

ENHANCED-USE LEASING POST TRANSACTION

- 1. REASON FOR ISSUE:** This directive establishes the framework for the Department of Veterans Affairs (VA) policy for the post transaction oversight and management of VA's enhanced-use (EU) leasing program, including organizational roles and responsibilities.
- 2. SUMMARY OF CONTENTS/MAJOR CHANGES:** This directive sets forth policies, roles, and responsibilities, and the tools used for oversight of VA's EU Leasing program during the post transaction period of an EU lease.
- 3. RESPONSIBLE OFFICE:** The Office of the Assistant Secretary for Management (004) is responsible for the contents of this handbook.
- 4. RELATED DIRECTIVES/HANDBOOKS:** VA Handbook 7454, Enhanced-Use Leasing Post Transaction; VA Directive 7415, Enhanced-Use Leasing Program; and VA Handbook 7415, Enhanced-Use Leasing Program.
- 5. RESCISSION:** None.

CERTIFIED BY:

/s
Roger W. Baker
Assistant Secretary for
Information and Technology

**BY DIRECTION OF THE SECRETARY OF
VETERANS AFFAIRS:**

/s/
W. Todd Grams
Executive in Charge, Office of Management
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ENHANCED-USE LEASING POST TRANSACTION POLICIES

1. PURPOSE

a. This directive establishes a formal framework for the Department of Veterans Affairs (VA) policy on the oversight and management of VA's Enhanced-Use (EU) Leasing program during the post transaction period of an EU lease. The Office of Asset Enterprise Management (OAEM), within the Office of Management, has oversight responsibility for the program as well as management responsibility for those projects identified as Departmental asset initiatives. This directive provides guidance associated with EU leasing post transaction activities, including the roles and responsibilities of VA organizations.

b. OAEM provides oversight and advice to the Secretary of Veterans Affairs (Secretary), the Assistant Secretary for Management (AS/M), leadership of the three Administrations, or other duly-authorized official(s) regarding acquisition, management, and disposal of VA's capital assets. The EU Leasing program is a component of VA's capital asset management program and is one of the possible actions resulting from market demand driven integrated strategic and capital plan. VA uses a life cycle approach to managing and maintaining its capital assets, and categorizes such assets into four phases: formulation, execution, steady state, and disposal (when applicable).

c. Post transaction monitoring begins at the close of the formulation phase (i.e., once the EU lease has been executed by the Secretary, the AS/M, or other duly-authorized VA official) and continues until the end of the EU lease term, spanning the execution phase, the steady state phase, and the disposal phase (when applicable). The execution phase begins at EU lease signing and continues through the completion, acceptance and commencement or activation of any development or improvements required by the EU lease. At the conclusion of the construction/renovation period, the project moves to the steady state phase. The steady state phase is the operational stage of the asset, and continues throughout the length of the lease term, unless a determination is made that VA no longer needs the property, and VA disposes of it. The disposal phase is the final stage of an asset's lifecycle and involves the retirement and liquidation of the asset.

2. POLICY

a. Policies and procedures set forth in this directive and the accompanying VA Handbook 7454, Enhanced-Use Leasing Post Transaction, will be adhered to for oversight and management of the EU Leasing program during the post transaction period.

b. Additional guidance regarding Department policy related to the EU Leasing program can be found in VA Directive 7415 and VA Handbook 7415, Enhanced-Use Leasing Program Policies and Procedures.

c. A web-based oversight tool, the Enhanced-Use Leasing Information System (EULIS), will be used to collect information at the local level and as a repository for documentation of lessee compliance with the terms of the EU lease. This will facilitate both document retention and oversight by responsible VA personnel.

d. In order to ensure that project documentation is properly maintained in the transition from the execution phase to the steady state phase, the Portfolio Manager (PM) will prepare a formal End of Construction Report (ECR), to be reviewed by the Local Site Monitor (LSM), and approved by the Veterans Integrated Service Network (VISN) Capital Asset Manager (VISN CAM) or the Veterans Benefits Administration (VBA)/ National Cemetery Administration (NCA) Representative (as applicable by EU lease project) and the Oversight Monitor (OM). Once the LSM accepts the approved formal ECR, the execution phase of the lease ends, and the steady state begins. For additional detail regarding the formal ECR, see VA Handbook 7454, Enhanced-Use Leasing Post Transaction.

e. The post transaction compliance team will be made up of the LSMs, local support staff (as applicable), the PMs, the VISN CAMs and the VBA/NCA representatives (as applicable by EU lease project), the OM(s), and the Designated VA Representative (DVR). The VISN CAMs and the VBA/NCA representatives are responsible for compliance oversight of the LSMs.

f. During the steady state phase, issues relating to EU lease project development or EU lease negotiations, or other non-compliance related issues may be considered to be a "development matter" as determined by the DVR. If an issue is determined to be a development matter, the DVR may transfer compliance monitoring and responsibility for the resolution of the development matter to the PM. At the direction of the DVR, the LSM may retain responsibility for the day-to-day post transaction compliance monitoring even if the project reverts from the steady state phase to the formulation or execution phases (e.g., amendments, additional construction phases). Notwithstanding the above, at no time shall the DVR transfer any of the DVR's delegated authorities or responsibilities. The OM will notify the PM, the LSM, the VISN CAM or VBA/NCA representative (as applicable), the local facility director, the lessee, the local fiscal officer (LFO), and any other applicable parties in writing or via electronic mail (e-mail) of the DVR's decision that a development matter has occurred.

g. If and as needed, additional post transaction guidance will be provided in training materials for responsible officials, e.g. the LSMs, VISN CAMs, VBA/NCA representatives, OMs, PMs.

3. RESPONSIBILITIES. See VA Handbook 7454 for further information regarding the following roles and responsibilities.

a. Assistant Secretary for Management Pursuant to authority granted under section 512 (a) of title 38 United States Code, the Secretary has delegated authority to execute and implement the EU lease program to the AS/M (or the VA official formally designated within the Department to fulfill the obligations of the AS/M), with re-delegation authority as provided pursuant to criteria set forth in the Enhanced-Use Lease Delegation Plan (attached as Appendix A). Only the Secretary may authorize additions, deletions, or modifications of an existing EU lease that result in a change to the project or fall outside of the scope of the previously-approved concept plan.

b. Designated VA Representative. The AS/M (or other duly-authorized VA official) designates a DVR to serve as the EU lease administrative officer within OAEM, and exercise appropriate delegated signatory authority for documents that from time-to-time require VA

execution in relation to an existing, previously-executed EU lease. The DVR is responsible for ongoing administration and monitoring of awarded EU lease projects, with the exception of terminations, disputes, amendments, and other lease administration actions that result in any change in the project, or which would fall outside of the scope of the previously-approved concept plan. The DVR may authorize additions, deletions, or modifications to supplementary EU lease-related agreements only (e.g., Tenant Selection Plans, Facility Service Agreements, Operations and Maintenance Plans), so long as the revisions do not result in a material change to the project, conflict with any text of the EU lease, and/or fall outside of the scope of the previously-approved concept plan.

c. Oversight Monitor. The DVR, in consultation with OAEM's Capital Asset Management Service (CAMS), shall assign an OM (or OMs) within the Office of Management to coordinate all post transaction compliance activities related to the EU Leasing program portfolio. The OM is responsible for creating and implementing oversight management tools that align with OAEM's monitoring strategy in order to track EU lease project performance following lease execution. The OM is also responsible for facilitating all communication related to post transaction compliance between the DVR and the LSMs, VISN CAMs, VBA/NCA representatives, and the lessees, including communicating all requests and approvals of the DVR (e.g., requests for VA expenditures, compliance issues). The OM is responsible for overseeing the compliance monitoring performed by the PMs, LSMs, VISN CAMs, and VBA/NCA representatives and for overseeing and facilitating the compliance issue resolution process. Additionally, the OM shall produce portfolio management reports as needed. The OM shall not have the authority to execute any amendments/ modifications to the EU lease, to execute any amendments/ modifications to any EU lease exhibits, to extend or terminate the EU lease, or to approve any VA expenditures on the projects. All such inquires shall be directed to the DVR.

d. VISN Capital Asset Manager. VHA established VISN CAMs in each VISN to coordinate all policies and programs associated with capital assets for their respective VISN. The VISN CAM serves as a level of oversight over the VHA EU lease projects, and is responsible for liaising with OAEM and the local facility when issues arise with EU lease projects or during policy planning. The VISN CAM is also responsible for assisting with significant asset initiatives or particularly complex EU lease projects. During the steady state phase, the VISN CAM is responsible for monitoring the activities of the LSM on at least a quarterly basis, or more frequently as appropriate or when issues arise. The VISN CAM does not have the authority to execute any amendments/ modifications to the EU lease, to execute any amendments/ modifications to any EU lease exhibits, to extend or terminate the EU lease, or to approve any VA expenditures on the projects. All such inquires shall be directed to the DVR.

e. VBA/NCA Representatives. Coordination of policies and programs associated with VBA and NCA capital assets is handled by each Administration's corporate personnel at VA's Central Office (VACO). VBA's Office of Administration, Emergency Preparedness, and Facilities shall assign a representative to serve as a level of oversight over each VBA EU lease project. The NCA Deputy Under Secretary for Management, Design & Construction Service (43B) shall assign a representative to serve as a level of oversight over each NCA EU lease project. The VBA/NCA representative is responsible for liaising with OAEM and the local facility when issues arise with EU lease projects or during policy planning. The VBA/NCA

representative is also responsible for assisting with significant asset initiatives or particularly complex EU lease projects. During the steady state phase, the VBA/NCA representative is responsible for monitoring the activities of the LSM on at least a quarterly basis, or more frequently as appropriate or when issues arise. The VBA/NCA representative does not have the authority to execute any amendments/ modifications to the EU lease, to execute any amendments/ modifications to any EU lease exhibits, to extend or terminate the EU lease, or to approve any VA expenditures on the projects. All such inquires shall be directed to the DVR.

f. Portfolio Manager. The DVR, in consultation with OAEM's Investment and Enterprise Development Service (IEDS), shall assign a PM to provide day-to-day support during the formulation phase and throughout the execution phase (refer to VA Handbook 7415 for additional details regarding the formulation and execution phases). During the execution phase, the PM coordinates directly with the lessee (and when applicable, the LSM and the OM) and the Director of IEDS to perform required construction/development responsibilities. Additionally, the PM coordinates directly with the lessee, the LSM (when applicable), other local support staff, and the OM to provide all required compliance monitoring data, reports, and project documents in accordance with established timeframes. The PM shall monitor and manage the EU lease project until final acceptance and approval of the formal End of Construction Report (ECR), unless sooner revoked in writing by the DVR. Following the EU lease project's transition to the steady state, if a development matter arises the DVR may transfer compliance monitoring and responsibility for the resolution of the development matter to the PM. PMs report to the Director of IEDS and will be held accountable for performing assigned responsibilities by the Director of IEDS. The PM does not have the authority to execute any amendments/ modifications to the EU lease, to execute any amendments/ modifications to any EU lease exhibits, to extend or terminate the EU lease, or to approve any VA expenditures on the projects. All such inquires shall be directed to the DVR.

g. Local Site Monitor. For VHA projects, the VISN CAM in consultation with the local facility director shall recommend an LSM (subject to approval by the DVR) to monitor and manage (with local facility support staff; e.g., legal, financial, engineering) the EU lease project for the duration of the steady state phase, unless sooner revoked in writing by the DVR. For VBA and NCA projects, the LSM shall be recommended by the VBA/NCA representative in consultation with the local facility director (subject to approval by the DVR). The LSM is responsible for providing all required monitoring data, reports, and project documents in accordance with established timeframes. Additionally, the LSM is responsible for notifying the VISN CAM or the VBA/NCA representative (as applicable) and the OM of any issues that arise with his/her assigned EU lease project in accordance with the established communication protocols. At the direction of the DVR, the LSM may retain responsibility for the day-to-day post transaction compliance monitoring even if the project reverts from the steady state phase to the formulation or execution phases (e.g., amendments, additional construction phases). Additionally at the DVR's discretion, an LSM may be identified and required to perform all or a portion of the monitoring and management activities during the execution phase of the EU lease. The LSM shall not have the authority to execute any amendments/modifications to the EU lease, to execute any amendments/modifications to any EU lease exhibits, to extend or terminate the EU lease, or to approve any VA expenditures on the projects. All such inquires shall be directed to the DVR.

h. The Office of Financial Process Improvement and Audit Readiness. The Office of Financial Process Improvement and Audit Readiness (OFPIAR) oversees all accounting and financial operations associated with trust accounting for VA's capital asset portfolio. Some previously executed EU leases established independent owner trusts to finance the projects. For these EU lease projects, the OFPIAR is responsible for the financial oversight of EU lease funds held in the owner trusts. The OFPIAR reviews and oversees such trust accounts for compliance with accounting/ auditing standards and VA financial regulations, and performs periodic financial reporting duties.

i. The Office of Finance. The Office of Finance establishes financial policy, systems, and operating procedures for all VA financial entities. The office provides guidance on all aspects of financial management and directs and manages the Department's financial operations and systems support. The Office of Finance maintains and updates VA's corporate core accounting system, the Financial Management System (FMS).

j. Local Fiscal Officer. The Local Fiscal Officer (LFO) is responsible for ensuring the complete and accurate processing of all financial transactions related to EU lease projects in FMS. The LFO compiles financial results at the facility level and provides information to designated representatives for financial reporting purposes.

k. VA Green Management Program Service. The VA Green Management Program Service (GMPS) provides green management, environmental and energy expertise to support OAEM's IEDS and CAMS throughout the lifecycle of the EU lease projects. The OM shall notify the GMPS immediately of any related issues.

l. VA Real Property Service. VA's Real Property Service (RPS), a division of the Office of Construction and Facilities Management (CFM), supports VA's mission in part by acquiring land and leasing space for the construction and/or operation of medical, medical-related, and cemetery facilities that service our nation's Veterans. RPS is also involved with intergovernmental and third-party related real property transactions, parking analyses, and VA's granting and receipt of easements, licenses, and permits. RPS also provides guidance to regional and local VA offices regarding real property issues, including certain real property actions that can be handled by local VA offices versus directly by RPS. RPS should be notified immediately whenever real property issues beyond the underlying EU lease project itself arise, e.g. issues with easements, rights of way.

m. Local Facility Support Staff. The local facility is responsible for providing necessary technical experts to support the PM and the LSM. The local facility director shall be responsible for assigning support staff as requested by the PM or the LSM. Expertise will primarily include engineering staff and/or financial staff.

4. REFERENCES

- a. 38 U.S.C. Sections 8161 through 8169
- b. 38 U.S.C. Section 512 (a)
- c. Federal Financial Management Improvement Act of 1996

- d. VA Directive and Handbook 7415, Enhanced-Use Leasing Program
- e. VA Directive 7815, Acquisition of Real Property By Lease and By Assignment From General Services Administration
- f. VHA Directive 2005-004, Delegation of Outleases, Revocable Licenses, and Permits

5. DEFINITIONS

a. Annual Oversight Compliance Certificate (AOCC). An annual certificate collected at the close of each fiscal year during the steady state phase of the lease. The AOCC lists all requirements for an operational EU lease and all of the required supporting documentation.

b. “As-Built” Drawings. The final drawings produced at the completion of a construction project.

c. Assistant Secretary for Management. The AS/M currently serves as the Department's Chief Budget Officer, Chief Financial Officer, and Senior Real Property Officer. Oversees all resource requirements, development and implementation of agency performance measures, and financial management activities relating to VA programs and operations.

d. VISN Capital Asset Manager. The designated VISN CAM provides corporate (VISN-level) leadership directing activities relating to the planning, acquisition, management and disposal of capital assets. The VISN CAM serves as a level of oversight over the VHA EU lease projects, and is responsible for liaising with OAEM and the local facility when issues arise with EU lease projects or during policy planning. The VISN CAM is also responsible for assisting with significant asset initiatives or particularly complex EU lease projects. During the steady state phase, the VISN CAM is responsible for monitoring the activities of the LSM on at least a quarterly basis, or more frequently as appropriate or when issues arise.

e. Designated Local VA Representative. For EU leases re-delegated to any of the three Administrations, i.e. VHA, VBA, or NCA, the respective Under Secretary may designate a DLVR with the authority to perform the same tasks that the DVR is authorized to perform for non-delegated EU leases, under the oversight of the DVR. Re-delegation by the Under Secretaries of the VBA or the NCA requires prior approval by the AS/M. An EU project must meet certain criteria in order to be eligible for re-delegation. The criteria include: no obligation or financial liability by the Department for lease improvements; project value must be below established threshold for major construction; lease term can be no greater than 55 years; and project cannot be considered a “significant asset initiative” as determine by the Secretary.

f. Designated VA Representative. Through a delegation from the Secretary, the AS/M has designated a DVR within OAEM to serve as the EU lease administrative officer within OAEM, and exercise appropriate delegated signatory authority for documents that from time-to-time require VA execution in relation to an existing, previously-executed EU lease. The DVR is responsible for ongoing administration and monitoring of awarded EU leases, with the exception of terminations, disputes, amendments, and other lease administration actions that

result in any change in the project, or which would fall outside of the scope of the previously-approved concept plan. The DVR may authorize additions, deletions, or modifications to supplementary EU-related agreements only (e.g., Tenant Selection Plans, Facility Service Agreements, Operations and Maintenance Plans), so long as the revisions do not result in a material change to the project, conflict with any text of the EU lease, and/or fall outside of the scope of the previously-approved concept plan.

g. Development Matters. During the steady state phase, issues relating to EU lease project development, EU lease negotiations, or other non-compliance related matters may be considered to be a “development matter” as determined by the DVR. If an issue is determined to be a development matter, the DVR may transfer compliance monitoring and responsibility for the resolution of the development matter to the PM. At the direction of the DVR, the LSM may retain responsibility for the day-to-day post transaction compliance monitoring even if the project reverts from the steady state phase to the formulation or execution phases (e.g., amendments, additional construction phases). Notwithstanding the above, at no time shall the DVR transfer any of the DVR’s delegated authorities or responsibilities.

h. Disposal Phase. The last phase in the capital asset management system which covers issues to be addressed at the end of an asset’s life cycle including the removal of the asset from service, planning for the transition to a replacement if required, and final removal of the asset from the agency’s property inventory in a timely cost-effective manner. Disposal of complex assets or systems may involve a multi-year process requiring significant effort and funding.

i. Enhanced-Use Lease. A lease agreement entered into between the Department and a third party lessee, under the authority contained in 38 U.S.C. Section 8161, et seq.

j. Enhanced-Use Leasing. The authority provided to the Department under 38 U.S.C. §§ 8161-8169. It is a mechanism by which VA outleases its unused or underutilized real property and improvements to a public or private sector party for terms of up to 75 years, in exchange for monetary and/or in-kind consideration used to support VA’s mission and activities. EU leasing is a negotiated arrangement between the Department and the private sector (or another government entity) for the use of Department-controlled property.

k. Enhanced-Use Leasing Information System. EULIS is a web-based, compliance oversight tool that allows VA to monitor its portfolio of projects administered under the EU leasing authority, during the execution and steady state phases.

l. Execution Phase. A phase in the capital asset management system that focuses on the expenditure of the appropriations obtained in the previous phase and on the actual award of the contract through the build-out or completion of the asset. The execution phase begins at EU lease signing and continues through the completion, acceptance and commencement or activation of any development or improvements required by the EU lease.

m. Fair Consideration. In return for an EU lease, VA must receive fair consideration as determined by the Secretary. Fair consideration may include cash and/or in-kind consideration as defined in 38 U.S.C. § 8162.

n. Formal End of Construction Report (ECR). A report prepared by the PM within 45 days following the later of the issuance of the Certificate of Occupancy (or the equivalent specified by the EU lease) and VA's receipt of the "As-Built" drawings. This report is reviewed by the LSM, and approved by the VISN CAM or VBA/NCA representative (as applicable) and the OM. Once the LSM accepts the approved formal ECR, the execution phase of the lease ends, and the steady state begins.

o. Formulation Phase. The formulation phase involves defining a specific concept or need, obtaining fund authorization, and eventually gaining appropriations (non-appropriated funding) to obtain a needed capital asset. For EU leases, the formulation phases includes concept paper review; public hearings; direct source leasing (when applicable); solicitations (when applicable); bid terms and agreement; environmental and historic planning, compliance and reporting requirements; developer selection and notification; appraisal and reporting requirements; protests (when applicable); business case application review and standards; notice of intent to enter into an EU lease; and lease development.

p. Local Site Monitor. For VHA projects, the VISN CAM in consultation with the local facility director shall recommend a LSM (subject to approval by the DVR) to monitor and manage (with local facility support staff; e.g., legal, financial, engineering) the EU lease project for the duration of the steady state phase, unless sooner revoked in writing by the DVR. For VBA and NCA projects, the LSM shall be recommended by the VBA/NCA representative in consultation with the local facility director (subject to approval by the DVR). The LSM is responsible for providing all required monitoring data, reports, and project documents in accordance with established timeframes. Additionally, the LSM is responsible for notifying the VISN CAM or the VBA/NCA representative (as applicable) and the OM of any issues that arise with his/her assigned EU lease project in accordance with the established communication protocols. At the direction of the DVR, the LSM may retain responsibility for the day-to-day post transaction compliance monitoring even if the project reverts from the steady state phase to the formulation or execution phases (e.g., amendments, additional construction phases). Additionally at the DVR's discretion, an LSM may be identified and required to perform all or a portion of the monitoring and management activities during the execution phase of the EU lease.

q. Local Fiscal Officer. The LFO is responsible for ensuring the complete and accurate processing of all financial transactions related to EU lease projects in FMS. The LFO compiles financial results at the facility level and provides information to designated representatives for financial reporting purposes.

r. Monitoring Information System (MIS). The MIS is the process of abstracting EU lease requirements and populating a template provided by the OM. The MIS is an important tool to help the OAEM administer and oversee each EU lease during its term.

s. Outcomes Tracking Sheet (OTS). The OTS for each EU lease documents and tracks the provision/ performance of consideration and expenses as well as other account balances.

t. Oversight Compliance Summary Certificate (OCSC). A one-time certificate collected at the end of the execution phase for each EU lease. The OCSC lists all

development requirements applicable during the execution phase of the EU lease and all of the required supporting documentation.

u. Oversight Monitor. The DVR, in consultation with OAEM's CAMS, shall assign an OM (or OMs) to coordinate all post transaction compliance activities related to the EU Leasing program portfolio. The OM is responsible for creating and implementing oversight management tools that align with OAEM's monitoring strategy in order to track EU lease project performance following lease execution. The OM is also responsible for facilitating all communication related to post transaction compliance between the DVR and the LSMs, the VISN CAMS, the VBA/NCA representatives, and the lessees, including communicating all requests and approvals of the DVR (e.g. requests for VA expenditures, changes to EU lease exhibits, etc.). The OM is responsible for overseeing the compliance monitoring performed by the PMs, the LSMs, the VISN CAMS, and the VBA/NCA representatives and for overseeing and facilitating the compliance issue resolution process. Additionally, the OM shall produce portfolio management reports as needed.

v. Portfolio Manager. The DVR, in consultation with OAEM's IEDS, shall assign a PM to provide day-to-day support during the formulation phase and throughout the execution phase (refer to VA Handbook 7415 for additional details regarding the formulation and execution phases). During the execution phase, the PM coordinates directly with the lessee (and when applicable, the LSM and the OM) and the Director of IEDS to perform required construction/development responsibilities. Additionally, the PM coordinates directly with the lessee, the LSM (when applicable), other local support staff, and the OM to provide all required compliance monitoring data, reports, and project documents in accordance with established timeframes. The PM shall monitor and manage the EU lease project until final acceptance and approval of the formal End of Construction Report (ECR), unless sooner revoked in writing by the DVR. Following the EU lease project's transition to the steady state, if a development matter arises the DVR may transfer compliance monitoring and responsibility for the resolution of the development matter to the PM.

w. Post Transaction. A stage of the EU lease that begins with the execution of the EU lease (i.e. at the time of the EU lease signing) and spans the execution phase, the steady state phase, and disposal or termination (when applicable).

x. Post Transaction Monitoring. Beginning with the execution of the EU lease (i.e. at the time of the EU lease signing), this process involves the oversight and management responsibility of the EU lease portfolio by OAEM within the Office of Management and continues throughout the length of the lease term, unless a determination is made that VA no longer needs the property.

y. Steady State Phase. A phase in the capital investment management process that involves the typical operations and maintenance of an asset through its expected life span. For EU leases, the steady state phase starts with the completion, acceptance, and commencement or activation of any development or improvement required by the lease and continues throughout the length of the lease term, unless a determination is made that VA no longer needs the property.

z. VBA/NCA Representative. For VBA and NCA EU lease projects, the VBA/NCA representative serves as a level of oversight that would be completed by a VISN CAM for a

VHA EU lease project. The VBA/NCA representative serves as a level of oversight over the VBA/NCA EU lease projects, and is responsible for liaising with OAEM and the local facility when issues arise with EU lease projects or during policy planning. The VBA/NCA representative is also responsible for assisting with significant asset initiatives or particularly complex EU lease projects. During the steady state phase, the VBA/NCA representative is responsible for monitoring the activities of the LSM on at least a quarterly basis, or more frequently as appropriate or when issues arise.