

FEDERAL REAL PROPERTY COUNCIL

# 2018 GUIDANCE FOR REAL PROPERTY INVENTORY REPORTING

## ADDENDUM

This addendum provides instructions to agencies for the data element Real Property, which is how agencies are to indicate assets to be removed from the Federal Real Property Profile (FRPP) public data set for reasons of national security, in accordance with the Federal Assets Sale and Transfer Act of 2016.

### **44. REAL PROPERTY (ALIAS FOR REMOVAL FROM PUBLIC DATA SET FOR REASONS OF NATIONAL SECURITY)**

Agencies are to respond Yes for the data element Real Property for assets that are to be removed from the FRPP public data set for reasons of national security, as explained below. If submitting data via an XML or CSV file format, enter the code Y to indicate assets that are to be removed from the FRPP public data set for reasons of national security, as explained below.

Agencies are to respond No for the data element Real Property for assets that may be included in the FRPP public data set. If submitting data via an XML or CSV file format, enter the code N to indicate assets that are to be included in the FRPP public data set.

#### **Notes:**

- Every asset must report a value for the Real Property data element.
- If an asset has a value of yes for the real property data element, then data element 43, FOIA exemptions, is optional. The FOIA exemptions data element can either have a NULL value OR provide value 10 for the FOIA exemption data element. An error would only be generated if real property data element (national security) is Y and the FOIA exemption data element value is 01, 02, 03, 04, 05, 06, 07, 08, or 09. If real property is no, then FOIA exemption value can be any of the 10 choices.
- If an asset has a value of no for the real property data element, then data element 43, FOIA exemptions, is required. The FOIA exemptions data element would have a value of 01 through 10, corresponding to the 9 categories of FOIA exemptions and value 10 representing no FOIA exemption (and no national security considerations).

### **NATIONAL SECURITY EXCLUSIONS**

In accordance with the Federal Assets Sale and Transfer Act of 2016 (Public Law 112-287) (FASTA), the U.S. General Services Administration (GSA) made Federal Real Property Profile (FRPP) data accessible to the public on December 16, 2017. The database did not include assets withheld for reasons of national security, procurement laws or a Freedom of Information Act (FOIA) exemption.

If an asset in the agency's inventory meets security-related criteria for exclusion from the public data set, then the agency should mark the asset as a national security asset by

selecting “YES,” with associated code “Y” or “NO” and the code “N,” in the data element “Real Property.” GSA will remove that asset entirely from the FRPP public data set.

Section 2 of Executive Order 13327, Federal Real Property Asset Management, states For the purpose of this order, Federal real property shall exclude...land and interests in land that are withheld from the scope of this order by agency heads for reasons of national security, foreign policy, or public safety.

At the request of GSA and the Office of Management and Budget, the Department of Homeland Security’s Interagency Security Committee (ISC) assessed the risks associated with releasing FRPP data to the public. The ISC also recommended criteria for identifying national security assets for exclusion from the required publication, in three categories: (1) specific data elements that could identify facility vulnerabilities individually or when aggregated with other data; (2) mission criticality criteria; and (3) agency-specific restrictions on the public release of facility information.

### **1. Specific Data Elements**

Based on the ISC’s recommendations, the following FRPP data elements will be omitted from the public data:

- Field Office
- Reporting Bureau
- Using Organization
- Replacement Value
- Repair Needs
- Condition Index
- Owned and Otherwise Managed Annual Operating and Maintenance Costs
- Leased Annual Rent to Lessor
- Leased Annual Operating and Maintenance Costs
- Annual Operating and Maintenance Component Costs
  - Total Recurring Maintenance and Repair
  - Elevator
  - HVAC
  - Plumbing
  - Total Utilities
  - Water/Sewage
  - Electricity
  - Gas
  - Steam
  - Cleaning and Janitorial
  - Roads and Groundskeeping
- Installation ID
- Sub Installation ID
- Installation Name
- Number of Federal Employees
- Number of Federal Contractors

## 2. Mission Criticality Criteria

The value of a federal facility is based largely on that facility's mission, particularly as it relates to National Essential Functions<sup>1</sup> and to government activities mentioned below. The ISC derived information from the Risk Management Process for Federal Facilities (RMP) Standard<sup>2</sup> to consider how government facilities can be categorized as national security assets.

The RMP outlines criteria for determining a facility security level (FSL), one of which is mission criticality. Mission criticality is based on the mission(s) carried out by a facility's federal tenants—not by tenant agencies overall. Mission criticality is then assigned one of four risk values: Low, Medium, High, or Very High. For reasons of national security, assets whose mission criticality criterion value is High or Very High should be excluded from the public FRPP data set.

Very High mission-critical assets perform one of the following roles:

- House chief officials for a branch of government; national leadership, seats of constitutional branches
- House communications centers supporting essential government functions
- House essential communications, workstations, electronic equipment, or hard-copy documentation necessary for defense or intelligence activities
- House individuals who advance American interests with foreign governments
- House government officials of foreign nations
- House individuals or specialized equipment necessary to identify and analyze threats to homeland security
- House individuals who conduct criminal investigations into high-profile crimes
- House personnel or specialized equipment necessary to identify or respond to large-scale or unique incidents, or is an identified continuity of government (COG) facility
- House personnel or specialized equipment essential to regulating national fiscal or monetary policy, financial markets, or other economic functions
- Contain currency, precious metals, or other material necessary to maintain economic stability
- House specialized equipment necessary to process or monitor financial transactions for the nation's economy
- House personnel or specialized equipment necessary to detect or respond to unique public health incidents
- House personnel or specialized equipment affecting the strategic capability for the defense of the United States, or otherwise supports such capability
- House material or information that, if compromised, could cause a significant loss of life—including but not limited to production quantities of chemicals, biohazards, explosives, weapons, etc.
- COG facilities

High mission-critical assets:

- House original, irreplaceable material or information central to the daily conduct of government

- House personnel or material necessary to the development of defense systems
- Are designated as a shelter in the event of an emergency incident
- House regional or headquarters offices for policy and management oversight
- Contain biological/chemical/radiological/medical research, or store research-and-development (de minimis) quantities of chemicals, biohazards, explosives, and similar items
- House continuity-of-operations facilities for department and agency headquarters
- House general criminal investigative work
- House personnel or specialized equipment affecting tactical or operational capability for the defense of the United States, or otherwise supports such capability
- House functions related to Judicial processes

Questions regarding how to determine the mission criticality of an asset should be directed to your agency's chief security officer.

### **3. Agency Specific Guidance**

Agencies should consult with their chief security officers to identify agency-specific guidance or policies restricting the public release of facility information. Such guidance may require a national security exemption for an asset. For example, a laboratory building might normally be assigned a lower mission criticality value, yet the laboratory it contains may conduct research and diagnostic activities vital to protecting the United States from threatening disease agents.