



Evaluating Kentucky's Ability To Monitor Unused And Underutilized Properties

Research Memorandum No. 533

Kentucky Legislative Research Commission

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Evaluating Kentucky's Ability To Monitor Unused And Underutilized Properties

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Foreword

Legislative Oversight and Investigations Committee staff appreciate all those who provided assistance with this report. We are grateful to the staff of the Division of Real Properties in the Finance and Administration Cabinet. Their assistance was instrumental in understanding operations and procedures related to property requests, providing data, and giving staff access to the state property management database.

Committee staff wish to recognize performance auditors from Georgia and Wisconsin. Staff from the Georgia Department of Audits and Accounts met with Legislative Oversight staff to discuss methods for analyzing space management and allocation. Staff from the Wisconsin Legislative Audit Bureau met with Legislative Oversight staff to discuss their report, *Telework, Space Management, and Risk Management* to provide insights into how they evaluated space usage.

Jay D. Hartz
Director

Legislative Research Commission
Frankfort, Kentucky
June 11, 2026

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Evaluating Kentucky’s Ability To Monitor Unused And Underutilized Properties

On December 10, 2025, the Legislative Oversight and Investigations Committee (LOIC) asked staff to conduct a limited scope study on Kentucky’s underutilized and unused real properties. When LOIC staff discovered data was not available, the study transitioned to evaluating whether existing information could be used to evaluate property usage. This memorandum presents the findings of that study.

Summary Of Findings

The Finance and Administration Cabinet holds broad statutory authority over the acquisition, disposition, and oversight of Kentucky’s real properties, including a requirement that its Department for Facilities and Support Services (DFSS) “maintain a comprehensive real property and facilities management database to include all state facilities and land owned or leased by the executive branch agencies, including any postsecondary institution.”¹ As of February 26, 2026, this database contained information on 8,466 state-owned and 1,214 leased real properties. Appendix B shows those assets by property type.

Agency officials confirmed that this database, called ARCHIBUS, does not document real property utilization rates, nor does the state have a minimum utilization standard.² Staff therefore turned to evaluating whether the information collected is sufficient to calculate the utilization rate of individual properties and whether there was enough other data for the cabinet to craft effective cost-saving consolidations or divestments, as required by KRS 42.425(2) and KRS 45A.045(4). Staff then compared ARCHIBUS records to federal executive branch reporting standards. While DFSS is not bound by federal standards, the Federal Real Property Profile (FRPP) serves as a vetted public model for tracking real property utilization.

Utilization rate is a metric that quantifies how effectively a real property is used relative to its total capacity over a specific period. ARCHIBUS only records a building’s gross square footage, so the information needed to calculate utilization rates for all assets does not exist in the database. A comparison of other information recorded in ARCHIBUS to the elements that federal agencies are required to report revealed other gaps, but some of the missing data elements exist elsewhere in Kentucky state government.

The data gaps found in ARCHIBUS are not a compliance failure: DFSS meets its legal obligation of maintaining a database. The problem is structural rather than legal. Because KRS 42.425 (2)(d), KRS 42.425 (2)(a)(1), and KRS 45A.045 (6) provide minimal direction about the database’s purpose and what types of data should be recorded, the cabinet built the database to store basic, mostly static property attributes. Whether this scope aligns with legislative intent, and whether additional data elements would be appropriate, depends on how the General Assembly intends the database to function.

Without statutory clarification of the database's intended purpose—specifically, whether it should support operational efficiency analysis and asset optimization decisions—recommending structural changes to ARCHIBUS or offering evidence-based conclusions about underutilization risks investing state dollars in data collection that may not align with the General Assembly's policy objectives. If the General Assembly intends ARCHIBUS to be used to measure property utilization, Division Of Real Properties (DRP) would likely need to move to a management system similar to the one used by the federal government. However, a review of the federal process found deficiencies, suggesting that effective implementation of active real property management in Kentucky may require significant effort.

Kentucky's Real Property Management Database

DFSS delegated the statutory responsibility of maintaining ARCHIBUS to its DRP. The database tracks four separate property types: state-owned buildings, leased facilities, state-owned land, and property the commonwealth leases to third parties. Statute requires all state agencies and postsecondary institutions to work with DFSS to maintain the database.³ Judicial branch properties and right-of-way properties are excluded from ARCHIBUS.⁴ This study focuses on the datasets for state-owned buildings and leased facilities, each of which includes 19 distinct data fields per property.

DRP has no data dictionary explaining what each variable recorded in ARCHIBUS is intended to capture or how agencies should document the information.⁵ While most fields are self-explanatory, others required staff to infer their purpose by examining the data entered and drawing on knowledge of the information typically required for public real-estate management. Establishing clear definitions was necessary before comparing Kentucky's data against recognized standards for modern public-sector portfolio management. Table 1 provides LOIC staff descriptions of variables recorded in ARCHIBUS.

Table 1
Variables Recorded In ARCHIBUS

Variable	Description
Insurance certificate number	Identifier associated with the property's insurance documentation, used to verify coverage, track renewal cycles, and confirm compliance with state risk-management requirements
Site code	Identifier assigned to a geographic site or campus containing one or more buildings
Site name	The descriptive name of the site or campus where the building is located
Building code	A unique identifier assigned to an individual building within a site
Building name	The descriptive name of the building (e.g., "Capitol Annex")
Address	The street address of the building
City code	A coded value representing the city in which the property is located
County name	The county in which the property is located
Division code	An internal organizational code identifying the division responsible for the property or occupying it
Department	A coded identifier for the state department associated with the property
Department name	The full name of the state department associated with the property
Year built	The year the building was originally constructed
Construction cost	The original cost to construct the building
Gross cost	Total building area measured to the exterior walls
Rentable area	The portion of the building that can be assigned to occupants for programmatic use
Number of floors	The count of above-ground floors in the building
Number of basements	The count of below-ground levels in the building
Number of elevators	The number of elevator units in the building
Use description	A categorical description of the building's primary function

Source: Legislative Oversight staff analysis of ARCHIBUS, 2026.

According to agency officials, the ARCHIBUS database was originally populated with these property-level attributes when the system was implemented, creating a baseline inventory that DRP has maintained ever since.⁶ Statute and regulation establish two mechanisms for updating the inventory.

200 KAR 6:015 requires each agency to submit a *Request For Insurance Coverage and Real Property Reporting* form annually for every land installation and every building or improvement valued at more than \$5,000. Appendix C includes a copy of the form which captures information about geographic boundaries, structural specifications, and insurance valuations.⁷ However, the only elements from this form that corresponds to existing ARCHIBUS fields are square footage and the number of floors above and below ground level.

The second update mechanism arises through the space-procurement process outlined in KRS 56.803. When an agency requests space, it must submit a *Space Request* form documenting the amount of square footage needed, the classifications and number of employees who will occupy the space, and the applicable space standards tied to job titles. DFSS uses compliance with the space-standards listed in Appendix D as a criterion for granting additional space, per KRS 42.425(2). However, the only data point on this form that maps directly to the database is gross square footage, which is updated only when new space is added.⁸

The variables recorded in ARCHIBUS for state-owned buildings and leased facilities are primarily property-level attributes that rarely change over time. This makes the database function

as a baseline asset inventory. Whether this adequately serves legislative intent depends on whether the General Assembly expects ARCHIBUS to support ongoing portfolio analysis or maintain a baseline asset record only.

While the statute establishes a clear requirement for a centralized record, it lacks necessary specificity regarding which data elements must be collected, how the database should be structured, or what qualitative standards should govern its organization.⁹ The cabinet is granted broad statutory discretion, which is reflected in 200 KAR 6:015, the administrative regulation governing real property inventories. The regulation focuses on the procedural submission of inventory forms rather than defining rigorous, standardized data fields or architecture for the resulting database. Consequently, the absence of clear guardrails and detailed regulatory requirements could easily result in inconsistent data across various agencies and institutions. This lack of uniformity risks leaving the commonwealth with a fragmented real property portfolio that may lack the documented, high-fidelity information required for transparent oversight and effective long-term capital planning.

Occupancy And Utilization Rates

Occupancy rate measures how much available space is currently occupied, calculated by dividing occupied space by total available space and multiplying by 100. For example, a state office building that has 100,000 square feet of usable space with 60,000 square feet occupied at a given time would have an occupancy rate of 60 percent. This metric provides a snapshot of the portion of a property's capacity in use, offering a foundation for understanding whether space is allocated to active users, no longer serving the agency's mission, or sitting vacant. While ARCHIBUS does note how much space is rented out for leased buildings, only the gross square footage is documented for owned buildings.

Utilization rate, by contrast, measures how intensively and effectively a space is being used over time by accounting for both occupancy levels and activity frequency. This requires tracking not only whether space is occupied, but also how often it is used and the productivity of mission-critical value of that use. While occupancy rate answers the question "Is this space occupied?" utilization rate answers "How effectively is this space serving the agency's mission?" For example, that same 60,000 square feet of occupied office space might only be actively used 30 hours per week, with the remainder sitting underutilized despite being technically occupied, resulting in a lower utilization rate than occupancy rate would suggest.

While ARCHIBUS does not capture occupancy rate, it also does not contain sufficient information to calculate a utilization rate. The system lacks the necessary occupancy and activity-level data required to determine how fully a building is being used. When asked what changes would be needed for DRP to calculate utilization rates, the agency said,

ARCHIBUS does not define a standard for utilization or track percentage utilization given that state buildings are used not only for offices but also for a variety of other purposes, including but not limited to, public-facing customer service centers, detention centers, educational facilities, fleet maintenance, and grounds maintenance, to name a

few. DFSS is required to secure space that's suitable to an agency's reasonable needs pursuant to KRS 56.803(2).¹⁰

Although utilization data can be complex to collect and analyze, the complexity should not preclude the effort. Federal guidance under the USE IT Act outlines established methods for compiling and reporting utilization information precisely so that agencies can calculate utilization rates.¹¹

Comparison Of Kentucky Records Against Federal Standards

Given the data gap in utilization rates, the next step was to determine whether ARCHIBUS captured other information a modern public owner is expected to maintain. Although no single comprehensive real-property management standard exists, the field is shaped by a set of fragmented, specialized frameworks. To establish a consistent benchmark, this analysis relied on the information the federal government requires its agencies to submit to the government-wide real property management system, the Federal Real Property Profile. The FRPP database functions as a vetted, government-specific standard for high-level portfolio management, built around the performance metrics required of large public institutions.

The FRPP records 45 core data elements designed to capture comprehensive information about real property assets. These elements span five broad categories: asset identification and classification, location and geographic information, operational and financial metrics, temporal information, and facility condition and sustainability data. These elements enable agencies to understand how property is used, at what cost, in what condition, and whether it supports current or future mission needs.

Several FRPP data elements are specific to federal mandates that do not apply to state operations. Consequently, elements related to the Federal Assets Sale and Transfer Act, the MOBILE NOW Act, and Freedom of Information Act Exemptions were excluded from this comparison, as they represent federal statutory requirements with no state analog. To streamline the comparison further, certain FRPP data elements were collapsed into single variables. For example, the individual FRPP variables for street address, city, zip code, county, and country were consolidated into one *Main Location* variable.

Conversely, the analysis included a data element from the FRPP called the USE IT Act, which captures the requirement that federal agencies report occupancy and actual utilization rates for each asset, based on a standard of 150 square feet per employee. Although this requirement applies only to federal agencies and does not impose a compliance obligation on Kentucky, it reflects a congressional recognition that traditional capacity metrics are insufficient for modern real property management. Therefore, while compliance-specific federal reporting was excluded from the comparison, the occupancy and utilization data standards embodied in the FRPP USE IT Act variable was used.

With these exceptions noted, the data currently collected in ARCHIBUS was compared against 28 FRPP data elements mandated for federal agencies. This comparison identifies data gaps

where the state inventory lacks the granularity the federal government requires of its agencies. Table 2 lists the 10 FRPP data elements currently documented in ARCHIBUS, representing 36 percent of total FRPP requirements. These elements establish essential baseline information for property inventory and accountability. Their presence demonstrates that ARCHIBUS already contains the structural capacity to store and organize federally recognized real-property data.^a

Table 2
Federal Real Property Profile Variables Documented In ARCHIBUS

Variable	Description
Real Property Type	Designates property as land, building, or structure
Real Property Use	Primary function, such as office, warehouse, etc.
Legal Interest	Property is owned, leased, or otherwise maintained
Reporting Agency	Agency responsible for reporting
Using Organization	Primary occupant agency
Size	Measures land assets in acres and buildings in square feet
Main Location (combined category)	Street address, city, zip code, state, county, country, and latitude and longitude, which can be determined from address
Real Property Unique Identifier	Agency-assigned unique code for asset tracking
Installation/Sub-Installation Identifier	Asset identifier within building complex
Year of Asset Construction	Calendar year asset was constructed

Note: Variable names come from the 2025 guidance for reporting, except for the combined main location variable.

Source: United States. Government Services Administration. “Federal Real Property Council 2025 Guidance For Real Property Inventory Reporting.” Sept. 30, 2025. Web.

These 10 elements capture the fundamentals necessary for basic accountability. Whether additional elements are needed depends on legislative intent: if ARCHIBUS is meant to serve only as an inventory system, these may be sufficient; if it is meant to support portfolio management, additional financial and operational data would be necessary.¹² ARCHIBUS currently captures physical characteristics rather than financial or performance metrics. This design reflects the statutory requirement to maintain an inventory, but leaves open the question of whether the General Assembly intended the system to support portfolio-level decision-making.

Table 3 lists the 15 FRPP data elements identified as not contained in ARCHIBUS but potentially available within state government including some that staff verified during agency inquiry. For other elements listed without an agency designation, staff did not conduct a systematic search to determine where they are housed. These are identified as logically necessary to state operations, not because their custodians were confirmed. A comprehensive audit of all data sources fell outside the scope of this study.

^a It remains unclear whether ARCHIBUS possesses the native capability to automatically perform the required underlying calculations, or if vendor customization would be necessary to support them.

Table 3
Federal Real Property Profile Variables Not In ARCHIBUS
But Likely Documented Elsewhere

Variable	Description (Agency)
Historical Status	National Register listing or historic designation (Kentucky Heritage Council)
Field Office	Designates asset as headquarters or field office
Field Office Collocation	Denote that field office could be shared with another agency
Status	Denotes whether an asset is mission-essential
Replacement Value	Cost to design, acquire, and construct equivalent asset (Office of the Controller, Division of State Risk)
Repair Needs	Non-recurring cost to restore asset to original design
Historical Capital Expenditures	Total capital spending on asset over past 5 years
Estimated Future Capital Expenditures	Projected capital spending over next 5 years
Condition Index	Calculated ranging from excellent to poor condition, based on repair needs versus replacement value
Annual Operations Cost	Recurring costs for utilities, janitorial, etc. (DRP had utility and janitorial expenses for leased assets, but not owned.)
Annual Maintenance Cost	Recurring cost for planned maintenance and preventative repairs
Lease Annual Rent to Lessor	Net annual rent paid to lessor
Lease Start and Expiration Date	Date on which lease began and will end
Number of Employees	Number of employees occupying the property
Number of Contractors	Number of contractors occupying the property

Note: Variable names come from the 2025 guidance for reporting, except for the combined main location variable. Agency names in parentheses indicate the agency that monitors that data.
 Source: United States. Government Services Administration. "Federal Real Property Council 2025 Guidance For Real Property Inventory Reporting." Sept. 30, 2025.

The existence of these data elements across multiple agencies reflects a governance challenge: while Kentucky possesses much of the information required for comprehensive strategic decision-making, that information is fragmented and accessible only through manual inter-agency coordination. This could create a vulnerability because data exists outside formal integration, standardization protocols, or consistent definition frameworks. Different agencies may calculate identical metrics using different methodologies, creating opportunities for inconsistency and potential discrepancies.

Yet, the fact that these 15 data elements are held by other state agencies also represents a viable near-term opportunity for improvement. Unlike missing data that requires new collection systems and processes, these elements already exist within state government. Addressing this gap would require data-sharing agreements, standardized mapping protocols, and integration arrangements that fall well within the commonwealth's current capacity.

The concentration of these 15 elements around financial data reveals an analytical limitation: Kentucky currently lacks integrated financial and physical condition data within ARCHIBUS. If legislative intent includes portfolio health assessment, this represents a data gap that would need to be addressed.

The remaining three FRPP data elements are neither recorded in ARCHIBUS nor systematically documented by state agencies. These consist of:

- **Utilization:** indicates whether asset is used for current program purposes as utilized, underutilized, or unutilized;
- **Year Asset Reported Underutilized:** documents the year an asset was first reported underutilized; and
- **USE IT Act Data:** federal mandate that includes reporting bi-weekly occupancy data to calculate asset utilization rates.

Without these metrics, ARCHIBUS cannot be used for portfolio-level optimization decisions such as identifying underperforming assets, assessing consolidation opportunities, or prioritizing capital investment. Whether these capabilities are required depends on the statutory intent for ARCHIBUS.

While ARCHIBUS captures what the state owns and where it is located, it does not capture what portfolio managers need to manage that inventory. The database lacks critical information: utilization rates, property condition, repair needs, replacement values, operating costs, lease terms, and disposition history. Without these metrics, DRP cannot rely on ARCHIBUS alone to identify underperforming assets, assess whether properties should be consolidated or disposed of, determine what long-term financial obligations they represent, or understand whether properties are oversized, underused, or deteriorating. In short, Kentucky's ARCHIBUS database provides an inventory view of its buildings. Whether a management-view that supports portfolio-level decision-making is needed is not clearly specified in statute.

The Limitations Of FRPP As A Portfolio Management Framework

Should the General Assembly determine that ARCHIBUS is intended to support portfolio management, simply adding FRPP data elements to the database may not be sufficient. The Government Accountability Office (GAO) has noted that the federal framework represents only a minimal baseline, and has documented fundamental limitations in federal utilization metrics, noting that the long-standing 150 square foot per person benchmark is a blunt instrument that fails to account for mission-specific operational requirements.¹³ When agencies apply this benchmark, facilities that are essential for public access, security, or specialized service delivery often appear underutilized despite being fully aligned with agency mission needs.

The GAO has further observed that FRPP reporting, in its current form, captures inventory, not performance.¹⁴ The federal database was designed to answer a narrow set of questions: How much space does the government control? Where is it located? What is it used for? But FRPP does not include the full range of lifecycle, condition, and risk information required for strategic decision-making. This limitation is particularly acute for questions that determine long-term asset viability, such as vendor pricing structures, capital project delivery, program cost-effectiveness, and the total cost of ownership over an asset's lifecycle.¹⁵ The GAO has warned repeatedly that disposal or consolidation decisions based solely on FRPP-level data risk being misaligned with long-term mission and financial realities.¹⁶

Addressing Kentucky's gaps relative to the data collected in the FRPP is therefore necessary but insufficient. GAO notes that portfolio management requires a deeper, more integrated information base than the federal standard provides.¹⁷

Kentucky's Statutory And Structural Limitations

While DRP is responsible for maintaining an inventory of state-owned and leased real property and administering space standards, neither statute nor regulation requires it to collect or integrate the broader categories of information that determine long-term asset viability. Much of the information essential for understanding the condition, constraints, and lifecycle trajectory of state facilities is held by various entities or by the agencies that occupy a facility. The cabinet may request this information when needed, but the information is not required to be incorporated into the centralized ARCHIBUS database.

As a result, the cabinet's access to critical property information is largely event-driven. Detailed data typically becomes available only when an agency requests additional space, proposes a relocation, or initiates a project requiring cabinet review.¹⁸ Outside these moments, DRP does not receive regular updates on building condition, lifecycle needs, environmental status, or other factors that shape long-term planning. The statewide inventory therefore supports transactions, but it does not function as a comprehensive, continuously updated portfolio management system. This structure does not prevent the cabinet from gathering information for specific decisions, but it limits its ability to monitor trends, identify emerging risks, or evaluate opportunities across the portfolio.

Is An Integrated Portfolio Management System Feasible?

The statewide real property inventory fulfills its statutory mandate, but the broader set of data needed for long-term planning, risk assessment, and strategic decision-making is distributed across multiple agencies and accessed primarily in response to specific requests. A system that captures and integrates this broader information would enable the commonwealth to evaluate opportunities more accurately, anticipate risks earlier, and manage its real estate portfolio in a way that supports long-term fiscal responsibility and effective service delivery.

The barriers to building such a system could be substantial. They include the technical challenge of integrating data held across multiple agencies using incompatible systems; the governance difficulty of establishing standards and compliance mechanisms across agencies with competing priorities; the analytical complexity of translating disparate data streams into actionable decision frameworks; and the organizational challenge of sustaining the system once built, given that portfolio management benefits often materialize slowly while the costs of system maintenance are immediate and visible.

Because the governing statutes mandate a “comprehensive” database, but provides no definition of what that means, there is no coherent statutory baseline against which to evaluate the adequacy of Kentucky’s current data practices or to frame specific, evidence-grounded recommendations. In the absence of such guidance, only general principles of public-sector

portfolio management can be offered, but these principles are not anchored in Kentucky law and therefore cannot substitute a clear policy framework.

Conclusion

This study concludes that ARCHIBUS cannot currently answer the committee's original question. The database does not systematically capture occupancy rates, utilization metrics, or the activity-level data necessary to determine how effectively state properties are serving agency missions. ARCHIBUS functions as a baseline asset inventory, documenting what the state owns, where properties are located, and their basic physical characteristics, but it does not contain the operational and performance information required to identify underutilized or unused facilities. This gap reflects an ambiguity in governing statute, where the law requires a "comprehensive" real property database but does not specify whether that database should support portfolio management and utilization analysis or serve solely as an asset registry.

If the General Assembly intends for the state to identify and act upon underutilized properties, ARCHIBUS must be expanded to capture utilization data. Before the General Assembly can direct the Department for Facilities and Support Services to collect specific utilization data, the legislature may wish to consider clarifying what "utilization" means in Kentucky's context and the purpose of the measurement. This distinction matters because utilization is not a single, universally applicable metric. A detention facility operating at 60 percent occupancy may be fully utilized for its security mission, while an office building at the same occupancy rate may represent inefficient use of state resources. Similarly, utilization could be measured by occupancy rates, by frequency of use over time, by mission effectiveness, or by cost-per-employee metrics—each requiring different data collection and producing different answers. The state's diverse portfolio includes office buildings, customer service centers, educational facilities, detention centers, maintenance facilities, and specialized operations, each with distinct utilization profiles. Statutory language mandating the collection of specific data fields without first defining what the legislature intends to measure and accomplish through that data would risk requiring agencies to collect information that does not serve legislative objectives or fails to capture what legislators actually need to know.

However, many of the data elements necessary to support utilization analysis already exist in other state agencies and could be integrated through data-sharing agreements and standardized protocols. Once the General Assembly indicates its policy objectives, the cabinet could pursue administrative improvements by establishing clear data definitions, piloting utilization and occupancy reporting with selected agencies, and formalizing data integration with other state entities. These steps would enable the state to answer the committee's original question and provide the foundation for ongoing portfolio management.

Appendix A

Agency Response



Andy Beshear
GOVERNOR

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June 2, 2026

Mr. Christopher T. Hall
Legislative Oversight and Investigations Committee
Legislative Research Commission
Capitol Annex, Room 462
Frankfort, KY 40601

Re: FAC Response to LOIC Report regarding Unused or Underutilized Properties

Dear Mr. Hall:

The Finance and Administration Cabinet appreciates this opportunity to address the May 28, 2026 report regarding Legislative Oversight and Investigations Committee (LOIC) staff's review of unused and underutilized state properties. The Cabinet was pleased that your staff considered the comments in our May 22, 2026 letter and the resulting changes LOIC made to the April 30, 2026 draft of the report.

The Cabinet provided all data requested by LOIC staff that exists and worked with the ARCHIBUS vendor to make sure LOIC could access the information captured in the database. Some data LOIC now wants to review has not been captured by the Division of Real Properties (DRP) traditionally due to it not being in keeping with the original intent of the applicable statutes. Additionally, there has never been funding or staffing provided to modify the ARCHIBUS database to capture those elements, though as LOIC correctly notes, many of these elements are captured by other state agencies.

As we stated in response to the prior version of the report, we do not believe it is accurate to suggest there are "gaps." It should be made clear in the report, and specifically in the last sentence of the second Summary paragraph and in the last sentence of the first paragraph of the Conclusion, that the "gap" comes from comparing the current Kentucky data compilation to the Federal Real Property Profile (FRPP) to which Kentucky is not required to adhere. We understand that LOIC is referencing the FRPP to support a recommended expansion of ARCHIBUS into the state "management" system referred to in KRS 42.425(2)(d) by including, among other things, an agency utilization rate. It is important to reiterate, as previously stated, that an expansion or replacement of ARCHIBUS would require not only additional funding for

Mr. Chris Hall
June 2, 2026
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the system but also an increase in staffing in DRP to initially amass the information from other agencies, to develop and apply new criteria such as a utilization standard, and then to maintain that information in the future.

Again, thank you for the opportunity to respond to the May 28, 2028 LOIC report on this very important information maintained by the DRP. Like you, we are interested in the accuracy of the report, and it is in this context that we submit our response.

Sincerely,



Holly M. Johnson
Secretary

cc: Geri Grigsby, Deputy Secretary
Barbara Dickens, General Counsel
Fiorella Riveros Salazar, Office of Legislative and Intergovernmental Affairs
Charles Bush, Commissioner, Department for Facilities and Support Services
Natalie Brawner, Division of Real Properties

Appendix B

Kentucky Owned And Leased Real Property By Type February 2026

Use Type	Owned	Leased	Use Type	Owned	Leased
Boat ramp	3	0	Other	234	0
Boat slip/storage	2	0	Park lodging	365	0
Classroom	7	1	Parking	45	2
Communications	97	0	Parks	17	0
Conservation easement	4	0	Public safety	77	5
Correction	194	0	Recreation	864	4
Defense	310	24	Research	152	2
Education	958	42	Residence	824	2
Exhibition	120	2	Right of way	1	0
Farming	402	7	ROW maintenance	162	1
Food service	52	0	Sales	34	0
General maintenance	207	0	Service facility	64	0
Hangar	7	0	Storage	2,101	51
Historic	11	0	Tower site	217	2
Judicial	2	4	Travel	4	0
Manufacturing	11	0	Unknown	1	0
Mechanical	255	1	Vacant	31	0
Medical	107	18	Vehicle maintenance	13	0
Not state use	2	0	Warehouse	2	0
Office	422	485	(Blank use type)	85	561
Total				8,466	1,214

Note: The ARCHIBUS database excludes properties associated with the judicial branch and entities that do not meet the legal definition of a "state agency," such as independent school districts and municipal corporations.
 Source: Natalie W. Brawner, Director, Division of Real Properties. Email to Chris Hall, Feb. 26, 2026.

Appendix C

Request For Insurance Coverage And Real Property Reporting Form

COMMONWEALTH OF KENTUCKY - FINANCE & ADMINISTRATION CABINET		
<u>REQUEST FOR INSURANCE COVERAGE AND REAL PROPERTY REPORTING</u>		
STATE AGENCY / DIVISION _____	CERTIFICATE # _____	
APPRAISAL eMARS # _____	DATE OF REQUEST _____	
1. GENERAL INFORMATION		
BUILDING / STRUCTURE NAME _____	YEAR OF CONSTRUCTION _____	COUNTY _____
STREET _____	CITY _____	
ZIP _____	DATE ACQUIRED _____	
INSTALLATION NAME _____	INSTALLATION NUMBER _____	
2. PROPERTY DETAILS		
STATE FIRE MARSHAL APPROVED? <input type="checkbox"/>	HANDICAP REQUIREMENTS MET? <input type="checkbox"/>	
IS BUILDING IN FLOOD PLANE? <input type="checkbox"/>	GROSS SQ FT _____	
BASEMENT # _____ FINISHED? <input type="checkbox"/>	* TUNNEL ? <input type="checkbox"/>	
FLOOR LEVELS <u>NOT</u> INCLUDING BASEMENT: _____		
SUBMIT FTR-12 FORM		
DIMENSIONS OF BLDG (if known) _____ (Outside dimension of each floor level including basement)		
DESCRIBE ANY ALARM SYSTEMS _____		
TYPE OF HEAT	UNHEATED <input type="checkbox"/>	ELECTRIC <input type="checkbox"/>
(Check <u>ALL</u> that apply)	SPACE HEAT <input type="checkbox"/>	STEAM BOILER <input type="checkbox"/>
	HEAT PUMP <input type="checkbox"/>	LIST ANY OTHERS: _____
GAS FURNACE <input type="checkbox"/>		
OIL FURNACE <input type="checkbox"/>		
WATER BOILER <input type="checkbox"/>		
GEO THERMAL <input type="checkbox"/>		
DOES BUILDING HAVE BOILER AND MACHINERY ITEMS TO INSURE? <input type="checkbox"/>		
<i>Please provide a complete description of each item including make, model and serial number. (separate attachment)</i>		
STRUCTURE USE _____	# ELEVATORS _____	MECH PENTHOUSE _____
LEASED BUILDING <input type="checkbox"/>	**If yes please attach copy of lease.	
	SPRINKLERS <input type="checkbox"/>	NONE <input type="checkbox"/>
		FULL <input type="checkbox"/>
		PARTIAL <input type="checkbox"/>
3. CONSTRUCTION TYPE (Choose more than one if applicable; for help double click icons on the right.)		
<input type="checkbox"/> 1. FRAME - Built of wood or other combustible materials, including construction where combustible materials are combined with other materials such as brick veneer.		
<input type="checkbox"/> 2. JOISTED MASONRY - Exterior walls are constructed of masonry materials such as brick, concrete, gypsum block, or with similar non-combustible materials and where floors and roof are combustible.		
<input type="checkbox"/> 3. NON COMBUSTIBLE - Exterior walls, floors and roof constructed of, and supported by, non-combustible materials such as metal or gypsum but lacking the fire proofing of item #5.		
<input type="checkbox"/> 4. MASONRY NON - COMBUSTIBLE - Exterior walls are constructed of masonry materials, as described in item #2 above with the floors and roof of metal or other non-combustible materials.		
<input type="checkbox"/> 5. MODIFIED FIRE RESISTIVE - Non-combustible materials providing at least (1) hour fire resistance but not more than (2) hours.		
<input type="checkbox"/> 6. FIRE RESISTIVE - Built with non-combustible materials and protected with maximum fireproofing with a fire resistance rating of not less than (2) hours.		
4. AMOUNT OF INSURANCE VALUE REQUESTED		
STRUCTURE / BLDG VALUE \$ _____	CONTENTS \$ _____	
**IF YES, ANNUAL BUSINESS INCOME		
DOES LOCATION PRODUCE REVENUE ? <input type="checkbox"/> YES <input type="checkbox"/> NO	** \$ _____	
** Business income and expense coverage is available for purchase to agencies that have this exposure. Contact Underwriting		
5. AGENCY CONTACT INFORMATION		
CONTACT _____	Phone Number _____	eMail Address _____
SITE CONTACT _____		
COMMENTS _____		
* eMail -or- Mail your Completed Form *		
Division of Real Properties 403 Wapping St. Suite 300 Frankfort, KY 40601 (502) 782-0373	<div style="border: 1px solid black; padding: 5px; display: inline-block; font-weight: bold; font-size: 1.2em;">EMAIL</div>	Division of State Risk & Insurance Services 300 Mero St., 1st Floor Frankfort, Ky 40601 (502) 564-6033

Source: Natalie W. Brawner, director, Division of Real Properties. Email to Chris Hall, March 3, 2026.

Appendix D

Department For Service and Facilities And Support Services' Space Standards In Square Feet By Job Classification

Employee Category	Private Office	Open Office
Executive	275	N/A
Executive manager	200	N/A
Manager	150	96
Senior level professional	130	80
Professional or technical	110	80
Clerical	100	64
Field	80	50

Source: Natalie W. Brawner, director, Division of Real Properties. Email to Chris Hall, March 3, 2026.

Endnotes

- ¹ KRS 42.425(2) and 45A.045.
- ² Natalie W. Brawner, director, Division of Real Properties. Email to Chris Hall, March 3, 2026.
- ³ KRS 42.425 (2)(d).
- ⁴ Natalie W. Brawner, director, Division of Real Properties. April 6, 2026. Interview.
- ⁵ Natalie W. Brawner, director, Division of Real Properties. Email to Chris Hall, March 3, 2026.
- ⁶ Natalie W. Brawner, director and Jason Martin, analyst, Division of Real Properties; Charles Bush, interim commissioner, Department for Facilities and Support Services; and Barbara Dickens, general counsel, Finance and Administration Cabinet. April 6, 2026. Interview.
- ⁷ Kentucky. Finance and Administration Cabinet. “Request For Insurance Coverage And Real Property Reporting” – Form B 117-6/FTR-10. nd. Web.
- ⁸ Natalie W. Brawner, director, Division of Real Properties. Email to Chris Hall, March 3, 2026.
- ⁹ KRS 42.425(2)
- ¹⁰ Ibid.
- ¹¹ United States. General Services Administration. “USE IT Act And Occupancy Data.” April 23, 2026. Web.
- ¹² United States. Government Accountability Office. “Federal Real Property Asset Management: Agencies Could Benefit From Additional Information On Leading Practices.” Nov. 2018. Web.
- ¹³ United States. Government Accountability Office. “Federal Real Property: Agencies Need New Benchmarks To Measure And Shed Underutilized Space.” Oct. 2024. Web.
- ¹⁴ Ibid.
- ¹⁵ United States. Government Accountability Office. “Federal Real Property: GSA Should Improve Accuracy, Completeness, And Usefulness Of Public Data.” Feb. 6, 2020. Web.
- ¹⁶ United States. Government Accountability Office. “Federal Real Property: Agencies Need New Benchmarks To Measure And Shed Underutilized Space.” Oct. 26 2023. Web.
- ¹⁷ United States. Government Accountability Office. “Federal Real Property: GSA Should Improve Accuracy, Completeness, And Usefulness Of Public Data.” Feb. 6, 2020. Web.
- ¹⁸ Natalie W. Brawner, commissioner, and Jason Martin, analyst, Division of Real Properties; Charles Bush, interim commissioner, Department for Facilities and Support Services; and Barbara Dickens, general counsel, Finance and Administration Cabinet. April 6, 2026. Interview.



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