs, FAA tracked some indirect costs in specific situations. For example, FAA's Logistics Support Facility tracked all costs and inventory valuation associated with items it managed for other FAA organizations, including the personnel costs associated with conducting complete inventory location counts, according to FAA officials.

<sup>21</sup>Department of Energy, *Technical Assessment of the Fermi National Accelerator Laboratory Personal Property Management System* (April 2018).



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effective or feasible. In addition, allocating costs based on warehouse usage would be challenging if users' space usage changes regularly.

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## Without Guidance, Selected Agencies Did Not Systematically Assess the Ongoing Need for Property in Their Warehouses

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### Two of the Three Agencies Specified When to Identify Some Types of Unneeded Property, but None Specified How to Assess Most Items for Ongoing Need

Two of the three agencies we reviewed had policies in place explaining the frequency in which property custodians should assess property for ongoing need. Specifically, the Office of Science and BOP had policies that called for identifying unneeded property beyond the statutory requirement to continually survey property to identify excess.<sup>22</sup> For example, DOE regulations, which cover the Office of Science, require managers to perform walkthroughs at least every 2 years to identify unneeded property.<sup>23</sup> According to officials, these walkthroughs are conducted by contractors that manage national laboratories. Similarly, BOP policy requires that property custodians conduct an annual site inspection to identify unneeded property prior to the annual inventory, and, according to officials, this process is overseen by the institution's associate warden.<sup>24</sup> In contrast, FAA policy does not set any timeframe for property custodians to identify unneeded property. However, according to one FAA headquarters official, assessing property for ongoing need is inherent to the inventory process, which, according to FAA policy, should occur at least every 3 years for accountable property.<sup>25</sup>

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<sup>22</sup>40 U.S.C. § 524(a)(2).

<sup>23</sup>41 C.F.R. § 109-25.109-1.

<sup>24</sup>Bureau of Prisons, *Property Management Manual*, Program Statement 4400.05 (2015). BOP institutions are managed by a warden and other officials, including an associate warden, who generally provide overall direction and implement policies.

<sup>25</sup>Federal Aviation Administration, *Order 4600.27C* (Sept. 4, 2015).

In addition, only DOE had specific requirements to determine if property is needed. Specifically, DOE regulation requires written justification for retention of property classified as equipment held for future projects.<sup>26</sup> If equipment is retained for longer than a year, the justification is to be reviewed by a higher level of authority, and retention of such equipment for longer than 3 years requires approval by the head of the DOE field organization.<sup>27</sup> The Office of Science Organizational Property Management Officer—who is responsible for reviewing contractors that manage Office of Science sites—reviewed sites’ adherence to this requirement using metrics, such as acquisition date and time in storage, according to officials.

Beyond this particular requirement for DOE, none of the agencies had a systematic way to identify property that may be unneeded. Instead, they primarily relied on professional judgment to determine the ongoing need for property in warehouses in the absence of guidance on how to determine whether property is still needed. For example, FAA officials confirmed that they do not have guidance or metrics on how to identify unneeded property and typically rely on property custodians’ professional judgment.<sup>28</sup> According to officials at one FAA site we visited, property custodians do not use specific criteria for identifying unneeded property because it is obvious when items are no longer needed. Similarly, at the BOP institutions we visited, officials confirmed that they rely on property custodians’ professional judgment, along with the judgment of associate wardens, to identify unneeded property during the annual site inspections, but acknowledged that this has led to different outcomes. For example, at one site we visited, site officials stated that some associate wardens are more inclined than others to require property custodians to identify property as unneeded.

While officials at all of the selected agencies said they believed property custodians were able to identify unneeded property in a timely manner using their professional judgement, we identified instances, through our

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<sup>26</sup>41 C.F.R. § 109–28.5004.

<sup>27</sup>41 C.F.R. § 109–28.5004(d).

<sup>28</sup>However, organizations within FAA may establish procedures for identifying certain types of property as unneeded. For example, FAA policy requires a reutilization and disposition plan for property associated with aviation support systems deployed throughout the country. These plans are to include information about when and how components of the system are to be identified as unneeded. Federal Aviation Administration, *Order 4600.27C* (Sept. 4, 2015).

interviews and agency assessments, where agencies had retained unneeded property in storage. While the agencies identified and in most cases addressed these instances, these situations demonstrate the challenges associated with agencies' existing approaches. Specifically:

- A 2016 report from DOT's inspector general found that FAA property custodians allowed obsolete computers to remain on the property records, including computer systems manufactured in 2006 or earlier that were likely no longer in use because of their 3- to 4-year lifecycles.<sup>29</sup>
- In 2018, a review found that Fermi National Accelerator Laboratory's contractor was storing IT equipment, which had not been classified as equipment held for future projects, dating back to 1998.<sup>30</sup> The report recommended that the contractor review all IT equipment for continued need and that certain items be removed from the active inventory in their asset management system.
- BOP headquarters officials told us that, when assisting regional office personnel in training a new property official at an institution, they noticed the institution was storing inmate clothing that exceeded the institution's needs. According to the officials, they worked with the new property official to transfer the clothing from the institution to another BOP institution that needed it.

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## Stakeholders Identified Systematic Methods to Assess Property for Ongoing Need

Selected agencies' limited guidance on how to identify unneeded property and reliance on professional judgment were not unique to the agencies in our review. For example, in a previous review that examined five agencies—Environmental Protection Agency, Forest Service, GSA, Department of Housing and Urban Development, and Internal Revenue Service—we found that selected agencies did not have policies and processes for identifying unneeded property on a proactive basis and

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<sup>29</sup>In response to the DOT inspector general's finding, FAA stated it would develop a National Personal Property and Oversight and Evaluation program along with metrics to assess the effectiveness of the agency's property management system. According to officials, FAA established a committee that attempted to develop such metrics, but after having limited success in producing consistent metrics from the data they had available, they discontinued the effort in 2018.

<sup>30</sup>Department of Energy, *Technical Assessment of the Fermi National Accelerator Laboratory Personal Property Management System* (2018).

relied on “triggering events,” such as an office move to make excess property decisions.<sup>31</sup> Moreover, the industry and standards-setting groups we interviewed for this review indicated that these approaches were common across the federal government.

However, the industry stakeholders and federal agencies that participated in ICPM that we interviewed identified more systematic ways to identify unneeded property. For example:

- **Periodic justification for continued storage.** One agency implemented a policy in 2013 requiring written justification to retain certain accountable property for certain time periods, with the time period varying for different types of property. After the initial storage time period, written justification for continued storage must be reviewed and approved by an official who is above the property custodian. According to property officials, this policy has contributed to an estimated 35 to 40 percent reduction of property held in storage.
- **Data analytics.** Officials from another agency stated that they use a logistics management application to track and analyze information, such as property age, amount, rate of usage, and warehouse space availability. As a result, the agency has identified and disposed of excess property at various warehouses that otherwise would likely have been retained.<sup>32</sup> For example, according to officials, analysis conducted using this application on idle property in one warehouse informed the decision to identify as unneeded a significant amount of furniture. A previous manager had acquired the furniture for use in staff housing, but the items were not well-suited to available housing in the area.
- **Utilization reviews.** Industry groups we interviewed advocated for increased use of data to assess utilization to inform decisions on whether to retain stored property, such as utilization reviews that systematically assess property utilization and continued need. For example, when conducting a utilization review, one stakeholder recommended a process that begins with pinpointing where the inactive population of property items reside. Upon locating anything that has been inactive for a certain

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<sup>31</sup>[GAO-18-257](#). We recommended that OMB provide guidance to executive agencies on managing their property, emphasizing that agencies’ policies or processes should reflect the requirement to continuously review and identify unneeded property. The agency did not comment on the recommendation and has not yet taken action to implement it.

<sup>32</sup>According to the agency’s annual performance report, the agency achieved \$1.6 million in warehouse reduction costs in fiscal year 2018 resulting from inventory optimization efforts, which included data analytics, conducted at 10 posts.



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period of time, within a certain storage area, those items are identified as candidates for disposal. After the results come in, the property custodians can recommend that a certain amount of items on the overall list are marked for disposal.

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### Limited Guidance Exists for Property Management

While some stakeholders identified systematic ways to identify unneeded property in certain circumstances, limited government-wide guidance exists for agencies to use to determine whether property in warehouses is still needed and being used. Specifically, there are two sources for guidance related to assessing property in warehouses for ongoing need:

- **ASTM's standards for strategic warehousing and storage of property.** The standard for strategic warehousing notes that entities often continue a warehouse activity largely because it is easier than going through the effort of dismantling it. It urges that entities consider whether warehousing is needed. Furthermore, the standard asserts that a sound business case should be in place to support storage of property, including a decision of whether the items need to be warehoused. The standard for storage of property notes that entities should deploy an inventory management system to track incoming and outgoing assets; such a system can help in developing performance metrics for stored items.
- **GSA's federal warehousing bulletin.** This bulletin references the two ASTM standards identified above and discusses the importance of critically assessing the need for items in storage, but provides limited information on how to make such assessments.<sup>33</sup>

According to GSA officials, the use of voluntary consensus standards, such as ASTM standards, can assist agencies with property management. However, only one agency official we interviewed stated that voluntary consensus standards informed the agency's policy; the others we interviewed were either unaware of the standards or said the standards were not relevant to agency policy or practice.

The FPPMA requires agencies, in accordance with GSA guidance, to inventory and assess property. As part of such assessments, it calls for

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<sup>33</sup>General Services Administration, *Federal Warehousing and Storage of Assets*, Bulletin FMR B-44 (Washington, D.C.: May 2, 2017).

evaluations of the age and condition of the property and the extent to which the agency uses it. According to officials at the selected agencies, they are waiting for guidance from GSA before taking steps to implement FPPMA.

According to GSA officials, they are in the process of developing informal guidance on minimizing and identifying excess property to meet this requirement because FPPMA did not provide GSA additional authority to issue regulations or formal guidance. In particular, GSA developed draft guidance, which incorporated principles from a new ASTM standard on identifying and reducing excess property that GSA officials expect will be issued in early 2020, and provided it to ICPM participants for review and comment in September 2019. According to GSA officials, this informal guidance will be issued in December 2019. GSA officials plan to include the guidance on the GSA website and disseminate it to ICPM participants and may provide it in hard copy at relevant GSA events.

The draft guidance we reviewed encourages agencies to designate an individual to manage an agency's asset management program and use that system to capture and provide information on property age, condition, utilization, and mission dependency on a real-time basis, among other things. The draft guidance also included some criteria agencies could use to identify excess property.

However, the guidance did not provide specific approaches or practices agencies could use to assess property utilization, including property stored in warehouses. The draft guidance and an accompanying strategy document indicate that GSA will collect best practices and incorporate them into the guidance, but GSA officials did not specify what types of best practices it plans to include or provide a timeline for doing so. Including additional information on approaches or practices agencies can use to assess property use and ongoing need—such as periodic property justifications, data analytics, and utilization reviews—could assist agencies in fulfilling their FPPMA requirements.

Moreover, GSA officials did not provide a documented plan or time frame for communicating the guidance beyond publishing it on GSA's website and disseminating it to ICPM members, an approach that can limit the reach and awareness of this information to agencies government-wide.

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As we have previously reported, work by others has shown that inaction on unneeded government property can limit its efficient use.<sup>34</sup>

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## Conclusions

As agencies continue efforts to manage their warehouse space in accordance with government-wide initiatives, improvements to how agencies assess property utilization and identify unneeded property in warehouses could enhance these efforts. The agencies in our review did not systematically assess their property for ongoing need and in some cases, retained unneeded property. More broadly, agencies across the government are operating without the benefit of government-wide guidance that could help assess their property for ongoing need in a systematic manner. With the recent enactment of FPPMA, an opportunity exists for GSA to develop and communicate guidance to help agencies assess property utilization and identify unneeded property in warehouses more efficiently that includes practices GSA identifies as being useful. Such guidance could help agencies avoid retaining property that is no longer needed and, as a result, allow them to better manage the use of their warehouse space.

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## Recommendation

The Administrator of GSA should direct the Office of Government-wide Policy (1) to incorporate into its guidance approaches or practices that agencies could use to assess utilization of and the ongoing need for property—approaches such as recommendations for periodic justifications, data analytics, and utilization reviews—and (2) to develop a plan and timelines for communicating the guidance to agencies government-wide. (Recommendation 1)

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## Agency Comments

We provided a draft of this report to GSA, DOT, DOE, and DOJ for review and comment. GSA concurred with our recommendation and provided written comments, which are reprinted in appendix II and summarized

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<sup>34</sup>[GAO-18-257](#).

below. DOT, DOE, and DOJ each stated in an email that they had no comments on the draft report.

In its written comments, GSA agreed with our recommendation and stated that it is further developing its guidance as well as a plan and timeline for dissemination of that guidance to executive agencies.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies of this report to the GSA Administrator, the Secretary of Energy, the Attorney General, and the Secretary of Transportation, and other interested parties. In addition, the report will be available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff members have any questions regarding this report, please contact Lori Rectanus at (202) 512-2834 or [rectanusl@gao.gov](mailto:rectanusl@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report are listed in appendix III.



Lori Rectanus  
Director, Physical Infrastructure Issues

# Appendix I: Objectives, Scope, and Methodology

This report addresses: (1) what is known about property in selected federal agencies' warehouses and how much they spend to store this property and (2) the extent to which selected agencies assess the ongoing need for property stored in warehouses.

To address both objectives, we selected three agencies for analysis—the Federal Aviation Administration (FAA) within the Department of Transportation; the Office of Science within the Department of Energy (DOE); and the Bureau of Prisons (BOP) within the Department of Justice. We limited our scope to civilian agencies because we have already done extensive work on property management within Department of Defense.<sup>1</sup> At the department level, we used Reduce the Footprint data from fiscal year 2017 because they were the most current data available when we conducted the analysis to identify the top 10 departments in terms of warehouse square footage. To obtain variation among these agencies, we categorized these departments as large, medium, or small in terms of warehouse square footage and selected one from each category based on changes in square footage between fiscal years 2015 and 2017 using fiscal year 2017 Reduce the Footprint data and on the proportion of leased warehouse space to owned warehouse space using fiscal year 2017 Federal Real Property Profile (FRPP) data. Because none of the selected agencies manages property at the department level, we then selected a component within each department. For the Department of Transportation and the Department of Justice, we selected the components with the most warehouse square footage according to fiscal year 2017 FRPP data—FAA and BOP, respectively. For DOE, we used the agency's fiscal year 2017 real property data to identify the components with the most warehouse square footage because DOE reports most information to FRPP at the department level rather than for specific offices, such as the Office of Science. We then selected the

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<sup>1</sup>See, for example, GAO, *Defense Inventory: Further Analysis and Enhanced Metrics Could Improve Service Supply and Depot Operations*, GAO-16-450 (Washington, D.C.: June 9, 2016) and *Defense Inventory: DOD Needs Additional Information for Managing Ware Reserve Levels of Meals Ready to Eat*, GAO-15-474 (Washington, D.C.: May 7, 2015).

Office of Science, which had third highest amount of warehouse square footage, because of security concerns with one of the components with more warehouse square footage and because the other component with more warehouse square footage used a greater proportion of warehouse space to store nuclear and nuclear-related material.<sup>2</sup>

To determine what is known about property in selected agencies' warehouses, we interviewed headquarters-level officials regarding the agencies' property data, conducted site visits to view and photograph property stored in warehouses, and gathered information in interviews with agency officials. In selecting sites, we selected at least one site per agency that was among the largest in terms of warehouse square feet for that agency and at least one other site that was near one of the large sites, as described below:

- FAA: Mike Monroney Aeronautical Center in Oklahoma City, Oklahoma; Staging Area and Mobile Asset Deployment Center in Independence, Missouri; and Charles B. Wheeler Downtown airport in Kansas City, Missouri.
- Office of Science: Argonne National Laboratory and Fermi National Accelerator Laboratory in the Chicago area.
- BOP: U.S. Penitentiary Leavenworth in Leavenworth, Kansas, and Federal Correctional Institute El Reno in El Reno, Oklahoma.

For each agency, we also interviewed officials at the headquarters and regional levels. Information obtained from these sites and regional officials is not generalizable to the selected agencies, and information from these agencies is not generalizable to other agencies.

To determine how much selected agencies spend to store property in warehouses, as well as the numbers and square footage of these warehouses, we analyzed FRPP data from fiscal year 2018 for FAA and BOP, and DOE fiscal year 2018 real property data for the Office of Science because DOE reported most data to FRPP at the department level; both sources included information about direct costs such as rent, operations, and maintenance costs. We used FRPP data from fiscal year

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<sup>2</sup>In the absence of a more precise category in FRPP data, DOE reports as warehouses in FRPP specialized facilities used to store nuclear material, nuclear-contaminated material, and nuclear waste. In DOE's real property data, these types of specialized facilities are tracked separately.

2018 because that was the most recent data available when we conducted our analysis and DOE data covering the same period to be consistent. We reviewed documentation related to these data sources, interviewed knowledgeable officials, and determined that these data were sufficiently reliable for providing information about warehouse numbers, square footage, and the costs listed above.

To determine the extent to which selected agencies assess the ongoing need for property stored in warehouses, we reviewed statutes, regulations, GSA guidance, our prior work, reports by federal agencies' Offices of Inspector General, and relevant industry standards related to property storage and warehousing practices.<sup>3</sup> In addition, for selected agencies we analyzed property policies and procedures for identifying and disposing of unneeded property and interviewed headquarters, regional, and site officials. We also interviewed three industry stakeholders—two property-management and one standards-setting organization—to discuss property storage and warehousing processes, practices, and standards that agencies could use to assess the ongoing need for property.<sup>4</sup> We selected these organizations based on their knowledge about property management practices. Furthermore, we interviewed officials from four agencies—Census Bureau, Department of State, Internal Revenue Service, and National Aeronautics and Space Administration—that participate in the Interagency Committee on Property Management (ICPM), a committee chaired by GSA that consists of executive agency representatives interested in federal property. We invited all ICPM participants to speak with us regarding their practices for identifying unneeded property and interviewed all participants who volunteered to participate to understand how other agencies assess property for ongoing need. Finally, we reviewed FPPMA's requirements and interviewed GSA's Office of Government-wide Policy officials about GSA's role in assisting agencies in identifying unneeded federal property, how FPPMA could affect GSA's roles and responsibilities going forward, and GSA's progress in implementing FPPMA.

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<sup>3</sup>GAO, *Federal Real Property Asset Management: Agencies Could Benefit from Additional Information on Leading Practices*, [GAO-19-57](#) (Washington, D.C.: Nov. 5, 2018) and *Federal Personal Property: Opportunities Exist to Improve Identification of Unneeded Property for Disposal*, [GAO-18-257](#) (Washington, D.C.: Feb. 16, 2018).

<sup>4</sup>The two property management organizations we interviewed were National Property Managers Association and Asset Leadership Network. The standards-setting organization we interviewed was ASTM International, which was formerly the American Society for Testing and Materials.

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We conducted this performance audit from October 2018 to December 2019 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.



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# Appendix II: Comments from the General Services Administration

Appendix II: Comments from the General  
Services Administration



The Administrator

December 12, 2019

The Honorable Gene L. Dodaro  
Comptroller General of the United States  
U.S. Government Accountability Office  
Washington, DC 20548

Dear Mr. Dodaro:

The U.S. General Services Administration (GSA) appreciates the opportunity to review and comment on the Government Accountability Office's (GAO) draft report titled *FEDERAL PROPERTY: GSA Guidance Needed to Help Agencies Identify Unneeded Property in Warehouses* ([GAO-20-228, December 2019](#)).

To help executive agencies better manage the warehousing and storage of unneeded personal property, GAO made one recommendation for GSA:

The Administrator of GSA should direct the Office of Government-wide Policy to incorporate into its guidance approaches or practices agencies could use to assess utilization of and the ongoing need for property such as recommendations for periodic justifications, data analytics, and utilization reviews, and to develop a plan and timelines for communicating the guidance to agencies government wide.

GSA concurs with the recommendation and is further developing its guidance, in accordance with 40 U.S.C. § 524(a)(13), as well as a plan and timeline for dissemination of that guidance to executive agencies.

If you have any questions, please contact me at (202) 969-7277 or Jeffrey A. Post, Associate Administrator, Office of Congressional and Intergovernmental Affairs at (202) 501-0563.

Sincerely,

A handwritten signature in blue ink that reads "Emily W. Murphy".

Emily W. Murphy  
Administrator

cc: Lori Rectanus, Director, Physical Infrastructure Issues, GAO

1800 F Street, NW  
Washington, DC 20405-0002  
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# Appendix III: GAO Contact and Staff Acknowledgments

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## GAO Contact

Lori Rectanus, 202-512-2834, [rectanusl@gao.gov](mailto:rectanusl@gao.gov)

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## Staff Acknowledgments

In addition to the individual named above, the following individuals made important contributions to this report: Nancy Lueke (Assistant Director), Rebecca Rygg (Analyst-in-Charge), Terence Lam, Malika Rice, Kelly Rubin, Patrick Tierney, Laurel Voloder, and Crystal Wesco.

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# Appendix IV: Accessible Data

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## Agency Comment Letter

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### Accessible Text for Appendix II Comments from the General Services Administration

December 12, 2019

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Comptroller General of the United States

U.S. Government Accountability Office

Washington, DC 20548

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If you have any questions, please contact me at (202) 969-7277 or Jeffrey A. Post, Associate Administrator, Office of Congressional and Intergovernmental Affairs at (202) 501-0563.

Sincerely,

Emily W. Murphy

Administrator

cc: Lori Rectanus, Director, Physical Infrastructure Issues, GAO

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