

Real Property Management

I. PURPOSE

This directive establishes the Federal Protective Service (FPS) Real Property Management policy and assigns program responsibilities to ensure that FPS space and facilities management complies with Federal regulatory requirements.

II. SCOPE

- A. This directive applies to FPS Headquarters, Regions, MegaCenters, and those FPS elements occupying shared spaces.

III. AUTHORITIES/REFERENCES

- A. OMB Management Procedures Memorandum No. 2015-01, Implementation of OMB Memorandum M-12-12 Section 3: *Reduce the Footprint (RTF Memo)*, March 2015.
- B. US Code, Chapter 42, U.S.C. § 4321-4335 (The National Environmental Policy Act of 1969).
- C. Chapter 36 Code of Federal Regulations (CFR) Chapter VIII, Part 800, *Protection of Historic Properties*, July 2012.
- D. Public Law 111-292, *Telework Enhancement Act*, December 2010.
- E. Interagency Security Committee, *Risk Management Process for Federal Facilities: An Interagency Security Committee Standard, 2nd Edition*, November 2016.
- F. GSA Explosive Canine Training Aids (ECTA) - *Policy for Storage of Explosive Materials in GSA Owned Buildings and/or on GSA-Owned Property*, 2015.
- G. DHS Delegation Number 00500 Revision 01, *Delegation to the Chief Readiness Support Officer*, issued June 5, 2012 and incorporating Change 1 issued May 25, 2018.
- H. DHS Instruction 119-02-001 Revision 1, *Real Property Manual*, July 2, 2010.
- I. DHS Directive 119-02, *Real Property Management Program*, December 10, 2012.
- J. DHS Instruction 119-02-003, *DHS Workplace Standards*, September 30, 2014.
- K. DHS Instruction 121-01-017-01, *Physical Security Construction and Equipment Specification Instruction Manual*, March 21, 2015.

- L. DHS Directive 023-01 Revision 01, *“Implementation of the National Environmental Policy Act,”* October 31, 2014.
- M. DHS Instruction 256-05-001, *“Worksite Lactation Program,”* May 19, 2016.
- N. DHS Instruction Manual 121-01-010-01, Revision #01.1, April 28, 2020.
- O. FPS Directive 15.5.12.1, *“Firearms Policy,”* December 15, 2010.
- P. FPS Directive 15.4.7.1, *“Worksite Lactation Program,”* May 10, 2016.

IV. DEFINITIONS

- A. **Acquisition:** The process by which an executive agency obtains custody of and interest in real property (by means of transfer, purchase, construction, lease, or permit) for its own use in carrying out established agency mission(s). Acquisition can also be acquired through Memorandum of Agreements (MOA).
- B. **Delegation of Authority:** ASD Facilities has delegated Authority to manage real property projects, operations and maintenance (O&M) for FPS HQ, Regions and Field Offices with GSA, including signature authority on all MOA and O&M Reimbursable Work Authorization (RWA) documents. Currently DHS Management (MGMT) retains the Authority through the DHS Director of Management (DoM) for signature authority on Occupancy Agreements (OA) with GSA and Construction RWA documents.
- C. **Demarc:** A demarc (an abbreviation for demarcation point) marks the point, in space controlled by FPS, where communications lines (i.e. data or telephone communications) connect to the data or telephone company."
- D. **Operations and Maintenance (O&M):** The functional checks, servicing, repairing or replacing necessary equipment, devices, machinery, building infrastructure and supporting utilities in government installations; to include damage and/or wear and tear of tenant improvements.
- E. **Real Property:** Land and improvements constructed on or associated with that land. Improvements include buildings, other permanent structures, easements, or rights of way.
- F. **Shared Spaces:** This may also be referred to as *“space consolidation”*; it includes but is not limited to FPS and other Sub-Component co-location to reduce lease space expenses.
- G. **Space Consolidations:** May be sought after in lieu of new, expired OA and expansion space requests. For all space consolidation efforts, FPS HQ will conduct an analysis to determine if an employee/facility consolidation is warranted. Efforts will be geared toward reducing real estate expenses and maximizing space efficiency. Space consolidation options may be sought after in lieu of new, expired OA and expansion space requests. For all space consolidation efforts, FPS HQ will conduct an analysis to

determine if an employee/facility consolidation is warranted. Efforts will be geared toward reducing real estate expenses and maximizing space efficiency.

- H. **Space Disposal:** The process by which FPS no longer requires the utilization of the asset or structure. GSA is responsible for promoting effective use of federal real property assets, as well as the disposal of real property that is no longer mission-critical to federal agencies.
- I. **Space Request Form (SRF):** Standardized form on the Facilities SharePoint site, used by FPS requesting party, for all additions, modification, or deletions of space.
- J. **Underutilized:** Whenever all or a portion of real property, with or without improvement, is used only for irregular periods, or intermittently; or when a portion of the property can satisfy current program needs.
- K. **Utilization:** The manner and degree of efficiency with which real property controlled by FPS is used in the accomplishment of its mission(s).

V. RESPONSIBILITIES

- A. **Deputy Director for Technology and Innovation (DD T&I):**
 - 1. Appoints the Administrative Services Division (ASD) Director;
 - 2. Attends Management Review Committee (MRC) meetings; and
 - 3. Has approval authority over HQ Space Requests and or Real Property changes prior to Office of the Chief Readiness Support Officer (OCRSO) MGMT approval.
- B. **Assistant Directors for Operations (ADFOs):**
 - 1. Appoint the zone's Business Operations Manager (BOM);
 - 2. Approve or deny prioritized projects list from their BOM; and
 - 3. Review and approve all personnel moves and hiring actions within their appointed zone.
- C. **Business Operations Manager (BOM):**
 - 1. Reviews the prioritized projects list from Regions and provides input on termination or project requests (emergency or urgent) that are not included in the approved FPS Annual Project List; and
 - 2. Is responsible for Operations and Maintenance oversight and provides input to ADFO and or approvals.
- D. **Director, Administrative Services Division (ASD):**
 - 1. Is responsible for all aspects of the Real Property Management Program; and
 - 2. Provides oversight and internal controls for the Real Property Management Program (this includes financial planning, integration and coordination measures).

E. Regional Directors (RDs):

1. Review and approve purchase requests (furniture or appliances) of less than \$1000;
2. Oversees the FPS Real Property for their region, including all upgrades and Operations and Maintenance oversight; and
3. Approves the overall Region budget for all O&M costs unless they are related to facilities projects, in which case the Facilities Branch Manager secures funding.

F. Resource Management Branch Chiefs (RMCs):

1. Coordinate with facilities zonal managers for all space requests utilizing the Space Request Form (SRF) and reviews and approves or denies requests prior to sending to the Facilities Branch Manager;
2. Responsible for maintaining all of the buildings within their region and ensuring compliance with the DHS guidelines and the Space and Facilities Real Property Guide, maintaining compliance with 150 square foot per person utilization rate; and
3. Coordinate all requests for furniture and funding of \$1000 or less.

G. The Facilities Branch Manager (Facilities):

1. Manages the FPS Real Property Management Program, in accordance with DHS Directive 119-02, "*Real Property Management Program*," December 10, 2012, by ensuring that it adheres to policies, laws, regulations, directives, and other guidance (such as the Risk Management Process for Federal Facilities: An Interagency Security Committee Standard);
2. Reviews and approves all Requisitions–Materials–Supplies–Equipment G-514 Forms, Reimbursable Work Authorizations (RWAs), Purchase Card Transaction Request (PCTWs), Occupancy Agreements (OAs), Memorandum of Agreements (MOAs), and internal fund transfers;
3. Plans, manages and monitors facility construction, operations & maintenance (O&M), and the executing of the program's budget and leases (acquisition, disposal, expiration notifications and utilization of space);
4. Serves as the FPS representative to DHS, GSA, and other agencies in coordinating nationwide FPS Real Property Management Programs;
5. Develops and implements internal procedures, management controls, and audit preparation strategies regarding space and real property management;
6. Monitors efficiencies through rent analysis (analytics), customer feedback, and site visits to make recommendations for changes to the FPS Real Property portfolio;
7. Conducts periodic surveys or site visit assessments;
8. When requested or directed, resolves any Space/Real Property issues that arrive from GSA or DHS Management;
9. Maximizes collocation or shared space opportunities with other agencies;
10. Establishes ground rules/issues for sharing resources at collocated facilities;

11. Serves as agency lead responsible for documenting and monitoring all space assignments, space utilization, and right sizing;
 12. Coordinates all requests for facility and workspace reconfiguration, including movement of personnel and equipment; and
 13. Ensures requests for facility/workspace assignment and reconfiguration are integrated with other service providers for information technology, furniture, security, and telecommunications.
- H. **Project Management Division (PMD)** assists the Real Property Management Program Office with reviewing and coordinating acquisition packages with the FPS Acquisition Division (FPSAD)
- I. **FPS Acquisition Division (FPSAD)** assists the Real Property Management Program Office with the procurement of the real property requests submitted by PMD, Regional offices, and other Headquarters elements.
- J. **Financial Management Division (FMD)** assists the Real Property Management Program Office for the processing and approval of all financial obligations, documentation and securing funds necessary to fulfill all space and real property actions.
- K. **Current Operations Division (COD)** assists the Real Property Management Program Office with providing operational standards and requirements relating to K9 officers.
- L. **Information Technology Division (ITD)** assists the Real Property Management Program Office and stakeholders to provide a turn-key solution for the installation, repair, project scope development and integration of IT, Telecom and VTC systems.
- M. **Environmental Compliance Office (ECO)** assists the Real Property Management Program Office by providing technical subject matter expertise (SME) for FPS actions to assure compliance with the National Environmental Policy Act (NEPA), and other applicable environmental, cultural, tribal, sustainability, energy laws and Executive Orders (EOs).

VI. POLICY AND REQUIREMENTS

- A. **General Policy.** Space management and administration within FPS is subject to oversight by the DHS OCRSO. OCRSO is responsible for establishing the DHS policy for space and real property management for which the FPS Real Property Management program is required to comply.
- B. **Space and Real Property Program Requirements.**
1. Administration and oversight: All space requests received will be reviewed and validated against the current utilization standards for suitability prior to expanding the current footprint.
 2. Space designs: All space designs will utilize open plan concept (when practical)

to maximize workspace effectiveness and promote collaborative, fair, safe, and transparent work environment.

3. Workspace sizes: The standard workstation size is 36 square feet (sf). Office sizes range from 100sf to 180sf. Each employee makes up a percentage of the total office space that includes workstations, offices, support spaces, circulation, and shared spaces. Any exceptions that exceed the standard must be justified in writing by the requester to the Real Property Management Program Manager. Refer to FPS Instruction Manual 15.2.6.1-01 – Real Property Management (Attachment A) for appropriate space allocation based on personnel positions (Section 6.9 – Space Allocation).
 4. Operations: This includes O&M which is responsible for the daily management facilities and equipment life cycle, to include above standard building services, such as custodial, solid waste management (including recycling), heating and cooling, tenant alterations, minor repairs, and building maintenance.
- C. The **Space Acquisition Process** is comprised of four milestones/phases: Initiation, Design, Construction, and Close-Out.
1. **Initiation Phase** (identifies the need for a project, defines the scope/requirements, and seeks funding approval).
 - a. The FPS requesting party must submit an SRF through the share point site.
 - b. Upon receipt of the SRF, the BOM will review all requests above \$1000 RMC to review all requests below \$1000) for approval or denial.

Note: ECO reviews all request regardless of dollar value
 - c. If approved by the ADFO, Facilities submits a Program of Requirements (POR) to the FPS requesting party for review and concurrence.
 - d. If the FPS requesting party approves the POR, Facilities will submit the Project Requirement Package to OCRSO, Real Property, for approval and transmission to GSA. If denied, the response will be generated automatically by the SharePoint site and the Regional POC will be notified
 2. **Design Phase** (identifies the space, incorporates the program requirements into design drawings and construction drawings):
 - a. Identification of space: Facilities will notify the FPS requesting party of the location(s) identified by GSA that meets the POR. ECO will also review potential sites for compliance with NEPA and other laws/EO's (property may fall under National Historic Preservation ACT)
 - b. Acquisition: Once the space is approved, GSA will submit an OA to OCRSO, Real Property, with a copy to Facilities to initiate the space acquisition process. Facilities reviews the OA for concurrence. If

approved, Facilities sends approval to OCRSO for signature and forwarding to GSA. If Facilities does not concur, they either engage with GSA to revise the OA or reject the OA in its entirety.

- c. Design Kick-Off: GSA will organize a design kick-off meeting (which will include the ECO when applicable), which includes the FPS requesting party's representative, to develop Design Intent Drawings (DIDs). The design includes furniture and other details throughout the space and are produced after the initial layout is approved by Facilities. GSA typically allows two rounds of reviews, but no more than three (35%, 70%, 90%) rounds of reviews and comments before finalizing the elements of the DID. The development of the DID will involve the coordination from the BOM, in cooperation with Facilities, ITD, and other Subject Matter Experts (SMEs) to meet the design criteria expressed in the POR. The information in the DIDs contains the foundation of design criteria that will be further developed and engineered during the Construction Drawings (CD) Phase. The final DID must be approved by Facilities Manager before transitioning to the CD phase. The content of the DID typically includes the following elements:
 - 1) Demolition (if applicable);
 - 2) Partition (wall) plan;
 - 3) Electrical plan (power and data drops, communications and cameras, etc.);
 - 4) Furniture plan;
 - 5) Ceiling plan;
 - 6) Wall types;
 - 7) Door Hardware;
 - 8) Finish Specifications (wall and floor finishes, etc.); and
 - 9) Other elements may include security and audio-visual infrastructure.
 - d. Construction Drawings (CD): The GSA will review the approved DID received from Facilities Manager, then initiate architect-engineer (A-E) design and construction drawings. GSA typically submits draft CDs at various stages (i.e. 90%, 100%) to Facilities for review and comments. GSA incorporates all corrections into revised CDs for final approval by Facilities. Once 100% CDs are approved by Facilities, GSA submits an Independent Government Cost Estimate (IGCE), based on the final CD, to Facilities for RWA funding for the project. Once RWA funding is submitted and accepted by GSA, the project transitions to the Construction Phase.
3. **Construction Phase** (the period where the construction work commences and inspection milestones [integration of support services: security, IT, Telecom, and etc.] take place.) It is managed by GSA Project Managers in partnership with Facilities. The GSA partners with Facilities, to manage all aspects of the design, construction, and build out.

- a. Construction build-out: GSA offices offer centralized responsibility and accountability and start-to-finish management of each project. Project managers drive the delivery process, helping to achieve faster decision making and day-to-day leadership of the project team. The project team is composed of the architect-engineer, the construction manager, Facilities, ITD, GSA client/tenant groups, property development professionals, and other program offices. Construction build-out includes pre-construction activities (i.e. swing space relocations - if required), demolition/clearing of proposed space, award of the construction contract, construction build-out and site improvements, integration design specifications (i.e. IT, telecom, security) furniture, relocation services, etc.
- b. IT/Telecom installation and activation: The GSA integrates the installation of IT/telecom solutions into the construction build-out (i.e. network cabling, connectors, network switch, UPS, power, demarc extensions, network racks, patch cables, VTC system, telecom system and components) based on the approved IT Statement of Work (SOW) requirements provided by ITD during the design phase. IT/telecom infrastructure installation is co-managed by ITD and GSA.

Note: The IT and telecom system activation and network configuration are the responsibility of ITD.

- c. Security installation: The GSA integrates the installation of security into the construction build-out (i.e. door hardware and locks, access and camera control system infrastructure, etc.) based on the approved requirements provided by Facilities during the design phase.

Note: The security system hardware and technology system installation may be performed by a GSA contractor or funded and installed by FPS.

- d. Furniture installation: This activity may involve the procurement of new furniture, acquiring excess or pre-owned furniture, relocation of existing furniture and/or the excess or removal of existing furniture. Facilities may solicit a turn-key services with GSA to provide a comprehensive furniture solution based on approved requirements. These actions should be determined and initiated during the initiation and design phase for integration and execution during the construction phase.

4. **Close-Out Phase** (the process of finalizing all activities for the project). As part of close-out services, GSA provides the following:

- a. A copy of the As-Built CD drawings (reflecting what was actually built into the space);
- b. A copy of Equipment Technical / Service Manuals;

- c. Commissioning of the facility (testing of operating systems and components, providing test and balance reports, validating contract fulfillment, etc.);
- d. Initiating Termination / Disposal of Vacated Space (as needed);
- e. Identification and/or removal of excess furniture (as needed);
- f. Completing RWA closeout letters;
- g. Submitting the final OA for billing to OCRSO Real Property; and
- h. When applicable, written confirmation of how environmental and historic preservation conditions met and copies of any required reports or permits.

D. Utilization of Sustainable Products and Services, Reuse, Recycling, and Disposal.

- 1. FPS is committed to reducing waste, cutting costs, enhancing the resilience of Federal infrastructure, operations, and enable more effective accomplishment of its mission.
- 2. FPS will maximize opportunities to increase efficiencies in energy and sustainability requirements by installing fixtures that reduce resource intensity use and purchase products and services that are bio-preferred and bio-degradable.
- 3. To the maximum extent possible FPS will audit for reuse interior elements (fixtures, furniture) prior to purchasing new.
- 4. Refer to the FPS Real Property Manual for more information on these topics.

E. Reporting

- 1. The ECO shall maintain accountability and track progress, the following reports may/will be requested throughout the fiscal or calendar year:
 - a. Waste diversion/disposal;
 - b. Instances of reuse of interior fixtures and cost savings; and
 - c. Others (i.e., reduction of overtime utilities and underutilized storage space).
- 2. Additional reporting information is available in the accompanying Manual.

VII. ATTACHMENT

- A. FPS Instruction Manual 15.2.6.1-01, Real Property Management.

VIII. QUESTIONS

Address any questions regarding this directive to the Directives Manager at FSPolicy@fps.dhs.gov.



L. Eric Patterson
Director
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11/19/2020

Date