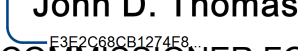




December 16, 2019

MEMORANDUM FOR: AGENCIES SEEKING DELEGATIONS OF LEASE
ACQUISITION AUTHORITY FROM GSA

FROM: JOHN D. THOMAS 
ACTING ASSISTANT COMMISSIONER FOR OFFICE OF
LEASING - PR

SUBJECT: LEASING ALERT (LA-19-12) – Compliance Checklist for
Federal Agencies Seeking Lease Delegations

Purpose. This Leasing Alert establishes a requirement for the completion of a certification of organizational compliance checklist (compliance checklist) by federal agencies seeking to utilize a delegation of GSA lease acquisition authority for real property leasing activities (see Attachment 1 of this Leasing Alert for associated guidance). This requirement is in response to [GAO Report Number 19-405, "Federal Real Property: GSA Needs to Strengthen Oversight of Its Delegated Leasing Program."](#) In order to be eligible for a delegation of leasing authority, agencies must annually represent and self-certify to GSA their organizational capacity utilizing the compliance checklist attached to this Leasing Alert.

Effective Date. This Leasing Alert and attachments are effective immediately.

Applicability. This Leasing Alert and its attachments are mandatory and apply to all federal agencies seeking to utilize a delegation of GSA lease acquisition authority for real property leasing activities. It does not apply to GSA lease acquisitions.

Cancellation. None

Instructions and Procedures. See Attachment 1 of this Leasing Alert for instructions and procedures.

Attachments.

Attachment 1 – Instructions and Procedures

Attachment 2 – Certification of Organizational Compliance Checklist

Attachment 1 - Instructions and Procedures

Certification of Organizational Compliance

In order to be eligible for a delegation of lease acquisition authority, federal agencies must represent and self-certify annually to GSA using the certification of organizational compliance checklist (compliance checklist) as outlined in Attachment 2 of this Leasing Alert. This compliance checklist represents to GSA the federal agency's capabilities regarding program oversight and Federal Management Regulations (FMR) compliance. Delegated federal agencies must represent both the qualifications of their contracting workforce and the adequacy of the organization's support structure, policies and procedures necessary to manage a lease portfolio. Delegated agencies can access the compliance checklist through G-REX TEMPO.

Due Date

Initial submission of FY20 compliance checklists are due March 31, 2020.

For FY21 and beyond, a completed compliance checklist must be provided to GSA's PBS Office of Leasing, Center for Lease Delegations and Contract Administration annually no later than November 30th. Note that, in the event the checklist is not timely submitted, GSA will notify that agency's Senior Real Property Officer (SRPO) or equivalent; depending upon the circumstance, further delegations of authority may be suspended until the compliance checklist is transmitted to GSA.

For a federal agency seeking a delegation of lease acquisition authority for the first time, the compliance checklist must be completed and submitted to GSA prior to GSA granting the delegation authority.

Completed compliance checklists shall be submitted to the following GSA email inbox: delegate@gsa.gov.

Attachment 2

Certification of Organizational Compliance Checklist

By completing this checklist, you are representing your agency's organizational certification of compliance to perform the duties outlined in FMR Bulletin C-2 and Leasing Alert 19-12 in relation to delegation of lease acquisition authority.

Submit checklist no later than November 30th of each fiscal year** to delegate@gsa.gov

**FY 20 deadline is March 31, 2020

PROGRAM OVERSIGHT AREA CERTIFICATION FY20 ____	<input checked="" type="checkbox"/>
Needs assessment reviews are performed prior to seeking delegation of lease acquisition authority (4. General Conditions for the use of All Leasing Authority) (g))*	<input type="checkbox"/>
Files will be available to GSA for review in G-REX at all times - pre and post award (4. General Conditions for the use of All Leasing Authority) (h))*	<input type="checkbox"/>
The agency's overall space needs are consistent with the OMB "Reduce the Footprint" policy and the agency's OMB approved implementation plan (5.(a) Additional Delegation Requirements (9))*	<input type="checkbox"/>
A process is in place to submit delegation of lease acquisition authority requests being submitted to GSA a minimum of 18 months in advance (4. General Conditions for the use of All Leasing Authority) (i))*	<input type="checkbox"/>
A process is in place for required documents to be uploaded into G-REX thirty (30) days after lease award. (5.(c) Additional Delegation Requirements)*	<input type="checkbox"/>
Controls are in place to affect and monitor the minimization of lease extensions and lease holdovers by managing delegated lease inventory (i.e., current, awarded, expiring leases). (4. General Conditions for the use of All Leasing Authority) (j))*	<input type="checkbox"/>
A process is in place for complying with the FRPP reporting requirement. (6. Federal Real Property Profile Reporting Requirements for General Purpose, Categorical and Special Purpose Leasing Authority)*	<input type="checkbox"/>
A process is in place to monitor and assess the cost of leased space relative to industry market rates. (5.(a) Additional Delegation Requirements (7))*	<input type="checkbox"/>
The agency has a sufficient organizational structure and support in relation to legal, subject matter experts (including but not limited to, seismic, fire and life safety, environmental and sustainability experts), and Realty Specialists/LCO's. (4. General Conditions for the user of All Leasing Authority (f) and 5.(a) Additional Delegation Requirements (6))*	<input type="checkbox"/>

A system is in place that insures that only warranted LCO's that have met GSA's training and continuing education requirements are permitted to make awards. (4. General Conditions for the Use of All Leasing Authority (c))*



** Reflects citation from FMR Bulletin C-2, April 16, 2014.*

Name of Individual Certifying and their Official Title (Senior Real Property Officer/equivalent or designee)

Signature of the Individual Certifying (wet or digital)

Date Signed and Submitted
