

Date: May 20, 2021

From: Executive Director, Office of Construction and Facilities Management (003C),
and Chief Security Officer, Office of Operations, Security, and Preparedness (007)

Subj: Interagency Security Committee Risk Evaluation Policy for All Delegated Leases
(VIEWS 4329434)

To: Under Secretaries, Assistant Secretaries, Other Key Officials

1. It is the Department of Veterans Affairs' (VA) policy that all delegated leases require risk evaluations to be conducted prior to solicitation issuance. VA will follow the Cybersecurity & Infrastructure Security Agency (CISA) guidance, *The Risk Management Process (RMP) for Federal Facilities: An Interagency Security Committee Standard (ISC)* and the supplemental information provided in this memo. The RMP can be found at the following link, [ISC Risk Management Process - 2016 | CISA](#). The published edition at time of lease solicitation will be the required ISC process.

2. This policy applies to all leases approved through the Strategic Capital Investment Planning Process (SCIP) 2021 cycle that have not yet started procurement.

3. This policy rescinds the "Real Property Policy Memorandum 2018-02 Physical Security Standards for Leased Facilities" memo dated February 26, 2018, signed by the Acting Principal Executive Director, Office of Acquisitions, Logistics and Construction and Chief Security Officer, Office of Operations, Security, and Preparedness.

4. VA specific information can be found in Attachment A, which provides specific implementation guidance on risk evaluation. VA's supplemental information to Appendix D of CISA's RMP guidance is contained in Attachment B.

5. For questions related to ISC risk evaluation requirements, conducting evaluations, or final reports within this policy, please contact Joel Andrews, Security Specialist at (202) 461-5249 for questions; for questions related to engineering issues related to countermeasures, please contact Vincent Rizzo, Director, Office of Healthcare Engineering, at (716) 238-5587; for questions related to the process or requirements for leases in active procurement, contact Rudy Clemons, Director, Lease Execution at (202) 632-5615; or for questions related to the process or requirements for leases in

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active post-award design and construction (pre-occupancy), please contact Mitch Ortiz, Director, Lease Delivery, CFM, at (202) 257-9293.

6. Non-delegated leases will follow General Service Administration's ISC process.

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Attachments

Implementing ISC Risk Evaluations for Leases

1. Facility Security Levels (FSL) I – IV Level of Protection (LOP) templates establishing VA's baseline security requirements need to be developed in collaboration with Office of Operations, Security and Preparedness (OSP), Veterans Health Administration (VHA), Veterans Benefit Administration (VBA), National Cemetery Administration (NCA), and Office of Construction and Facilities Management (CFM) for use by the Physical Security Specialist (PSS.)
2. At project initiation, the Lease Contracting Officer (LCO) or project manager (PM) will ensure a PSS is part of the Integrated Project Team (IPT.) This individual is to be certified in accordance with the ISC standards. For VA employees, after successful completion and certification of the Modified Infrastructure Survey Tool (MIST) training provided by Little Rock's Law Enforcement Training Center (LETC), the individual will be certified. Certification will be subject to LETC's training programs and requirements.
3. Once all space, design, delineated area, and utilization requirements are known, the designated PSS will determine the initial FSL by completing the FSL matrix provided in "The Risk Management Process for Federal Facilities: An Interagency Security Committee Standard" using the latest edition. The link to the current addition is provided in Attachment A. The PSS will have 10 business days after receipt of all project information to determine the initial FSL.
4. The FSL will identify the baseline LOPs for each physical security countermeasure as outlined in "Risk Management Process for Federal Facilities: An ISC Standard, Appendix B: Countermeasures." Note: The published edition at time of lease solicitation will be the required ISC process to follow for evaluations and countermeasures. Any clarifications of the application of process or evaluation or any changes to the FSL or LOPs specific to a lease will be reviewed and evaluated by the respective local Facility Security Committees (FSC) in accordance with this policy's Attachment D. For VHA, the local FSC will meet as often as necessary to review recommended changes. The national FSCs will meet monthly, or more often as necessitated by the incoming requests, to review recommended changes to lease specific FSCs or LOPs for approval or disapproval. Decisions will be communicated within 5 business days after meeting.
5. The PSS will have 10 business days from receipt of market surveys to conduct a risk assessment to determine if the baseline LOPs are appropriate for the potential sources of space identified through the market survey process or if adjustments are needed. During this phase, the PSS will perform area and space specific risk assessments. Once each LOP has been identified, for VHA, the VA Medical Center (VAMC) Police Chief or designee, and for VBA and NCA, OSP's designee should

review the requirements prior to solicitation issuance for approval. If the Police Chief or designee wants modifications to the LOP, the changes will need to be submitted and reviewed by the respective VHA local FSC committee or VBA or NCA's national FSC for approval. The approved LOPs will be included in the solicitation or request for proposals.

6. After receipt of initial proposals, the ISC risk evaluation and FSL will be updated to account for new sources of space offered by potential lessors. During this phase, the PSS will have 10 business days from receipt of relevant proposal information to perform additional area and space specific risk assessments as required to determine if the original LOPs are enough or if adjustments are needed. If adjustments are needed and result in a higher LOP, the estimated additional cost, if any, of the higher LOP must be identified prior to review and decision on recommending approval or disapproval by VHA's local FSC or VBA or NCA's national FSC. For VHA, if disapproved by VHA's local FSC, the decision for disapproval must be sent to VHA's national FSC for a final decision. The national FSC will make the final decision during the monthly meeting, or meet more often as necessitated by incoming inquiries, and communicate the decision within 5 business days. The PSS will provide the final decision to the LCO within 5 business days, and the LCO will in turn amend the solicitation to include the adjusted LOPs and request revised proposals. Note: It is important to ensure as much information is included in the solicitation to minimize revised proposals.
7. The Architect Engineer (AE) firm for the lessor will employ a certified professional physical security consultant who will consult with the IPT's PSS to obtain the risk assessments and implement the countermeasures as detailed by the IPT's physical security specialist. As appropriate to the scope of the project, the AE firm will employ additional professional specialists including but not limited to blast design engineer and electronic security systems engineer.
8. For VHA, if the PSS is a VA employee other than the parent facility's Police Chief or Police Chief designee, such as an Emergency Manager within the VAMC that reports to another office, the PSS will coordinate with the Police Chief to finalize the ISC risk evaluation.
9. For VHA, if the PSS is within the parent facility's Police Office, the Police Chief will be responsible for finalizing the ISC risk evaluation. Note: For GSA leases, the Federal Protective Service (FPS) provides these risk assessment evaluations. They have a 30-day window to conduct their assessment.
10. For VHA, if no VA employees at the parent facility are trained in physical security and ISC requirements,

- a. Trained VA employees from another VA Medical Center (VAMC) can conduct the assessment and collaborate with the Police Chief and Chief, Engineer on the final risk mitigation measures; or
- b. The assessment can be contracted, managed, and finalized by the Police Chief or his designee.

VA Supplement to *The Risk Management Process for Federal Facilities: An Interagency Security Committee Standard Supplement* – Appendix D - How to Conduct a Facility Security Committee

D.1 Introduction

Numbering intentionally aligned to CISA's Appendix D.

This appendix will supplement Appendix D of the ISC's "The Risk Management Process for Federal Facilities." It will list relevant sections and make necessary modifications to implement the concepts and procedures of the Facility Security Committee (FSC) for leases procured by the Department of Veterans Affairs. An FSC will be established at VA Medical Centers (VAMC) who procure leases.

For single tenant facilities, the local VAMC or national Veterans Benefit Administration (VBA) or National Cemetery Administration (NCA) FSC will be the decision maker for security requirements based on recommendations from the Police Chief or designee. For Veterans Health Administration (VHA), if recommendations are disapproved, the national FSC will be responsible for reviewing security requirements and associated costs to make the final decision.

For multi-tenant facilities, decisions will be made by the local FSCs and national FSCs for respective lease requirements.

For changes to the established FSL or LOP regardless of the number of tenants, final decisions will be made by the national FSCs.

1. Facility Security Committee Memberships

- a. VHA: The local VAMC FSC will be responsible for overseeing security requirements for all VHA's Minor and Major Leases. The local FSC will consist of the following members:
 - Respective VAMC Director, or his/her designee, will be a member and will also be responsible for establishing an FSC,
 - Chief of Police Service, Chairperson
 - Chief of Facilities Management Service (FMS),
 - VISN Emergency Manager,
 - VISN Capital Asset Manager (CAM),
 - Tenant representative from the lease, and
 - The PSS as a non-voting member.

- b. VBA/NCA: Leases executed by VBA or NCA will be responsibility of the administrations for ensuring security requirements for all Minor Leases. The

security decisions will be approved and disapproved by respective national FSCs. The FSC will consist of the following members:

- VACO capital program office Director, or his/her designee, will be a member and will also be responsible for establishing the national FSC,
 - VACO OSP Designee, Chairperson
 - Chief Fiscal Officer (CFO),
 - Tenant representative from the lease, and
 - The PSS as a non-voting member.
- c. VHA's National FSC: This committee is VHA's Physical Security Committee (PSC) and will consist of the following members:
- PSC Co-Chairs - VHA Healthcare Environment and Facilities Program (HEFP)
 - PSC Members, and
 - Office of Construction and Facilities Management's (CFM) Office of Real Property designee.

FSC members will serve a minimum 3-year tenure, unless the representative changes jobs or leaves VA. The head of each office (e.g. OSP, CFM, VHA, etc.) will nominate its representative.

D.2 Facility Security Committees

The FSC will consist of representatives as stated in D.1. When procuring a facility to be occupied by other Federal tenants (e.g. DOD), a representative from these other tenant's security organization will form part of the committee.

For VHA's Minor and Major Leases, the local FSC recommends approves or disapproves the FSL for the facility and the minimum Level of Protection (LOP) (security countermeasures). If disapproved, the FSL and countermeasures will be reviewed by the national FSC for final decision. The national FSC approves or disapproves recommended changes by the local FSC to the lease's LOPs taking into consideration facility criticality, cost and other impacts. For Major Leases, the local FSC will send final, approved ISC risk evaluations to the national FSC for final approval.

For VBA and NCA's Minor Leases, the national FSC approves or disapproves the FSL for the facility and the minimum LOP (security countermeasures.)

D.2.1 – Risk of Mitigation or Acceptance – No changes – VA will follow the guidance within ISC's Appendix D.2.1

D.2.2 – Risk Acceptance – No changes – VA will follow the guidance within ISC’s Appendix D.2.2

D.2.3 – Financial Commitment – No changes – VA will follow the guidance within ISC’s Appendix D.2.3

D.2.4 – Financial Authority – No changes – VA will follow the guidance within ISC’s Appendix D.2.4

D.2.5 Selecting a Security Organization

The Security Organization as it relates to Attachment D is represented by the Chief of Police Service for the facility and is advised by the PSS. The PSS is a non-voting member of the FSC who will carry out the tasks listed in D.3.5. The Chief of Police is responsible for reviewing and concurring with all assessments performed by the PSS prior to submitting them to the FSC for approval.

D.2.6 Interagency Security Committee Training

For local FSC’s, since the Police Chief and the PSS have been certified by LETC’s security training requirements, they will provide subject matter expertise to the local FSC on security related questions and concerns rather than all members of the FSC requiring the identified trained.

For the national FSCs, all members will be required to be trained. Refer to the latest ISC “The Risk Management Process for Federal Facilities: An Interagency Security Committee Standard” Appendix D for updated courses. The version at time of signing this policy requires at least the following training courses:

- IS-890: Introduction to the Interagency Security Committee and Risk Management Process
- ISC-891: Introduction to Interagency Security Committee Documents
- ISC-892: Interagency Security Committee Risk Management Process: Facility Security Level Determination
- ISC-893: Interagency Security Committee Risk Management Process: Levels of Protection and Application of the Design Basis Threat Report
- ISC-894: Interagency Security Committee Risk Management Process: Facility Security Committees

D.3 Facility Security Committee Procedures and Duties – No changes – the guidance within ISC’s Appendix D.3 remain unchanged as VA’s requirements

D.3.1 Voting Procedures

For facilities where VA is the single tenant, each member’s vote will carry the same weight. For multi-tenant facilities, the FSC will develop a weighted voting system based on square feet occupied.

D.3.1.1 – Decision Item Approval – No changes – VA will follow the guidance within ISC’s Appendix D.3.1.1

D.3.1.2 – Decision Item Disapproval – No changes – VA will follow the guidance within ISC’s Appendix D.3.1.2

D.3.2 Facility Security Committee Chairperson

For leases procured by VHA, the local FSC chairperson will be the Chief of Police Service. For leases procured by CFM, the FSC chairperson will be the representative from OSP.

D.3.3 – Facility Security Members – No changes – VA will follow the guidance within ISC’s Appendix D.3.3

D.3.4 – Owning or Leasing Authority – No changes – VA will follow the guidance within ISC’s Appendix D.3.4

D.3.5 Security Organization

The PSS is responsible for the following:

- Advising the FSC
- Performing the FSL assessment
- Presenting the FSL assessment to the FSC
- Preparing, presenting, and distributing a facility security assessment (FSA) in accordance with the time intervals established by the ISC based on the FSL
- Evaluating the facility to determine whether the baseline LOP is adequate, or whether a customized LOP is necessary
- Presenting a written plan for proposed countermeasures that identifies how it will mitigate the risks identified with specific credible threats
- Presenting written operating procedures for countermeasures

- Presenting written cost impact for proposed countermeasures, which might need assistance from Chief, FMS to develop
- Providing technical assistance and guidance to the FSC as appropriate
- Casting votes for their organization (only if their organization is a tenant).

D.3.6 – Federal Department and Agency Headquarters – No changes – VA will follow the guidance within ISC’s Appendix D.3.6

D.4.1 – Facility Security Operations Section – No changes – VA will follow the guidance within ISC’s Appendix D.4.1

D.4.2 Facility Security Committee Funding Process

When the FSC considers items that require funding, the respective FSC will review and approve or disapprove. For local FSC disapprovals, the recommendation change and costs will be reviewed by national PSC for a final decision. the VAMC Director is ultimately responsible for determining whether funding is available. This is initially based on respective FSC recommendations from Police Office, PSS, and Chief, FMS assessments and cost estimates. The VAMC Director must then balance these costs and risks to available balances of medical care appropriations received from the VAMC CFO.

D.4.2.1 – Security Organization Presents Countermeasures Implementation and Funding Plan to the Facility Security Committee – No changes – VA will follow the guidance within ISC’s Appendix D.4.2.1

D.4.2.2 – Facility Security Committee Member or their Funding Authority Requests Removal of previously Implemented Countermeasure – No changes – VA will follow the guidance within ISC’s Appendix D.4.2.2

D.4.2.3 – Facility Security Committee Members Request Guidance from their Respective Funding Authority – No changes – VA will follow the guidance within ISC’s Appendix D.4.2.3

D.4.3 – Decision Process – No changes – VA will follow the guidance within ISC’s Appendix D.4.3

D.5 – Funding – No changes – VA will follow the guidance within ISC’s Appendix D.5

D.6.1 – Record Keeping Purpose – No changes – VA will follow the guidance within ISC’s Appendix D.6.1

D.6.2 – Format of Records – No changes – VA will follow the guidance within ISC’s Appendix D.6.2

D.6.3 Access to Records

The Lease Contracting Office (LCO) shall have access to meeting records including, but not limited to meeting minutes, Facility Security Assessments, Vote tabulation, funding approval/disapproval, and risk acceptance information. All FSC approvals and decisions concerning changes in LOPs shall be transmitted to the LCO within two (2) business days of such action.