



JUL 30 2010

The Honorable Darrell Issa
2157 Rayburn House Office Building
Washington, D.C. 20515

Dear Congressman Issa:

In response to your June 24, 2010, letter to the Recovery Accountability and Transparency Board (Board) regarding signage displayed at American Recovery and Reinvestment Act (ARRA) projects, the Board requested the assistance of the General Services Administration (GSA) Office of Inspector General (OIG). The Board asked the GSA OIG to review three areas identified in your letter: account for all guidance issued by GSA on the posting of stimulus signs; determine whether GSA requires stimulus recipients to post signs and has the statutory authority to do so; and determine whether the agency has relaxed such requirements. The fourth requirement, determining the total cost for posting of the stimulus signs, was delegated by the Board to GSA.

We found that GSA is requiring ARRA signage on major projects, similar to its normal signage requirement for all of its major construction projects. GSA's Public Buildings Service (PBS) has issued internal guidance on ARRA signage, and the signage requirements are incorporated into the construction contracts funded by ARRA. These requirements have not been relaxed and are being followed with occasional deviation from policy. The areas for review, as stated in your letter, and the results of our review are discussed in more detail below.

1. A complete accounting of all guidance issued by any federal agency to recipients of stimulus funds including federal, state, and local agencies on the posting of signs logos or emblems intended to publicly identify the source or expenditure of stimulus funds.

As an initial matter, we note that in March 2009 the Office of Management and Budget (OMB) issued guidance relating to signage at ARRA-financed projects. Specifically, in ARRA guidance titled "General Guidelines for Emblem and Logo Applications," the following language appears: "All projects which are funded by the ARRA should display signage that features the Primary [ARRA] Emblem throughout the construction phase. The signage should be displayed in a prominent location on site. Some exclusions may apply." Below we discuss guidance issued by GSA/PBS.

PBS guidance to recipients regarding signage is done through individual contracts, but is based on internal agency policy. With regard to ARRA signage, PBS modified its standard policy for construction project signage for its ARRA projects. According to

PBS's standard policy¹, "All GSA new construction and prospectus² level repair and alteration projects must display an official construction sign on the site, in a prominent location." The official construction sign is 12-feet by 6-feet, includes the official GSA logo, and identifies the President of the United States, GSA Administrator, PBS Commissioner, GSA Regional Administrator, and the building contractors. Refer to Appendix A for an example of an official construction sign for a project not funded by ARRA.

PBS issued guidance updating the design of official construction signs for ARRA projects through its intranet. The PBS website states that, "All GSA new construction and prospectus level repair and alteration projects must display an official construction sign on the site, in a prominent location. Construction signs must conform to the following look and feel." Two design templates were provided, which were similar to the example in Appendix B. In addition to the intranet guidance, electronic files were provided to GSA's 11 regions containing the aforementioned templates as well as size specifications for site (exterior) signs.

The primary changes to the signage requirements are the addition of the ARRA logo and a revised slogan. For example, the slogan on a non-ARRA sign in Washington, D.C., is "Building for the People of the United States of America," while the slogan on an ARRA sign is, "Recovery in Progress. Working for you. Working for Washington, DC." Refer to Appendix B for an example of an official construction sign for an ARRA project.

These requirements apply to the projects in the GSA's Revised American Recovery and Reinvestment Act Spending Plan categorized as Federal Buildings and Courthouses, Border Stations and Land Port of Entry, and High Performance Green Building Full and Partial Modernizations. It may also apply to some High Performance Green Building Limited Scope Projects depending on the project scope and dollar value.

In addition to the exterior signage, some projects will also have interior signage. For the majority of the High Performance Green Building Limited Scope and Small Projects, PBS has elected to display a smaller version of the newly designed ARRA sign in building lobbies.³ The specifications for these signs were also provided to GSA's 11 regions.

2. Whether any federal agency requires or has required stimulus recipients to post signs, logos, or emblems identifying the source or expenditure of stimulus funds and whether such agency had statutory authority to do so.

¹ Facilities Standards for the Public Buildings Service dated March 2005.

² The prospectus threshold is the dollar amount at which Congressional approval and appropriation is required. The prospectus threshold for fiscal year 2010 is \$2.79 million.

³ The smaller version is 30 inches by 40 inches and contains the same information that is found on the larger, exterior signs. Installation of the interior signs is handled by GSA. Regions reported differences in how interior signs were funded, with ARRA and non-ARRA funds utilized.

In general, GSA's standard practice for new construction and prospectus level repair and alteration projects includes the requirement for exterior signage in the general contract as the contractor's responsibility. On ARRA funded projects, the general contractor, as the stimulus recipient, typically remains responsible for posting the exterior ARRA signage.

However, for interior ARRA signage for limited scope and small projects, the construction contractor generally does not have the responsibility for the signage. Instead, PBS has been contracting separately for the interior signage by using either ARRA funding or non-ARRA funding from the Federal Buildings Fund.

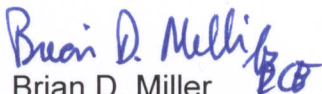
GSA's authority to manage federal properties, which includes construction and repair, is derived from Federal Property and Administrative Services Act of 1949⁴. Although we are aware of no specific statute authorizing or prohibiting signage, the Government Accountability Office has long opined that agencies have a legitimate interest in informing the public of their activities and functions. *See, e.g., 31 Comp. Gen. 311* (Jan. 18, 1952); GAO-01-77R (Washington, D.C., Oct. 18, 2000).

3. If any federal agency has relaxed a requirement that recipients post signs, logos or emblems identifying the source or expenditure of stimulus funds.

Overall, the PBS followed the guidance provided and did not relax the signage requirement, with the exception of a limited number of size and quantity deviations reported by PBS.

I hope we have addressed your concerns. If you need further assistance, please do not hesitate to contact me at (202) 501-0450 or Dave Farley, Director, Office of Communications and Congressional Affairs, Office of Inspector General at (202) 219-1062.

Sincerely,


Brian D. Miller
Inspector General

⁴ 40 United States Code §490, Operation of Buildings and Related Activities.

Appendix A

Non-ARRA Official Construction Sign—Federal Office Building 8 Renovation



Appendix B

ARRA Official Construction Sign—Modernization of the Department of the Interior

