



Department of Veterans Affairs Office of Inspector General

Healthcare Inspection

Survey of Efforts to Safeguard VA Potable and Waste Water Systems

Report No. 03-01743-114

VA Office of Inspector General
Washington, DC 20420

March 18, 2004



DEPARTMENT OF VETERANS AFFAIRS
Office of Inspector General
Washington DC 20420

TO: Under Secretary for Health (10/10B5)

SUBJECT: **Final Report** - Healthcare Inspection - Survey of Efforts to Safeguard VA Potable and Waste Water Systems- Report Number: 03-01743-114

1. Purpose

The Department of Veterans Affairs (VA) Office of Inspector General's (OIG) Office of Healthcare Inspections conducted a survey for the Environmental Protection Agency (EPA) to review security over VA potable and waste water systems and the degree of VA coordination with EPA concerning those systems. The purpose of the review was to determine whether VA, in the wake of the September 2001 terrorist attacks, is actively and consistently identifying and addressing risks to VA-owned or leased water utilities or systems through vulnerability assessments, design enhancements, emergency response plans, and security improvements.

2. Background

The *National Strategy for Homeland Security*¹ has outlined the need for unified protection efforts over critical infrastructures in the United States, including those for water. The *National Strategy* lists strategic initiatives intended to unify the country's efforts to protect critical infrastructures or systems, maintain a complete and accurate assessment of critical infrastructures, and to develop a national infrastructure protection plan.² The *National Strategy* states that all societal elements have a crucial stake in reducing vulnerability to terrorism. Cooperation throughout all levels of government is needed to protect critical infrastructure and key assets. For example, the Federal Government can create venues to share information on infrastructure vulnerabilities and best-practice solutions, or create a more effective means of providing specific and useful information to non-Federal entities in a timely fashion. EPA is the designated lead agency in the Federal Government responsible for overall protection of the country's potable water infrastructure.

The *National Strategy for Homeland Security* defines critical infrastructure sectors, including water, as those which:

¹ Office of Homeland Security. *National Strategy for Homeland Security*. July 2002.

² Office of Homeland Security. *National Strategy for Homeland Security*. July 2002.

“...provide essential goods and services needed for people to survive. Incapacitation or destruction of critical infrastructure systems have a debilitating impact on security, public health, and safety.”

Key assets in the Nation include those at individual or localized facilities that deserve special protection because of their destructive potential or their value to the local community.

3. Scope and Methodology

In March 2003, EPA OIG officials asked our office to assist them in an inter-agency cooperative effort to identify VA potable and waste water systems and the degree of VA coordination with EPA concerning those systems.

To respond to EPA's request, we asked Veterans Health Administration (VHA) Headquarters managers to survey field officials and obtain necessary water infrastructure information. We reviewed responses received as of April 30, 2003, from each of VHA's 21 Veterans Integrated Service Networks (VISN). VISN input included responses from field facilities, which reported water system assets on VHA property and varying security review efforts.

We made similar queries to the Veterans Benefits Administration (VBA) and National Cemetery Administration (NCA). VBA reported that it does not control any potable water or waste treatment facilities and that the majority of VBA facilities are located in space owned by and leased from the General Services Administration. Some VBA facilities co-located on VHA properties are under the purview of the VHA facilities. The NCA reported that standardized security assessments, using EPA-recommended guidelines, were underway for each cemetery site that has a water system. Therefore, we focused our discussion in this report on VHA facilities.

4. Survey Results

Our survey disclosed that VHA management needs to coordinate with the EPA and the Department of Homeland Security to ensure uniform security of VA-owned potable and waste water infrastructures to reduce potential vulnerabilities to terrorist threats. VHA facilities reported varying degrees of effort in identifying and addressing potential risks to their water utilities or systems. VHA facilities provided varying responses to the extent they conducted vulnerability assessments, design enhancements, enhanced emergency response plans, and security improvements. While specifically asked, no facility reported that managers coordinated security reviews or assessment efforts with EPA or the Department of Homeland Security.

Many VHA facilities reported they had VA-owned water towers, wells, reservoirs, potable water treatment facilities, and waste water handling facilities, but facilities' levels of concern or attention paid to water system security issues varied. For example, one VISN responded to our survey by stating there was "...no need to coordinate facilities' water and wastewater security activities...", although one of its VAMCs had a VA-owned water supply well and others had VA-owned water towers. Some facilities indicated they had reviewed or were "looking into" security of their water systems or assets. One VISN said that it was very interested "...in receiving information from other VISNs and VA Central Office regarding partnering with EPA." Another VISN wrote it was "...gathering information from EPA's web site" to use in developing a security plan.

While survey results were mixed, there were examples of water system security upgrade efforts. For example, one VA medical facility reported that after a 2001 risk assessment, managers determined they needed to better protect their utilities by installing intrusion alarm systems, reversed door hinges, latches and locks, surveillance cameras, lighting, and improved fencing. This VA medical facility established an "Anti-Terrorism/Security Upgrades, Utility Systems" project for 2004. Another VA medical facility was installing intrusion alarms on its water well.

Several VA medical facilities reported that their officials were working with State or local agencies regarding potential security issues. One VA medical facility wrote that managers had been advised to read recommendations on security by the Centers for Disease Control and Prevention and the EPA. This facility was considering water alarms on its water tower and filtration plant, although managers felt that security over the tower and plant were already adequate. Other facilities established or planned to form work groups to address security issues related to their local assets.

Because of the many water system assets in the VHA system, and the varying degrees of security, or reviews of security initiated or underway, the Under Secretary for Health needs to ensure managers are uniformly and comprehensively addressing security requirements for protecting VHA water infrastructures in a coordinated effort with EPA. VHA's participation would assist EPA in fulfilling its role as the lead agency over water system security in the country. VHA also needs to provide the Department of Homeland Security assistance in its efforts to unify Federal actions for addressing national water infrastructure concerns.

5. Conclusion

VHA facilities that we surveyed described varying degrees of effort in conducting water system assessments and security reviews. No facility reported that it coordinated these efforts with EPA or the Department of Homeland Security. The Under Secretary for Health needs to standardize security requirements for protecting water infrastructures, and coordinate efforts with EPA to assess and implement security of potable and waste water systems on VHA properties. These actions would assist the Department of

Homeland Security in unifying Federal efforts for addressing national water infrastructure concerns, including development of critical infrastructure personnel surety programs.

6. Recommendations

The Under Secretary for Health, in conjunction with Veterans Integrated Service Network Directors, needs to:

- a. Standardize water system security assessments and requirements using EPA-recommended guidelines to ensure all VA medical facilities are considering and applying similar safety measures.
- b. Ensure VHA managers coordinate with EPA to uniformly and comprehensively safeguard VA medical facility potable and waste water systems.
- c. Ensure that effective liaisons have been established with the Department of Homeland Security in unifying Federal efforts to address national water infrastructure concerns.

7. Under Secretary for Health Comments

The Under Secretary for Health comments are enclosed in Appendix A.

8. Inspector General Comments

The Under Secretary for Health agreed with our recommendations and provided acceptable improvement plans. We will follow-up on planned actions until they are completed.



JOHN D. DAIGH JR., M.D.
Assistant Inspector General
for Healthcare Inspections

UNDER SECRETARY FOR HEALTH COMMENTS

MEMORANDUM

Date: August 29, 2003

From: Under Secretary for Health

Subj: Draft OIG Report, Survey of Efforts of Safeguard VA Potable and Waste Water Systems, (Project Number 2003-01743-HI-0218).

To: Assistant Inspector General for Healthcare Inspections (54)

1. Representatives from your office and VHA met July 30, 2003 to discuss the findings and recommendations of this draft report. Based on the outcome of that meeting, we concur with the report's findings and recommendations. We are also providing the following comments.
2. The July 30, 2003 meeting focused on recommendation "a" that would have VHA standardize water system security assessments and requirements using EPA guidelines. We support the overall concept that VHA facilities need to have adequate security in place for drinking and wastewater systems. We believe, however, that any request for VHA facilities to enhance or standardize security measures needs to be accompanied by definitive guidance on the types of security measures that are available and which will work to enhance security in a cost effective manner. VHA does not view currently available guidance as adequately addressing our needs.
3. We believe that EPA, as the primary national regulators for the management of drinking water and wastewater systems, is the best-qualified member of the federal community to provide the guidance. Using EPA guidance regarding water and waste water system security will provide facilities the greatest assurance that their enhancements to water and wastewater security will not be superceded by more stringent regulatory requirements.

UNDER SECRETARY FOR HEALTH COMMENTS

4. We proposed during the July 30, 2003 meeting that VHA contact EPA and request that they assist us in developing guidance on water and wastewater security. OIG representatives agreed that this approach is a reasonable one and meets the intent of the report recommendations. Although we concur with the recommendations, prior commitments by responsible VHA staff preclude our providing you with a detailed action plan until September 2003. We will forward it to you as soon as it is available. In the meantime, we will contact the appropriate EPA officials to initiate discussion.

5. Thank you for this opportunity to review the draft report. If you have any questions, please contact Margaret M. Seleski, Director, Management Review Service (105E) at (202 273-8360.

//s//

Robert H. Roswell, M.D.

UNDER SECRETARY FOR HEALTH COMMENTS

Department of

Memorandum

Veterans Affairs

Date: October 21, 2003

From: Under Secretary for Health (10/10B5)

Subj.: Draft OIG Report, *Survey of Efforts to Safeguard VA Potable and Waste Water Systems*, (Project Number 2003-01743-HI-0218), EDMS Folder # 235437

To: Assistant Inspector General for Healthcare Inspections (54)

1. As indicated in my original response to this draft report, dated August 29, 2003, the attached action plan has been developed. In that response we stated that currently available Environmental Protection Agency (EPA) guidance is not adequate for addressing our needs, and that VHA would contact EPA for their assistance in developing guidance on water and wastewater security. This will allow us to meet the intent of the recommendations.

2. A draft letter to appropriate EPA officials is currently in concurrence and will be sent no later than November 7, 2003. If you have any questions, please contact Margaret M. Seleski, Director, Management Review Service (10B5) at (202) 273-8360.

//s//

Robert H. Roswell, M.D.

Attachment

UNDER SECRETARY FOR HEALTH COMMENTS

Draft OIG Report, Survey of Efforts to Safeguard VA Potable and Waste Water Systems, (Project Number 2003-01743-HI-0218).

Status Update 09/30/2003

Recommendation a. VHA standardize water system security assessments and requirements using EPA guidelines. Concur

Recommendation Metrics

GOAL	STRATEGY	MEASURE	TARGET	STATUS	ACTUAL	BENCHMARK	PRIOR FY
Develop a standardized method of ensuring VHA water system security, using EPA guidelines	A draft letter is in concurrence from the DUSH for Operations and Management, to the Director, Office of Groundwater and Drinking Water and the Director, Office of Wastewater Management, U.S. Environmental Protection Agency, requesting to meet to discuss what VHA might do to enhance water and wastewater security at its facilities. Current EPA guidelines are not germane to water systems the size of those of VA medical centers. The Letter is to be mailed by October 31, 2003.	Measures will be developed, based on response to this letter.					

UNDER SECRETARY FOR HEALTH COMMENTS

Draft OIG Report, Survey of Efforts to Safeguard VA Potable and Waste Water Systems, (Project Number 2003-01743-HI-0218).

Status Update 09/30/2003

Recommendation b. Ensure VHA managers coordinate with EPA to uniformly and comprehensively safeguard VA medical facility potable and waste water systems. Concur.				Recommendation Metrics		
GOAL	STRATEGY	MEASURE	TARGET	STATUS	ACTUAL	BENCHMARK
	Action on this recommendation is pending the outcome of discussions between VHA and EPA to address Recommendation a.					
Recommendation c. Ensure that effective liaisons have been established with the Department of Homeland Security in unifying Federal efforts to address national water infrastructure concerns. Concur.				Recommendation Metrics		
GOAL	STRATEGY	MEASURE	TARGET	STATUS	ACTUAL	BENCHMARK
	Action on this recommendation is pending the outcome of discussions between VHA and EPA to address Recommendation a.					

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Appendix C

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