

PRINTING AND REPRODUCTION MANAGEMENT

1. SUMMARY OF MAJOR CHANGES: Major changes include:

a. Adds responsibilities in paragraph 2 for the Veterans Health Administration (VHA) Publication Control Officer (paragraph 2.d.), VHA Program Office-based Publication Control Officer (paragraph 2.f.) and Field-based Publication Control Officer (paragraph 2.i.).

b. Updates general requirements for publications in paragraph 5 and reporting requirements in paragraph 6.

c. Incorporates the Joint Committee on Printing (JCP) forms previously included in Appendices A and B into the body of the directive and adds the exception request process for compliance with Tier 1 Graphic Standards as Appendix B.

d. Removes references to therapeutic printing plants which were discontinued in accordance with VHA Directive 1163, Psychosocial Rehabilitation and Recovery Services, dated August 13, 2019.

2. RELATED ISSUES: None.

3. **POLICY OWNER:** The Office of Regulations, Appeals and Policy (10BRAP) is responsible for the content of this directive. Questions may be referred to VHA10BRAPPOLICY@va.gov.

4. **RESCISSIONS:** VHA Directive 1118, Printing and Reproduction, dated January 12, 2017, is rescinded.

5. **RECERTIFICATION:** This VHA directive is scheduled for recertification on or before the last working day of August, 2028. This VHA directive will continue to serve as national VHA policy until it is recertified or rescinded.

6. **IMPLEMENTATION SCHEDULE:** This directive is effective upon publication.

**BY DIRECTION OF THE OFFICE OF
THE UNDER SECRETARY FOR HEALTH:**

/s/ Shereef Elnahal, M.D., MBA
Under Secretary for Health

August 9, 2023

VHA DIRECTIVE 1118

NOTE: *All references herein to Department of Veterans Affairs (VA) and VHA documents incorporate by reference subsequent VA and VHA documents on the same or similar subject matter.*

DISTRIBUTION: Emailed to the VHA Publications Distribution List on August 10, 2023.

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PRINTING AND REPRODUCTION MANAGEMENT

1. POLICY

It is Veterans Health Administration (VHA) policy to comply with applicable Government Publishing Office (GPO) and Joint Committee on Printing (JCP) standards for printing and reproduction management and applicable Federal, Department of Veterans Affairs (VA) and GPO standards for acquisition and procurement of printing and reproduction services as referenced in this directive. **AUTHORITY:** 44 U.S.C. §§ 501-503.

2. RESPONSIBILITIES

a. **Under Secretary for Health.** The Under Secretary for Health is responsible for ensuring overall VHA compliance with this directive.

b. **VHA Chief of Staff.** The VHA Chief of Staff is responsible for supporting the Office of Regulations, Appeals and Policy with implementation and oversight of this directive.

c. **Assistant Under Secretary for Health for Operations.** The Assistant Under Secretary for Health for Operations is responsible for:

(1) Communicating the content of this directive to each of the Veterans Integrated Services Networks (VISNs).

(2) Assisting VISN Directors to resolve implementation and compliance.

(3) Providing oversight of VISNs to ensure compliance with this directive and its effectiveness.

d. **VHA Publication Control Officer, Office of Regulations, Appeals and Policy.** The VHA Publication Control Officer (PCO) is responsible for:

(1) Ensuring this directive is compliant with applicable statutes, regulations and policies.

(2) Assisting VHA Central Office in the administrative management and procurement of forms and publications.

(3) Facilitating communications between the VA Office of Procurement, Acquisition and Logistics (OPAL) (including, but not limited to Hines Service and Distribution Center and Logistics Support Services (LSS)), VHA program offices, VA medical facilities and the VA Office of Information and Technology (OIT), including the VA Section 508 Office.

(4) Providing a tool for VA medical facilities to list their designated primary and alternate Field-based Publication Control Officer (FPCO). **NOTE:** *The primary and alternate FPCO must ensure the list is accurate. A list of FPCOs is available at:*

<https://dvagov.sharepoint.com/sites/VACOVHACOS/10B4/PCO/Lists/Station%20POCs/AllItems.aspx?viewpath=%2Fsites%2FVACOVHACOS%2F10B4%2FPCO%2FLists%2FStation%20POCs%2FAllItems%2Easpx>. This is an internal VA website that is not available to the public.

(5) Maintaining the VHA portion of the VA Forms website and the Brochures portion of the VHA Forms and Publication website at: <https://vaww.va.gov/vaforms/> and <https://vaww.va.gov/vhapublications/publications.cfm?Pub=8>. **NOTE:** These are internal VA websites that are not available to the public.

(6) Coordinating with OIT to address issues related to the public-facing VA Forms website (see <https://www.va.gov/find-forms/>).

(7) Collaborating with the Assistant Under Secretary for Health for Operations to communicate and report any requested information between the VISN and Field-based Publication Control Officer. **NOTE:** FPCOs can be associated with the VA medical facility or VISN.

e. **VHA Central Office Chief Program Officers.** VHA Central Office Chief Program Officers or equivalent are responsible for:

(1) Developing forms and publications (e.g., posters, fact sheets, pamphlets, brochures and workbooks).

(2) Designating a VHA program office-based PCO (POPCO) and ensuring the VHA POPCO completes the duties outlined in paragraph 2.f.

(3) Providing the name, telephone number and email address of the designated POPCO to the VHA PCO and ensuring the POPCO contact information is updated as needed.

(4) Ensuring the content of the material to be printed is in accordance with governing laws and policies, including but not limited to the Rehabilitation Act of 1973, as amended.

(5) Ensuring the most economical and efficient method of printing and reproduction is selected and that only the quantity of material needed is printed, distributed and stored.

(6) Ensuring the development of all materials conforms with VA printing policies and with this directive.

f. **VHA Program Office-Based Publication Control Officer.** The VHA POPCO is responsible for:

(1) Acting as a liaison between Chief Program Officers and VHA PCO.

(2) Coordinating the development, certification, recertification, printing and reproduction issues concerning all forms and publications (e.g., posters, fact sheets, pamphlets, brochures, workbooks) owned by the VHA program office.

(3) Responding to inquiries to include but not limited to data calls from the VHA PCO.

(4) Assigning form letter numbers for form letters owned by the VHA program office.

(5) Requesting form numbers and Information Bulletin (IB) numbers from the VHA PCO as needed.

(6) Maintaining an inventory of forms, surveys, publications and form letters owned by the VHA program office.

(7) Ensuring all forms that require approval from the Office of Management and Budget (OMB) under the Paperwork Reduction Act (PRA) are recertified prior to the expiration date. **NOTE:** *This process can take up to 1 year to complete.*

(8) Ensuring all forms, surveys, publications and form letters that are available in electronic format and require 508 conformance (e.g., fillable and PDF forms and documents) are appropriately formatted.

(9) Maintaining a record of all 508 conformance reports concerning forms, surveys and publications owned by the VHA program office.

g. **Veteran Integrated Services Network Director.** The VISN Director is responsible for:

(1) Ensuring that all VA medical facilities within the VISN comply with this directive and informing leadership when barriers to compliance are identified.

(2) Ensuring that VISN printing and duplication processes, as well as the VA medical facility processes under their jurisdiction, are compliant with all statutes, regulations and the requirements outlined in paragraphs 3 and 6 in this directive.

(3) Issuing any supplemental VISN instructions necessary to carry out this directive.

(4) Ensuring challenges in all VA medical facilities within the VISN are resolved; including ensuring that any instances of non-compliance by VA medical facilities with this directive or title 44, United States Code are addressed and resolved.

h. **VA Medical Facility Director.** The VA medical facility Director is responsible for:

(1) Establishing local printing and duplication processes that are compliant with applicable statutes, regulations and the requirements outlined in paragraphs 3 and 6 in this directive.

(2) Issuing any supplemental VA medical facility instructions necessary to carry out this directive.

(3) Designating a primary and alternate FPCO at the VA medical facility to be responsible for coordinating the printing and reproduction within their VA medical facility and ensuring they complete the duties outlined in paragraph 2.i. **NOTE:** *The VA medical facility Director must provide the name, telephone number and email addresses of these individuals to the VHA PCO and ensure any changes to the FPCO designation are reported to the VHA PCO.*

(4) Developing local procedures to determine the appropriate use of business cards. **NOTE:** *Information about content and specific design elements for business cards can be found in the Tier 1 Graphics Standards Guide at http://vaww.va.gov/6102/graphics_resource_center.asp. This is an internal VA website that is not available to the public.*

(5) Ensuring that only VHA Fund 0160 Medical Services are used for the purchasing of condolence cards; see paragraph 3.b. for additional information.

i. **Field-Based Publication Control Officer.** **NOTE:** *FPCOs can be associated with the VA medical facility or VISN. The FPCO is responsible for:*

(1) Acting as a liaison between the VA medical facility Director and VHA PCO.

(2) Coordinating printing and reproduction within the VA medical facility, including coordinating the recertification of forms and updates on publications.

(3) Maintaining an appropriate supply of forms and publications for the VA medical facility.

(4) Communicating with the local GPO Regional Printing and Procurement Office (GPO-RPPO) for the procurement of any printing or reproduction services outside the VA medical facility Director's authority. **NOTE:** *A list of GPO-RPPO locations can be accessed at: <https://www.gpo.gov/who-we-are/our-agency/office-locations>.*

(5) Coordinating the reporting of VA medical facility individual print and duplication jobs as required by VA OPAL, Logistic Support Services (OPAL-LLS). **NOTE:** *See paragraph 6 for further information.*

(6) Adhering to the printing and reporting limitations and requirements outlined in this directive.

(7) Updating the list of FPCOs to ensure accurate information when there is a change in designation at the VA medical facility. **NOTE:** *A list of FPCOs is available at: <https://dvagov.sharepoint.com/sites/VACOVHACOS/10B4/PCO/Lists/Station%20POCs/AllItems.aspx?viewpath=%2Fsites%2FVACOVHACOS%2F10B4%2FPCO%2FLists%2FStation%20POCs%2FAllItems%2Easpx>. This is an internal VA website that is not available to the public.*

3. GENERAL REQUIREMENTS AND STANDARDS FOR PRINTING

a. **Use of Government Printing Office.** All printing, binding, duplication, CD/DVD publishing and blank-book work for VHA must be procured through GPO or through the appropriate GPO-RPPO using JCP Form No. 2, Commercial Printing Report, at <https://www.gpo.gov/docs/default-source/forms-standards-pdf-files/jcp2>, unless one of the following specific exceptions apply:

(1) The printing is authorized in accordance with paragraph 3.i. of this directive.

(2) The printing is a class of work JCP considers urgent or necessary to be done elsewhere.

(3) The printing is an individual printing order not more than \$1,000, is not of a continuing or repetitive nature, and as certified by the Director, GPO, if the printing is included in a class of work that cannot be provided more economically through GPO or a GPO-RPPO.

(4) Printing from other sources is specifically authorized by law.

b. **Appropriated Funds for Printing.** Funds appropriated for printing must not be obligated or expended by VHA for the procurement from commercial sources of any printing related to the production of Government publications, including forms, unless such procurement is by or through GPO.

(1) VHA must use Medical Services appropriations for the procurement or printing and mailing of condolence cards from VHA treatment team members or other VHA officials to family members or loved ones of Veterans who have died while receiving VA health care as outlined in paragraph 2.h. in this directive. Condolence cards containing compassionate expressions of sympathy from health care team members, or other VA officials, are clinically appropriate official communications that complete the therapeutic relationship between health care providers and deceased Veterans' survivors. Condolence cards are basic care at end-of-life in the inpatient and outpatient settings, as such condolence cards are part of the complete medical package under 38 C.F.R. §17.38. See Appendix A for further guidance on communications of condolence.

(2) VHA is prohibited from using Medical Services appropriations for condolence cards exchanged between VHA or VA employees, even if employees are survivors of a deceased Veteran. Condolence cards exchanged between VHA or VA employees are personal cards. Refer to paragraph 4.b.

c. **VA Medical Facility Printing (Printing Outside the Washington, D.C. Metropolitan Area).**

(1) All VA medical facilities must submit their external printing requirements to their appropriate GPO-RPPO through the FPCO, with the exception of GPO Riders or as permitted in paragraph 3.i. **NOTE:** *A rider is an announced order where agencies, departments, administrations and other Federal offices are offered the opportunity to*

“ride” an authorized order through GPO. Riding an order allows the other Government offices to purchase the item at a discounted rate. This is only procured by the VHA PCO.

(2) GPO-RPPO must determine the area of bid competition, considering all factors, including lead-time and transportation costs.

d. Washington, D.C. Metropolitan Area Printing.

(1) When applicable, VHA program offices and VA medical facilities in the Washington, D.C. Metropolitan Area must submit printing requirements that surpass the limitations outlined in paragraph 3.i., to OPAL–LSS for processing, using the Publication Job Tracker portal. If the portal is nonoperational, VA Form 7700, Requests for Reproduction Services, must be submitted to OPAL-LSS. **NOTE:** *This includes VA Central Offices and the Baltimore and Washington, D.C. Metropolitan Area VA medical facilities.*

(2) Each VHA program office and VA medical facility is responsible for all costs associated with printing, restocking and distribution of materials, except by direction of the Under Secretary for Health. Each VHA program office must do a thorough cost-benefit analysis to determine the most valuable allocation of Government resources when deciding if to print documents and whether to distribute documents digitally or physically.

(3) All printing must be compliant with all VA and VHA policy and guidance and must be executed where most economical or in the better interest of the Government.

e. Digital Distribution and Local Printing.

(1) Nothing in VA or GPO policy precludes VHA program offices from producing documents or publications, distributing them digitally and having them locally reproduced within the limits imposed on VA medical facilities Duplicating Activities outlined in paragraph 3.i.

(2) This distribution allows printing to be on demand, reduces printing and distribution surcharges and provides VA medical facilities greater flexibility as communication is increasingly utilizing digital media.

(3) An IB number must be obtained from the VHA PCO and placed on the document consistent with VA and VHA policy and guidance regarding identification of publications; see paragraph 5.g.

f. Commercial Printing Services.

(1) Use of local commercial contracting for printing services is prohibited by Federal law; Federal Acquisition Regulation (FAR) § 8.802 defines GPO as a mandatory source for all Federal printing. There are no exceptions to the law without a written waiver from JCP or the Public Printer, head of GPO, located in Washington, D.C. Each waiver

request must be approved prior to procurement of printing through a source other than GPO or as contracted through GPO or a GPO-RPPO; see paragraph 3.h. **NOTE:** VA is not aware of any waiver ever being granted.

(2) If an exception is necessitated by an emergency, VHA program offices or VA medical facilities must submit a request for a waiver to use commercial printing services to OPAL–LSS. In turn, OPAL–LSS must request a waiver from GPO. The Public Printer, head of GPO, located in Washington, D.C., must approve each waiver request prior to procurement of printing through a source other than GPO or as contracted through GPO or a GPO-RPPO. **NOTE:** VA is not aware of any waiver ever being granted.

(3) A VA employee must never directly procure printing from a commercial printing service (e.g., UPrint or Office Depot) without the involvement of GPO or a GPO-RPPO. Quarterly reporting requirements apply; see paragraph 6 for more information.

g. Procuring Printing from Commercial Printing Services via Credit Card.

(1) The procurement of printing from commercial sources with a Government credit card, unless coordinated through GPO (e.g., GPO Express), is a violation of law and GPO and VA policy. All credit card purchases for printing procurement must comply with all statutes, regulations, the requirements outlined in paragraphs 3 and 6 of this directive and GPO policy. There are no exceptions to the law without a written waiver from JCP or the Director, GPO; see paragraph 3.h.

(2) If an exception is necessitated by an emergency, VHA program offices or VA medical facilities must submit a request for a waiver to use commercial printing services to the VHA PCO and OPAL–LSS Publications Service for submission to GPO. GPO or a GPO-RPPO must approve each waiver request prior to procurement of printing through a source other than GPO or as contracted through GPO.

h. Procurement Limits for Commercial Printing.

(1) Appropriated funds may be obligated or expended for any individual printing orders costing not more than \$1,000 if the work is not of a continuing or repetitive nature and as certified by the Director, GPO, if the work is included in a class of work which cannot be provided more economically through GPO.

(2) Splitting up a purchase to remain under the single purchase threshold is a violation of FAR § 13.003(c)(2). **NOTE:** A split purchase is separating a requirement that exceeds a micro-purchase account single purchase threshold into two or more purchases as a means of circumventing the purchase limit.

i. VA Medical Facility Duplicating Activities.

(1) VA medical facilities are authorized to perform copy and duplicating activities. These activities are restricted by a quantity limitation of no more than 5,000 copies per job reproduced of any single page items and multiple page documents must not exceed 25,000 copies per job in aggregate of multiple pages. **NOTE:** A page or production unit

is defined as 11 by 17 inches or less; for larger page sizes. Reference JCP Government Printing and Binding Regulations for additional guidance at <https://www.gpo.gov/fdsys/pkg/GPO-CPUB-101spub9/html/GPO-CPUB-101spub9.htm>.

(2) Quantities in excess of these limitations must be procured through the GPO-RPPO. It is illegal to break up items in an attempt to fraudulently fall below these thresholds. GPO regulations preclude the use of printing presses (such as iGen or Indigo Digital Printing Presses or traditional offset printers) and it is illegal for VA medical facilities to purchase digital or traditional printing presses for their VA medical facility and must direct these printing requirements to their local GPO-RPPO. Print jobs that exceed the 5,000 and 25,000 thresholds must be reported within 15 calendar days to OPAL–LSS. Refer to paragraph 6 for more information.

j. Printing Requirements in Contracts.

(1) It is a violation of FAR Subpart 8.8 to include printing in contracts outside of the GPO unless certain conditions have been met. Contracts and grants must not include printing requirements leading to an obligation of funds without specific approval in advance by the Director, GPO.

(2) Consistent with VA policy, the Chief of OPAL–LSS must advise and assist the VHA program office or VA medical facility and submit, on behalf of the VHA program office or VA medical facility, all requests for printing requirements in contracts to the Director, GPO when appropriate.

k. Printing by Private Publishers of Material Created by Appropriated Funds.

(1) When appropriated funds are used to create information for publication, the printing and binding of that information is subject to the provisions of 44 U.S.C. §§ 103, 501. The information must not be made available to a private publisher for initial publication without the prior approval of JCP.

(2) The Chief of OPAL–LSS must advise and assist in the application of this requirement and request prior approval from JCP, when appropriate.

l. Paper and Envelopes for Government Agencies in the District of Columbia.

All orders for paper, including copier paper and envelopes, placed within the District of Columbia must be procured through GPO by OPAL–LSS. Paper and envelopes must not be procured in any other manner.

m. Printing Requirements from Grants. A grant for the sole purpose of printing is prohibited unless authorized by JCP.

4. PRINTING LIMITATIONS

a. **Business Cards.** Business cards are authorized when they enhance an employee's ability to conduct agency business with outside organizations which will further the statutory mission of VA, and when the distribution of business cards will

facilitate prompt and efficient communications between the agency and those Veterans, persons and organizations of which it transacts business.

b. **Cards.** The printing or engraving of calling or greeting cards is prohibited. Such printing is considered personal rather than official and must not be done at Government expense. ***NOTE: The prohibition of printing or engraving of calling or greeting cards does not include condolence cards.***

c. **Color Printing.** JCP recognizes that printing in two or more colors generally increases costs. Consequently, it is the responsibility of the head of any department, independent office or establishment of the Government, to assure that all multicolor printing contributes demonstrable value toward achieving a greater fulfillment of the ultimate end-purpose of whatever printed item in which it is included. Stationery is not to be printed in colors other than black or blue, as directed by the Secretary of VA.

d. **Desk and Wall Calendars.** Standardized Government desk and wall calendars are the only calendars which departments are authorized to obtain at Government expense and must be ordered through the General Services Administration (GSA). Schedule and appointment sheets are not considered to be calendars.

e. **Free Distribution.** VHA program offices and VA medical facilities must not make free distribution of any publication costing more than \$100 to any private individual or private organization in quantities exceeding 50 copies without prior approval of JCP.

f. **Executive Order 13589, Promoting Efficient Spending, Section 5, Printing.** VHA is encouraged to limit the publication and printing of hard copy documents and to presume that information should be provided in electronic form whenever practicable, permitted by law and consistent with applicable records retention requirements.

g. **Monthly Catalog Listing of Government Publications.** Government publications, except those determined by their issuing components to be required for official use only, strictly administrative or operational purposes which have no public interest or educational value and publications classified for reasons of national security, must be made available to depository libraries for public information; if they are produced or procured through other than GPO sources to OPAL–LSS and VHA Office of Regulations, Appeals and Policy. GPO is the authoritative national source for descriptive and subject cataloging for Federal Government documents. Failure to provide materials to GPO for consideration may result in VA being responsible for costs that would have been incurred had the document been presented in a timely manner.

h. **Publications as an Employee Morale Factor.** There is no authority for VA to issue any publication whose principal objective is the development of employee morale.

i. **Personalized Stationery.** The printing of VA officials' names on official stationery requires approval by JCP. Addresses and telephone numbers must be omitted to allow greater distribution and prevent the creation of unusable stocks frequently caused by changes. Personalized second sheets must not be produced or procured at Government expense.

5. GENERAL REQUIREMENTS FOR PUBLICATIONS

a. **Section 504 Compliance.** All published documents (including graphics) must be **compliant** with Section 504 of the Rehabilitation Act of 1973, as amended, by adhering to VA regulations published at 38 C.F.R. part 18. These regulations state that no qualified person(s) with a disability shall, on the basis of disability, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity which receives Federal financial assistance. It is the responsibility of the publishing VHA program office to ensure that all publications are compliant with the Rehabilitation Act of 1973, as amended.

b. **Section 508 Compliance.** All published documents (including graphics) must comply with and be accessible in accordance with current requirements and interpretation of Section 508 of the Rehabilitation Act of 1973, as amended. All documentation must be approved by VHA before distribution to the public and prepared in a format specified by VHA. Webmasters and content providers are responsible for consulting sources such as the Access Board and the GSA Section 508 website at: <http://www.section508.gov/> and <https://www.access-board.gov/ict.html>. In addition, the VA's Section 508 Office provides additional information and guidance at <http://www.section508.va.gov/index.asp>.

c. **Tier 1 Graphic Standards.** VA Directive 0023, Tier 1 Graphic Standards Guide, dated May 24, 2013, and any subsequent standards, must be utilized to assure a unified corporate image is utilized throughout VHA Central Office and all VA medical facility activities. Standardized format and style must be used as outlined in the VA Tier 1 Graphic Standards Guide. Clip art is not appropriate at any time. See Appendix B for the exception process.

d. **Evidence-Based Patient Centered Care.** Every publication must incorporate best practices and evidence-based recommendations to create documents that support VHA's commitment to diversity, equity and inclusion and patient centered care. Examples of this include but are not limited to:

(1) **Low-vision.** Authors must ensure that all publications are accessible to individuals with low vision, including older adults. Publications must be printed with text in no less than 12-point font; 14-point font bold and 18-point font regular are generally considered large print.

(2) **Languages Other than English.** Authors must publish documents in languages other than English when such documents may be frequently requested by individuals or their representatives who speak languages other than English.

(3) **Reading Level.** The National Veterans Health Education and Information (VHEI) Program recommends a 5th to 8th grade reading level in alignment with health literacy guidelines from Federal partners (Centers for Disease Control and Prevention (CDC), National Institutes of Health (NIH) and Agency for Healthcare Research and Quality (AHRQ)). According to AHRQ, the average adult reads at the 8th or 9th grade reading

level, and 20% read at the 5th grade level or below. Providing a range to accommodate reading level offers greater flexibility to developers of Veteran education materials and helps meet Veteran health literacy needs.

e. **VA Seal.** The VA Seal (agency identifier) and name must appear on all printing when appropriated funds are used; refer to VA Directive 0023. **NOTE:** *Approved graphics may be downloaded from http://vaww.va.gov/6102/graphics_resource_center.asp. This is an internal VA website that is not available to the public.*

f. **Commercial Advertisements.** No Government publication or other Government printed matter, prepared or produced with either appropriated or non-appropriated funds or identified with an activity of the Government, can contain any advertisement inserted by or for any private individual, firm or corporation; or contain material which implies in any manner that the Government endorses or favors any specific commercial product, commodity or service.

g. **Courtesy and Copyright.**

(1) **Courtesy Credit Lines.** Courtesy credit lines are permissible only for un-copyrighted materials contributed or loaned by nongovernmental parties. They must be subordinate in font size to that of both text and legends for illustrations. When all materials have come from a single nongovernmental source, credit lines must be given only in a paragraph of four or more lines single-spaced.

(2) **Copyright Notices.** When privately copyrighted material is reprinted in a Government publication, notice of copyright is essential to ensure the public is not misled. Privately copyrighted notices must be subordinate in font size to that of both text and legends for illustrations. A work of the U.S. Government, as defined by copyright law, is a work prepared by an officer or employee of the Federal Government as part of that person's official duties. In general, under section 105 of the Copyright Act of 1976, such works are not entitled to domestic copyright protection.

(3) **Copyright Release.** When a decision has been made that the use of copyrighted material is essential to the usefulness of the publication to be printed, the VHA PCO must ensure that a copyright release has been obtained and filed and maintained in the publication's history file.

h. **Identification of Publications.** All documents and publications printed at Government expense must include the name of the branch, bureau, department or office of the Government responsible for publishing the same, the date of issuance, the title, subtitle and series title and number, when applicable. Local use of any nationally numbered document must not be superseded by a local identification system. Modifications must be limited to local points of contact.

i. **Signatures.** When the size of signatures on freehand art is out of proportion or relation to the design, the copy is unacceptable and must not be printed unless the

signature is removed or sufficiently reduced in size. Signatures of technical illustrators, designers, typographers or layout artists must not be printed.

j. **Publication Bylines.** The printing of Government employees' bylines in Government publications must be confined to the authors of the articles appearing therein and to the photographers who have originated the pictures contained therein. The authors' and photographers' bylines must be printed in exact juxtaposition with the articles or pictures which they have created.

k. **Publication Mastheads.** The printed mastheads of Government publications must include the name of the publishing department or agency and its issuing office, together with the names of the department or agency head and the head of the issuing bureau, branch or office. Additional names must include only the names of the executive or managing editor, photo editor, art editor and their editorial equivalent officers by whatever title they are identified, unless otherwise authorized by JCP.

6. REPORTING REQUIREMENTS

a. **Individual Prints or Duplication Jobs.** VHA program offices and VA medical facilities must report certain individual prints or duplication jobs within 15 calendar days of job completion. Single page print and duplication jobs that exceed 5,000 copies per job and multiple page print and duplication jobs that exceed 25,000 copies per job must be reported. Reports must include print and duplication jobs by title, quantity, date and location. Reports must be submitted to OPAL-LSS, who will in turn report to GPO. Refer to paragraph 3.i. for additional information on individual prints or duplication jobs.

b. **Joint Committee on Printing, Form Number 2 (Commercial Printing Report).** VHA program offices and VA medical facilities must report all transactions involving composition, printing, binding and blank-book work which are procured directly from commercial sources within 30 calendar days after the close of each fiscal quarter. **NOTE:** JCP Form No. 2, *Commercial Printing Report*, is available at: <https://www.gpo.gov/docs/default-source/forms-standards-pdf-files/jcp2>. The following information is required:

- (1) Name of VA medical facility, city and State.
- (2) Description of print job (list each separately).
- (3) JCP or GPO waiver number and date, if applicable.
- (4) Total number of copies.
- (5) Number of pages per copy.
- (6) Style of binding, if applicable.

(7) Total cost, including paper. Reports must be submitted to OPAL-LSS, who will in turn prepare JCP Form No. 2, *Commercial Printing Report* for submission to the JCP—

GPO. Negative reports are not required. Refer to paragraph 3.f. of this directive for additional information on commercial printing.

7. TRAINING

There are no formal training requirements associated with this directive.

8. RECORDS MANAGEMENT

All records regardless of format (for example, paper, electronic, electronic systems) created by this directive must be managed as required by the National Archives and Records Administration (NARA) approved records schedules found in VHA Records Control Schedule 10-1. Questions regarding any aspect of records management can be addressed to the appropriate Records Officer.

9. BACKGROUND

a. GPO is the U.S. legislative agency responsible for providing electronic access to, and producing most printed matters for the Federal Government, such as the Congressional Record, Supreme Court decisions, passports, tax forms, internal Government documents and agency publications. As authorized by title 44 United States Code, GPO is the only authorized source of printing services for the Federal Government. All printing, binding and blank-book work for executive departments will be procured through GPO (Washington, DC) or through the regional GPO nearest to the VA medical facility. Unless there is authority under a specific exception as outlined in paragraph 3.i., VA is not authorized to purchase, use or own any equipment designated for printing press or plant purposes.

b. JCP, a Congressional joint committee authorized by title 44 United States Code, oversees the operations of GPO and thereby oversees compliance by Federal agencies with laws, rules and regulations designed to minimize printing costs to the American people. To ensure effective and efficient printing throughout the Federal Government, JCP may use any measure it considers necessary to remedy neglect, delay, duplication or waste in public printing. GPO has employed this provision and seized VA property under this authority in the past. VA ceased operations at its Federal printing plant in 1984 at the direction of GPO and JCP.

10. DEFINITIONS

a. **Binding.** Binding is fastening together or reinforcing sections of books, pamphlets, brochures, reports or single sheets of paper. This includes all fastening operations or processes such as sewing, stapling, stitching, folding, punching, drilling, gluing, trimming, covering, stamping and lettering.

b. **Digital Printing Presses.** Digital printing presses are machines that enable printing from a digitally based image directly to a variety of media. The term is usually used in the context of professional printing where low-volume runs from desktop

publishing and other digital sources are printed using large format or high-volume laser or inkjet printers.

c. **Duplication.** Duplication is the process of making copies on photocopy machines employing electrostatic, thermal or other processes without using an intermediary such as a negative or plate.

d. **Government Publishing Office.** GPO is a legislative agency that provides electronic access to and produces most printed matter for Government, such as the Congressional Record, Supreme Court decisions, passports, tax forms, internal government documents and agency publications.

e. **Government Publishing Office Regional Printing Procurement Office.** GPO-RPPO is any office established by the Director of GPO; in accordance with JCPs authorization, that procures Federal printing needs which are determined to be commercially procurable.

f. **Joint Committee on Printing.** JCP oversees the operations of GPO and thereby oversees compliance by Federal agencies with laws, rules and regulations designed to minimize printing costs to the American people.

g. **Printing.** Printing is the processes of composition, platemaking, presswork, binding, duplicating and microform; the equipment as classified in the tables in Title II, Government and Printing and Binding Regulations and used in such processes or the end items produced by such processes and equipment.

h. **Section 504.** Section 504 refers to section 504 of P.L. 93-112, the Rehabilitation Act of 1973, codified at 29 U.S.C. § 794. Section 504 provides that no otherwise qualified individual with a disability in the U.S. shall be excluded from, denied the benefits of, or be subjected to discrimination under any program or activity that either receives Federal financial assistance or is conducted by any Executive agency or the United States Postal Service. Section 504 requires, among other things, that VHA provide appropriate auxiliary aids to persons with disabilities (those with impaired sensory, manual, or speaking ability) where necessary to ensure effective communication. Types of auxiliary aids include braille or large print versions of materials, electronic diskettes, audiotapes and audio files, qualified interpreters or readers, telecommunications devices for deaf persons, captioning of video and other methods of making information available and accessible to persons with disabilities. In considering what type of auxiliary aid to provide, VHA must give primary consideration to the request of the individual with a disability and must honor that request unless VA can demonstrate that another effective means of communication exists.

i. **Section 508.** Section 508 refers to section 508 of P.L. 93-112, the Rehabilitation Act of 1973, codified at 29 U.S.C. § 794d. Section 508 establishes requirements for electronic and information technology developed, maintained, procured or used by the Federal Government. Section 508 requires Federal electronic and information

technology to be accessible to people with disabilities, including employees and members of the public.

j. **Traditional Offset Printers.** Traditional offset printers use a printing technique whereby ink is spread on a metal plate with etched images, then transferred to an intermediary surface such as a rubber blanket and finally applied to paper by pressing the paper against the intermediary surface. Traditional offset printers are used to produce large volumes of high-quality documents.

k. **Washington, D.C. Metropolitan Area.** For the purposes of this directive and in accordance with GPO policies, the Washington, D.C. Metropolitan Area reflects any station, VA Central Office and VA medical facilities, located within 50 miles of the District of Columbia.

11. REFERENCES

- a. P.L. 93-112 §§ 504, 508, codified at 29 U.S.C. §§ 794 and 794d respectively.
- b. 17 U.S.C. § 105.
- c. 44 U.S.C. §§ 103, 501-503.
- d. 38 C.F.R parts 17 and 18.
- e. Federal Acquisition Regulation §§ 8.8, 8.802, 13.003, codified at 48 C.F.R. §§ 8.8, 8.802, 13.003 respectively.
- f. VA Directive 0023, Tier 1 Graphic Standards, dated May 24, 2013.
- g. VA Form 7700, Request for Reproduction Services, dated December 9, 2022.
- h. Department of Veterans Affairs, Office of Survivors Assistance:
<https://www.va.gov/survivors/>.
- i. Department of Veterans Affairs, VA Forms. <https://vaww.va.gov/vaforms/>. **NOTE:** *This is an internal VA website that is not available to the public.*
- j. Department of Veterans Affairs, VA Tier 1 Graphic Standards:
<https://dvagov.sharepoint.com/sites/VACOBBrand/SitePages/Home.aspx>. **NOTE:** *This is an internal VA website that is not available to the public.*
- k. Department of Veterans Affairs, VA Graphics Resource Center:
http://vaww.va.gov/6102/graphics_resource_center.asp. **NOTE:** *This is an internal VA website that is not available to the public.*
- l. Veterans Health Administration, VHA Publications:
<https://www.va.gov/vhapublications/>.

m. Department of Veterans Affairs, Section 508 Office website.
<http://www.section508.va.gov/index.asp>.

n. Veterans Health Administration, VHA Forms and Publications:
<https://vaww.va.gov/vhapublications/publications.cfm?Pub=8%20>. **NOTE:** *This is an internal VA website that is not available to the public.*

o. Executive Order 13589, Promoting Efficient Spending:
<https://obamawhitehouse.archives.gov/the-press-office/2011/11/09/executive-order-13589-promoting-efficient-spending>.

p. General Services Administration Section 508 website: <http://www.section508.gov/>.

q. Joint Committee on Printing, Government Printing and Binding Regulations, 2-1:
<https://www.gpo.gov/fdsys/pkg/GPO-CPUB-101spub9/html/GPO-CPUB-101spub9.htm>.

r. Joint Committee on Printing Form No. 2 (Rev. 3-71), Commercial Printing Report:
<https://www.gpo.gov/docs/default-source/forms-standards-pdf-files/jcp2>.

COMMUNICATIONS OF CONDOLENCE

1. GUIDANCE AND PROCEDURES

a. The voluntary sharing of compassionate sympathy is part of our responsibility to care for those who have served our country, their spouses and dependents. The provision of personalized condolences, whether via card or letter or phone contact is one of the most meaningful acts of kindness a care team or administrator can do for the mourning family. From Department of Veterans Affairs' (VA) nationwide surveys of bereaved family members, one of the most powerful interventions associated with improved satisfaction with care at the end of life has been a phone call from a VA care team member offering condolences and assistance in identifying support as needed.

b. VA employees, as approved by their supervisor, may communicate condolences to the survivor(s) of any Veteran who dies while enrolled in VA care, whether this death occurred while the Veteran was an inpatient or outpatient.

c. Each VA medical facility has the option to personalize and customize their approach to communicating condolences, within the guidelines outlined here.

d. VA employees, at the direction of their supervisor, have discretion on whether to use an established Veterans Health Administration (VHA) condolence card or letter.

e. If using an official VHA card or letter for condolences, whenever possible, the card or letter should be personalized (such as with an original signature).

f. Avoid any evangelizing or comments about religion or spirituality other than those that are known to specifically support the family member's belief system.

g. Formal documentation in the medical record is not required when sending a condolence card or letter.

h. References to accessing survivor benefits (e.g., Telephone 800-827-1000, online at <https://www.va.gov/survivors/> or the provision of a local VA medical facility survivor benefits phone number) may also be provided.

2. SAMPLE CONDOLENCE CARD LANGUAGE

a. Sample condolence card language to consider: "On behalf of our care team and our country, we offer our condolences for your loss."

b. VA employees are not required to, but may wish to include comments as appropriate to:

(1) Acknowledge the loss (e.g., "...on behalf of our team, we are saddened to hear of [Veteran's name] passing",

(2) Express sympathy (e.g., “we offer our condolences on your loss”),

(3) Highlight any special qualities observed in the deceased (e.g., [Veteran’s name] will be remembered fondly for his good humor”),

(4) Reinforce the bereaved family’s strengths (e.g., “you provided excellent support for [Veteran’s name] during his difficult time”) and

(5) If you offer support, be specific about the offer, such as “here is the contact information should you need help in locating a grief support group in your area”.

3. REFERENCES

a. Fast Facts and Concepts #22. Writing a Condolence Letter by Ron Wolfson, PhD and Elizabeth Menkin, MD which can be accessed at www.MyPCNOW.org.

b. Zunin AS and Zunin LM. *The Art of Condolence: What to Write, What to Say, What to Do at a Time of Loss*. New York, NY: Harper Collins; 1991.

**EXCEPTION REQUEST PROCESS FOR COMPLIANCE WITH TIER 1 GRAPHIC
STANDARDS**

1. Ongoing Department-wide review of the graphic standards is conducted by the Department of Veterans Affairs (VA) Office of Procurement, Acquisition and Logistics, Logistic Support Services (OPAL–LSS).
2. Within the Veterans Health Administration (VHA), the use of logos to identify internal sub-divisions is prohibited.
3. Term-limited exceptions to the Tier 1 Graphic Standards for VHA product or program logos are reviewed on a case-by-case basis by VHA Digital Media, VHA Office of Communications, in conjunction with the OPAL–LSS. Requests for exceptions must be submitted at the VA Tier 1 Graphic Standards website, <https://dvagov.sharepoint.com/sites/VACOBBrand>. **NOTE:** *A list of approved exceptions is also maintained at that site. This is an internal VA website that is not available to the public.*
4. Questions from VHA organizations pertaining to VA graphic style may be addressed to VHA Digital Media, VHA Office of Communications at vhadigitalmedia@va.gov.