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From: Acting Principal Executive Director, Office of Acquisition, Logistics, and Construction (003)
Assistant Secretary for Office of Operations, Security, and Preparedness (007)

Subj: Real Property Policy Memorandum 2018-02 Physical Security Standards for Leased Facilities
(Existing Space and Lease Construction Projects) (VAIQ 7866496)

To: Office of Real Property (003C1E)
Veterans Integrated Service Network Directors
Department of Veterans Affairs Lease Contracting Officers
Department of Veterans Affairs Leasing Officials

1. As the Department of Veterans Affairs (VA) leasing program has developed and increased in complexity in recent years, the Office of Acquisition, Logistics, and Construction and the Office of Operations, Security, and Preparedness (OSP) now need to officially differentiate between the standards, processes, and policies applicable to owned VA facilities versus leased facilities. VA has engaged in extensive discussions with the Congressional Budget Office, Office of Management and Budget, and the General Services Administration as to the best way for VA to move forward with its leasing program while ensuring compliance with applicable statutes and budgetary treatment requirements. These discussions resulted in a mandate from Congress and the Administration that VA re-examine how it conducts its leasing program and implement changes to bring it into better alignment with Federal requirements and similar programs at other Federal Departments.

2. In furtherance of these efforts, we are hereby implementing the following policies:

a. In response to the Government Accountability Office Report "VA Facility Security" dated January 2018, VA adopts all elements of the Interagency Security Standards (ISC) for its leased facilities. Resiliency requirements will be implemented via the most current version of the National Fire Protection Association 99: Health Care Facilities Code, structural provisions of local building codes, and directions incorporated in the Agency Specific Requirements (ASR) for each leased facility.

b. All leased facilities will, at a minimum, be designated Facility Security Level (FSL) II. Detailed FSL information will be incorporated in the ASR for each leased facility.

c. The Director of the parent VA Medical Center and/or the VISN Network Director may add physical security requirements beyond those listed in the attachment to this Memorandum. However, any such requested additional physical security requirements must be analyzed through an ISC-compliant risk assessment and approved by the Office of Security and Law Enforcement and the Deputy Under Secretary for Health for Operations

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and Management. Requested additional physical security requirements must also be priced as tenant improvements and paid in lump sum to prevent exceeding prospectus rental rates and/or qualifying the lease as a capital asset pursuant to budgetary treatment requirements of the Office of Management and Budget's Circular A-11.

d. For leased facilities in procurement or under construction as of the date of this Memorandum, the Lease Contracting Officer, working in concert with the project team, may change the lease requirements to align with those described in this Memorandum when it is in the best interest of the Government. In the event this change conflicts with a requirement included within the prospectus, such changes will be routed to the Deputy Under Secretary for Health for Operations and Management for approval.

3. In an effort to comply with the ISC, decrease project delivery times, increase competition, and lower delivery costs, VA leasing projects are no longer required to conform to:

a. Physical Security Design Manual for VA Life-Safety Protected Facilities (<https://www.cfm.va.gov/til/PhysicalSecurity/dmPhySecLS.pdf>);

b. Physical Security Design Manual for VA Mission Critical Facilities (<https://www.cfm.va.gov/til/PhysicalSecurity/dmPhySecMC-2007.pdf>); and

c. Appendix B, Physical Security Requirements and Options, VA Handbook 0730 (See VA Publications <https://www.va.gov/vapubs/index.cfm>).

4. The policies and information contained in this Memorandum supersede any other published guidance on these topics. In collaboration with VA Administrations, including OSP, the Office of Construction and Facilities Management is responsible for the development of any further definition or process to support these policies, which remain in effect until rescinded.

5. If you have any questions, please contact the Associate Executive Director, Office of Real Property, Mr. Darren Blue at (202) 632-4641 or Darren.Blue@va.gov.



Stella S. Fiotes, AIA
Acting Principal Executive Director
Office of Acquisition, Logistics, and
Construction



Donald P. Loren
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Attachment: Facility Security Level II Standards

ATTACHMENT

INSTRUCTIONS TO LEASING SPECIALISTS: THE FOLLOWING BASELINE SPECIFICATIONS REPRESENT THE FULL EXTENT OF SECURITY SPECIFICATIONS AVAILABLE TO LEVEL II REQUIREMENTS UNDER THE ISC.

THESE ARE THE MINIMUM BASELINE REQUIREMENTS (MANDATORY). THE LCO MAY INCLUDE ADDITIONAL REQUIREMENTS, IF REQUESTED BY THE VA MEDICAL CENTER DIRECTOR IN WRITING. ADDITIONAL REQUIREMENTS MUST BE IDENTIFIED THROUGH PROGRAMMATIC OR RISK BASED ASSESSMENT BY THE VA CHIEF OF POLICE OR THEIR DESIGNEE. ANY ADDITIONAL REQUIREMENTS NOT SUPPORTED BY RISK ASSESSMENT MAYBE INCLUDED, BUT MUST BE FUNDED AS TENANT SPECIFIC SECURITY (TIS) AND NOT AS BSAC.

SECURITY REQUIREMENTS - FACILITY SECURITY LEVEL II

THESE PARAGRAPHS CONTAIN ADDITIONAL SECURITY REQUIREMENTS, AND, UNLESS INDICATED OTHERWISE, ARE TO BE PRICED AS PART OF THE BUILDING SPECIFIC AMORTIZED CAPITAL (BSAC). WHERE THEY ARE IN CONFLICT WITH ANY OTHER REQUIREMENTS ON THIS LEASE, THE STRICTEST SHALL APPLY.

DEFINITIONS:

CRITICAL AREAS - The areas that house systems that if damaged or compromised could have significant adverse consequences for the facility, operation of the facility, or mission of the agency or its occupants and visitors. These areas may also be referred to as "limited access areas," "restricted areas," or "exclusionary zones." Critical areas do not necessarily have to be within Government-controlled space (e.g., generators, air handlers, electrical feeds which could be located outside Government-controlled space).

SENSITIVE AREAS - Sensitive areas include vaults, pharmacy, SCIFs, evidence rooms, war rooms, and sensitive documents areas. Sensitive areas are primarily housed within Government-controlled space.

FACILITY ENTRANCES, LOBBY, COMMON AREAS, NON-PUBLIC, AND UTILITY AREAS.

FACILITY ENTRANCES AND LOBBY

EMPLOYEE ACCESS CONTROL AT ENTRANCES (SHELL)

The Lessor shall provide key or electronic access control for the entrance to this building. All Government employees, under this, shall be allowed access to the leased space (including after-hours access).

COMMON AREAS, NON-PUBLIC, AND UTILITY AREAS.

PUBLIC RESTROOM ACCESS (SHELL)

The Government reserves the right to control access to public restrooms located within the Space.

ACTION REQUIRED. INSERT OTHER CRITICAL AREAS AS DEFINED BY THE CLIENT AGENCY.

SECURING CRITICAL AREAS (SHELL)

The Lessor shall secure areas designated as Critical Areas to restrict access:

- A. Keyed locks, keycards, or similar security measures shall strictly control access to mechanical areas. Additional controls for access to keys, keycards, and key codes shall be strictly maintained. The Lessor shall develop and maintain accurate HVAC diagrams and HVAC system labeling within mechanical areas.
- B. Roofs with HVAC systems shall also be secured. Fencing or other barriers may be required to restrict access from adjacent roofs based on a Government Building Security Assessment. Roof access shall be strictly controlled through keyed locks, keycards, or similar measures. Fire and life safety egress shall be carefully reviewed when restricting roof access.
- C. At a minimum, Lessor shall secure building common areas including sprinkler rooms, electrical closets, telecommunications rooms.

VISITOR ACCESS CONTROL (SHELL)

Entrances are open to the public during business hours. After hours, visitor entrances are secured, and have a means to verify the identity of persons requesting access prior to allowing entry into the Space.

INTERIOR (GOVERNMENT SPACE)

DESIGNATED ENTRANCES (SHELL)

The Government shall have a designated main entrance.

IDENTITY VERIFICATION (SHELL)

The Government reserves the right to verify the identity of persons requesting access to the Space prior to allowing entry.

FORMAL KEY CONTROL PROGRAM (SHELL)

The Government reserves the right to implement a formal key control program. The Lessor shall have a means of allowing the electronic disabling of lost or stolen access media, if electronic media is used.

SITES AND EXTERIOR OF THE BUILDING

SIGNAGE

POSTING OF SIGNAGE IDENTIFYING THE SPACE AS GOVERNMENTAL (SHELL)

The Lessor shall not post sign(s) or otherwise identify the facility and parking areas as a Government, or specific Government tenant, occupied facility, including during construction, without written Government approval.

POSTING OF REGULATORY SIGNAGE (SHELL)

The Government may post or request the Lessor to post regulatory, statutory, sensitive areas and site specific signage.

LANDSCAPING

LANDSCAPING REQUIREMENTS (SHELL)

Lessor shall maintain landscaping (trees, bushes, hedges, land contour, etc.) around the facility. Landscaping shall be neatly trimmed in order to minimize the opportunity for concealment of individuals and packages/containers. Landscaping shall not obstruct the views of security guards and CCTV cameras, or interfere with lighting or IDS equipment.

CRIME PREVENTION THROUGH ENVIRONMENTAL DESIGN (SHELL)

The Lessor shall separate from public access, restricted areas as designated by the Government, through the application of Crime Prevention Through Environmental Design (CPTED) principles by using trees, hedges, berms, or a combination of these or similar features, and by fences, walls, gates and other barriers, where feasible and acceptable to the Government.

HAZMAT STORAGE

If there is HAZMAT storage, lessor shall locate it in a restricted area or storage container away from loading docks, entrances, and uncontrolled parking.

PLACEMENT OF RECEPTACLES, CONTAINERS, AND MAILBOXES

Trash receptacles, containers, mailboxes, vending machines, or other fixtures and/or features that could conceal packages, brief cases, or other portable containers shall be located 10 feet away from building.

SECURITY SYSTEMS

THE FOLLOWING CCTV, IDS, AND DURESS ALARMS ITEMS ARE TO BE INSTALLED BY EITHER THE LESSOR OR PARENT VA MEDICAL CENTER. CONSULT WITH PARENT VA MEDICAL CENTER TO DETERMINE WHICH VERSIONS APPLY. WHEN CHOOSING PARAGRAPHS REQUIRING LESSOR INSTALLATION, ESPECIALLY FOR DURESS ALARMS, OBTAIN SPECIFICATIONS FROM FPS AND PARENT VA MEDICAL CENTER

CLOSED CIRCUIT TELEVISION SYSTEM (CCTV)

ACTION REQUIRED: LEASING SPECIALIST MUST CHOOSE 1 OF THE 2 FOLLOWING PARAGRAPHS (LESSOR PROVIDED OR GOVERNMENT PROVIDED) AND DELETE THE OTHER PARAGRAPH.

LESSOR PROVIDED DESIGN, INSTALLATION, AND MAINTENANCE

The lessor shall design, install, and maintain a Closed Circuit Television (CCTV) system as described in this section. The CCTV system will support the entry control system (at entrances and exits to the space), with time lapse video recording, that will allow Government employees to view and communicate remotely with visitors before allowing access to the Space. As determined by the Government the CCTV system shall provide unobstructed coverage of designated pedestrian entrances and exits. Technical review of the proposed system shall be coordinated with the Government security representative, at the direction of the Contracting Officer, prior to installation. CCTV system testing and acceptance shall be conducted by the Government prior to occupancy. The CCTV system shall comply with the Architectural Barriers Act, section F230.0. The Government will centrally monitor the CCTV system. Government specifications are available from the Lease Contracting Officer. CCTV system components which fail or require maintenance or which fail during testing should be serviced in accordance with the Security System Maintenance Criteria listed below.

Security System Maintenance Criteria: The Lessor, in consultation and coordination with a security provider, either internal or external, as determined by the Lease Contracting Officer, and the Government security representative, shall implement a preventive maintenance program for all security systems the Lessor has installed. Any critical component that becomes inoperable must be replaced or repaired by the Lessor within 5 business days. Critical components are those required to provide security (IDS, CCTV, access control, etc.) for a perimeter access point or critical area. "Replacement" may include implementing other temporary measures in instances where the replacement or repair is not achievable within the specified time frame (e.g. a temporary barrier to replace an inoperable pop-up vehicle barrier, etc.). Failure by the Lessor to provide sufficient replacement measures within the timeframe identified above may result in the Government's providing guard service, the cost of which must be reimbursed by the Lessor.

GOVERNMENT PROVIDED PRODUCT, INSTALLATION, AND MAINTENANCE

The Government shall provide and install an entry control system, with time lapse video recording, that will allow Government employees to view and communicate remotely with visitors before allowing access. This Closed Circuit Television (CCTV) system shall provide the Government with unobstructed coverage, as determined by the Government, of designated pedestrian entrances and exits. The Lessor shall permit twenty-four hour CCTV coverage and recording, provided and operated by the Government. The Government will centrally monitor the CCTV surveillance. Government specifications are available from the Contracting Officer. The Lessor shall post necessary regulatory, statutory, and/or site specific signage, as determined by the Government.

The Lessor, at the notice to proceed stage of the procurement, shall advise the Government of the appropriate time to install the equipment during the construction of the Space. The Lessor shall facilitate the installation by allowing access to electrical panels and other areas of the building as necessary.

INTRUSION DETECTION SYSTEM (IDS)

ACTION REQUIRED: LEASING SPECIALIST MUST CHOOSE 1 OF THE 2 FOLLOWING PARAGRAPHS (LESSOR PROVIDED OR GOVERNMENT PROVIDED) AND DELETE THE OTHER PARAGRAPH.

LESSOR PROVIDED DESIGN, INSTALLATION, AND MAINTENANCE

The Lessor shall design, install, and maintain an Intrusion Detection System (IDS) as described in this section. The Government requires an IDS, which will cover perimeter entry and exit doors, and operable ground-floor windows. Basic Security-in-Depth IDS components include: magnetic door switch(s), alarm system keypad, passive infrared sensor(s) (PIR), an alarm panel (to designated monitoring center) and appropriate communication method i.e. telephone and/or Internet

connection, glass-break detector, magnetic window switches or shock sensors. Technical review of the proposed system shall be coordinated with the Government security representative, at the direction of the Lease Contracting Officer, prior to installation. System testing and acceptance shall be conducted by the Government prior to occupancy.

Basic Security-in-Depth IDS shall be connected to and monitored at a central station operated by parent VA Medical Center or other location. Emergency notification lists shall be coordinated with the monitoring station to include all applicable Government and lessor points of contact. Monitoring shall be designed to facilitate a real-time detection of an incident, and to coordinate an active response to an incident. The Lessor must complete the Megacenters Alarm Requirements (MAR) application process specified by the Government to meet the monitoring requirements for a functional IDS. Components which fail or require maintenance or which fail during testing shall be serviced in accordance with the Security System Maintenance Criteria listed below.

Security System Maintenance Criteria: The Lessor, in consultation and coordination with a security provider, either internal or external, as determined by the Lease Contracting Officer, and the Government security representative, shall implement a preventive maintenance program for all security systems the Lessor has installed. Any critical component that becomes inoperable must be replaced or repaired by the Lessor within 5 business days. Critical components are those required to provide security (IDS, CCTV, access control, etc.) for a perimeter access point or critical area. "Replacement" may include implementing other temporary measures in instances where the replacement or repair is not achievable within the specified time frame (e.g. a temporary barrier to replace an inoperable pop-up vehicle barrier, etc.). Failure by the Lessor to provide sufficient replacement measures within the timeframe identified above may result in the Government providing guard service, the cost of which must be reimbursed by the Lessor.

GOVERNMENT PROVIDED SCOPE AND PRODUCT, INSTALLATION, AND MAINTENANCE The Lessor shall permit installation of a perimeter Intrusion Detection System (IDS) to be operated by the Government. The Government shall provide and install an IDS on perimeter entry and exit doors, and operable ground-floor windows. Basic Security-in-Depth IDS include: magnetic door switch(s), alarm system keypad, passive infrared sensor(s) (PIR), an alarm panel (to designated monitoring center) and appropriate communication method i.e. telephone and/or Internet connection, glass-break detector, magnetic window switches or shock sensors.

Basic Security-in-Depth IDS shall be connected and monitored at a central station. Emergency notification lists shall be coordinated with the monitoring station to include all applicable Government and Lessor points of contact. Monitoring shall be designed to facilitate a real-time detection of an incident, and to coordinate an active response to an incident.

The Lessor, at the notice to proceed stage of the procurement, shall advise the Government of the appropriate time to install the equipment during the construction of the Space. The Lessor shall facilitate the installation by allowing access to electrical panels and other areas of the building, as necessary.

DURESS ALARM

ACTION REQUIRED: LEASING SPECIALIST MUST CHOOSE 1 OF THE 2 FOLLOWING PARAGRAPHS (LESSOR PROVIDED OR GOVERNMENT PROVIDED) AND DELETE THE OTHER PARAGRAPH.

LESSOR PROVIDED DESIGN, INSTALLATION, AND MAINTENANCE

The Lessor shall design, install, and maintain a duress alarm system as described. THE GOVERNMENT SHALL PROVIDE A SCOPE OF WORK FOR A DURESS ALARM SYSTEM. (LCO SHOULD ADD SPECIFIC SCOPE HERE) Technical review shall be coordinated with the Government security representative, at the direction of the Contracting Officer, prior to installation. System testing and acceptance shall be conducted by the Government prior to occupancy. This system shall comply with the Architectural Barriers Act, section F230.0.

The lessor in consultation and coordination with the security provider and Government shall conduct security system performance testing annually. Testing must be based on established, consistent agency-specific protocols, documented and furnished to the Contracting Officer. Components which fail or require maintenance or which fail during testing should be serviced in accordance with the Security System Maintenance Criteria listed below.

Security System Maintenance Criteria: The Lessor in consultation and coordination with a security provider, either internal or external, as determined by the Lease Contracting Officer, and the Government security representative shall implement a preventive maintenance program for all security systems they have installed. Any critical component that becomes inoperable must be replaced or repaired within 5 business days. Critical components are those required to provide security (IDS, CCTV, access control, etc.) for a perimeter access point or critical area. "Replacement" may include implementing other temporary measures in instances where the replacement or repair is not achievable within the specified time frame (e.g. a temporary barrier to replace an inoperable pop-up vehicle barrier, etc.). Failure by the Lessor to provide sufficient replacement measures within the timeframe identified above may result in the Government's providing guard service, the cost of which must be reimbursed by the Lessor.

GOVERNMENT PROVIDED SCOPE, PRODUCT, INSTALLATION, AND MAINTENANCE

The Lessor shall permit installation of a duress alarm system to be provided and operated by the Government. The Government, in coordination with a security provider, either internal or external, as determined by the Contracting Officer, shall document and implement duress procedures for emergency situations.

The Lessor, at the notice to proceed stage of the procurement, shall advise the Government of the appropriate time to install the equipment during the construction of the Space and shall facilitate the installation, including access to electrical panels and other areas of the building, as necessary.

STRUCTURE

WINDOWS

SHATTER-RESISTANT WINDOW PROTECTION

The Lessor shall provide and install, shatter-resistant material not less than 0.18 millimeters (7 mil) thick on all exterior windows in Government-occupied space meeting the following properties - Film composite strength and elongation rate measured at a strain rate not exceeding 50% per minute shall not be less than the following:

- Yield Strength: 12,000 psi
- Elongation at yield: 3%
- Longitudinal Tensile strength: 22,000 psi
- Traverse Tensile strength: 25,000 psi
- Longitudinal Elongation at break: 90%
- Traverse Elongation at break: 75%

THE ALTERNATIVE METHOD is for the Lessor to provide a window system that conforms to a minimum glazing performance condition of "3b" for a high protection level and a low hazard level. Window systems shall be certified as prescribed by WINGARD PE 4.3 or later to GSA performance condition 3b in accordance with the GSA Standard Test Method for Glazing and Window Systems Subject to Dynamic loadings or Very low Hazard (in accordance with ASTM F 1642, Standard Test Method for Glazing or Glazing Systems Subject to Air Blast loading) in response to air blast load of 4 psi/28 psi-msec.

If the lessor chooses the Alternative Method, they shall provide a description of the shatter-resistant window system and provide certification from a licensed professional engineer that the system as offered meets the above standard. Prior to installation, this will be provided for evaluation by the Government, whose approval shall not be unreasonably withheld.

OPERATIONS AND ADMINISTRATION

LESSOR TO WORK WITH VA POLICE (SHELL)

The Lessor shall cooperate and work with the buildings' VA Police throughout the term of the lease.

ACCESS TO BUILDING INFORMATION (SHELL)

Building Information--including mechanical, electrical, vertical transport, fire and life safety security system plans and schematics, computer automation systems, and emergency operations procedures--shall be strictly controlled. Such information shall be released to authorized personnel only, approved by the Government, by the development of an access list and controlled copy numbering. The Contracting Officer may direct that the names and locations of Government tenants not be disclosed in any publicly accessed document or record. If that is the case, the Government may request that such information not be posted in the building directory.

Lessor shall have emergency plans and associated documents readily available in the event of an emergency.