

VA Office of Inspector General

OFFICE OF AUDITS AND EVALUATIONS



Veterans Benefits Administration

*Claims Folder Storage
at the VA Regional Office,
Winston-Salem, North Carolina*

August 9, 2012
12-00244-241

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Executive Summary

During the onsite benefit inspection of the VA Regional Office (VARO) Winston-Salem, we observed an excessive number of claims folders stored on the top of, and around, filing cabinets. Based on our concerns, we issued a Management Advisory Memorandum to the Under Secretary for Benefits to ensure the VARO addressed management of veterans' files and employee safety concerns immediately. The inadequate storage created an unsafe workspace for VARO employees and appeared to have the potential to compromise the integrity of the building.

The volume and the manner in which the folders were stored impeded VARO productivity by reducing access to folders. Veterans' claims were also at increased risk of loss or misfiling, as well as unnecessarily exposed to potential water and fire damage. In addition, cabinets were positioned so close together that file drawers could not be opened completely. In response, the General Services Administration performed a load bearing study indicating the files, as currently stored, exceeded the capacity of the floor by approximately 39 pounds per square foot. The photos attached to the advisory memo to VBA management show the excessive and potentially unsafe file storage at the time of our inspection.

The Under Secretary for Benefits directed the VARO leadership take immediate action to address our concerns. Subsequently, VARO managers relocated excess folders and file cabinets to other floors and began exploring alternate temporary storage areas, as well as requested additional storage cabinets. VARO management complied and submitted a long-range proposal to improve claim folder access and security. Management's planned action is responsive to our recommendations. We will follow up as required.

A handwritten signature in black ink, reading "Linda A. Halliday". The signature is written in a cursive style.

LINDA A. HALLIDAY
Assistant Inspector General
for Audits and Evaluations

OIG's Management Advisory Memorandum

Department of Veterans Affairs

Memorandum

Date: June 11, 2012

From: Assistant Inspector General for Audits and Evaluations (52)

Subj: Management Advisory—Risks Associated With Veterans Claims Folder Storage, Building Integrity, and Employee Safety at the Winston-Salem VA Regional Office

To: Under Secretary for Benefits (20)

1. We are providing this management advisory for your immediate action to address issues regarding claims folder storage, building integrity, and employee safety at the Winston-Salem VA Regional Office (VARO). We identified these issues during our inspection (May 8-18, 2012) of the VARO, which we conducted as part of our nationwide Benefits Inspection Program for evaluating the effectiveness of VARO operations. In the upcoming months, we will provide a draft report outlining our results and recommendations from this VARO inspection.
2. We are concerned about the number of claims folders stored at this VARO, located in the Hiram H. Ward Federal Building at 251 North Main Street, Winston-Salem, NC. The volume of folders and inadequate storage seems to indicate the VARO has exceeded the capacity to store files. This over-storage creates an unsafe environment for the employees, overexposes many claims folders to risk of fire/water damage, inadvertent loss and possible misplacement, as well as impedes VARO productivity by reducing access to many folders in a timely manner. We observed files stored approximately two feet high and two rows deep on top of file cabinets. File cabinets were placed so closely together that file drawers could not be opened completely. We estimated that approximately 37,000 claims folders were stored on top of file cabinets. We also observed files stored on the floor and stacked, as space permitted, in boxes along walls. The attached photos provide illustrations of the excessive and unsafe file storage at this VARO.
3. The excess weight of the stored files has the potential to compromise the structural integrity of the sixth floor of the facility. We noticed floors bowing under the excess weight to the extent that the tops of file cabinets were noticeably unlevel throughout the storage area. We asked the responsible Property Manager within the General Services Administration (GSA) for a copy of the most recent inspection report and load bearing study of the building. The Property Manager could not locate any evidence of a load bearing study, but thought that such a study was conducted approximately 10 years ago. He said that he would coordinate with GSA's Civil Engineering office to determine whether a new study might be conducted. Additionally, the Property Manager provided us with a copy of a GSA fire inspection report, dated May 8, 2012. In the report, the Regional Fire Protection Engineer expressed concerns about "floor stack loading" on the

sixth floor of the building, stating that it constituted “an extreme fire load and a possible structural overloading concern.”

4. The excessive file storage and building integrity issues observed pose unnecessary risks to the safety of VA employees working in the building. VARO safety meetings, quarterly VARO safety inspections, and an annual workplace evaluation conducted by the VISN 6 Safety Manager all disclosed concerns with boxes of files blocking exits, files stacked too close to overhead sprinklers, and files falling from the tops of file cabinets onto employees. In 2011, one employee experienced a minor shoulder injury when claims folders fell on him from the top of a filing cabinet. Narrow aisles due to file cabinet placement may also impede employees from exiting file storage areas in case of emergency or crisis situations. Egress may be especially hampered when staff use ladders or file carts to store claims folders in the crowded space.
5. The file storage space constraints at the Winston-Salem VARO began in 2005 when the VARO assumed jurisdiction for several national initiatives, which increased the number of files significantly. To alleviate the situation, over the past several years, the VARO has transferred or retired approximately 50,000 claims folders to external file storage locations. Additionally, in January 2010 the VARO submitted a request to the Veterans Benefits Administration's (VBA) Southern Area office for a recurring relocation of about 15,000 files each year. VARO managers told us that they never received a formal written response to that request, but they were able to retire some additional files in 2010 and 2011. However, our observations support that this action was not sufficient to correct the situation. VARO managers told us they made several additional requests to the Southern Area office for assistance in addressing their file storage space limitations; however, those requests were not approved due to lack of funding and inadequate external storage alternatives.
6. In January 2010, VARO management obtained additional space for storing files at an off-site, privately-managed facility. Yet, in October 2011, the facility manager advised VARO officials that the privately-managed building had exceeded the maximum allowable weight. As such, the VARO had to relocate excess files back to the Federal building. In May 2012, after we raised this issue as a concern, the GSA Property Manager advised us that the VARO's Acting Director contacted him about identifying a warehouse near the Federal building to help resolve the VARO's file storage problem.
7. We recommend that VBA take the following actions:
 - a) Conduct a load bearing study of VBA-occupied floors within the facility to determine whether the current weight associated with storage of excessive claims folders has compromised the building's structural integrity.
 - b) Develop and implement a plan to immediately relocate claims folders to another storage facility to relieve the over-storage and possible building integrity issues.
 - c) Determine the impacts of the building integrity on employee safety and institute short-term and long-term plans to address them.

8. Please provide your written comments to this Management Advisory by July 1, 2012. Your comments should provide an implementation plan and target completion dates for addressing the recommendations
9. If you have questions or wish to discuss the issues in this Management Advisory, please contact me at 202-461-4725. We appreciate the cooperation your staff extended to us during this inspection.


LINDA A. HALLIDAY

cc: Director, Southern Area (20F2)

Attachment

Attachment



Figure 1 – 6th Floor Claims Storage Filing Area (VARO Winston-Salem)



Figure 2 – Neatly bundled claim folders at risk of fire/water damage, inadvertent loss and possible misplacement

Attachment



Figure 3 – File cabinets show gradual sloping away from support structures



Figure 4 – Sloping floors cause cabinets to shift due to the increased weight over time



Figure 5 – Literally, file clerks use ladders to access claims files and those stacked behind

Attachment



Figure 6 – Access to many claims folders limited, drawers need to be “unpacked” to get to folders in rear of drawer



Figure 7 – Boxes full of claims folders stacked against full cabinets await additional cabinets and filing

VARO Director Comments

Department of Veterans Affairs

Memorandum

Date: June 29, 2012

From: Director, Winston-Salem Regional Office (318/00)

Subj: Management Advisory – Risks Associated With Veterans Claims Folder Storage Building Integrity, and Employee safety at the Winston-Salem Regional Office

To: Assistant Inspector General for Audits and Evaluations (52)

The Winston-Salem Regional Office has been working to address the issues regarding claims folder storage, building integrity, and employee safety, which were noted during the OIG Visit during the period from May 8-18, 2012.

GSA conducted a load bearing study of the 6th floor. On Wednesday June 13, 2012, the Regional Office was notified that the estimated load on the 6th floor was 164 psf, which exceeded the capacity of 125 psf for the floor. The Director's Office notified the Southern Area Office and VA Central Office. The Regional Office's Management Team took immediate action and removed all of the folders from on top of the file cabinets on the 6th floor. These folders were relocated to areas on the 5th, 7th, and 8th floors.

On Thursday June 14, 2012, a member of the Office of Facilities and two contractors from Turnkey Services visited the Regional Office to assess the situation. Members of the Regional office Management Team met with this group to formulate both short-term and long-term solutions. Members of the team toured to assess the feasibility of using vacant areas for file storage. Members of the team contacted the GSA engineer who conducted the load bearing analysis because there were some questions regarding the data used to calculate the structural load. During the discussion it was noted that the engineer estimated the weights of the file cabinets and the folders on top of them. The team provided the actual weight of the cabinets to the engineer. The load was recalculated and determined to be 120, which is within the structural limit of the floor. The structural analysis is attached. Additionally, the engineer stated that there was never any danger of the floor collapsing.

The team recommended the following short-term actions in order to ensure the issues of claims folder storage, building integrity, and employee safety is resolved:

- 1) Do not put overflow files on top of the cabinets. Employees were notified June 13, 2012 to terminate placement of folders on top of the cabinets on the 6th floor.
- 2) Begin converting vacant space on the basement sublevels to temporarily store files. On June 14-15, 2012, the workstations and furniture on the B1 sublevel were removed.

3) Remove 130 cabinets from the 6th floor so aisle the width between cabinets is at least 44 inches, which is compliant with the ADA. On June 18-19, 2012, 216 file cabinets were relocated from the 6th floor to a vacant area on the B1 sublevel. The Regional Office is in the process of securing a contractor to reconfigure the existing file cabinets on the 6th floor to comply with ADA requirements. The RO expects to have a final recommendation on the folder reconfiguration by June 29, 2012. Once the recommendation is received, the RO is capable of compliance within 2 weeks.

4) Initiate action to purchase a high-density file system in the basement on sublevels B1 and B2. GSA forwarded the CAD drawings for the building to Turnkey Services and the team to determine the size of the high-density system that will fit on the B1 and B2 sublevels. The Office of Facilities is in the process of procuring a high-density system. The Office of Facilities is conducting market research for the high density system. The estimated cost for the project would be \$405, 000 in GOE funds.

5) Request an emergency Folder Relocation and Folder Retirement. This issue is being discussed at Central Office in the Office of Facilities Management. Winston-Salem has approximately 7,707 XC folders that can be retired at any time before September 30, 2012. There are 11,339 c-folders that can be relocated to the Records Management Center (RMC). Once a decision is made the RO can work with the RMC to expedite the relocation of these folders.

6) Purchase additional file cabinets or contact other VA Facilities regarding excess file cabinets for the basement sublevels. The Office of Facilities has located 270 cabinets at the St Paul Regional Office that will tentatively be here in September 2012 (could be as early August). This will be used as a short term solution to overflow issues until a permanent solution is determined by the team.

7) Install card readers on access points to VA occupied space. This will increase employee safety and secure Veterans Personal Identifiable information. Per the Office of Facilities, this is a long-term solution. Installing card readers is included in the building refurbishment scheduled for 2014. However, the Office of Facilities has requested approval to purchase cipher locks for the doors on VA occupied floors, which will serve as a short-term countermeasure. The request is pending.

The team recommended the following long-term actions in order to ensure the issues of claims folder storage, building integrity, and employee safety is resolved:

8) Follow-up with GSA on the possibility of securing an off-site storage facility for files. GSA is in the process of looking for warehouse space in the Winston-Salem area. Additionally, the Office of Facilities is researching the option of obtaining additional space. However, a final decision on off site storage will not be made until the recommendation from Turkey services is received. The recommendation from Turkey services is expected no later than June 29, 2012.

9) Request additional scheduled Folder Relocations and Folder Retirements annually. This issue is being discussed at Central Office. We are awaiting decision on this issue.

10) Install card readers on access points to VA occupied space. This will increase employee safety and secure Veterans Personal Identifiable information. Card readers will be installed in VA occupied space as part of the building refurbishment scheduled for 2014.

If you have any questions or wish to discuss these issues, please contact me at (336) 251-0703. We appreciate your interest in this issue.

(Original Signed)

C. J. RAWLS

cc: Director, Southern Area

Appendix A Office of Inspector General Contact and Staff Acknowledgments

OIG Contact	For more information about this report, please contact the Office of Inspector General at (202) 461-4720.
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Acknowledgments	Brent Arronte, Director Kristine Abramo Daphne Brantley Robert Campbell Ramon Figueroa Nora Stokes
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