

Department of Veterans Affairs (VA)
Responses to the May 2024 Report Recommendations
From the Advisory Committee on Structural Safety of VA Facilities

Recommendation 1: The Advisory Committee on Structural Safety of VA Facilities commends the Department of Veterans Affairs (VA) on the use of leased spaces to expedite services to veteran populations in need.

The Advisory Committee recommends that the VA conduct a study to determine feasibility of leasing for facilities in high-risk zones. The study should evaluate the risk categories of the facilities per the locally adopted codes, the latest edition of the International Building Code, and the Facility Criticality Designations in the VA Design Standards. The intent of the study is to inform the VA's decision on when to execute leases to optimize the risk, building performance, reliability, and return on investment.

The Advisory Committee recommends prioritizing leased spaces for buildings with VA Design Standards Facility Criticality Designations that align with risk categories in locally adopted codes. VA Directive 7512 should be updated to reflect the requirements for leases.

VA Response: Concur. The Office of Acquisition, Logistics, and Construction (OALC) and the Office of Construction and Facilities Management (CFM) will plan to conduct a study to evaluate the recommended various risk categories for leased projects to help inform VA for leasing in high-risk areas. VA Directive 7512, Seismic Safety of VA Buildings, dated August 3, 2017, will be updated in 2025 to reflect the planned study and will be updated in the future based on the findings of the study to clarify seismic policy for leased projects.

Recommendation 2: The Advisory Committee on Structural Safety of VA Facilities commends the Department of Veterans Affairs (VA) on the use FEMA P-154 for the screening of buildings with potential seismic hazards within the Facility Condition Assessment Program.

The Advisory Committee recommends that FEMA P-154 training be required for Level 1 Screeners.

VA Response: Concur. OALC CFM will update the Facility Condition Assessment (FCA) requirements to mandate that appropriate Federal Emergency Management Agency (FEMA) P-154 training is required for all FCA team assessors who will conduct FEMA P-154 screenings, including Level 1 Screeners.

Recommendation 3: The Advisory Committee on Structural Safety of VA Facilities commends the Department of Veterans Affairs (VA) on implementing training for the Damage Assessment Team on ATC-20 and ATC-45.

The Advisory Committee recommends that VA develop the capability to deploy trained staff within 48 hours to engage in post-event safety evaluations, and to authorize VA staff to assess and tag buildings at impacted VA Facilities.

VA Response: Concur. VA will develop the capability to activate available Applied Technology Council (ATC) ACT-20 and ATC-45 trained, volunteer staff within 48 hours to engage in post-event safety evaluations and will authorize them to assess and tag buildings at impacted VA Facilities.

Recommendation 4: The Advisory Committee on Structural Safety of VA Facilities commends the Department of Veterans Affairs (VA) on using the NIST Interagency Report Standards of Seismic Safety for Existing Federally Owned and Leased Buildings.

The Advisory Committee recommends that the VA adopts the latest version of ICSSC Recommended Practice 10 (RP 10-22) and modify H-18-8 to include RP 10-22 prior to January 2025, regardless of the update date of Directive 7512. The adoption should modify RP 10-22 1.3(f) to remove “Risk Category III.”

VA Response: Concur. OALC CFM will update H-18-8 by January 2025 to adopt the latest version of Interagency Committee on Seismic Safety in Construction (ICSSC) Recommended Practice 10 (RP 10-22) to comply with Executive Order (EO) 13717, Establishing a Federal Earthquake Risk Management Standard, dated February 2, 2016. This update will occur in parallel to the update of VA Directive 7512 but will not wait for the directive to be published. H-18-8 also will clarify that the RP 10-22 exemption for small buildings does not apply for Essential (Risk Category III) buildings due to the immediate occupancy performance objective of these buildings.

Recommendation 5: The Advisory Committee on Structural Safety of VA Facilities commends the Department of Veterans Affairs (VA) on the consideration of hazardous materials when assessing risk categories.

The Advisory Committee recommends that the VA identify the risk category of spaces within facilities containing hazardous materials based on the hazardous materials definitions outlined in the most recent edition of the International Building Code (IBC). Additionally, the VA should consider applicable federal regulations for materials not included in the IBC, such as radioactive materials/ nuclear waste.

VA Response: Concur. VA will clarify which spaces are considered hazardous to align with the 2024 IBC definitions and also consider other sources, including applicable Federal regulations, to include applicable hazardous materials not included in the 2024 IBC.

Recommendation 6: The Advisory Committee on Structural Safety of VA Facilities commends the Department of Veterans Affairs (VA) on the seismic assessment program to identify EHR and HR buildings.

The Advisory Committee recommends that the VA continue to review all structures of Critical or Essential nature regardless of size. This review should include a review by an assessor to verify the status of the building to determine if the building is exempt.

VA Response: Concur. OALC CFM will continue to not exempt buildings based on size for them to qualify as Exceptionally High Risk (EHR) or High Risk (HR). Similarly, buildings are already verified to not be exempt prior to classifying them as EHR or HR, and that process will also continue.

**Department of Veterans Affairs
December 2024**

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 the Department of Veterans Affairs (VA) on the use of leased spaces to expedite services to veteran populations in need. The Advisory Committee recommends that the VA conduct a study to determine feasibility of leasing for facilities in high-risk zones. The study should evaluate the risk categories of the facilities per the locally adopted codes, the latest edition of the International Building Code (IBC), and the Facility Criticality Designations in the VA Design Standards. The intent of the study is to inform the VA's decision on when to execute leases to optimize the risk, building	OALC CFM	VHA Healthcare Environment and Facilities Programs (HEFP)	OALC CFM will plan to conduct a study to evaluate the recommended various risk categories for leased projects to help inform VA for leasing in high-risk areas. VA Directive 7512 will be updated in 2025 to reflect the planned study and will be updated in the future based on the findings of the study to clarify seismic policy for leased projects.	The next committee meeting is planned to occur during the week of June 9-13, 2025.	Open	Donald L. Myers, AIA Director, Facilities Standards Service, Office of Facilities Planning, CFM Donald.Myers@va.gov 202-632-5388

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performance, reliability, and return on investment. The Advisory Committee recommends prioritizing leased spaces for buildings with VA Design Standards Facility Criticality Designations that align with risk categories in locally adopted codes. VA Directive 7512 should be updated to reflect the requirements for leases.						
(#2) The Advisory Committee on Structural Safety of VA Facilities commends the Department of Veterans Affairs (VA) on the use Federal Emergency Management Agency (FEMA) P-154 for the screening of buildings with potential seismic hazards within the Facility Condition Assessment Program. The Advisory Committee recommends that FEMA P-154 training be required for Level 1 Screeners.	OALC CFM		OALC CFM will update the FCA requirements to mandate that appropriate FEMA P-154 training is required for all FCA team assessors that will conduct FEMA P-154 screenings, including Level 1 Screeners.	The next committee meeting is planned to occur during the week of June 9-13, 2025.	Open	Donald L. Myers, AIA Director, Facilities Standards Service, Office of Facilities Planning, CFM Donald.Myers@va.gov 202-632-5388

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Recommendation	Lead Office	Other Offices	Steps/Tasks to Implement	Due Date	Current Status	Contact Person (DFO)
(#3) The Advisory Committee on Structural Safety of VA Facilities recommends the Department of Veterans Affairs (VA) on implementing training for the Damage Assessment Team on Applied Technology Council (ATC) ATC-20 and ATC-45. The Advisory Committee recommends that VA develop the capability to deploy trained staff within 48 hours to engage in post-event safety evaluations, and to authorize VA staff to assess and tag buildings at impacted VA Facilities.	OALC CFM	Office of Emergency Management and Resilience and VHA	VA will develop the capability to activate available ATC-20 and ATC-45 trained, volunteer staff within 48 hours to engage in post-event safety evaluations and will authorize them to assess and tag buildings at impacted VA Facilities. CFM will coordinate with the Office of Emergency Management and Resilience and VHA to highlight the importance of sending trained staff for damage assessments.	The next committee meeting is planned to occur during the week of June 9-13, 2025.	Open	Donald L. Myers, AIA Director, Facilities Standards Service, Office of Facilities Planning, CFM Donald.Myers@va.gov 202-632-5388
(#4) The Advisory Committee on Structural Safety of VA Facilities recommends the Department of Veterans Affairs (VA) on using the National Institute Standards and Technology Interagency Report Standards of Seismic Safety for Existing Federally Owned and Leased Buildings.	OALC CFM	VHA HEFP	OALC CFM will update H-18-8 by January 2025 to adopt ICSSC RP 10-22 to comply with EO 13717. This update will occur in parallel to the update of VA Directive 7512 but will not wait for the directive to be published. H-18-8 also will clarify that the RP 10-22 exemption for small buildings does not apply for Essential (Risk	The next committee meeting is planned to occur during the week of June 9-13, 2025.	Open	Donald L. Myers, AIA Director, Facilities Standards Service, Office of Facilities Planning, CFM Donald.Myers@va.gov 202-632-5388

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(#5) The Advisory Committee on Structural Safety of VA Facilities commends the Department of Veterans Affairs (VA) on the consideration of hazardous materials when assessing risk categories. The Advisory Committee recommends that the VA identify the risk category of spaces within facilities containing hazardous materials based on the hazardous materials definitions outlined in the most recent edition of the IBC. Additionally, the VA	OALC CFM	VHA HEFP	VA will clarify which spaces are considered hazardous to align with the 2024 IBC definitions and also consider other sources, including applicable Federal regulations, to include applicable hazardous materials not included in the 2024 IBC. CFM will coordinate with VHA HEFP subject matter experts to determine applicable hazardous materials.	The next committee meeting is planned to occur during the week of June 9-13, 2025.	Open	Donald L. Myers, AIA Director, Facilities Standards Service, Office of Facilities Planning, CFM Donald.Myers@va.gov 202-632-5388

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should consider applicable federal regulations for materials not included in the IBC, such as radioactive materials/ nuclear waste.						
(#6) The Advisory Committee on Structural Safety of VA Facilities commends the Department of Veterans Affairs (VA) on the seismic assessment program to identify EHR and HR buildings. The Advisory Committee recommends that the VA continue to review all structures of Critical or Essential nature regardless of size. This review should include a review by an assessor to verify the status of the building to determine if the building is exempt.	OALC CFM		OALC CFM will continue to not exempt buildings based on size for them to qualify as EHR or HR. Similarly, buildings are already verified to not be exempt prior to classifying them as EHR or HR, and that process will also continue.	Ongoing	Closed	Donald L. Myers, AIA Director, Facilities Standards Service, Office of Facilities Planning, CFM Donald.Myers@va.gov 202-632-5388