



U.S. General Services Administration (GSA)

**GSA Order: GSA Delegations of Authority - OGC**

ADM 5450.39D CHGE 28

Office of the General Counsel

**Purpose:**

This directive updates and revises Chapter 11, Office of the General Counsel, of the GSA Delegations of Authority Manual.

**Cancellation:**

Supersedes ADM 5454.39D CHGE 3 dated May 15, 2016.

**Nature of Revision:**

This Order updates and revises GSA Delegations of Authority Manual, Chapter 11, Office of the General Counsel, Parts 1 and 3 to reflect organizational and functional changes and documents the commensurate authorities as delegated by the Administrator to the OGC, General Counsel, Deputy General Counsel (Career), and Associate General Counsel for Ethics Law.

a. Under Chapter 11, Part 1:

- (1) Position titles, division names, and legal citations were updated and references to Regions and Regional Counsel were stricken.
- (2) Duplicative delegations were deleted.
- (3) Updated standardized language relating to entering into interagency agreements, MOUs, and MOAs was added along with a standard limitation requiring coordination of agreements with non-GSA entities with 50 or fewer employees with the GSA CABs office.
- (4) A delegation designating the General Counsel as Chief FOIA Officer and assigning responsibility for the FOIA program to the General Counsel was added to properly reflect the GSA FOIA Program's transfer to OGC in 2020.
- (5) The delegations relating to the Ethics program were moved to a new Part 3, and the Deputy General Counsel (Career) was designated as GSA's

Designated Agency Ethics Official.

- (6) A reference to Financial Management authorities delegated by the Chief Financial Officer was removed.
- b. Under Chapter 11, in accordance with the changes to the delegations from the Administrator, the Acting General Counsel is simultaneously updating the redelegations of authority to other OGC staff for consistency. In addition, the redelegations are being updated as follows:
- (1) The provisions delegating authority to settle cases are being simplified and streamlined to provide similarly situated OGC attorneys the same settlement levels. Delegations are reflected in dollar amounts which increase from GS-15 attorneys up to the General Counsel. This structure eliminates the need for a table to settlement authorities accompanying Part 2. The policy goal is to ensure that settlement authority remains at a high level (General Counsel) for claims involving a significant amount of money while allowing Senior Executives purview over cases involving a moderate amount of money, and GS-15 level attorneys purview over cases involving a small amount of money.
  - (2) The authority to settle claims of GSA employees other than travel claims is being redelegated only to the Deputy General Counsels rather than to all of the Associate General Counsels. The policy goal is to ensure that claims with similar facts are treated in a similar manner by having the settlement authority rest with a smaller group of people.
  - (3) The authority to issue advance decisions concerning payments to be made by a disbursing official or the Administrator is being reserved to the General Counsel. The policy goal is to ensure the advance decisions are issued at the same level inside of GSA as those issued by the Government Accountability Office.
  - (4) The authority to decide FOIA appeals is being formally redelegated to the Associate General Counsel for General Law to accurately reflect the structure in place since 2020.

**Delegation of Authority:**

I hereby delegate the authorities contained in Chapter 11, Parts 1 and 3.

**Implementing Actions:**

- a. The changes outlined in this Delegation become effective upon signature.
- b. The Chief Administrative Services Officer may cancel this Order, in consultation with the Chief Human Capital Officer, upon publication of a superseding directive that cancels it in accordance with OAS 1832.1C.
- c. The officials designated in this Order, in conjunction with other appropriate officials, shall take all necessary actions to implement this Order. The GSA Delegations of Authority Manual will be updated at a later date.

**Signature**

/S/  
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Edward C. Forst  
Administrator

4/2/2026  
\_\_\_\_\_  
Date