

Interagency Committee on Property Management (ICPM)
GAO 104626 Working Group Recommendations
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Background

The GAO published a [report](#) on June 28, 2022, entitled “Federal Personal Property: Better Internal Guidance and More Action from GSA Are Needed to Help Agencies Maximize Use of Excess,” which found that executive agencies may not be maximizing the use of excess property. The report also identified four critical components of the Federal Management Regulations (FMR) in the consideration of excess which should be incorporated and operationalized in agency guidance. As part of GSA’s corrective action plan, GSA committed to leading a Working Group (WG) composed of members of the Interagency Committee on Property Management (ICPM). The WG assessed current agency policies on the acquisition of excess personal property and developed recommendations to increase the promotion and consideration of excess property.

Agency Research

The ICPM WG members began by examining their individual agency’s level of excess personal property consideration and promotion, and the extent to which their agency had formal guidance on the consideration of excess personal property before new procurements. In conducting this agency research, they used the following methods:

- Stakeholder Identification and Interviews:
 - Identified the stakeholders within their agency and conducted interviews to discuss how they are currently promoting and obtaining excess property
 - Uncovered stakeholder challenges and successes in acquiring excess property
- Guidance Review:
 - Obtained informal and formal guidance at their agency and reviewed it for the four critical Federal Management Regulation (FMR) components in the consideration of excess personal property

The ICPM WG members conducted research using the following questions as a guide:

Your Agency’s Current State

- How is your agency currently promoting excess as the first source of supply?
 - Do you have training directed towards using excess?
 - Do you have any internal communication efforts to drive the use of excess?
 - Do you have any formal guidance which includes the four key elements of the FMR in the consideration of excess? Please refer to pages 17-23 of the Final Report.
 - (1) Requirement to consider excess
 - (2) Roles and responsibilities identified and defined

- (3) Determining when it is practicable to check for and obtain excess property
 - (4) Evaluating the suitability of excess to meet personal property needs
- Who are the stakeholders at your agency involved in considering excess property and in new procurements?
 - What is the relationship/interaction between the stakeholders?

Obstacles

- What obstacles are preventing your agency from obtaining excess property?
Common examples include:
 - Shipping / transportation costs
 - Specific property needs
 - The condition of excess property
 - Determining when the acquisition of excess property is appropriate
- What obstacles are preventing acquisition personnel from considering excess property?
 - Do they know about excess property and the requirement to consider excess before initiating new procurements?
 - Do they know how to obtain excess property?
- What barriers are preventing acquisition and disposal personnel from interacting?

Recommendations

- What improvements do you recommend to policies and guidance for acquisition professionals?
- How can GSA and the ICPM WG improve policies and guidance that would contribute to the consideration of excess as the first source of supply?
- What improvements can your agency make internally which would result in the effective consideration and acquisition of excess property?

Recommendations

The ICPM WG recommends the following to increase the promotion and consideration of excess personal property:

- Recommendation 1: Strengthen Excess Personal Property Guidance
- Recommendation 2: Increase Training Opportunities and Communication
- Recommendation 3: Regulatory Updates
- Recommendation 4: Improve Information Technology
- Recommendation 5: Conduct Further Research

Recommendation 1: Strengthen Excess Personal Property Guidance

1a. Excess Personal Property Consideration Guide

One of the ICPM WG recommendations is to develop a guide which will help explain and operationalize the four key requirements in the FMR in the consideration of excess personal property.

The FMR at 41 CFR Part 102-36 outlines four key requirements in the consideration of excess personal property. These requirements are essential to include in a Federal agency's internal guidance.

The four essential elements in the FMR are:

- (1) Considering Excess¹
- (2) Defining Roles and Responsibilities²
- (3) Determining When It Is Practicable to Check for and Obtain Excess³
- (4) Evaluating the Suitability of Excess to Meet Personal Property Needs⁴

The ICPM WG will lead an effort to operationalize the four key elements and work collaboratively across the ICPM community to develop this guidance document. Federal agencies can then use this guidance document to strengthen their own internal guidance and procedures.

1b. Internal Agency Guidance and Procedures

The ICPM WG recommends that agencies strengthen their own internal guidance and procedures on the promotion and consideration of excess personal property. This can be accomplished by the following:

- Guidance:
 - Include a section in agency acquisition guidance to consider excess personal property as a required source of supply and include information on the practicality of checking for excess
 - Draft and issue agency-wide policy on the use of excess personal property
- Roles and Responsibilities:
 - Identify clear roles and responsibilities for screening excess within the acquisition process
 - Update purchase card and procurement guidance on who checks for excess property at the agency

¹ FMR [41 CFR 102-36.45\(a\)](#)

² FMR [41 CFR 102-36.45\(b\)](#)

³ FMR [41 CFR 102-36.35\(a\)](#) and [41 CFR 102-36.65](#)

⁴ FMR [41 CFR 102-36.70](#)

- Process:
 - Centralize agency purchasing and add the property management office in the approval workflow for all purchases
 - Streamline the entire logistics operation process from acquisition to disposal
 - Implement a policy stating that procurement of new property will only be approved after proof that excess property has been considered
 - Document due diligence, such as market research, to show that excess personal property isn't available/won't fit requirements (more than a checkbox)
 - Develop checkpoints and timelines for acquiring excess property to support mission requirements

Recommendation 2: Increase Training Opportunities and Communication

2a. Federal Acquisition Institute (FAI) Course

The ICPM WG recommends increasing Government-wide training opportunities, such as creating excess personal property training tailored to the acquisition community with an emphasis on excess as the first source of supply, into the Federal Acquisition Institute (FAI) Cornerstone OnDemand (CSOD). The training should outline the statutory and regulatory requirements behind the consideration of excess and the benefits of obtaining excess personal property in lieu of new procurements. Additionally, the ICPM WG recommends making this training mandatory for Federal Acquisition Certifications (FAC), including contracting (FAC-C), and contracting officer representatives (FAC-COR).

2b. GSA Communications

The ICPM WG recommends that GSA take the following steps:

- Enhance verbiage on the [GSA.gov](https://www.gsa.gov) NUO page to reflect roles and responsibilities of an NUO go beyond providing access to the Personal Property Management System (PPMS)
- Publish an article in FAI's *Acquisition Today: News for the Acquisition Workforce* Newsletter highlighting excess personal property requirements
- Publish an article in the Acquisition.gov News Section highlighting excess personal property requirements
- Send an "Acquisition Alert" message to the GSA acquisition community announcing the newly created excess personal property training in FAI CSOD

2c. Internal Agency Training and Communication

The ICPM WG recommends that agencies increase their internal training and communication centered around excess as the first source of supply by taking the following actions:

- Increase communication efforts on the importance of utilizing excess property as a required source during acquisitions
- Circulate emails to agency personnel containing a list of current-in-stock excess property
- Provide timely notification of property needs that would assist in utilizing needed excess property before it becomes a last minute request
- Add excess property policy and Frequently Asked Questions (FAQs) concerning excess property to agency intranet pages
- Better train and inform personnel on the existence and use of excess property
- Include excess property training in Employee Onboarding Orientations
- Implement a training schedule to ensure acquisition professionals understand the agency's procurement strategy

2d. Professional Associations Partnership Opportunities

The ICPM WG recommends exploring partnership opportunities with professional associations, such as the National Property Management Association (NPMA), the National Contract Management Association (NCMA), and the ASTM International Committee E53 on Asset Management, to promote excess personal property considerations in their training courses and presentations. These professional associations routinely conduct training to their membership and are partners in Federal acquisition and property management initiatives.

Recommendation 3: Regulatory Updates

3a. FMR

The ICPM WG recommends the following:

- Strengthen the role of the NUO in the FMR
- Issue a GSA FMR Bulletin on maximizing the use of excess property

National Utilization Officer (NUO)

Strengthen the role of the NUO in the FMR

The ICPM WG recommends updating the current language in the FMR at 41 CFR 102-36.45(b) to ensure each executive agency designates an official NUO. The current language reads as follows:

(b) You **are encouraged** to designate national and regional property management officials to:

(1) Promote the use of available excess personal property to the maximum extent practicable by your agency.

(2) Review and approve the acquisition and disposal of excess personal property.

(3) Ensure that any agency implementing procedures comply with this part.

The ICPM WG recommends that the language be strengthened to read as follows:

(b) You **must** designate national and regional property management officials to:

(1) Promote the use of available excess personal property to the maximum extent practicable by your agency.

(2) Review and approve the acquisition and disposal of excess personal property.

(3) Ensure that any agency implementing procedures comply with this part.

GSA Bulletin

The ICPM WG recommends that GSA issue an FMR Bulletin on maximizing the use of excess personal property which can incorporate guidance from the “Excess Personal Property Consideration Guide.” The ICPM WG feels that an FMR Bulletin would strengthen the guidance and impress upon agencies the importance of considering excess personal property in lieu of new procurements.

3b. FAR

The ICPM WG recommends the following updates to the FAR at 48 CFR Subpart 8.1 to clarify requirements and strengthen efforts to maximize use of excess property:

- Move guidance from the FMR (see 41 CFR 102-36.45, 65, 70, and 90) to the FAR to ensure those entering into contracts or making purchases are following excess property requirements. This will realign the requirements to the more appropriate regulation and better reach the right audience. This will also allow both disposal and acquisition functions to be addressed in the same document.
- Direct acquisition professionals to search for excess property on the Personal Property Management System (PPMS).
- Require documentation of excess property research and justification for new contract actions be retained by contracting officers in the contract file.
- Add citation to the FMR requirement for agencies to designate a National Utilization Officer (NUO), specifically 41 CFR 102-36.45(b).

Recommendation 4: Improve Information Technology

The ICPM WG recommends that GSA improve their personal property management systems to help facilitate the identification, promotion, and consideration of excess personal property.

GSA is launching the new Personal Property Management System (PPMS) that will replace GSAXcess as the government-wide repository of excess personal property. PPMS combines GSA's legacy personal property applications (e.g., GSAXcess, AAMS, MySales, GSAAuctions and the Computers for Learning website) into a unified, modern, easy-to-use system. It was designed to effectively fulfill its mission in personal property disposal, enhance the range and level of technological services for our internal/external customers, and improve the overall operational efficiency for a more seamless experience. PPMS will make it easier to track property throughout the disposal process, upload and edit photos, update property descriptions, download standard forms, and perform advanced searches, among many other benefits.

Specifically, PPMS will feature:

- Improved property reporting capabilities, including photo editing, rich text descriptions, and document uploads, that will improve the quality of data on available excess property
- Enhanced search features, including the ability to search by location/state, reimbursable status, and more, enabling agencies to locate suitable property quicker and more efficiently
- Enhanced want list capabilities that enable users to be automatically notified of newly reported excess property that meets their agency's requirements
- Cradle to grave data capture throughout the disposal process and improved data analytical tools to better inform business decisions

In addition, GSA is working to secure appropriated funding to implement additional functionality that would improve the utilization of excess property. These include integration with ordering systems (e.g., GSAAvantage) to make locating excess property easier for acquisition professionals. Additional features can be added to the enhancement list based on recommendations from the ICPM WG.

Recommendation 5: Conduct Further Research

The ICPM WG recommends conducting further research by:

- Analyzing personal property spend data
- Surveying the Acquisition Workforce on excess property consideration
- Exploring standard job responsibilities for National Utilization Officers and the creation of a new occupational series
- Examining the impact to reutilization when Personal Property Management and Acquisition Systems are integrated

5a. Government Purchase Card Spend Data Analysis and Ordering Guide

The ICPM WG recommends analyzing spend data in the space of personal property acquisition, including purchase card transactions. If warranted based on the analysis, the ICPM WG

recommends to focus further improvement efforts on micropurchase actions, including updating the Government Purchase Card Ordering Guide.

5b. Acquisition Workforce Survey

The ICPM WG recommends conducting an acquisition workforce survey to gather feedback from the broader acquisition workforce audience (e.g., contracting officers, Government purchase card holders) on suggestions for improving use and consideration of excess personal property. This survey should provide more robust information than from previous outreach efforts focused on personal property program offices.

5c. Position Standardization / Occupational Series Creation

The ICPM WG recommends exploring the development of standard job responsibilities for a National Utilization Officer (NUO) to be used at agencies. Although the role of an NUO will vary at each agency, this should help clarify that responsibilities typically go beyond coordinating with GSA to provide access to PPMS. At some agencies, the NUO is also responsible for promoting the use of excess personal property as the first source of supply; ensuring effective acquisition, use, and disposal of excess property; reviewing and approving the acquisition and disposal of excess personal property; and supporting reutilization and sustainability efforts.

Additionally, the ICPM WG recommends exploring the creation of a Property Management Career Series with the Office of Personnel Management (OPM). The series would include the positions responsible for the accountability and management of government property throughout the property management life cycle (e.g., acquisition through disposal): Agency Property Officer, Property Management Officer, Accountable Property Officer, Custodial Property Officer, and National Utilization Officer.

5d. Property Management and Acquisition Systems Integration

The ICPM WG recommends conducting additional research on the impact of excess personal property reutilization when an agency's Personal Property Management System and Acquisition System are integrated and have the ability to share data regarding accountable property purchases. For example, the ICPM WG would like to explore if agencies have systems with the capability to flag certain 4-digit Federal Supply Classification (FSC) codes to research excess assets first. Another topic to explore is if the systems are capable of issuing alerts to Personal Property Management contacts when certain FSCs are purchased.