United States General Accounting Office

GAO

Report to the Honorable
Fred Thompson, Chairman
Committee on Governmental Affairs
U.S. Senate

April 2000

GENERAL SERVICES ADMINISTRATION

Leasing Practices in Selected Regions

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United States General Accounting Office
Washington, D.C. 20548

General Government Division

B-284261

April 14, 2000

The Honorable Fred Thompson
Chairman, Committee on Governmental Affairs
United States Senate

Dear Mr. Chairman:

This report responds to your request that we review the process used by the General Services Administration's (GSA) Public Buildings Service (PBS) to procure leased space for federal agencies. You were particularly interested in how different regional offices determine agencies' space requirements, conduct market surveys, and communicate with offerors during the leasing process. You also expressed concerns about possible limitations on competition during the lease solicitation process.

As agreed with your office, this report (1) identifies the approaches 3 of GSA's 11 regional offices use to lease space, including how each region determines an agency's space requirements, identifies and assesses potential space, and communicates with actual offerors, and (2) assesses the effect of solicitation practices on competition.

The three regional offices included in the review were Mid-Atlantic in Philadelphia, PA; Southeast in Atlanta, GA; and National Capital (NCR) in Washington, D.C. When combined, these regions account for over half of PBS' total amount of leased square footage and annual rent paid for leased space.

Results in Brief

All three regions used the traditional, simplified, and sole source approaches to leasing. In addition, NCR has developed a leasing approach unique to its region called the Advanced Acquisition Program (AAP), which it uses extensively. Under the traditional leasing approach, a specific space need is generally advertised in the local newspaper to allow everyone who has space that could meet the agency's requirements to submit an offer. The simplified leasing approach is used to expedite the leasing process for leases that are expected to be under $100,000 in net annual rent. Under this approach, the contracting officer has to solicit only three sources, to promote competition, or document the file to explain the lack of competition. Because the agency's space requirements are usually less than 10,000 square feet, they are not required by regulation to be advertised in the newspaper. The sole source approach is used when the contracting officer determines that only one source can meet the agency's requirements, and thus only the one source is solicited. NCR's AAP is a variation of the traditional leasing approach under which NCR advertises annually for a variety of generic space requirements; evaluates the offers it receives; and develops an inventory of available space, based on acceptable offers, from which it can quickly award leases when specific space needs are identified.

In all three regions, specific space requirements are developed and defined primarily by the customer agencies. PBS officials said that the contracting officers typically question an agency's requirements only if they have concerns about their ability to secure sufficient competition because of the nature of the space requirements. In these regions, potential sites are identified in many ways, including through newspaper advertisements, contacts with local real estate brokers, and the contracting officers' knowledge of the area. To determine which sites could satisfy an agency's space requirements, the contracting officer or realty specialist and the customer agency representative may visit the potential sites. According to PBS officials, much of the communication with potential and actual offerors during the leasing process is oral. We were unable to assess the level of communication with potential offerors both because there are no requirements related to communication with potential offerors and its documentation, and because documentation of any communication varied in the lease files we reviewed. Required communication with actual offerors was well documented in some of the lease files we reviewed. For other lease files, contracting officers told us that all required communication occurred, even though it was not always documented as required by regulation.

The processes used to develop the agencies' space needs, identify and assess potential space, and communicate with the actual offerors did not appear to unduly restrict competition. We reviewed 45 of the 360 leases that became effective[1] in the three regions in fiscal year 1999 and found that (1) the space needs were generally broad enough to elicit multiple offers; (2) representatives for the buildings that PBS identified and assessed were solicited unless PBS determined that a building clearly could not meet the agency's requirements; and (3) communication with actual offerors was generally conducted according to regulation, although it was not always documented as required. In 10 of the 12 sole source cases we reviewed, justifications for limiting the competition to one source were prepared and approved as required. In the case of the other two sole

[1]The effective date of the lease is the date on which the rent payments commence.

source leases we reviewed, the justification for one was prepared but not signed by the appropriate official, while the file for the other lease we reviewed, which was for a few parking spaces that cost about $5,000 annually, did not contain documentation as to why only one offer was solicited.

Participants in PBS' leasing process who believe that a contract has been or is about to be awarded in violation of the laws and regulations that govern contracting with the federal government can protest the awards to GSA and us. In the three regions we visited, protests were filed in connection with 4 of the 360 leases that became effective in fiscal year 1999. All of these protests were submitted by incumbent lessors who were not successful in retaining their government lease when GSA conducted a new acquisition for the expiring lease. Two of these protests were withdrawn by the protesters before we issued a decision, and the other two were denied.

Background

As the federal government's landlord, PBS provides space for most federal agencies. It manages about 151 million square feet of leased space in about 6,400 private sector properties at an annual cost of about $2.7 billion. In addition to the leased space, PBS also manages about 184 million square feet of space in almost 2,000 government-owned properties.

Between 1993 and 1995, the National Performance Review, GSA's Inspector General, and we[2] raised several concerns about PBS' leasing program, including that PBS' leasing program (1) was not efficient, (2) did not promote competition, (3) took too long to award leases, and (4) was not meeting the customers' needs. Numerous recommendations were made by these organizations and us to address the concerns that were raised. The essence of the recommendations was to (1) adopt private sector practices, (2) streamline procedures, (3) increase customer satisfaction, (4) promote competition, and (5) separate policymaking from oversight.

In July 1996, PBS reformed its leasing process nationwide to be more businesslike and results-oriented through the implementation of its "Can't Beat GSA Leasing" program. Through this program, PBS responded to the recommendations that had been made and adopted leasing practices commonly used by the private sector, streamlined the leasing process by eliminating or making optional many of the previously required reviews

[2] Federal Office Space: More Businesslike Leasing Approach Could Reduce Costs and Improve Performance (GAO/GGD-95-48, Feb. 27, 1995).

and paperwork, and reduced the time it took to acquire leases. Federal agencies also now have the option either to use PBS to acquire new leased space when necessary or to conduct the lease procurement themselves after requesting a delegation of authority for leasing from PBS. To separate policymaking from oversight, GSA established the Office of Governmentwide Policy outside of PBS.

Scope and Methodology

To understand PBS' lease acquisition process, we reviewed PBS' guidance on its leasing process in the General Services Administration Acquisition Regulation System (GSAR), 48 CFR Part 570, "Can't Beat GSA Leasing" desk guide, and several acquisition letters on real property leasing activities. At your request, we visited PBS' Mid-Atlantic, Southeast, and National Capital (NCR) regions, which combined account for over half of PBS' total number of leased square feet and annual rent paid for leased space. In these three regions, we identified (1) the leasing approaches used—including how each region determined agencies' space requirements, identified and assessed potential space, and communicated with actual offerors—and (2) the effect of solicitation practices on competition.

We spoke with the cognizant officials in each region about the leasing approaches used in the region. We reviewed a random sample of 42 of the 360 leases that the regional office officials identified as becoming effective in these three regions in fiscal year 1999. Since the leasing approach can vary based on the lease's annual rent, we stratified the lease inventory in each region into three groups based on annual rent below $100,000, between $100,000 and $1.9 million, and above $1.9 million. We randomly selected a sample of leases from each of these groups for review.[3] However, because of the relatively small number of lease files we reviewed, we did not generalize the results of our lease file reviews to the universe of leases in the regions we visited. We reviewed GAO protest decisions or protest files for the four leases that became effective in fiscal year 1999 that the regions identified as having protests associated with them. For three of the four protested leases, we also reviewed PBS' lease files. We did not review the other lease file because it contained classified information.[4] In total, we reviewed 45 of PBS' lease files in the three regions we visited.

[3]In the Southeast region, there were three leases above $1.9 million that became effective in fiscal year 1999, and we reviewed the files for all three of these leases. In the Mid-Atlantic region, there were no leases above $1.9 million that became effective in fiscal year 1999.

[4]We did not review any classified documents in the GAO protest files.

We reviewed PBS' lease files to examine the leasing approach used for each lease, including (1) how space needs were determined, (2) how potential sites were identified and assessed, and (3) what level of communication with potential and actual offerors took place. We were unable to assess the level of communication with potential offerors because there were no requirements related to communication with potential offerors and its documentation, and documentation of any communication varied in the lease files we reviewed. While reviewing the lease files, we also looked for the effect that these aspects of the leasing process had on competition. When necessary, we spoke to the contracting officers responsible for the lease files to clarify events that occurred during the leasing process and to get answers to any questions we had on the leasing approach.

We did not evaluate the overall efficiency, effectiveness, and prices of, or customer satisfaction with, PBS' leasing program. Nor did we review PBS' decisions to satisfy the agencies' space requests through leasing rather than construction or purchase of a building.[5] We also did not question PBS' decisions regarding justifications for eliminating sites from competition and for using sole source solicitations.

We did our work from October 1999 to March 2000 in accordance with generally accepted government auditing standards. We requested comments on a draft of this report from the Administrator of GSA. GSA's comments are discussed at the end of this report.

Many Similarities in Leasing Approaches Used in the Regions

The Mid-Atlantic, Southeast, and National Capital (NCR) regions all used the three basic leasing approaches that are provided for in statute or regulation—traditional, simplified, and sole source. Because of NCR's history of volume leasing in a small geographic area, it has developed and uses extensively a unique leasing approach called the Advanced Acquisition Program (AAP), which regional officials said allows it to award leases more quickly by developing an inventory of available space for lease. The extent to which each leasing approach was used in the different regions varied, but specific aspects of the process of acquiring a lease were similar among the regions.

[5]We previously reported that the federal government could realize significant savings if it owned some of the space it leased, but that GSA had to lease the space because it lacked sufficient funds for construction. See General Services Administration: Comparison of Space Acquisition Alternatives—Leasing to Lease-Purchase and Leasing to Construction (GAO/GGD-99-49R, Mar. 12, 1999), Space Acquisition Cost: Comparison of GSA Estimates for Three Alternatives (GAO/GGD-97-148, Aug. 6, 1997), and Federal Office Space: Increased Ownership Would Result in Significant Savings (GAO/GGD-90-11, Dec. 22, 1989).

The Mid-Atlantic region and NCR used what they considered the quickest and easiest leasing approach the majority of the time. The Mid-Atlantic region used the simplified leasing approach for 58 percent of all its leases, and NCR used the AAP approach for 54 percent of all its leases that became effective in fiscal year 1999. The Southeast region used the traditional and simplified leasing approaches equally—45 percent each. Table 1 shows the percentage of each region's use of each leasing approach for leases that became effective in fiscal year 1999.

Table 1: Leasing Approaches Used in Three PBS Regions for Leases Effective in Fiscal Year 1999

		Percentage of leases using			
Region	Total number of leases	Traditional approach	Simplified approach	Sole source approach	AAP
Southeast	**193**	45%	45%	11%	N/A
Mid-Atlantic	**108**	32	58	10	N/A
NCR	**59**	24	5	17	54%

Note 1: Percentages may not add to 100 due to rounding.
Note 2: N/A = not applicable.
Source: PBS regional officials.

As a part of the "Can't Beat GSA Leasing" program, PBS streamlined its leasing process to make it more businesslike, thereby eliminating many of the previously required reviews and documentation. The contracting officer now has more flexibility to make business decisions about leasing, and PBS relies on the contracting officer's knowledge in making leasing decisions. While more flexibility has been built into the process, statutes and regulation still prescribe the circumstances in which the different leasing approaches may be used and certain steps that must occur during the leasing process.[6]

The traditional leasing approach, which can be used for all leases, uses the full and open competition standard that allows all sources to compete for the lease. Under the traditional leasing approach, once the agency's space requirements have been defined, they are generally advertised in the local newspapers to identify potential sites. All space requirements exceeding 10,000 square feet are required by regulation to be advertised in the local newspaper or the Commerce Business Daily. PBS officials told us that they advertise in the local newspapers. The potential sites are visited to determine whether they could satisfy the agency's space requirements. The contracting officer then prepares a Solicitation for Offers (SFO), which contains the agency's requirements and information related to submitting

[6]The specific federal statutes and executive orders that are applicable to PBS' leasing program are listed and explained in a letter we issued on this subject, Federal Statutes and Executive Orders Applicable to the Public Buildings Service's Leasing Program (GAO/GGD-00-27R, Oct. 18, 1999).

an offer. The SFO is to be sent to everyone who is determined to have space that could meet the agency's requirements or who requests the SFO. After offers are received, they are to be evaluated based on the SFO requirements and the offered price. These basic steps were taken in all three regions when the traditional leasing approach was used.

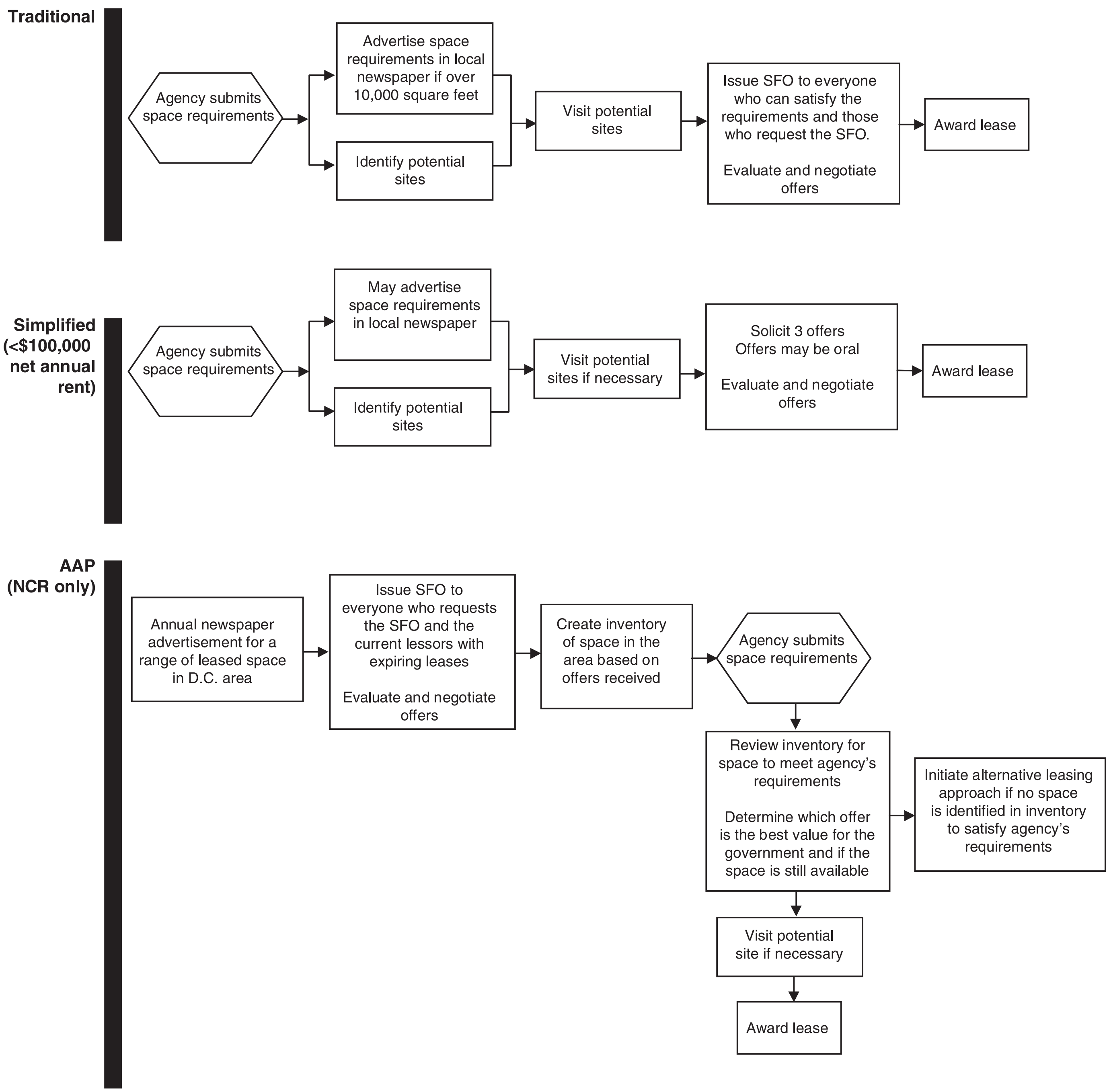
The simplified leasing approach used in the three regions expedites the leasing process and can be used if the average annual rent is expected to be $100,000 or less, excluding operating expenses. The process is intended to be less formal than the traditional leasing approach, with much of it handled by telephone or during on-site visits. Under the simplified approach, the contracting officer only has to (1) solicit three sources to promote competition or (2) document the file to explain the lack of competition. Because space requirements are generally under 10,000 square feet, they are not required by regulation to be advertised in the local newspaper. The potential sites may be visited to determine which three sites satisfy the agency's requirements and thus should be solicited. Offers are to be evaluated by considering the agency's space requirements and the offered price.

Under the sole source leasing approach, the contracting officer determines that there is only one source that can satisfy the agency's space requirements. Sole source lease awards typically occur as an outcome of the traditional or simplified leasing approach, since the determination that there is only one source that can satisfy the agency's space requirements is to be made after the market survey is completed. PBS can negotiate with the one source for the space and then award the lease using a sole source contract. For all sole source leases, there must be information in the file explaining why only one source was solicited. If the lease's annual rent is $500,000 or more, and depending on the size of the lease, a justification to use other than full and open competition must be approved by either (1) the competition advocate in the region responsible for promoting full and open competition, (2) the head of the procuring activity, or (3) the senior procurement executive of the agency. The justification for using the sole source contract must include an explanation of what was done to determine that only one source could provide the space and that the price offered was fair and reasonable.

NCR began to use AAP in 1991 to expedite the acquisition of small amounts of space because of complaints from customer agencies that it was taking too long to obtain needed space. NCR currently uses AAP for leases of all sizes. Through this program, NCR conducts a competitive procurement process through which it annually solicits potential offerors for generic space requirements, ranging from 2,000 to 440,000 square feet, in a certain geographic area. NCR then evaluates the offers received and develops an inventory of available space ranging from 2,000 to 440,000 square feet. When NCR receives a space request, the AAP inventory is sorted according to the agency's space requirements, and those sites in the inventory that may satisfy the requirements are reviewed. The offeror of the available space that will satisfy the agency's requirements at the lowest price is to be awarded the lease. NCR then states that it can award a lease for this space without further competition or negotiation because it has already gone through a competitive procurement process to acquire the space. According to NCR officials, this approach has worked well for NCR because of the large government presence and consequent high demand for space in its relatively small geographic area.

Figure 1 summarizes the traditional, simplified, and AAP leasing approaches. It does not include the sole source leasing approach since sole source awards typically occur as an outcome of the traditional or simplified leasing approach.

Figure 1: Key Steps in Various PBS Leasing Approaches



Source: GAO summary of GSAR and information provided by regional PBS officials.

There are certain aspects of the leasing process, such as the development of space requirements, identification and assessment of potential sites, and communication with actual offerors, that occur in all acquisitions, regardless of the leasing approach used. These aspects of the leasing process were essentially done the same way in each of the regions we visited.

Determination of Agency Space Requirements

In all three regions, space requirements—including the amount of space, location, and any required special features—were primarily developed by the customer agency. PBS officials in the regions told us that they generally question the customer agency's space requirements only if they have concerns about their ability to generate sufficient competition because of the nature of the space requirements.

This is markedly different from how space needs were developed prior to PBS' "Can't Beat GSA Leasing" program, when PBS prescribed what an agency could or could not have for their office space. In fiscal year 1998, PBS began preparing occupancy agreements to establish the relationship between itself and its customer agencies. The occupancy agreement includes the customer agency's identified space requirements, the term of the lease, and the estimated per square foot and annual rental costs of the space requirements. The purpose of the agreement is to ensure that the agency is aware of and agrees to the estimated cost of acquiring space to satisfy its requirements, and understands how changes to the space requirements can result in an increase in the total cost for the space.

Identification and Assessment of Potential Space

Potential sites that may satisfy the agency's space requirements are identified in various ways. While space needs of 10,000 square feet or more must be advertised in a local newspaper, the contracting officer has flexibility in using other sources to identify potential sites to meet space requirements. In the cases that we reviewed, the methods or sources used to identify potential sites varied somewhat by contracting officer. However, these differences did not appear to be due to regional office preferences or direction, but rather to the contracting officer's personal preferences and knowledge of the real estate market. In addition to advertising in local newspapers, contracting officers often contacted local real estate brokers or used their own knowledge of the market to identify potential sites. Examples of other sources that were contacted or reviewed when trying to identify potential sites for leasing included the local government, the chamber of commerce, an economic development authority, a group representing shopping centers, and newspaper advertisements offering space for lease.

To assess a potential site's ability to satisfy the agency's space requirements, the contracting officer or realty specialist and an agency representative may visit the site. Representatives from those sites that appear to satisfy the agency's requirements are then asked to submit an offer. Site visits may not be necessary when the contracting officer is familiar with the potential sites and their ability to satisfy the agency's requirements. When visiting potential sites, it was the practice in all three regions to have a customer agency representative accompany the contracting officer or realty specialist. The PBS officials said that this is an important step because if a particular building will not satisfy the agency's needs, it is important to identify this fact as early as possible and not spend time soliciting such sites. According to PBS officials, there must be a valid reason for why a site will not satisfy the agency's space requirements, since a key aspect of the contracting officer's job is to generate competition. In the cases that we reviewed that included site visits, it appeared that the contracting officer or realty specialist and agency representatives had agreed on which sites would satisfy the agency's space requirements.

Communication With Offerors

According to PBS officials, much of the communication with actual offerors is oral. Regulations require that a written record of all exchanges related to negotiations be placed in the lease file, and that written notice be provided to any offeror excluded from the competition as well as to any unsuccessful offeror. The level of documented communication with actual offerors in the lease files we reviewed varied by contracting officer. Some of the lease files contained a summary, or detailed notes, or records of the specific negotiations with each offeror and a clear trail of written correspondence. Other lease files did not contain documentation of negotiations held with offerors. All of the lease files involving leases where offerors were excluded from competition contained supporting documentation. However, some lease files did not contain documentation of written notice to the unsuccessful offerors. Contracting officers told us that in these cases all required communication occurred, even though it was not documented in the file as is required.

When we brought the issue of lease files missing documentation to the attention of NCR management, they said that their own review of lease files in the region had also found documentation to be missing. As a result of our work and their own review, in December 1999, NCR issued a real estate bulletin on lease file documentation that contained a checklist of required documents. In February 2000, NCR also issued a bulletin on the memorandum the contracting officer is required to prepare that summarizes the lease process, including the results of negotiations with actual offerors. NCR is also providing training for the staff on these bulletins.

Leasing Processes Did Not Unduly Restrict Competition

For the lease files we reviewed, the way in which (1) space needs were determined, (2) potential sites were identified and assessed, and (3) communication with actual offerors took place did not appear to unduly restrict competition. Participants in PBS' leasing process who believe that a contract has been or is about to be awarded in violation of the laws and regulations that govern contracting with the federal government can protest the awards to GSA and us. According to officials in the three regions we visited, about 1 percent (4 of 360) of the leases that became effective in fiscal year 1999 were protested.

The space requirements as defined by the customer agency and reviewed by the contracting officer were generally broad enough to elicit multiple offers. Of the eight leases we reviewed that were awarded using the traditional leasing approach, six received an average of about four offers, with a range of from two to five offers for each lease. For the other two leases, the agencies' requirements that they be located in a geographically small area because of their missions resulted in one offer being received for each lease. Of the 19 leases that were awarded using the simplified approach, the contracting officers solicited at least three sources to promote competition or provided documentation to explain the lack of competition. In the 12 lease cases we reviewed where the sole source approach was used, the required justification for using other than full and open competition was prepared and approved for 10 of the leases. Of the other two sole source leases we reviewed, one had a justification that was prepared but not signed by the appropriate official, while the file for the other lease, which was for a few parking spaces that cost about $5,000 annually, did not document why only one offer was solicited.

Finally, while it was not required by regulation, five of the six lease files we reviewed in NCR that used the AAP approach contained documentation concerning the number of properties identified in the AAP inventory that could satisfy the specific space requirement and how the successful offer was selected. The other AAP lease file did not contain this information.

As discussed previously, it was the practice in the three regions we visited to have a customer agency representative accompany the contracting officer or realty specialist on the visits to the potential sites to help determine which sites could satisfy the agency's requirements and whose representatives should be asked to submit an offer. In the cases we reviewed in which site visits occurred, we found nothing in the files to indicate that the presence of the agency representative on these visits caused sites to be eliminated from consideration without justification. For those cases where the site's representative was not asked to submit an offer, there was generally a reason noted for why the particular site would not satisfy the agency's requirements.

As discussed earlier, the level of communication with the actual offerors that was documented in the lease files varied by contracting officer. PBS contracting officers stated that not all communication with offerors that occurred was documented. However, we did not find anything to suggest that the same information was not being provided to all offerors at the same time. Based on the lease files we reviewed, there was no indication that the extent or means of communications with the actual offerors had an adverse effect on competition.

According to PBS officials in the 3 regions we visited, only 4 of the 360 leases that became effective in fiscal year 1999 were protested. All of these protests were submitted to GAO by incumbent lessors who were not successful in retaining their government lease when GSA conducted a new acquisition for the expiring lease. One protester[7] filed a protest over PBS' determination that its building would not be considered since it was not located within the central business area (CBA) in accordance with executive order 12072.[8] GAO denied this protest because PBS reasonably determined that the protester's building was outside the CBA and thus was not entitled to consideration for lease under the terms of executive order 12072. Another protester filed a protest alleging that PBS deliberately excluded it from the competition when it did not send the protester a copy of the solicitation.[9] GAO denied the protest because PBS advertised the requirements for leased space as required, and obtained full and open competition and a reasonable price for the space in response to the SFO. Additionally, GAO stated that there was no evidence that the contracting officer deliberately excluded the protester from competing. The other two protests were withdrawn by the protesters before GAO issued a decision. In one of these protests, the protester argued that a sole source contract to acquire space was not justified. In reviewing this file, we found that PBS awarded a sole source contract to utilize vacant space that it was already

[7]Peachtree 25th LLC d/b/a American Management Company, B-281185.2, Dec. 4, 1998, 98-2 CPD 126.

[8]Executive order 12072 requires that GSA, in leasing office space in an urban area, give first consideration to a city's centralized business area.

[9]Interproperty Investments, Inc., B-281600, March 8, 1999, 99-1 CPD 55.

leasing and paying rent on. Furthermore, PBS had determined that the protester's space did not meet the agency's minimum requirements. The other withdrawn protest stated that PBS intentionally precluded competition through the use of arbitrary requirements. The lease in question contained relevant security requirements for an agency that required a high level of security.

Conclusions

The GSAR contains the basic leasing approaches and actions that must occur when leasing space for federal agencies. The three regional offices we visited used these basic leasing approaches—traditional, simplified, and sole source—and generally complied with the requirements pertaining to the steps of the leasing process. NCR uses the three leasing approaches contained in the GSAR but has also developed the AAP, which is a variation of the traditional leasing approach. NCR uses AAP extensively to expedite the acquisition of leased space in its region, which is characterized by a large federal presence in a relatively small geographical area.

PBS' contracting officers have been allowed to exercise flexibility and discretion in acquiring leased space for federal agencies. Based on the lease files that we reviewed, we did not find any indication that the process by which leased space was being acquired adversely affected competition.

Agency Comments

We requested comments on a draft of this report from the Administrator of GSA. On March 21, 2000, we met with GSA's Assistant Commissioner, Office of Business Performance, and other GSA officials to discuss our draft report. The officials said that they agreed with the report and noted the weakness in documentation in the lease files. An NCR official said that they too had found weaknesses in documentation of lease files in NCR and have instituted a training program to address the issue. On March 30, 2000, the Assistant Commissioner sent an e-mail message to all GSA regional offices emphasizing the need to document in the lease files conversations with and notification to unsuccessful offerors.

We are sending copies of this report to Senator Joseph I. Lieberman, Ranking Minority Member of your committee; Senator George V. Voinovich, Chairman, and Senator Max Baucus, Ranking Minority Member, Subcommittee on Transportation and Infrastructure, Senate Committee on Environment and Public Works; Representative Bob Franks, Chairman, and Representative Robert Wise, Jr., Ranking Democratic Member, Subcommittee on Economic Development, Public Buildings, Hazardous Materials and Pipeline Transportation, House Committee on

Transportation and Infrastructure; the Honorable David J. Barram, Administrator, GSA; and to others upon request.

If you have any questions about this report, please call me or Ron King on (202) 512-8387. Key contributors to this assignment were Maria Edelstein, Shirley Bates, and Lisa Wright-Solomon.

Sincerely yours,

JayEtta Hecker,
Associate Director, Government
Business Operations Issues

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