

**Department of Veterans Affairs (VA)  
Response to the Advisory Committee on  
Structural Safety of VA Facilities (Committee)  
May 18, 2023, Recommendations**

**Recommendation 1:** The Advisory Committee on Structural Safety of VA Facilities commends Department of Veterans Affairs (VA) on their voluntary training related to post-disaster (earthquake and windstorm) damage assessment training. It is recognized that the current Disaster Assessment Team approach is voluntary. The Advisory Committee recommends the implementation of a Post Disaster Team be a funded program that funds recurring training for qualified staff and develops an implementation program for post disaster assessments. Members of this team should be among the first responders to a facility after a damaging event.

**VA Response: Concur.** The Office of Acquisition, Logistics, and Construction (OALC) and Office of Construction and Facilities Management (CFM) will fund post disaster (earthquake and windstorm) damage assessment training for Disaster Assessment Team members. CFM will investigate training options for Applied Technology Council's (ATC) post-disaster field evaluation procedures: ATC-20 (Post Earthquake Safety Evaluation of Buildings) and ATC-45 (Safety Evaluation of Buildings after Windstorms and Floods). When significant disasters occur requiring damage assessment, VA will prioritize sending qualified and trained staff to conduct damage assessments.

**Recommendation 2:** The Advisory Committee on Structural Safety of VA Facilities commends Department of Veterans Affairs (VA) on their revisions and updates to H-18-8. The Advisory Committee recommends that CFM investigate relocating the Facility Criticality Designation tables from H-18-8 Seismic Design Requirements and the Physical Security and Resiliency Design Manual to the overarching Structural Design Manual.

**VA Response: Concur-in-principle.** OALC CFM will collaborate with the Veterans Health Administration (VHA) to create a new overarching document more appropriate than the Structural Design Manual for relocating the Facility Criticality Designation tables from H-18-8 Seismic Design Requirements and the Physical Security and Resiliency Design Manual.

**Recommendation 3:** The Advisory Committee on Structural Safety of Facilities commends the Department of Veterans Affairs (VA) for beginning the process of using the HAZUS model for evaluating seismic risks to buildings. This work was done in the past as a demonstration project using an older version of HAZUS. The Advisory Committee recommends that CFM implement a seismic safety evaluation process for VA buildings by applying an updated version of the VA-specific HAZUS program. It is the Advisory Committee's opinion that this information would be valuable for project prioritization and potential recategorization of seismic risk.

**VA Response: Concur.** OALC CFM is developing a task order for a HAZUS tool tailored for VA use. It will provide quantifiable metrics for seismic risk to operations, life-safety, and repair costs, regardless of building criticality. The HAZUS data will allow a reevaluation of VA's seismic risk priority rankings and recommend updates to the prioritization criteria.

**Recommendation 4:** The Advisory Committee on Structural Safety of VA facilities commends Department of Veterans Affairs (VA) on their use of FEMA P-154 for the seismic assessment of existing buildings. The Advisory Committee recommends that CFM continue the FEMA P-154 seismic assessments and work to implement these seismic assessments into the FCA program by end of FY24 Q1.

**VA Response: Concur.** OALC CFM will add the Federal Emergency Management Agency (FEMA) P-154 seismic screening assessments to the scope template of the Facility Condition Assessment (FCA) program by the end of fiscal year (FY) 2024 quarter (Q)1 for FCA awards starting in FY 2024.

**Recommendation 5:**

The Advisory Committee on Structural Safety of VA Facilities commends the Department of Veterans Affairs (VA) for expediting facilities to address local veteran needs, such as Community Living Centers, clinics, and ambulatory care facilities, through the use of leased properties. The Advisory Committee recommends that, by FY24 Q1, the VA develop specific procedures for new construction leased spaces and existing-building leased spaces to uphold applicable VA Seismic and Life Safety Building Standards. Specific procedures should address:

- i. Structural Safety requirements
- ii. Fire and Life Safety requirements
- iii. Continuity of operation, specifically relating to utility/ building system redundancy and structural resiliency
- iv. Design drawing review and third-party inspections

**VA Response: Concur-in-principle.** While current leasing methods meet both the executive orders for structural seismic safety and local and national life safety standards, OALC CFM will work with VHA to balance enhanced safety/resiliency, continuity of operations, and quality assurance requirements for privately owned, leased Critical and Essential facilities while maintaining the business viability to proceed with the leasing delivery method. Requirements will be determined by the end of FY 2024 Q3, which will be sufficient to affect the first leased Community Living Centers not planned to be solicited until FY 2024 Q4.

The balanced approach for Critical and Essential facilities will include:

- Determination of which facilities should be considered Critical and Essential for non-inpatient leases considering various factors, such as risk acceptance, VA alternative care options, and so forth;

- Requiring VA's Seismic Design Handbook H-18-8, Structural Design Manual, and selected/essential elements of the Fire Protection Design Manual;
- Enhancing continuity of operations by considering a hybrid approach of minimum requirements and risk assessment-based requirements; and
- In addition to design document reviews and inspections for code-compliance by local building code enforcement officials, above-code VA lease requirements will be confirmed by:
  - Design document reviews for major leases to be conducted by CFM's Consulting Support Service and minor leases will be under the purview of the VHA local facility. Any deviations from VA lease standards require approval by the VHA Office of Healthcare Engineering through a formal process.
  - Installation of above-code requirements will be confirmed by CFM resident engineers for major leases and VHA CORs for minor leases.

### **Recommendation 6:**

The Advisory Committee on Structural Safety of VA Facilities commends the Department of Veterans Affairs (VA) on their current seismic assessment program for existing buildings. The current program only addresses EHR and HR buildings. The Advisory Committee recommends that CFM extend the seismic assessment program to reclassify those critical and essential buildings deemed to be at risk of collapse as HR or EHR buildings.

**VA Response: Concur.** Based on prior Advisory Committee recommendations, Exceptionally High Risk (EHR) and High Risk (HR) designations only applied to buildings in moderate high or higher seismic zones. OALC CFM will propose updates to VA Directive 7512 and *VA Seismic Risk Definitions* re-defining EHR and HR criteria to include buildings in lower seismic zones that are determined to be at risk for collapse after an American Society of Civil Engineers (ASCE) 41 or equivalent seismic evaluation. Additionally, detailed definitions of EHR and HR criteria will be permanently removed from Directive 7512 and directed to *VA Seismic Risk Definitions*, where they have been moved in response to a 2019 Advisory Committee recommendation to update the seismic risk criteria.

**Actions to implement:**

VA Action Plan						
Recommendation	Lead Office	Other Offices	Steps/Tasks to Implement	Due Date	Current Status	Contact Person (DFO)
(#1) The Advisory Committee on Structural Safety of VA Facilities commends Department of Veterans Affairs (VA) on their voluntary training related to post disaster (earthquake and windstorm) damage assessment training. It is recognized that the current Disaster Assessment Team approach is voluntary. The Advisory Committee recommends the implementation of a Post Disaster Team be a funded program that funds recurring training for qualified staff and develops an implementation program for post disaster assessments. Members of this team should be among the first responders to a facility after a damaging event.	OALC CFM		OALC and CFM will fund post disaster (earthquake and windstorm) damage assessment training for Disaster Assessment Team members. CFM will investigate training options for Applied Technology Council's (ATC) post-disaster field evaluation procedures: ATC-20 (Post Earthquake Safety Evaluation of Buildings) and ATC-45 (Safety Evaluation of Buildings after Windstorms and Floods). When significant disasters occur requiring damage assessment, VA will prioritize sending qualified and trained staff to conduct damage assessments. CFM will coordinate with the Office of Emergency Management & Resilience and VHA to highlight the importance of sending trained staff for damage assessments.	Next Committee meeting, planned for May 21-23, 2024	Open	Donald L. Myers, American Institute of Architects (AIA), Director of Facilities Standards Service, Office of Facilities Planning, CFM <a href="mailto:Donald.Myers@va.gov">Donald.Myers@va.gov</a> 202-632-5388
(#2) The Advisory Committee on Structural Safety of VA	OALC CFM		Concur-in-principle. OALC CFM will collaborate with VHA	Next Committee	Open	Donald L. Myers, AIA

<p>Facilities commends Department of Veterans Affairs (VA) on their revisions and updates to H-18-8. The Advisory Committee recommends that CFM investigate relocating the Facility Criticality Designation tables from H-18-8 Seismic Design Requirements and the Physical Security and Resiliency Design Manual to the overarching Structural Design Manual.</p>			<p>to create a new overarching document more appropriate than the Structural Design Manual for relocating the Facility Criticality Designation tables from H-18-8 Seismic Design Requirements and the Physical Security and Resiliency Design Manual.</p>	<p>meeting, planned for May 21-23, 2024</p>		<p>Director, Facilities Standards Service, Office of Facilities Planning, CFM  <a href="mailto:Donald.Myers@va.gov">Donald.Myers@va.gov</a>                  202-632-5388</p>
<p>(#3) The Advisory Committee on Structural Safety of Facilities commends the Department of Veterans Affairs (VA) for beginning the process of using the HAZUS model for evaluating seismic risks to buildings. This work was done in the past as a demonstration project using an older version of HAZUS. The Advisory Committee recommends that CFM implement a seismic safety evaluation process for VA buildings by applying an updated version of the VA-specific HAZUS program. It is the Advisory Committee's opinion that this information</p>	<p>OALC CFM</p>		<p>OALC CFM is planning on awarding a task order in FY24 to resume development of a VA-HAZUS tool tailored for VA use that will provide quantifiable metrics for seismic risk to operations, life-safety, and repair costs, regardless of building criticality. The task order will use the HAZUS data to reevaluate VA's seismic risk priority rankings and recommend updates to the prioritization criteria. The task order is projected as a 2-year effort to be completed in 2026.</p>	<p>Next Committee meeting, planned for May 21-23, 2024</p>	<p>Open</p>	<p>Donald L. Myers, AIA                  Director, Facilities Standards Service, Office of Facilities Planning, CFM  <a href="mailto:Donald.Myers@va.gov">Donald.Myers@va.gov</a>                  202-632-5388</p>

<p>would be valuable for project prioritization and potential recategorization of seismic risk.</p>						
<p>(#4) The Advisory Committee on Structural Safety of VA Facilities commends Department of Veterans Affairs (VA) on their use of FEMA P-154 for the seismic assessment of existing buildings. The Advisory Committee recommends that CFM continue the FEMA P-154 seismic assessments and work to implement these seismic assessments into the FCA program by end of FY 2024 Q1.</p>	<p>OALC CFM</p>		<p>OALC CFM will add FEMA P-154 seismic screening assessments to the scope template of the FCA program by the end of FY 2024 Q1 for FCA awards starting in FY 2024.</p>	<p>Next Committee meeting, planned for May 21-23, 2024</p>	<p>Open</p>	<p>Donald L. Myers, AIA Director, Facilities Standards Service, Office of Facilities Planning, CFM  <a href="mailto:Donald.Myers@va.gov">Donald.Myers@va.gov</a>                  202-632-5388</p>
<p>(#5) The Advisory Committee on Structural Safety of VA Facilities commends the Department of Veterans Affairs (VA) for expediting facilities to address local veteran needs, such as Community Living Centers, clinics, and ambulatory care facilities, through the use of leased properties. The Advisory Committee recommends that, by FY24 Q1, the VA develop specific</p>	<p>OALC CFM</p>	<p>VHA Healthcare Environment and Facilities Program and Office of Capital Asset Management</p>	<p>OALC CFM will work with VHA to balance enhanced safety/resiliency, continuity of operations and quality assurance requirements for leased Critical and Essential facilities while maintaining the business viability to proceed with the leasing delivery method. Requirements will be determined by the end of FY 2024 Q3, which will be sufficient to affect the first leased Community Living</p>	<p>Next committee meeting, planned for May 21-23, 2024</p>	<p>Open</p>	<p>Donald L. Myers, AIA Director, Facilities Standards Service, Office of Facilities Planning, CFM  <a href="mailto:Donald.Myers@va.gov">Donald.Myers@va.gov</a>                  202-632-5388</p>

<p>procedures for new construction leased spaces and existing-building leased spaces to uphold applicable VA Seismic and Life Safety Building Standards. Specific procedures should address:</p> <ul style="list-style-type: none"> <li>i. Structural Safety Requirements</li> <li>ii. Fire and Life Safety Requirements</li> <li>iii. Continuity of operation, specifically relating to utility/ building system redundancy and structural resiliency.</li> <li>iv. Design drawing review and third-party inspections.</li> </ul>			<p>Centers not planned to be solicited until FY 2024 Q4.</p> <p>All applicable VA design manuals, the VA Lease Design Narrative, and policies (such as Directive 7512), will be updated as needed to incorporate the enhancements for leased Critical and Essential facilities.</p>			
<p>(#6) The Advisory Committee on Structural Safety of VA Facilities commends the Department of Veterans Affairs (VA) on their current seismic assessment program for existing buildings. The current program only addresses EHR and HR buildings. The Advisory Committee recommends that CFM extend the seismic assessment program to reclassify those critical and essential buildings deemed to</p>	<p>OALC CFM</p>		<p>OALC CFM will update EHR and HR rankings to include buildings in lower seismic zones that are determined to be at risk for collapse after an ASCE 41 or equivalent seismic evaluation.</p>	<p>Next committee meeting, planned for May 21-23, 2024</p>	<p>Open</p>	<p>Donald L. Myers, AIA Director, Facilities Standards Service, Office of Facilities Planning, CFM <a href="mailto:Donald.Myers@va.gov">Donald.Myers@va.gov</a> 202-632-5388</p>

be at risk of collapse as HR or EHR buildings.						
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