

## SECTION 2-2: PERFORMANCE MEASURES

|        |                          |
|--------|--------------------------|
| 2-2-00 | Policy                   |
| 10     | Procedures               |
| 20     | Guidance and Information |
| 30     | Reporting Requirements   |

### 2-2-00 POLICY

HHS utilizes the following mandatory performance measures in the management of real property assets:

- Mission Dependency
- Condition Index
- Utilization Index
- Operations and Maintenance Cost
- Construction Program Metrics
- Daily Decision Making Metrics

Use of other, optional performance measures is encouraged.

#### A. MISSION DEPENDENCY

HHS measures the “Mission Dependency” of each of its real property assets to determine the value an asset brings to the performance of the mission as determined by the OPDIV in the categories of Mission Critical, Mission Dependent – Not Critical, and Not Mission Dependent. Mission Dependency applies to each facility for each OPDIV. The applicability of this metric extends to all properties leased and/or owned and operated by the OPDIV.

#### B. CONDITION INDEX

HHS uses Condition Index (CI) as a metric to assess the physical condition of its facilities. CI is an indicator of the physical condition of a facility *at the time* a visual condition assessment is performed. In addition to the metric, the visual condition assessment process, which gathers information necessary to calculate CI, yields information about specific defects needed for planning and executing specific capital repair projects. CI is calculated as the ratio of repair needs to asset value. The CI will be calculated annually, will be reported as a “percent condition” on a scale of 0% to 100%, and will be calculated as  $[(1 - \text{\$repair needs}/\text{\$PRV}) \times 100]$ . (A higher CI indicates that a constructed asset is in better condition.) “Repair needs” is the amount necessary to ensure that a constructed asset is restored to a condition substantially equivalent to the originally intended and designed capacity, efficiency, or capability.

‘Repair need’ is a response to deferred maintenance, which is defined as maintenance that was not performed when it should have been or was scheduled to be and which, therefore, is put off or delayed beyond the year of the condition assessment. ‘Asset value’ is defined as “plant replacement value (PRV) where the PRV is the cost in current dollars to replace the existing facility with new construction supporting existing functions. The process and results of defining deferred maintenance are equally critical to consistently calculating the CI metric for each facility. CI applies to each HHS owned building and structure as reported in accordance with FRPC requirements.

C. UTILIZATION INDEX

HHS utilizes a Utilization Performance Measure in conformance with FRPC guidance to determine the extent of facilities' utilization in five major property types occupied by HHS. Annually in the 4<sup>th</sup> quarter, HHS provides guidance to the OPDIVs for reporting facility utilization in the *HHS Guidance for Real Property Inventory Reporting*. The information is reported and kept current in the Automated Real Property Information System. The performance measure applies to each HHS office, warehouse, laboratory, hospital, and residence (as defined by the Federal Real Property Council). Applicability extends to all properties leased and/or owned and operated by HHS, but not properties owned by the HHS and operated by others, such as the IHS properties operated by tribes.

D. OPERATIONS AND MAINTENANCE COST

The purpose of this measure is to facilitate the ability to compare facility operating costs in a meaningful fashion and identify facilities that operate most/least efficiently. This is valuable information for decision-makers in determining how to invest resources for maximum return or improved performance. Each OPDIV or other HHS component will follow uniform procedures in reporting total operating and maintenance costs on a 'by building' basis. This performance measure applies to all HHS-owned buildings and leased buildings with delegated authority for operations and maintenance. The operating and maintenance cost measure is made up of four component costs:

- (1) Recurring maintenance and repair costs;
- (2) Utilities (includes central plant operation and purchase of energy);
- (3) Cleaning and/or janitorial costs (includes pest control, refuse collection, and disposal to include recycling operations); and
- (4) Road/grounds costs (includes grounds maintenance, landscaping, and snow and ice removal from roads, piers, and airfields).

E. CONSTRUCTION PROGRAM METRICS

The purpose of these measures is to -

- (1) Determine the percent a project changes in scope from planning through completion;
- (2) Determine the percent a project changes in cost from planning through completion; and
- (3) Determine the percent a project changes in schedule from planning through completion.

These performance measures apply to all projects that require an FPAA. With respect to change in project cost, each OPDIV shall generate a Project Budget Template.

F. EFFECTIVE DATE

This policy is effective September 12, 2008.

2-2-10 PROCEDURES

A. MISSION DEPENDENCY

Each OPDIV is responsible for the following to assure appropriate implementation:

1. Each OPDIV will apply the measure to 100 percent of the facilities in its inventory.

2. Each land-holding OPDIV will utilize an electronic asset inventory system. The OPDIV is to ensure that the inventory system has a data field called "Mission Dependency," allowing for the input of one of the Mission Critical letter designations identified in the procedures below. Additionally, a text field must be provided for use in providing an explanation for any assets designated as "Not Mission Dependent." The OPDIVs will ensure this system is coordinated with HHS prior to implementation.

The OPDIVs will utilize the following procedure:

1. Each OPDIV will evaluate the functions within each of its assets, categorize the asset, and enter the category into the OPDIV's asset inventory system using the following designations:

**Mission Critical** - Without the constructed asset or parcel of land, mission is compromised.

**Mission Dependent** - The asset does not fit into Mission Critical or Not Mission Dependent categories. The asset's primary function supports the Mission.

**Not Mission Dependent** - Mission is unaffected.

2. Each asset will receive only one categorization designation. Where there are multiple functions for a facility, then the highest applicable mission dependency category should be utilized.
3. The evaluation will be based on the facilities function under normal operations, not a catastrophic scenario.
4. Where any asset is designated as "Not Mission Dependent", the OPDIV will complete the text field to provide the explanation for this designation.
5. On a quarterly basis the OPDIV will notify OFMP of any changes to the inventory system as part of the Quarterly Certification Statement process.
6. On an annual basis, in the first quarter of each fiscal year, the OPDIV will review the asset categorizations for Mission Dependency and update the asset inventory system with any changes prior to HHS uploading the data to the Federal Real Property Profile (FRPP) system.

#### B. CONDITION INDEX

Each OPDIV is responsible for the following to assure appropriate implementation:

1. Each land holding OPDIV will implement a process to perform a condition assessment to identify repair needs of each owned building and structure reported in ARIS. The process shall result in the calculation and reporting of a Condition Index (CI) according to methods prescribed by HHS policies.
2. The OPDIV is to ensure that their local automated inventory system has a data field for CI for export to ARIS.
3. On a quarterly basis the OPDIV will notify OFMP of any changes to the inventory system as part of the Quarterly Certification Statement process.
4. On an annual basis, in the first quarter of each fiscal year, the OPDIV will review the asset CIs and update the asset inventory system with any changes prior to HHS uploading the data to the Federal Real Property Profile (FRPP) system.

#### C. UTILIZATION INDEX

Each OPDIV is responsible for the following to assure appropriate implementation:

1. Each OPDIV or other HHS component will apply this measure to 100% percent of its relevant portfolio.
2. Each OPDIV will utilize an electronic asset inventory system. The OPDIV component is to ensure that the inventory system has data fields for the relevant property types and for the categories Over Utilized, Utilized, Under Utilized, and Not Utilized, allowing for the input of one of the Utilization letter designations identified in the procedures below. The OPDIV will ensure this system is coordinated with OFMP prior to implementation.
2. Each OPDIV component will follow the procedures as contained in the *HHS Guidance for Real Property Inventory Reporting* provided annually in the 4<sup>th</sup> quarter to determine the utilization of each property type.
3. On a quarterly basis the OPDIV will notify OFMP of any changes to the inventory system as part of the Quarterly Certification Statement process.
4. On an annual basis, in the first quarter of each fiscal year, the OPDIV will review the asset categorizations for utilization and update the asset inventory system with any changes prior to HHS uploading the data to the Federal Real Property Profile (FRPP) system.

**D. OPERATIONS AND MAINTENANCE COST**

Each OPDIV or other HHS component is responsible for the following to assure appropriate implementation:

1. Each OPDIV will input operations and maintenance cost data from the prior fiscal year (including lease costs for leased assets) for each asset by November 15th each year to facilitate the annual data import to ARIS.
2. Identify all sources of O & M funding,
3. Devise a method for capturing the amount of funds expended for O & M work in a given fiscal year.
4. Distribute the expenses at the constructed asset level. This can be accomplished using an algorithm if the O & M expense data does not exist at the constructed asset level.
5. On a quarterly basis the OPDIV will notify OFMP of any changes to the inventory system as part of the Quarterly Certification Statement process.
6. On an annual basis, in the first quarter of each fiscal year, the OPDIV will review the asset data for operating cost and update the asset inventory system with any changes prior to HHS uploading the data to the Federal Real Property Profile (FRPP) system.

**E. CONSTRUCTION PROGRAM METRICS**

1. **Change in Project Scope:** The following procedure shall be utilized to implement this measure:
  - a. Projects shall be measured annually and reviewed quarterly via the Quarterly Status Report.
  - b. Project Scope shall be defined as FPAA, field 14a. Project Scope shall be further defined as physical size and characteristics, functions, and special features (see FPAA instructions).
  - c. The original, Revision 0, HHS approved FPAA shall be the benchmark for project scope.

- d. Annual reporting of this measure as part of the scorecard process will utilize the most recent approved FPAA or the Quarterly OFMP Report, whichever is most recent.
  - e. Final report of change in project scope shall occur when project reaches “Operational” (at “Beneficial Occupancy” of a facility).
  - f. Deliverable: Reporting of Change in Project Scope shall include the benchmark (original) FPAA, subsequent approved FPAA amendments, and the most recent FPAA (or Quarterly Report) with transmittal memo.
  - g. Additional explanation sheets submitted with FPAA can be included with Change in Project Scope.
2. **Change in Project Cost:** Each land holding OPDIV is responsible for the following to assure appropriate implementation:
- a. Projects shall be measured annually and reviewed quarterly via the Quarterly Status Report.
  - b. Project Cost shall be defined as FPAA, block 6.b.
  - c. The original, Revision 0, HHS approved FPAA shall be the benchmark for project cost.
  - d. Utilize an OPDIV generated project budget template to capture all project costs and cross reference with the FPAA cost data in fields 9 and 10.
  - e. Annual reporting of this measure as part of the scorecard process will utilize the most recent approved FPAA or the Quarterly OFMP Report, whichever is most recent.
  - f. Final report of change in project cost shall occur when all claims are resolved and the project reaches “Operational” (at “Beneficial Occupancy” of a facility).
  - g. When submitting final report of change in project cost, provide explanation or notation for:
    1. Final project costs that are unknown (*e.g.*, pending litigation)
    2. Projects that are incremental in “Beneficial Occupancy”
  - h. Deliverable: Reporting of Change in Project Cost shall include the benchmark (original) FPAA, subsequent approved FPAA amendments, and the most recent FPAA (or Quarterly Report) with transmittal memo.
  - i. Additional explanation sheets submitted with FPAA can be included with Change in Project Cost.
3. **Change in Project Schedule:** Reporting will be part of the testing process for metric applicability purposes. The following procedure shall be utilized to implement this measure:
- a. Projects shall be measured annually and reviewed quarterly via the Quarterly Status Report.
  - b. Project Schedule shall be defined as FPAA, block 15.
  - c. The original, Revision 0, HHS approved FPAA shall be the benchmark for project schedule.
  - d. Annual reporting of this measure as part of the scorecard process will utilize the most recent approved FPAA or the Quarterly OFMP Report, whichever is most recent.
  - e. Final report of change in project schedule shall occur when project reaches “Operational” (at “Beneficial Occupancy” of a facility).
  - f. Deliverable: Reporting of Change in Project Schedule shall include the benchmark (original) FPAA, subsequent approved FPAA amendments, and the most recent FPAA (or Quarterly Report) with transmittal memo.
  - g. Additional explanation sheets submitted with FPAA can be included with Change in Project Schedule.

## F. DAILY DECISION MAKING METRICS

1. **Owned and Delegated Asset Decisions – Checklist and Report:** The purpose of the owned and delegated asset decisions checklist and report is to address the requirements of the OMB performance measures to evidence that real property performance measures are used in daily decision-making as it applies to projects. Reporting of projects to HHS is selected by the OPDIV in accordance with the current Certification Statement requirements.

If a project is an HHS Level Approval Project, the documentation of data being used in daily decision making with expected results is documented using the HHS Form 300 – Facility Project Approval Agreement and submitted in accordance with *HHS Facilities Program Manual Volume I (2006)*. Actual results and consequences of those results within an organization's asset management process is documented and submitted in the final FPAA report required in E. Construction Program Metrics.

If a project is a smaller project (below the HHS Level Approval thresholds) the documentation of data being used in daily decision making with expected results, actual results and consequences of those results within an organization's asset management process is documented and submitted through the HHS Facility Project Decision Report (FPDR). HHS OFMP **does not** require the submission of documentation for all OPDIV level projects. The size (dollar amount) and type of non-HHS Level Approval projects for submission are determined by the OPDIV. Consideration should be given to reporting projects whose primary focus is to improve condition index (reduce BMAR) or renovations due to mission necessity. Projects selected should have been completed through project closeout. The OPDIV shall establish reporting requirements, beyond the HHS OFMP requirement, for submitting documentation of OPDIV level internal projects.

2. **Lease Decisions – Checklist and Report:** The purpose of the lease decisions checklist and report is to address the requirements of the OMB performance measures to evidence that real property performance measures are used in daily decision-making as it applies to lease actions. Reporting of projects to HHS is selected by the OPDIV in accordance with the current Certification Statement requirements.

The lease decisions checklist is to be completed for those lease actions for which OPDIVs submit reports to HHS to provide specific examples of the decision process for acquiring a leased asset. **OPDIVs are not required to complete the checklist and report for lease actions < 5,000 sq.ft.** The use of the Checklist will be effective starting the 1Q FY 09 (October 1, 2008). The submission of the checklist to HHS is required after the internal agency approval process and prior to the start of the lease acquisition process.

## 2-2-20 GUIDANCE AND INFORMATION

### A. PERFORMANCE MEASURES DEFINITIONS AND CALCULATIONS REFERENCES

HHS complies with the performance measures definitions and calculations to the extent they are defined in the Federal Real Property Council's (FRPC) *Guidance for Real Property Inventory Reporting*. The FRPC guidance is updated annually and is available on-line. As all the Federal Agencies have different missions, processes, and protocols the FRPC guidance only goes to the extent considered reasonable to generally address performance measures. In an effort to provide flexibility to reporting Agencies, FRPC guidance instructs Agencies to further define the performance measures as they apply to their particular situations. This information is provided to HHS and its entities in the

HHS *Guidance for Real Property Inventory Reporting*. Similar to the FRPC guidance, HHS guidance is updated annually and distributed throughout the organization typically in the fourth quarter.

Guidance and information contained in this section should be used in coordination with both the FRPC and HHS *Guidance for Real Property Inventory Reporting* documents. When any discrepancy between this section and the guidance documents occur, the guidance documents should be followed.

## B. FACILITY CONDITION ASSESSMENT

HHS recommends various optional metrics to assess the physical condition of its facilities. These metrics include: Backlog of Maintenance and Repair (BMAR) and Sustainment Rate (SR). Each is described below:

### 1. Backlog of Maintenance and Repair

BMAR is only mentioned here to suggest that OPDIVs recognize the terms BMAR, “deferred maintenance”, and “repair needs” as all describing the same figure (*e.g.*, the numerator in the equation used to calculate Condition Index).

BMAR is essentially the same as “repair needs”. That is, a repair need is a “need” because it exists at the time of the condition assessment; having been left unaccomplished, put off or delayed (backlogged). If the associated repair had been done there would be no need (no backlog). If a repair is anticipated in the future, it should not be considered a “need” for condition assessment purposes since it is not needed at the time the assessment is being performed.

### 2. Sustainment Rate (SR)

*Sustainment Rate*, or SR, indicates the degree to which necessary funding for routine maintenance, repair, and replacement projects is being expended. SR does not include Capital Improvement projects. SR represents the ratio of actual maintenance expenditures divided by total required expenditures. The result, multiplied by 100, yields a percentage; higher percentages represent better sustainment. If sustainment funding drops below acceptable profiles, the shortfall is likely to reduce the life of the asset and lead to increased long-term costs. Acceptable profiles are typically represented by industry standards for like-facilities over time (*e.g.*, 40 years, 67 years, 100 years). The determination of acceptable OPDIV funding profiles needed to achieve a minimum acceptable SR level will be based on OPDIV-specific condition assessments, competing requirements, and necessary mitigations.

SR is one of the metrics available to accomplish the goal of “obtaining and maintaining appropriate levels of maintenance funding”. Each OPDIV is encouraged to use an electronic asset inventory data processing system capable of calculating, storing, and reporting SR values. Upon annual update of their assessment information, OPDIVs are encouraged to review their SR ratio, to assess its driving factors, and to adjust their budget/investment strategies as warranted.

## CONDITION INDEX

In the past there have been a variety of methods used to calculate the average Condition Index (CI) for a group of facilities (aggregate CI). Each of the methods used, provides a different answer. For reporting purposes, the Department has always used the straight average, which is the total of all the CI numbers divided by the total number of facilities. It has been recognized that the BMAR weighted average is a more useful number for planning purposes because it can be used to estimate BMAR for the entire Department or OPDIV. The BMAR weighted average is calculated by totaling the CRV and the BMAR for all facilities, then calculating the aggregate CI from the totals.

Please note these methods are used for reporting to the Department only, if you have other requirements for reporting CI, use the method recommended by the requesting agency.

In addition to the methods described above, the OPDIVs should use the assumptions described below to report the aggregate condition index of their facilities.

#### Assumptions

1. Individual asset CI shall be calculated for all HHS owned buildings and structures in the Automated Real Property Inventory System (ARIS) Database. All of these assets will be used in the aggregate CI calculation.
2. If the CI is equal to zero and it will be used in the aggregate CI calculation, the OPDIV must be able to explain why the condition is so poor (fire, hurricane, etc...).

### C. UTILIZATION INDEX

Each OPDIV or HHS component will follow the procedures described in the *HHS Guidance for Real Property Inventory Reporting* to determine the utilization of each property type as Over Utilized, Utilized, Underutilized, or Not Utilized.

### D. OPERATIONS AND MAINTENANCE COST

If all cost information is not available at the building level then costs may be allocated using an algorithm. OPDIVs shall be able to describe the algorithm applied for each measure, but need not include that explanation in the database.

Where some of the operating and maintenance functions are performed by contractors and the costs are not allocated at the building level, the OPDIVs should revise the contract format to capture actual costs at the building level when the requirement is re-solicited.

Explanations for measuring the four components of the operating and maintenance costs are described below:

1. Recurring Maintenance and Repair Costs (\$/GSF):
  - a. Includes the following building systems and/or components:
    - HVAC systems to include building automation systems;
    - Electrical systems to include uninterruptible power systems, emergency power, and emergency generators;
    - Plumbing systems to include restroom fixtures, domestic water, sanitary sewer, reverse osmosis, natural gas, and compressed air;
    - Chilled water systems;
    - Steam and condensate systems;
    - Fire protection to include fire alarm systems, sprinkler systems, exit lights, fire stopping, cooking hoods, rated walls, and rated doors;
    - Architectural components to include flooring, doors with associated hardware, ceilings, painting, wall coverings;
    - Refrigeration for cold rooms and DX systems;
    - Card access systems to include readers, panels, and software;

- Medical gas systems;
  - Nurse call systems;
  - Building structure and components;
  - Laboratory fume hood exhaust systems;
  - Roofs, downspouts and gutters;
  - Predictive maintenance monitoring equipment;
  - Perimeter fencing and gates; and
  - Elevators, escalators, and lifts.
- b. Includes labor and materials for the following services:
- Preventive or predictive maintenance procedures on building equipment and components;
  - Service or trouble calls related to HVAC, electrical, plumbing, architectural components such as doors, floors, and windows, lighting, fire alarms, and any other component directly related to the safe operation of the building;
  - Miscellaneous repairs less than \$10,000;
  - Facility management services;
  - 24/7 emergency response;
  - Day to day operations and routine functional checks (logs) of critical equipment or problem areas;
  - Maintaining an accurate building equipment inventory and accurate building drawings;
  - Operating support for program related upgrades or capital repairs to include shutdowns as well as providing basic information about the building and associated systems; and
  - Associated support for all operations and maintenance services such as vehicles, vehicle maintenance, training, computer equipment, maintenance related software systems, office supplies, copiers, fax machines, phones, radios, IT support, and supervision;
- c. *Does not* include the following:
- Facility condition assessments;
  - Loading dock management services;
  - Animal care cage wash equipment maintenance and repair;
  - Other miscellaneous program related equipment maintenance and repair;
  - Telecommunication systems maintenance and repair; and
  - Portable equipment such as refrigerators, freezers, and laboratory equipment.
2. Utilities Costs (\$/GSF):
- a. Includes the following utility distribution systems and central utility plant equipment:
- Primary domestic water distribution system including fire hydrants;
  - Primary sanitary sewer distribution system;
  - Primary natural gas distribution system;
  - Primary compressed air distribution system;
  - Primary chilled water distribution system;
  - Primary steam and condensate return distribution system;
  - Primary electrical distribution system;
  - SCADA System;

- Metering systems; and
  - Central Utility Plant equipment to include boilers, chillers and air compressors;
- b. Includes labor and materials for the following services:
- Preventive or predictive maintenance procedures and repairs on all Central Utility Plant equipment;
  - Repair of all primary utility distribution systems;
  - Operation of Central Utility Plant;
  - Maintenance and repair of metering systems, and meter reading;
  - Purchase of all utilities to include electricity, natural gas, water/sanitary sewer, propane, and fuel oil;
  - Maintaining an accurate Central Utility Plant equipment inventory and accurate primary utility systems distribution drawings;
  - Operating support for program related upgrades or capital repairs to include shutdowns as well as providing basic information about primary utilities systems; and
  - Associated support for all operations and maintenance services such as vehicles, vehicle maintenance, training, computer equipment, maintenance related software systems, office supplies, copiers, fax machines, phones, radios, IT support, and supervision.
3. Cleaning/Janitorial Costs (\$/GSF):
- a. Includes the labor and materials for the following services:
- Custodial cleaning services to include offices, laboratories, restrooms, corridors, stairwells, building entrances, conference rooms, and break rooms;
  - Trash/Refuse collection;
  - Window washing;
  - Recycling operations; and
  - Pest control operations.
- b. *Does not* include the following:
- Removal of hazardous waste.
4. Roads/Grounds Costs (\$/GSF):

Roads and Grounds costs shall be allocated based on the GSF of a building. Because the size of campuses and the build-out per campus can vary substantially, the cost per acre can be included in the comment field if that helps to explain costs that might seem high as compared to a building located off campus or on a densely developed campus.

- a. Includes the following services:
- Maintenance of landscaping to include grass cutting, tree trimming, shrub trimming, mulching, fertilizing, application of herbicides, shrub bed maintenance, flower planting, tree planting, shrub planting, and removal of leaves;
  - Snow and ice removal from all roads, parking lots, sidewalks, and building entrances;
  - Maintenance and repair of exterior and transportation signage and electronic control devices;
  - Maintenance and repair of roads, sidewalks, parking lots, bridges, pavement marking, and street lights;
  - Removal of litter;

- Street sweeping; and
  - Parking garage cleaning, striping, lighting, and washing.
- b. *Does not* include the following:
- Any new construction of roads, sidewalks, or parking lots;
  - Purchase and maintenance of interior plants;
  - Setting up for special events held outdoors; and
  - Work required to comply with changes in security color codes;

#### 2-2-30 REPORTING REQUIREMENTS

Minimum reporting requirements are as follows:

- A. MISSION DEPENDENCY is a mandatory real property inventory data element that each OPDIV shall review at least annually and update the database with any changes.
- B. CONDITION INDEX is mandated by FRPC and must be reported by OPDIVs to HHS and by HHS to OMB. This first tier performance measure applies to each HHS owned and operated building and shall be collected and reported in accordance with HHS prescribed processes.
- C. UTILIZATION is a first tier performance measure mandated by FRPC. Each OPDIV will base its utilization results on objectively established space standards and on an annual census conducted in accordance with Section 2-2-20-B. Each OPDIV is responsible to assure appropriate implementation including timely entry of the resulting data into the asset inventory system. The OPDIV will review the facility utilization categorizations and update the building inventory system with any changes during the last quarter of each fiscal year (reflecting the census data).
- D. OPERATIONS AND MAINTENANCE COST is a first tier performance measure and is required by the FRPC. It is applicable to all HHS owned and leased buildings with delegated authority for operations and maintenance and must be reported at the constructed asset level by OPDIVs to HHS and by HHS to Federal Real Property Profile (FRPP).
- E. CONSTRUCTION PROGRAM METRICS final FPAA report shall be submitted to the Department at project closeout. A project will not be removed for the HHS Quarterly Status Report until the final FPAA report is submitted to the Department and accepted.
- F. DAILY DECISION MAKING METRICS checklist and report for HHS Approval Level projects shall be submitted as part of the *Construction Program Metrics* final FPAA requirement. The report shall be submitted to the Department at project closeout.

Reporting of non-HHS Level Approval projects and lease actions to HHS is selected by the OPDIV in accordance with the current Certification Statement requirements.