

**REVIEW OF SPACE UTILIZATION  
IN THE  
FRANCES PERKINS BUILDING**

**OFFICE OF THE ASSISTANT SECRETARY FOR ADMINISTRATION AND MANAGEMENT**

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<b>ACRONYMS</b>
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<b>ALJ</b>	<b>Administrative Law Judges</b>	<b>OASAM</b>	<b>Office of the Assistant Secretary for Administration and Management</b>
<b>BOC</b>	<b>Business Operations Center</b>		
<b>BRB</b>	<b>Benefits Review Board</b>	<b>OFCCP</b>	<b>Office of Federal Contract Compliance Programs</b>
<b>DLMS</b>	<b>Department of Labor Manual Series</b>	<b>OLMS</b>	<b>Office of Labor-Management Standards</b>
<b>DOL</b>	<b>Department of Labor</b>	<b>OMAP</b>	<b>Office of Management, Administration, and Planning</b>
<b>ECAB</b>	<b>Employees' Compensation Appeals Board</b>	<b>OSTM</b>	<b>Office of Space and Telecommunications Management</b>
<b>ESA</b>	<b>Employment Standards Administration</b>	<b>OWC</b>	<b>Office of Workers' Compensation Programs</b>
<b>FPB</b>	<b>Frances Perkins Building</b>	<b>SOL</b>	<b>Solicitor of Labor</b>
<b>FTE</b>	<b>Full Time Equivalent</b>	<b>VETS</b>	<b>Veterans' Employment and Training Services</b>
<b>FY</b>	<b>Fiscal Year</b>	<b>WB</b>	<b>Women's Bureau</b>
<b>IG</b>	<b>Inspector General</b>	<b>WHD</b>	<b>Wage Hour Division</b>
<b>ILAB</b>	<b>Bureau of International Labor Affairs</b>		
<b>MSHA</b>	<b>Mine Safety and Health Administration</b>		

## **EXECUTIVE SUMMARY**

We conducted this evaluation to assess the Department of Labor's (DOL) efforts in attaining optimum utilization of space in the Frances Perkins Building (FPB). Our evaluation covered Fiscal Years 1996 through 2000. The evaluation was designed to provide information on DOL's conformance to regulations pertaining to space, evaluate the actual utilization of space over a specified time frame, and make recommendations for any necessary improvements in space utilization in the FPB.

### **RESULTS OF EVALUATION**

Our evaluation identified several areas where improvements, if implemented, should ultimately result in cost savings to DOL in the millions of dollars. Implementation of our recommendations will improve the ability of the Office of Space and Telecommunications Management (OSTM) to more effectively oversee the space management program in the FPB.

#### **FINDING 1 - DOL is Not Enforcing Targeted Space Utilization Rates**

DOL's written policies and procedures are in conformance with standards developed by the General Services Administration (GSA). However, enforcement by OASAM and agency heads of DOL's targeted utilization rate has not occurred. As a result, we estimate that DOL is paying \$3.5 million annually for underutilized space in the FPB.

#### **FINDING 2 -OASAM is Not Consistently Analyzing Space Utilization Rates**

(a) Staffing information, including contractor usage, is not provided to the Office of Space and Telecommunications Management group annually, as required of agency heads in the current and draft of the revised DLMS on Space Management.

(b) There is a lack of consistency in OASAM's analysis of actual space utilization in the FPB, due in part to the agencies' failure to provide required staffing information. For example, (a) the targeted versus actual space utilization rates of DOL agencies, (b) agency costs versus utilization rates, and (c) use of space in the FPB by contracted employees has not been consistently examined, with results communicated to agency heads. OASAM has both the staff and the ability to perform these analysis when all the required information is received.

### **FINDING 3 - DOL's Space Initiative was not Achieved**

The objective of the space initiative was to increase the effective utilization of space within the FPB through internal realignments and the relocation of Headquarters' employees from satellite locations into the FPB, leaving only the Bureau of Labor Statistics located in the Postal Square Building. In 1998, OASAM estimated that the downsizing and relocation initiative would save the Department a minimum of approximately \$3,900,000 in rent each year after completion.

Several planned moves for the consolidation of DOL Headquarters' staff into the FPB were not completed. Several planned internal realignments of agencies in the FPB did not occur, due in part to stalled negotiations with the American Federation of Government Employees - Local 12.

#### **RECOMMENDATIONS**

1. OASAM needs to reemphasize DOL's space management program in the FPB. Agency heads should be informed they will be held accountable for making concerted efforts to achieve the targeted space utilization rate in accordance with DOL policy.
2.
  - (a) OASAM/OSTM should inform agency heads of the need to obtain accurate staffing information, including contractor usage, on a quarterly basis. Each agency and sub-agency (e.g., ESA-OMAP, OFCCP, OLMS, OWCP, WHD, etc.) should be held accountable for providing OSTM with support documentation pertaining to the staffing numbers (e.g., employee name, social security and/or badge number, and job title for DOL and contractor employees alike). Should an agency fail to provide staffing information on a regular basis, the agency head should be notified.
  - (b) OASAM should conduct quarterly analyses on space utilization for each agency and sub-agency in the FPB, and on that leased space outside the FPB which houses headquarters' employees. The reports should highlight: the targeted versus actual utilization rate; actual rental costs versus targeted rental costs; and use of space by contracted employees, including associated rental costs.
  - (c) The resulting utilization trend reports should be disseminated to each agency and sub-agency quarterly.
  - (d) The draft of the revised DLMS on space management should continue to assign the responsibility for providing specific staffing information, including contractor usage, to the agency heads, and assign the responsibility for requesting the information to OSTM.

3. OASAM should reevaluate the proposals for realignment of agencies within the FPB, and the relocation of MSHA, SOL and the ALJ into the FPB, through the following steps:
- (a) Following the completion of the first quarterly space utilization analysis for the Women’s Bureau and the Office of Federal Contract Compliance Programs, OASAM should reevaluate the need for the agencies to pursue labor negotiations with Local 12. The decision to request that the agencies move forward with the stalled union negotiations should be dictated by the difference between the actual and targeted utilization rates, based on current staffing figures which have been verified by OSTM. Use of contractors by OFCCP and the WB should also be addressed in the report. OSTM should highlight the cost factors in allowing the agencies to continue their underutilization of space, as well as costs associated with contracted employees. Agency heads (OFCCP and WB) and the Assistant Secretary for ESA should be notified in writing of OASAM’s findings.
  - (b) Upon completion of the space utilization trend analyses for each agency and sub-agency in the FPB, and for the leased space which houses Headquarters’ employees, OASAM should reevaluate the feasibility of moving any or all of these agencies into the FPB–MSHA, ALJ, SOL. This evaluation should include analysis on the amount of space used by contractors in the FPB versus the amount of space needed to move these agency Headquarters’ employees into the FPB. The report should contain specific recommendations and outcomes based on associated costs incurred and potential savings (i.e. rental fees, estimated move costs, etc.). The report should be shared with the Office of the Secretary of Labor.

### **OASAM RESPONSE AND OIG CONCLUSIONS**

The agency’s response to the OIG’s official draft report agrees with the recommendations made. The recommendations have been resolved and will be considered closed upon OIG’s receipt of the documentation detailed in the “OASAM Response and OIG Conclusions” section of the report. The agency’s complete response is found in the Appendix.

## **BACKGROUND**

The Frances Perkins Building serves as the National Office headquarters facility for the Department of Labor. However, as of July 2000, the Department is also renting 602,624 square feet of office space at six additional sites in the Washington metropolitan area in order to house DOL Headquarters' employees.

In DOL, the Office of the Assistant Secretary of Administration and Management is responsible for the planning and administration of the Department's space management and telecommunications programs. The Office of Space and Telecommunications Management, a division of the Business Operations Center, has direct responsibility for all space management issues concerning the FPB, including: administration of the programs; making recommendations to ensure conformance with the General Services Administration (GSA) standards; coordination of space planning; reviewing and evaluating requests for all space changes; developing and monitoring a space utilization survey program; and overseeing the development and implementation of space realignment plans to improve utilization of space.

Since moving into the FPB in 1975, the Department has been in a continuous process of renovating and realigning space among its agencies. As agencies have expanded and contracted over the years, specific projects were undertaken to either move satellite offices or agencies into the FPB, or locate and renovate space outside the FPB to accommodate the needs of expanding programs. Such moves and realignments are reviewed with the American Federation of Government Employees-Local 12, in accordance with article 23 of the labor agreement between the Department of Labor and the National Council of Field Labor Locals. While the article states that it is desirable that issues concerning space be resolved informally through discussion among the affected employees, the office steward, and local management, there is an understanding that any unresolved issues can always become the subject of formal midterm bargaining.

## **PURPOSE AND METHODOLOGY**

### **PURPOSE**

The purpose of this evaluation was to assess the Department of Labor's (DOL) efforts in attaining optimum utilization of space in the Frances Perkins Building (FPB). Specifically, we addressed DOL's current Space Management policies and procedures, space utilization trends in the Frances Perkins Building over a five year period, and plans to improve and/or maintain proper space utilization in the FPB.

This evaluation was conducted in support of the Office of the Assistant Secretary for Administration and Management's strategic goal number 3.2—reduce DOL space bill by more than \$4.0 million by the end of FY 2000 through increased efficiency of the internal DOL work space.<sup>1</sup> It also assists the DOL in meeting its strategic goal #6—Departmental Strategic Management.

### **METHODOLOGY**

We obtained all data and information related to space management of the FPB from representatives of the Office of the Assistant Secretary of Administration and Management (OASAM), Business Operations Center (BOC), Office of Space and Telecommunications Management (OSTM). We did not independently verify the validity of the data provided by the agency.

We eliminated 1995 as a review year because OASAM purged much of the space-related information for that year in accordance with the General Records Schedule 11, Space and Maintenance Records Transmittal No. 8, issued December 1998. This transmittal allows for the destruction of records relating to the allocation, utilization, and release of space under agency control, and related reports to GSA, two years after termination of assignment, or when a lease is canceled, or when plans are superseded or obsolete.

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<sup>1</sup> The related agency strategic goal is: "By FY 2002 OASAM will complete a series of cost saving and performance enhancing initiatives including consolidation and modernization of space, telecommunications, printing/document reproduction; and, consolidation of financial operational functions of payroll and invoice payment, and centralization of contracting activities."



## FINDINGS AND RECOMMENDATIONS

### **Finding 1 – DOL is Not Enforcing Targeted Space Utilization Rates.**

**DOL’s written policies and procedures are in conformance with standards developed by the General Services Administration (GSA). However, enforcement by OASAM and agency heads of DOL’s targeted utilization rate has not occurred. As a result, we estimate that DOL is paying \$3.5 million annually for underutilized space in the FPB.**

### **Regulations**

The DOL’s Space Management Program is authorized by the Federal Property and Administrative Services Act of 1949, as amended (40 U.S.C. 471 et seq.); the Public Buildings Act of 1959, as amended (40 U.S.C. 601-619); the Federal Property Management Regulations (FPMR, 41 CFR, Chapter 101, revised July 1, 1999). GSA policy on assignment and utilization of space is found at 41 CFR 101, part 101-17.

DOL policy issuances on space management conform to the provisions of the Code of Federal Regulations, Title 41 Public Contracts and Property Management, Chapter 101 (rev. 7-1-99).

For the period under review [Fiscal Years (FY) 1996-2000], the targeted space utilization rate<sup>2</sup> of the general use space<sup>3</sup> in DOL is indicated below. The average actual utilization rate in the Frances Perkins Building is also indicated:

### **Targeted/Actual Utilization Rates Per FTE**

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<sup>2</sup> An indicator of the efficiency with which space is used. It is calculated by dividing the total square footage of the general use space in question, by the number of personnel in the space. The calculation can be made for any of the classifications of space, but is commonly done only for “general use” as the rate has little meaning for any other category.

<sup>3</sup> Federally controlled space in buildings and structures which provide an acceptable environment for the performance of mission by employees or by other persons occupying it, including, but not limited to, office space, and special purpose spaces such as courtrooms, laboratories, and computer centers. General Use replaces the following three (3) categories : 1. Office Space, 2. Special Space, and 3. Office Storage Space (2/2000).

YEAR	1996	1997	1998	1999	2000
TARGETED UTILIZATION RATE PER FTE	150 sq. ft.	150 sq. ft.	150 sq. ft.	150 sq. ft.	150 sq.ft./ 190 sq. ft.**
ACTUAL UTILIZATION RATE PER FTE	197.87	232.5	173.8	194.8	235.5/ @ 150 sq. ft.

\* Reference Exhibit 1–Space Utilization Chart

\*\* Proposed as of 2/2000–still in proposal stage as of 8/00

The targeted utilization rate of 150 square feet per person is irrespective of type of furniture, age of building, grade levels of staff, or any other consideration. The proposed rate of 190 square feet per person reflects GSA’s recent price policy changes. It is important to note the difference in the scope of the current 150 square feet per person, and the proposed 190 square feet. Currently, the 150 square feet includes “office space” only (i.e., that area assigned to personnel as their work station). The proposed 190 square feet includes “general use” space (i.e., office space *and* special space *and* office storage space). The additional 40 square feet per person encompasses all three categories, not only the office space category.

### **Financial Impact**

These figures show that DOL was not in conformance with the targeted utilization rate of 150 square feet per person in the FPB during this period. The financial impact is that DOL is paying an estimated \$3.5 million annually for underutilization of space in the FPB, as seen below:

Because GSA changed its method of calculating rental costs in FY 1998, we are highlighting two years which reflect the rent changes, *plus* they include contractor figures in the staffing totals–FYs 1998 and 1999.

### **FPB Staff, Space & Cost Information**

Year	FY 1998	FY 1999
Number of Staff in FPB	3,979	3,943
Estimated Space Based on Target Utilization Rate of 150 Sq. Ft. Per Person	596,850 sq. ft.	591,450 sq. ft.
Actual FPB Agency Space Utilized	691,688 sq. ft.	768,221 sq. ft.
Difference in Estimated and Actual Space	94,838 sq. ft.	176,771 sq. ft.
Overpayment of Costs for Space in FPB	\$2,213,518.90 (\$23.34/sq. ft.)	\$4,668,522.10 (\$26.41/sq. ft.)

By averaging the overpayment of costs for space in the FPB for FY 1998 and 1999 (\$2,213,518.90 and \$4,668,522.10), we find that on average DOL has paid approximately \$3.5 million in rent annually for space in the FPB that is underutilized. Our evaluation of the leased space for MSHA, SOL, and ALJ employees showed that underutilization of space in those locations is costing DOL approximately \$1.5 million annually. Therefore, the estimated total monetary loss for underutilization of space in the FPB, Ballston Towers, and the Techworld Building is approximately \$5 million annually.

In addition to highlighting the total overpayment for underutilized space in these locations, we have demonstrated overpayment by specific agencies in the FPB in Exhibit 2—Additional Examples of Agency Overpayment of Rent Based on Underutilization of Space. This exhibit provides details on costs associated with space for the Veterans' Employment and Training Service, and the Bureau of International Labor Affairs.

Of great importance in evaluating rental costs versus utilization of space in the FPB is the fact that DOL has an average of approximately 650 contractors working in the building. Fiscal year 2000 figures show the total staffing figures for MSHA, SOL, and ALJ Headquarters' employees who are working outside the building to be approximately 360 employees. The utilization of space by contractor employees in the FPB versus DOL employees should be emphasized by OASAM to the agency heads. The majority of contracted employees in the FPB are associated with information technology projects. When feasible, agencies should explore alternatives to housing contract employees on-site, thereby freeing-up space for additional DOL employees.

We noted at the beginning of this report that one of the strategic goals of the Office of the Assistant Secretary for Administration and Management (strategic goal number 3.2), is to reduce DOL space bill by more than \$4.0 million by the end of FY 2000 through increased efficiency of the internal DOL work space. This goal has not been achieved, and will not be achieved until DOL agency heads agree to strive to attain the targeted space utilization rate, and to address the issue of housing contracted versus DOL employees in the FPB.

**Recommendation 1:**

OASAM needs to reemphasize DOL's space management program in the FPB. Agency heads should be informed they will be held accountable for making concerted efforts to achieve the targeted space utilization rate in accordance with DOL policy.

**FINDING 2 -OASAM is Not Consistently Analyzing Space Utilization Rates**

**(a) Staffing information, including contractor usage, is not provided to the Office of Space and Telecommunications Management group annually, as required of agency heads in the current and draft of the revised DLMS on Space Management.**

**(b) There is a lack of consistency in OASAM’s analysis of actual space utilization in the FPB, due in part to the agencies’ failure to provide required staffing information. For example, (a) the targeted versus actual space utilization rates of DOL agencies, (b) agency costs versus utilization rates, and (c) use of space in the FPB by contracted employees has not been consistently examined, with results communicated to agency heads. OASAM has both the staff and the ability to perform the analysis when all the required information is received.**

**FPB Staffing Information:** We were able to piece together staffing information from a variety of reports which shows that the DOL population in the FPB increased from 3,641 to 3,943 employees from FY 1996 to FY 1999, as indicated in the figures below. While fiscal years 1996, 1998, and 1999, include contractor numbers provided by the agencies to OSTM, contractor numbers were not provided to OSTM for fiscal years 1997 and 2000.

**Staffing in the Frances Perkins Building  
(HR Statistics)**

<b>Year</b>	<b>FY 1996</b>	<b>FY 1997*</b>	<b>FY 1998</b>	<b>FY 1999</b>	<b>FY 2000*</b>
<b>Staffing</b>	3,641	3,248	3,979	3,943	3,310

\* Does not include contractor numbers

While OASAM conducted a variety of ad hoc analyses on staffing versus space utilization, (which consistently support our findings that space in the FPB is being underutilized), we could find no consistency in analyzing staff, including contractors, versus actual space utilization for the review period.

Nevertheless, data reveals that on average there are approximately 650 contractors working in the FPB annually. This plays a significant role in blocking OASAM’s attempts to move DOL Headquarters’ employees who are currently located outside the FPB, into the building. While the financial impact of housing contractors in the FPB is addressed in finding number one, the statistics alone highlight the need for consistent review of staffing information, including contractors.

**DLMS Responsibilities for Space Management:** Responsibilities for implementation of DOL's space management program are detailed in the Department of Labor Manual Series (DLMS), section 2-Administration, Chapter 400-Space Management, section 413, Responsibilities. This DLMS has been in effect since March 1979, and delineates the space management responsibilities in DOL. Reference Exhibit 3 for specific information.

In February 2000, OASAM issued a draft proposal to revise this DLMS. The proposed section 413-Responsibilities, continues to charge the DOL Agency Heads with responsibility for providing staffing information to OSTM when needed. Ownership of requesting the required staffing information is assigned to OSTM, while ownership of providing all requested staffing information is assigned to the agency heads.

**Space Utilization Reports:** We attempted to conduct a five-year trend analysis on space utilization in the FPB, covering FYs 1996-2000 (reference Exhibit 1). We were provided numerous reports showing utilization rates for a specified period of time, but there were no consistent reports which displayed the actual space utilization rate versus the targeted utilization rate for each agency for the five year period. As mentioned above, accurate staffing information was missing for fiscal years 1997 and 2000, since no contractor information was provided to OSTM by the agency heads. It is not possible to calculate the true space utilization rate without contractor information because the results will be misleading. We believe that OASAM has both the staff and the ability to perform the analysis when all the required information is received.

In attempting to conduct the five-year space utilization trend, we abstracted information from a variety of reports provided by OSTM. While we made numerous efforts to include analysis of space-related costs for each agency for the same period, such information was difficult to abstract from the numerous reports. There was a lack of consistency in the identification of actual square footage costs associated with each agency for the five-year period. This was primarily due to the fact that GSA changed its method for calculating its rental rates during this period, as previously mentioned.

Prior to the change, the rate was calculated based on 16 different classes of information, resulting in an "office space" rate. The rental rate per square foot for fiscal years 1996 and 1997, prior to the change, is shown at \$38.49, while the rates for fiscal years 1998, 1999, and 2000 reflect the new blended rate, using only four classifications-\$23.34, \$26.41, and \$26.85 respectively. When using these figures in a five-year trend analysis, the results were so skewed that they were rendered meaningless. Therefore, we eliminated the rental costs paid by each agency during the review period as part of our overall trend analysis. Reference Exhibit 4 for additional information on the GSA price policy changes.

**Recommendation 2:**

(a) OASAM/OSTM should inform agency heads of the need to obtain accurate staffing information, including contractor usage, on a quarterly basis. Each agency and sub-agency (e.g., ESA–OMAP, OFCCP, OLMS, OWCP, WHD, etc.) should be held accountable for providing OSTM with support documentation pertaining to the staffing numbers (e.g., employee name, social security and/or badge number, and job title for DOL and contractor employees alike). Should an agency fail to provide staffing information on a regular basis, the agency head should be notified.

(b) OASAM should conduct quarterly analyses on space utilization for each agency and sub-agency in the FPB, and on that leased space outside the FPB which houses headquarters' employees. The reports should highlight: the targeted versus actual utilization rate; actual rental costs versus targeted rental costs; and use of space by contracted employees, including associated rental costs.

(c) The resulting utilization trend reports should be disseminated to each agency and sub-agency quarterly.

(d) The draft of the revised DLMS on space management should continue to assign the responsibility for providing specific staffing information, including contractor usage, to the agency heads, and assign the responsibility for requesting the information to OSTM.

### **Finding 3–DOL’s Space Initiative was not Achieved**

**The objective of the space initiative was to increase the effective utilization of space within the FPB through internal realignments and the relocation of Headquarters’ employees from satellite locations into the FPB, leaving only the Bureau of Labor Statistics located in the Postal Square Building. In 1998 OASAM estimated that the downsizing and relocation initiative would save the Department a minimum of approximately \$3,900,000 in rent each year after completion.**

**Several planned moves for the consolidation of DOL Headquarters’ staff into the FPB were not completed. Several planned internal realignments of agencies in the FPB did not occur.**

DOL pays approximately \$34 million in annual rent to GSA for the FPB. The Department pays an additional \$22 million annually to house the Bureau of Labor Statistics Headquarters’ employees in the Postal Square Building. Over \$4 million is paid for rent in six additional buildings in the metro area, which house other Headquarters’ employees.

During the period under review, OASAM planned for the consolidation of DOL staff into the FPB. One phase of transforming the FPB into a true Headquarters building was to restructure the space of some of the agencies already in the FPB. The plan was especially important for those agencies that had underutilized space. Another phase was to move some of the agencies currently outside of the FPB into the building.

We are highlighting some of the results of these planned space initiatives below. Section A highlights some proposed space realignment plans in the FPB which did not occur, while Section B provides information on the proposals to move into the FPB those Headquarters’ employees working in leased space outside the FPB

### **Major Planned Space Realignments Within the FPB Which Did Not Occur**

There were three major pending space realignments planned during the period under review which did not occur. In correspondence dated 1997, the OSTM noted that a substantial savings in the amount of \$2.7 million would occur if DOL’s realignment plans were approved by the American Federation of Government Employees–Local 12. OASAM has documented their encouragement of Local 12’s pre-decisional involvement in space-related moves of the agencies. However, the General Counsel of the Federal Labor Relations Authority informed OASAM that no further negotiations are required at the Departmental level. It thus becomes the responsibility of each DOL agency to consult and/or negotiate its specific space changes.

There were three agency realignment plans highlighted in OASAM's summary of planned internal realignments which involved some form of union participation:

**(1) ESA-Office of Federal Contract Compliance Programs (OFCCP):**

OASAM reported that the agency agreed to release 7,055 square feet of space. The space was redesigned and the floor plan submitted by management to Local 12 for approval. Local 12 did not approve the plan. No documentation was provided to show any action was taken on the plan from 1997 through the date of our review.

**Update information provided by OFCCP following the Inspector General's (IG) request:**

By memorandum dated June 29, 2000, the Acting Director, Office of Management Administration and Planning, Employment Standards Administration, noted that information we had been provided was 4 years old, that both the FTE allocation and the IT contractors working for OFCCP have changed, thus rendering the 1997 space plan inoperative. It was confirmed that OFCCP and Local 12 attempted to reach agreement through formal negotiations in 1997, when the plan was viable. Agreement could not be reached, at which time both sides agreed to request mediation. No formal request for mediation went forward to the Labor Management Review Committee and no further action has occurred.

**Conclusion:**

Using the 150 square feet per person ratio in effect for FYs 1998-2000, the following utilization and cost information is calculated:

**Office of Federal Contract Compliance Programs  
Space Utilization Trend**

	1998	1999	2000
<b>Staffing</b>	88	91	94
<b>Targeted Space Utilization (sq. ft.)</b>	13,200	13,650	14,100
<b>Actual Space Utilization (sq. ft.)</b>	18,695	18,695	18,695
<b>Amount of Space Above Target (sq. ft.)</b>	5,495	5,045	4,545
<b>Over Payment</b>	<b>\$128,253.30</b> (23.34/sq. ft.)	<b>\$133,238.45</b> (26.41/sq. ft.)	<b>\$122,033.25</b> (26.85/sq. ft.)

**(2) Bureau of International Labor Affairs (ILAB):**

OASAM reported that the agency agreed to release 6,615 square feet of space. Once the issue is resolved, the Administrative Law Judges (ALJ) will move into the space vacated by



ILAB. No documentation was provided to show any action was taken on the plan from 1997 through the date of our review.

**Update information provided by ILAB following the IG's request:**

By memorandum dated June 28, 2000, the Deputy Under Secretary for ILAB informed us that due to additional FTEs funded in FY 2000, the agency will no longer be releasing any space. Current plans call for some realignment and upgrading of ILAB's space, with a net gain of 65 square feet. The agency has consulted with OSTM and Local 12 regarding the plans.

**Conclusion:**

We were able to confirm through OASAM and through budget information that ILAB's proposed staffing will necessitate a need for additional space. Therefore, the 1997 realignment/reduction proposal is not viable at this time. However, as noted in finding number 4 B below, based on the number of ILAB employees in the FPB during fiscal years 1998, and 1999, the agency paid \$460,343.25 more than it should have, based on the targeted utilization rate of 150 square feet per person.

**(3) Women's Bureau (WB):**

OASAM reported that the agency agreed to release 3,340 square feet of space. The space was redesigned and the floor plan was submitted by management to their agency local 12 representative. The plan was rejected by Local 12. No documentation was provided to show any action was taken on the plan from 1997 through the date of our review.

**Update information provided by WB following the IG's request:**

By memorandum dated June 16, 2000, the Director of the Women's Bureau informed us that realignment/reduction of WB space is a closed issue. The memorandum states that OASAM invited the WB to relinquish 3,340 square feet of its space in April 1999, based on a need to house a research group and another DOL agency in the FPB. Due to FY 1999 projected budgetary challenges, the WB explored the possibility of a space realignment/reduction with OSTM, OLMS, and Local 12, through a series of meetings that never escalated to formal negotiations with Local 12. The WB further states that these conditions no longer existed in early FY 2000, (other locations were used for the two groups and the budgetary concern no longer existed), therefore the space realignment/reduction proposal was canceled.

**Conclusion:**

Using the 150 square feet per person rate in effect for FYs 1998-2000, the following utilization and cost information is calculated:

### Women's Bureau Space Utilization Trend

	1998	1999	2000
<b>Staffing</b>	42	40	40
<b>Targeted Space Utilization</b>	6,300	6,000	6,000
<b>Actual Space Utilization</b>	9,910	9,910	9,910
<b>Amount of Space Above Target</b>	3,610	3,910	3,910
<b>Over Payment</b>	<b>\$84,257.40</b> (23.34/sq. ft.)	<b>\$103,263.10</b> (26.41/sq. ft.)	<b>\$104,983.50</b> (26.85 /sq. ft.)

Both OFCCP and the WB continue to underutilize their space in the FPB, based on staffing. We believe the agencies should be made aware of the costs associated with the underutilization, and instructed to vigorously pursue required labor/management negotiations in order to effect the changes necessary to achieve compliance with the targeted space utilization rate.

**Recommendation 3 (a):**

Following the completion of the first quarterly space utilization analysis for the Women's Bureau and the Office of Federal Contract Compliance Programs, OASAM should reevaluate the need for the agencies to pursue labor negotiations with Local 12. The decision to request that the agencies move forward with the stalled union negotiations should be dictated by the difference between the actual and targeted utilization rates, based on current staffing figures which have been verified by OSTM. Use of contractors by OFCCP and the WB should also be addressed in the report. OSTM should highlight the cost factors in allowing the agencies to continue their underutilization of space, as well as costs associated with contracted employees.

Agency heads (OFCCP and WB) and the Assistant Secretary for ESA should be notified in writing of OASAM's findings.

**Planned Movement Into the FPB During Review Period**

OASAM presented a variety of proposal objectives for moving the Benefits Review Board (BRB), the Employees' Compensation Appeals Board (ECAB), the Mine Safety and Health Administration (MSHA), some of the Solicitor of Labor (SOL), and the Administrative Law Judges (ALJ), into the Frances Perkins Building during the review period. Following are the results of the proposals:

(1) **The Benefits Review Board** was located in the Techworld Plaza through FY 96. OASAM was able to successfully move the group into the FPB, realizing the following savings from the move:

**Benefits Review Board Move**

Estimated Staff	100
Actual Space (in Techworld)	32,504 square feet
Targeted Space at FPB	16,480
Annual Lease Cost (Techworld)	\$1,155,463
FPB Cost	\$634,315
Lease Savings	\$521,148
Moving Expenses (including internal readjustments)	\$216,250
<b>Total Savings First Year</b>	<b>\$304,898</b>
<b>OASAM Projected Savings for FY 1997</b>	<b>\$1,155,463</b>

Date of data: 11/97

(2) **The Employees' Compensation Appeals Board (ECAB)** was located in the Reporters Building through August 11, 1996. OASAM was able to successfully move the group into the FPB. A net increase was realized in the move:

**Employees' Compensation Appeals Board**

<b>Estimated Staff</b>	50
<b>Actual Space (Reporters Bldg.)</b>	7,688 square feet
<b>Targeted Space at FPB</b>	8,755
<b>Annual Lease Cost (Reporters Bldg.)</b>	\$231,178
<b>FPB Cost</b>	\$336,980
<b>Moving Expenses</b>	no information
<b>Rent Increase First Year</b>	\$105,802
<b>OASAM Projected Savings for FY 1997</b>	<b>\$231,178</b>

Date of data: 11/97

(3) **The Mine Safety and Health Administration** is located in the Ballston Towers. The planned moved of MSHA into the FPB has not occurred. OASAM informed us recently that the proposed plans to move MSHA have now been canceled. Had MSHA been moved into the FPB as planned, the following savings would have been realized:

**Mine and Safety Health Administration**

<b>Staff</b>	239
<b>Actual Space (Ballston Towers)</b>	56,324 square feet
<b>Actual Utilization Rate Per Person</b>	235.67 sq. ft.
<b>Targeted Space in FPB at 150 sq. ft. per person</b>	35,850 square feet
<b>Actual Annual Cost (Ballston Towers)</b>	\$1,260,852
<b>Targeted Cost (\$26.85 per sq. ft. in FPB at 150 sq. ft.)</b>	\$962,572.50
<b>Difference in Actual/ Targeted Costs at current rate of \$26.85/sq. ft. at 150 sq. ft. per person</b>	\$298,279.50
<b>Proposed Annual Rent Savings if Moved to FPB at 150 sq. ft. per person</b>	<b>\$298,279.50</b>

February 2000 Data

(4) **The Solicitor of Labor** also has some employees located in the Ballston Towers. The planned moved of these SOL employees into the FPB has not occurred. OASAM has

informed us recently that the proposed plans to move SOL have now been eliminated.

Had SOL been moved into the FPB as planned, the following savings would have been realized:

**Solicitor of Labor/Ballston Towers**

<b>Staff (National Office employees)</b>	34
<b>Actual Space (Ballston Towers)</b>	6,897 sq. ft.
<b>Actual Utilization Rate Per Person</b>	202.85 sq. ft.
<b>Targeted Space in FPB at 150 sq. ft. per person</b>	5,100 sq. ft.
<b>Actual Annual Cost (Ballston Towers)</b>	\$247,908
<b>Targeted Cost (\$26.85 per sq. ft. in FPB) at 150 sq. ft. per person</b>	\$136,935
<b>Difference in Actual/ Targeted Costs Annually at 150 sq. ft. per person</b>	<b>\$110,973</b>

February 2000 Data

(5) The **Administrative Law Judges** are located in the Techworld Plaza. The planned moved of the ALJ into the FPB has not occurred. Had the ALJ been moved into the FPB as planned, the following savings would have been realized:

**Administrative Law Judges**

<b>Estimated Staff</b>	84
<b>Actual Space (Reporters Bldg.)</b>	28,739 square feet
<b>Targeted Space at FPB</b>	13,350
<b>Annual Lease Cost (Reporters Bldg.)</b>	\$955,814
<b>FPB Cost</b>	\$529,728
<b>Projected Moving Expenses (w/furniture)</b>	\$371,280
<b>Annual Rent Savings</b>	<b>\$426,086</b>
<b>OASAM Projected Savings for FY 1998</b>	<b>\$1,071,444</b>

February 2000 Data

Review of the data presented clearly demonstrates a need to reevaluate, from a cost savings view, the planned proposals to move agencies such as MSHA, SOL, and ALJ into the FPB, and to encourage

resolution of outstanding space related issues with Local 12. We realize there are costs associated with these kinds of realignments and relocations, (i.e. space reconfigurations, moving, furniture, etc.), and we provided such information in our analyses when it was available. In several cost projections associated with internal realignments and relocations, OASAM calculated estimates that revealed recurring cost savings for agencies if they accepted the initial expenditures associated with the realignments and relocations.

**Recommendation 3 (b):**

Upon completion of the space utilization trend analyses for each agency and sub-agency in the FPB, and for the leased space which houses Headquarters' employees, OASAM should reevaluate the feasibility of moving any or all of these agencies into the FPB-MSHA, ALJ, SOL. This evaluation should include analysis on the amount of space used by contractors in the FPB versus the amount of space needed to move these agency Headquarters' employees into the FPB. The report should contain specific recommendations and outcomes based on associated costs incurred and potential savings (i.e. rental fees, estimated move costs, etc.). The report should be shared with the Office of the Secretary of Labor.

## **OASAM RESPONSE AND OIG CONCLUSIONS**

### **OASAM Response**

*“I have reviewed your draft report on Space Utilization in the Frances Perkins Building, and generally concur with your findings. We are currently proceeding to implement your recommendations. However, it should be noted that we will continue to evaluate our progress as we move forward and will revise our options and management approach, as necessary, to obtain the best results.”*

### **OIG Conclusions**

#### **1. Recommendation to Finding #1:**

OASAM needs to reemphasize DOL’s space management program in the FPB. Agency heads should be informed they will be held accountable for making concerted efforts to achieve the targeted space utilization rate in accordance with DOL policy.

**Conclusion:** We consider this recommendation to be resolved. The recommendation will be closed pending our receipt of OASAM’s notification to agency heads, reminding them of their accountability for making concerted efforts to achieve the targeted space utilization rate.

**Please provide written documentation to this office regarding such notification by October 30, 2000.**

#### **2. Recommendations to Finding #2:**

(a) OASAM/OSTM should inform agency heads of the need to obtain accurate staffing information, including contractor usage, on a quarterly basis. Each agency and sub-agency (e.g., ESA–OMAP, OFCCP, OLMS, OWCP, WHD, etc.) should be held accountable for providing OSTM with support documentation pertaining to the staffing numbers (e.g., employee name, social security and/or badge number, and job title for DOL and contractor employees alike). Should an agency fail to provide staffing information on a regular basis, the agency head should be notified.

**Conclusion:** We consider this recommendation to be resolved. The recommendation will be closed pending our receipt of OASAM’s notification to agency heads, reminding them of their responsibility to provide OASAM with staffing information, including contractor usage, on a quarterly basis beginning the first quarter of fiscal year 2001. **Please provide written documentation to this office regarding such notification by October 30, 2000.**

(b) OASAM should conduct quarterly analyses on space utilization for each agency and sub-agency in the FPB, and on that leased space outside the FPB which houses headquarters' employees. The reports should highlight: the targeted versus actual utilization rate; actual rental costs versus targeted rental costs; and use of space by contracted employees, including associated rental costs.

**Conclusion:** We consider this recommendation to be resolved. The recommendation will be closed pending our receipt of OASAM's first quarterly report. **Please provide copies of the analyses covering the period October 1, 2000 through December 31, 2000, to this office by February 16, 2001.**

(c) The resulting utilization trend reports should be disseminated to each agency and sub-agency quarterly.

**Conclusion:** We consider this recommendation to be resolved. The recommendation will be closed pending our receipt of documentation that OASAM has disseminated the first quarterly report. **Please provide written documentation to this office regarding such dissemination by February 16, 2001.**

(d) The draft of the revised DLMS on space management should continue to assign the responsibility for providing specific staffing information, including contractor usage, to the agency heads, and assign the responsibility for requesting the information to OSTM.

**Conclusion:** We consider this recommendation to be resolved. The recommendation will be closed pending our receipt of the subject DLMS. **Please provide a copy of the revised DLMS to this office by October 30, 2000.**

### **3. Recommendations to Finding #3:**

OASAM should reevaluate the proposals for realignment of agencies within the FPB, and the relocation of MSHA, SOL and the ALJ into the FPB, through the following steps:

(a) Following the completion of the first quarterly space utilization analysis for the Women's Bureau and the Office of Federal Contract Compliance Programs, OASAM should reevaluate the need for the agencies to pursue labor negotiations with Local 12. The decision to request that the agencies move forward with the stalled union negotiations should be dictated by the difference between the actual and targeted utilization rates, based on current staffing figures which have been verified by OSTM. Use of contractors



by OFCCP and the WB should also be addressed in the report. OSTM should highlight the cost factors in allowing the agencies to continue their underutilization of space, as well as costs associated with contracted employees. Agency heads (OFCCP and WB) and the Assistant Secretary for ESA should be notified in writing of OASAM's findings.

**Conclusion:** We consider this recommendation to be resolved. The recommendation will be closed pending our receipt of OASAM's findings as reported to OFCCP, WB and the Assistant Secretary for ESA. **Please provide this office a copy of the findings by April 13, 2001.**

(b) Upon completion of the space utilization trend analyses for each agency and sub-agency in the FPB, and for the leased space which houses Headquarters' employees, OASAM should reevaluate the feasibility of moving any or all of these agencies into the FPB-MSHA, ALJ, SOL. This evaluation should include analysis on the amount of space used by contractors in the FPB versus the amount of space needed to move these agency Headquarters' employees into the FPB. The report should contain specific recommendations and outcomes based on associated costs incurred and potential savings (i.e. rental fees, estimated move costs, etc.). The report should be shared with the Office of the Secretary of Labor.

**Conclusion:** We consider this recommendation to be resolved. The recommendation will be closed pending our receipt of OASAM's report to the Office of the Secretary of Labor. **Please provide this office a copy of the report by April 13, 2001.**

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**Contributors to this report:**

Barbara Farrell, Project Leader  
Dennis Raymond

Gregory D. Simmons, Director, Division of Evaluations and Inspections

**EXHIBIT 1**

**Space Utilization of the Frances Perkins Building  
FY 1996–2000**

**SPACE UTILIZATION FOR THE FRANCES PERKINS BUILDING**  
**Fiscal Years 1996–2000**

AGENCY	FY 1996			FY 1997			FY 1998			FY 1999			FY 2000		
	STAFF* (w/cont.)	SPACE	UR**	STAFF (no cont.)	SPACE	UR	STAFF (w/cont.)	SPACE	UR	STAFF (w/cont.)	SPACE	UR	STAFF (no cont.)	SPACE	UR
DASAM	518	105,980	204.6	442	109,859	248.5	452	70,802	156.6	626	110,304	176.2	461	110,955	240.7
DIG	190	28,954	152.4	150	29,420	196.13	188	25,745	136.9	188	29,405	156.4	151	29,405	194.7
PWBA	253	43,890	173.5	234	43,890	187.6	253	41,570	164.3	268	46,390	173.1	234	46,390	198.2
LAB	80	21,470	268.4	93	20,115	216.3	68	18,380	270.3	75	20,215	269.5	89	20,215	227.1
OCFO	110+	18,515	168.3	85	18,465	217.2	132	17,865	135.3	109	18,465	169.4	92	18,465	200.7
OSHA	393	86,330	219.7	371	98,285	264.9	575	87,325	151.9	498	100,780	202.4	393	100,780	256.4
ETA	771	132,714	172.1	597	137,146	229.7	756	134,146	177.4	734	139,346	189.8	596	139,346	223.8
D/SECY	58	26,005	448.4	58	26,005	448.4	66	25,835	391.4	66	25,835	391.4	188++(77)	69,767	371.1
ASP	30	8,285	276.2	31	8,595	277.3	30	8,295	276.5	30	8,295	276.5	30		
OCIA	35	7,895	225.6	31	7,895	254.7	25	7,895	315.8	28	7,895	282.0	28		
DPA	22	6,142	279.2	30	6,142	204.7	29	8,537	294.4	24	8,537	355.7	24		
ARB (OAA)	22	5,030	228.6	20	3,105	155.3	16	3,505	219.1	19	3,505	184.5	19		
DSA							10	2,225	222.5	10	2,225	222.5	10		
WB	45	9,910	220.2	44	9,910	225.2	42	9,910	236.0	40	9,910	247.8	40	9,910	247.8
BRB	145	16,480	113.7	123	16,480	134.0	100	16,480	164.8	88	15,330	174.2	78	15,030	192.7
ECAB	30	8,030	167.3	48	8,755	182.4	48	8,780	182.9	50	8,780	175.6	50	8,780	175.6
ESA	617	117,330	190.2	495	120,380	243.2	758	118,288	156.1	760	123,039	161.9	556	121,549	218.6
SOL	295	84,975	288.1	365	81,725	223.9	400	79,430	198.6	408	82,240	201.6	346	81,200	234.7
VETS	29	8,975	309.5	31	8,975	289.5	31	6,675	215.3	27	7,725	286.1	36	7,725	214.6
<b>TOTALS</b>	<b>3,641</b>	<b>720,430</b>	<b>197.87</b>	<b>3,248</b>	<b>755,147</b>	<b>232.5</b>	<b>3,979</b>	<b>691,688</b>	<b>173.8</b>	<b>3,943</b>	<b>768,221</b>	<b>194.83</b>	<b>3,310</b>	<b>779,517</b>	<b>235.5</b>

\* Agency staffing statistics, including contractors, were provided by the Agencies to OSTM for fiscal years 1996, 1998, 1999; staffing statistics for fiscal years 1997 and 2000 were not provided by the Agencies; figures for those years are provided by the Human Resources Center, and do not reflect contractor numbers.

\*\* Utilization Rate: calculated by dividing the total staff by the total office space. The UR is the average square feet per person.

+ Includes Office of Budget

++ OSEC space information was provided in a lump sum for FY 2000; it includes the groups listed under it with no space information

**EXHIBIT 2**

**Examples of Agency Overpayment of Rent**

**Examples of Overpayment of Rent**

In addition to the total overpayment in the FPB discussed in finding number four “Overpayment for Space”, we have selected a few agencies to highlight this issue:

**A. Veterans’ Employment and Training Service**

**VETERANS EMPLOYMENT AND TRAINING SERVICE**

Year	Staff	Space sq. ft.	Actual Utilization Rate (sq. ft.)	Targeted Space (150 sq. ft. X staff)	Difference in Space Sq. Ft.	Associated Cost Difference
1998	31	6,675	215.3	4,650	2,050	\$54,140.50 (@\$26.41/sq. ft.)
1999	27	7,725	286.1	4,050	3,675	\$99,210.75 (@26.85/sq. ft.)
					<b>2 Year Difference</b>	<b>\$153,351.25</b>

**B. Bureau of International Labor Affairs**

**BUREAU OF INTERNATIONAL LABOR AFFAIRS**

Year	Staff	Space sq. ft.	Actual Utilization Rate (sq. ft.)	Targeted Space (150 sq. ft. X staff)	Difference in Space Sq. Ft.	Associated Cost Difference
1998	68	18,380	270.3	10,200	8,180	\$219,633.00 (@\$23.34/sq. ft.)
1999	75	20,215	269.5	11,250	8,965	\$240,710.25 (@26.85/sq. ft.)
					<b>2 Year Difference</b>	<b>\$460,343.25</b>

**EXHIBIT 3**

**Current DLMS Space Management Responsibilities**

<b>DOL AGENCY HEADS ARE RESPONSIBLE FOR:</b>
(1) Ensuring that a space management program consistent with the policies, procedures, standards, and guidelines included in Chapter 400 of DLMS 2 is conducted within the respective Agency's area of jurisdiction.
(2) Designating a space management representative at the DOL National Agency level, and forwarding in writing the names of representatives to the Office Director, Office of Space Management (OSM), Directorate of Administrative Programs and Services (DAPS), Office of the Assistant Secretary for Administration and Management (OASAM)
(3) Informing the OSM or RA-OASAM of their space requirements.
(4) Providing the following information upon approval of each fiscal year budget:  (a) Staffing patterns, e.g., the number of employees to be located in each geographic area by grade, position title, supervisory status, and organizational units; (b) Total distribution of approved authorized budgeted positions by geographic area; (c) Information required to continuously study and maintain records of assigned space, upon request, to the OSM or the Regional OASAMs. <sup>4</sup>
(5) Promptly reporting to the OSM or Regional Administrators-OASAM space, assigned which is no longer needed.
(6) Providing funds necessary for space rentals, building alterations, and services.
(7) Obtaining approval from the OSM, or at the regional level from the RA-OASAM, prior to any and all space-related internal or external (between buildings) moves.

<b>OFFICE DIRECTOR, OFFICE OF SPACE MANAGEMENT, DAPS, IS RESPONSIBLE FOR:</b>
(1) Planning and coordinating the DOL Space Management Program relating to the acquisition of real property and its continued management. This includes the coordination of all activities relating to the major improvements or additions to existing buildings, and alterations and repairs to buildings housing all DOL activities.
(2) Assigning and reassigning real property and space holdings to DOL Agencies in coordination with the GSA.
(3) Developing and maintaining space management standards and guidelines for departmental activities.
(4) Developing long-range plans and programs for the housing of departmental activities in the Washington metropolitan area.
(5) Developing and maintaining policy and procedural instructions related to the management of real property.,
(6) Serving as the Department's principal representative to Federal, State, and District of Columbia Government officials and private realty firms; engineers; architects; and building owners and operators for matters concerning the construction, acquisition, renovation, repair, and improvement of real property not under GSA control in the Washington metropolitan area. Liaison services between the GSA and the regions are provided to the Regional Administrator--OASAM upon request to the OSM.
(7) Conducting periodic surveys of space utilization in the Washington metropolitan area to ensure that assigned space is being used efficiently and economically.
(8) Furnishing policy guidance and technical assistance to DOL Agency space representatives and Regional Administrators-OASAM on space management matters.
(9) Securing approval for the commitment of funds from DOL National Offices for the payment for space, renovation, moving costs, etc., for the Washington metropolitan area.

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<sup>4</sup> This highlights the current and proposed DLMS Space Management Policy responsibilities as it relates to agency heads.

**EXHIBIT 4**

**New Pricing Policy Information/GSA**



## New Pricing Policy/GSA

GSA developed its pricing policy, called New Pricing, in response to the concerns of customers, changes in the way the U.S. government conducts business, and the competitive pressures of the marketplace. New Pricing is based on market-based mechanisms to provide a variety of benefits.

New Pricing has four space categories. Generally, no more than two will be present in any one building. Determined by the predominate use of the space, these categories are broad in concept, and acknowledge the need for flexibility to use space in the way that best serves the mission of the agency. The categories are:

**General use.** Most space falls into this category. It includes general office space and special-purpose spaces as courtrooms, laboratories, and computer centers. It replaces the following categories that existed under the previous pricing system: office space, special space and office storage space.

**Parking.** Before, parking was measured in terms of square footage. The current process is to simply count the number of parking spaces included in the Occupancy Agreement. Parking is designated as *surface* when the spaces are outside, or *structured* when they are inside a garage.

**Warehouse.** The warehouse designation applies to properties where 70% or more of the space is used for storage.

**Unique.** Some properties, such as border stations, fulfill purposes that have no equivalent in the private sector and therefore cannot be priced by a reasonable market comparison. This category accounts for such one-of-a-kind situations.

Except for parking and certain types of unique space designations such as antennas, space is recorded and billed by the square foot. The Occupancy Agreement shows the measurement in two ways:

**Rentable square feet.** This measurement uses the ANSI/BOMA (American National Standards Institute/Building Owners and Management Association) system that is the most commonly used standard in the real estate industry. It enables you to make easy comparisons with market equivalents.

**Usable square feet.** This measurement affords you ease and precision in analyzing lease offers and your use of space. It is analogous to *occupiable square feet*, the measurement we formerly used.

**APPENDIX**

**Agency Response**

**U.S. Department of Labor**

Office of the Assistant Secretary  
for Administration and Management  
Washington, D.C. 20210

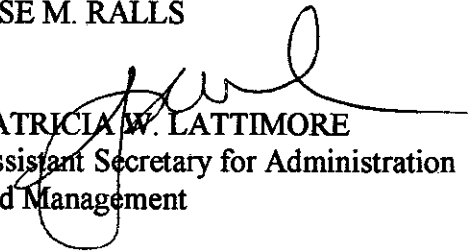


SEP 22 2000

Reply to the Attention of:

MEMORANDUM FOR JOSE M. RALLS

FROM:

  
PATRICIA W. LATTIMORE  
Assistant Secretary for Administration  
and Management

SUBJECT:

Review of Space Utilization in the  
Frances Perkins Building  
Report No. 2E-07-731-0001

I have reviewed your draft report on Space Utilization in the Frances Perkins Building, and generally concur with your findings. We are currently proceeding to implement your recommendations. However, it should be noted that we will continue to evaluate our progress as we move forward and will revise our options and management approach, as necessary, to obtain the best results.

If you have any questions, you may contact Kenneth Sellers, Director of Administrative Services at 219-6414.