

FEDERAL REAL PROPERTY COUNCIL

# 2022 GUIDANCE FOR REAL PROPERTY INVENTORY REPORTING

## ADDENDUM

This addendum provides instructions to agencies for the Real Property data element, 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 (FASTA) of 2016.

Data which is excluded from the detailed level public data set for national security reasons will instead be released in a summarized format.

Data which does not qualify for the national security exclusion in accordance with FASTA, nor designated as Controlled Unclassified Information (CUI), but which may present force protection or other security concerns, may instead be released at a detailed level but with certain specific data elements withheld.

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

**This is a required data element for all assets worldwide.**

Agencies are to respond YES for the Real Property data element for assets that are to be removed from the detailed level 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 detailed level 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 detailed level 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 detailed level 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 43a FOIA Exemption must not be reported.

If an asset has a value of NO for the Real Property data element, then data element 43a FOIA Exemption is required. The FOIA Exemption data element must 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).

## CONTROLLED UNCLASSIFIED INFORMATION EXCLUSION

If the real property data related to an asset has been designated by the submitting agency as CUI in accordance with Executive Order 13556, the agency should select “YES,” with associated code “Y” in the data element “Real Property.” GSA will remove that asset from the detailed level FRPP public data set and will instead release it in summarized format.

## NATIONAL SECURITY EXCLUSIONS

In accordance with FASTA, the U.S. General Services Administration (GSA) made Federal Real Property Profile (FRPP) data accessible to the public on December 16, 2017. The publicly accessible data did not include assets withheld for reasons of national security, procurement laws, or a Freedom of Information Act (FOIA) exemption as prescribed by FASTA.

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” in the data element “Real Property.” GSA will remove that asset from the detailed level FRPP public data set and will instead release it in summarized format.

At the request of GSA and the Office of Management and Budget, in 2017 the Department of Homeland Security’s Interagency Security Committee (ISC) assessed the risks associated with releasing FRPP data to the public. In response to the third and fourth recommendations from [GAO audit 20-135](#)<sup>1</sup>, in June 2020 the ISC issued updated risk-based criteria for identifying national security assets for exclusion from the required publication.

The ISC now recommends that the FRPP “allow reporting agencies to request redaction of asset data when they reasonably foresee that disclosure would harm an interest (information or assets) protected by the National Security exemption allowed for in PL 114-287. In making this determination, a consistent, risk-based approach should be used.” The ISC listed the following considerations to be used in making the determination:

1. Would the degradation to information or assets within this facility or installation reasonably be expected to cause serious or exceptionally grave damage to the national security of the United States (e.g., a classified Primary Mission Essential Function is performed at the facility)?
2. Is the threat to this facility or installation, as determined by the last risk assessment, very high?

---

<sup>1</sup> GAO recommendation three stated the Administrator of GSA should work in consultation with agencies to determine which, if any, data should be withheld from public release. GAO recommendation four stated the Administrator of GSA should instruct each agency to apply a consistent, risk-based approach in determining which, if any, assets or asset-specific information should be withheld from public release.

3. Is the facility or installation closed to the public?
4. Is this information already available in the public domain?

In addition to the above criteria, other agency-specific criteria may require a national security exemption. 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. To identify the ISC member within your agency, please send an email request to [ISC.DHS.GOV@HQ.DHS.GOV](mailto:ISC.DHS.GOV@HQ.DHS.GOV). 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.

The considerations and criteria mentioned above should be applied on an individual basis to the facility or installation, rather than applied in a blanket fashion to the entire portfolio.

Agencies should review the Excluding Specific Data Elements section of this document before submitting a Yes value to the National Security Exclusion data element. If certain data elements raise security concerns within the agency, the assets may not need to be removed from the public data set, instead just those data elements can be removed for that agency's inventory.

## **SUMMARIZED DATA FROM EXCLUDED ASSETS**

In response to GAO recommendation five<sup>2</sup>, the FRPC developed the following approach to summarize data which cannot be displayed at a detailed level in the FRPP public data set.

If an asset has a value of YES for the real property data element, indicating that it is excluded from the detailed level public data set, then GSA will summarize the data associated with that asset in the following method. The data will be organized by the Reporting Agency and Installation Name data elements. The City, State, and Country data elements will also be shown to provide a geographic reference. If the assets within the installation cross multiple cities or states, then the term "Multiple Cities" or "Multiple States" will be shown.

The summarized totals will be grouped by Legal Interest (owned, leased, and otherwise managed). Buildings will be summarized by asset count and square feet, structures will be summarized by asset count, and land will be summarized by acres.

---

<sup>2</sup> GAO recommendation five stated that the Administrator of GSA should allow agencies to provide summary data for secure installations.

Before the data is released publicly, GSA will first share the summarized data with the submitting agency for its review. The data released in the summarized format will be:

- 9. Reporting Agency
- 30c. Installation Name
- 24. City
- 25. State
- 26. Country

Owned Buildings:

- Building asset count
- Total Sq. Ft.

Otherwise Managed Buildings:

- Building asset count
- Total Sq. Ft.

Leased Buildings:

- Building asset count
- Total Sq. Ft.

Owned Structures:

- Structure asset count

Otherwise Managed Structures:

- Structure asset count

Leased Structures:

- Structure asset count

Owned Land:

- Total acres

Otherwise Managed Land:

- Total acres

Leased Land:

- Total acres

## **EXCLUDING SPECIFIC DATA ELEMENTS**

Members of the FRPC expressed concern that the ISC revised recommendations no longer included a reference to removing certain data elements from the public data set, which caused concern to agency facility security organizations. The concern focused on force protection of the asset and the people working there. While force protection was not specifically identified in the FASTA law as a reason to exclude data, the FRPC agreed on the following approach to allay those concerns.

The FRPC Data Governance working group developed a small subset of FRPP data elements, which can be considered for removal from an agency's publicly released detailed level data. Those data elements are:

- 10. Using Organization
- 14. Replacement Value

- 15. Repair Needs
- 18. Condition Index
- 19A. Owned and Otherwise Managed Annual Operating Costs
- 20A. Owned and Otherwise Managed Annual Maintenance Costs
- 19B. Lease Annual Operating Costs
- 20B. Lease Annual Maintenance Costs
- 21. Lease Annual Rent to Lessor
- 40. Number of Federal Employees
- 42. Number of Federal Contractors

If any or all of the above data elements pose a risk to the agency's real property inventory or to staff working in those assets, the agency must send GSA an email or letter stating that it requests that these data elements for its inventory be excluded from the FRPP public data set. The letter must be sent to **frppcerts@gsa.gov** by January 31 following the date of submission (45 days later). The message MUST indicate:

- the basis for the exclusion (i.e., force protection),
- that the agency General Counsel and facility security organizations have been consulted and concur with the request,
- which of the data elements are to be excluded.

GSA will not consider agency requests for exclusion of any data element which is not listed above.

Once GSA receives the request, it will remove the values for those data elements listed for that agency's inventory within the detailed level FRPP public data set. GSA will not consider any requests for data element exclusions after the public data set has been released.