




EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
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THE DIRECTOR

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M-25-25

MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES

FROM: Russell T. Vought 
Director

SUBJECT: Implementation of the Utilizing Space Efficiently and Improving Technologies Act

I. OVERVIEW

The Trump Administration is committed to efficient use of taxpayer dollars, and will shrink the Federal real estate footprint to eliminate unused and wasteful Federal office space. This memorandum lays out standardized technologies, approaches, and methodologies for Federal agencies¹ collecting and reporting occupancy and building use data in alignment with the Utilizing Space Efficiently and Improving Technologies Act (“USE IT Act”).² This required reporting will also ensure compliance with the Return to Office directives of the President.

Therefore, no later than May 4, 2025, Federal agencies⁵ must begin utilization monitoring at public buildings and Federally leased space where the Federal agency occupies space.³

Under the USE IT Act agencies have until July 4th for full implementation, however, this guidance requires agencies to immediately implement solutions that will be used to track and manage return to work implementation across the government. Additionally, the USE IT Act is limited to CFO Act agencies, but this guidance sets the requirement for all agencies to support efforts to eliminate unnecessary space and costs.

¹ For the purposes of this memorandum, the terms “Federal agency” and “agency” mean an “executive agency” as defined at 5 U.S.C. § 105, except that it does not include the Executive Office of the President. The guidance in this memorandum applies to a broader set of Federal agencies than the statutory requirements in the Act.

² Thomas R. Carper Water Resources Development Act of 2024, Pub. L. 118-272, Div. B, Title III, § 2302 (Jan. 4, 2025). See also 40 U.S.C. § 584 (note).

³ Any head of an agency may exempt individual public buildings from utilization monitoring if they determine that such monitoring would be detrimental to national security.

This memorandum rescinds OMB's Management Procedures Memorandum (MPM) No. 2024-01, "Implementation of Occupancy Metrics for Office Space" to initiate an expedited timeline to eliminate costs for unnecessary federal real estate.

Implementation and reporting of occupancy data are priorities to allow swift action to reduce wasteful spending and ensure compliance with return to work policies. Agencies should prioritize reporting for buildings used for general office space. Implementation guidance on specific technologies and required agency reports can be found in the attached Appendix.

Appendix I

UTILIZATION MONITORING TECHNOLOGIES

GSA is providing two playbooks for interim solutions for agencies to utilize until more permanent solutions are put in place, allowing for agencies to meet the initial reporting deadlines on May 19, 2025. Those playbooks are for the Daily Check in Tool and Laptop Occupancy, and can be found on the website linked below with other technology solutions.

To ensure consistent measurement across Federal buildings, agencies must implement one or more of the utilization methodologies or technologies specified by GSA. If agencies do not have an existing technology that can produce accurate and complete occupancy utilization data, agencies are encouraged to review GSA's list of available occupancy technologies and identify those that can be expeditiously and cost-effectively implemented. Regardless of the method of measurement selected by the agency, accuracy of occupancy counts is imperative. Agencies should leverage occupancy tools that gather the most accurate data.

PIV card data is specifically listed in the Act. If a Federal agency employs PIV card data and can meet the requirements of the Act, no additional technology is necessary. PIV card data can be collected from the agency's managed turnstiles, card readers used for space access, or both. All use of PIV card data must protect personally identifiable information. In addition, the Act provides that use of PIV Card data must isolate only the first credential use of the day for each cardholder. In instances where the use of PIV card data is not possible or would be incomplete, agencies are authorized to use other technologies that can meet the requirements of the Act such as sensors. Occupancy measurement tools are widely available with a range of associated costs and accuracies. Consistent with the requirements of the Act, GSA has provided a list of occupancy technologies at https://www.gsa.gov/real-estate/real-estate-services/federal-customers/occupancy-data?_gl=1*1jc36hz*_ga*NzA5MDg0OTM2LjE3MzM3NTAzNDA.*_ga_HBYXWFP794*MTc0NTI0OTIwMS4xODEuMS4xNzQ1MjQ5MjA5LjAuMC4w.

Appendix II

AGENCY REPORTS ON UTILIZATION DATA

Federal agencies are responsible for uploading occupancy and building utilization data via OMB Collect⁴. Occupancy Utilization is defined as the total usable square footage of a public building or federally leased space divided by the number of full-time employees assigned to that location. Building Utilization is defined as the percentage of utilization generated by comparing the actual utilization rate with the capacity based on a utilization benchmark of 150 usable square feet per person (agency targets set at 60 percent of this benchmark).

The first report containing this data must be provided on May 19, 2025, in accordance with the submission instructions in Appendix II, covering the biweekly pay period from May 4, 2025 through May 17, 2025.⁵ Agencies must continue to monitor occupancy data and report the data every two weeks thereafter, consistent with the agency's pay schedule. Data must be submitted no less frequently than every two weeks in accordance with section IV.

Agencies must, regardless of the occupancy measurement technology chosen, provide the following information:

1. A summary of daily occupancy⁶ totals starting on Sunday and concluding on Saturday.
2. The average occupancy of the space, derived from daily occupancy totals over a 2-week period.
3. Associated Occupancy Agreement (OA) or Real Property Unique Identifier (RPUID) number(s) to be used for occupancy reporting and capacity comparison.
 - (a) For spaces within GSA's custody and control, agencies should use an individual OA. If an agency has contiguous space with multiple OAs, it should report occupancy numbers for each individual OA.
 - (b) For spaces outside of GSA's custody and control, agencies should use an asset's FRPP RPUID.

Annually, agencies must report:

- Occupancy and Building utilization broken down by building and lease;
- Comparison of each building or lease against the target of 60% utilization at 150 square feet per person;
- Methodology used for calculations including period of data; and,
- The current agency point-of-contact for data verification, the official responsible for managing the space, or both

⁴ The OMB Collect exercise is available at <https://collect.omb.gov/site/235/home-page>

⁵ For agencies that use alternative pay periods, such as weekly or biweekly on the alternative date, data should be submitted on the Monday immediately following the end of the alternative pay period.

⁶ See definitions in section IX.

Appendix III

IMPROVING OFFICE SPACE DESIGN TO IMPROVE UTILIZATION

To accelerate portfolio-wide improvements to utilization, office space acquired after issuance of this memorandum must not be designed to exceed an office space design standard of 150 USF per person⁷. Spaces designed for public-facing uses⁸ are excluded from this requirement. To ensure that the acquisition of office space remains cost efficient for the government, the following requirements also apply:

- Leased office space that remains in an agency's portfolio under a succeeding or superseding lease agreement, and remains in use without construction to reconfigure the space, does not have to meet the 150 USF per person requirement.
- Lease replacements and lease re-competitions are not required to meet the 150 USF per person standard unless an economic analysis demonstrates that the use of the standard for a project has a payback period of less than 15 years and the cost of the project can be accommodated within budget guidance.

Agencies must update their office space design standard for USF per person, no later than 12 months after this memorandum is issued. Agencies must provide their updated design standard to OMB and the Federal Real Property Council.

⁷ Where the calculation of USF is defined by ANSI/BOMA Z65.1- 2010 (or 2017).

⁸ Spaces that have a predominant use code of "Public Facing Facility" in the FRPP and spaces agencies defined as "public facing office space".