



**Center for Veterans Enterprise
Procedure
Risk Mitigation - Site Visits**

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Approval

This Procedure titled “Risk Mitigation - Site Visits” is approved effective Feb. 1, 2013.

Team Lead (signature) (print) (date)

QA (signature) (print) (date)

Director, CVE (signature) (print) (date)

Table of Contents

1. Introduction	5
1.1 Purpose	5
1.2 Scope	5
1.3 Roles	5
1.4 Definitions and Acronyms.....	6
1.5 Cancellation, Noncompliance, and Withdrawal.....	9
1.6 References	9
1.8 Revisions	9
2. Process/Procedure (Mapping).....	11
2.1 Entry Criteria.....	11
2.2 Inputs.....	11
2.3 Outputs	13
3. Indicators of Misrepresentation and Potential Fraud; Risk Matrix ...	Error!
Bookmark not defined.	
3.1 Indicators of Misrepresentation and Potential Fraud.....	Error! Bookmark not defined.
4. Procedure (Steps)	14
4.1 Initial Site Visit Random Selection (Complete Action within 2 Days)	14
4.2 Ensure Random Selections Meet Site Visit Criteria (Complete Action in conjunction with Step 4.1)	14
4.3 Initial Site Visit Assignment input via Non-Quality Control (Complete Action within 2 Days)	15
4.4 Credential and Verification Letter for Announced and Unannounced Site Visits	16
Site Visit Examiner Annotation in VCMS.....	17
4.5	17
4.6 Site Visit Examiner Request for Extension to Conduct Site Visit or Return Report	17
4.7 Site Visit or Document Review Report Return and Review (Complete Action within 2 Days).....	18
4.8 Denials and Notice of Proposed Cancellation Letters (Complete Action within 24 hours)	Error! Bookmark not defined.
4.9 Compliance Letter (Complete Action within 7 Days)	Error! Bookmark not defined.
4.10 Expired Companies (Extraordinary Circumstances)	19
4.11 Verification and Validation (Quality Control)	20

4.12 Exit Criteria **Error! Bookmark not defined.**

1. Introduction

1.1 Purpose

- a. Provide guidance in the validation and monitoring of companies throughout the Center for Veterans Enterprise (CVE) verification process to ensure that the companies operate within 38 CFR Part 74, and established program criteria.
- b. Sustain CVE's goal of issuing standardized and accurate verification decisions to the Veteran applicant through further document reviews, and/or on-site examinations.
- c. Provide upfront preventative controls through Site Visits of pre-verified firms to ensure the applicant fully satisfies the program verification and eligibility requirements before approval to participate in the Veterans First program.
- d. Provide robust post-approval compliance and validation framework by identifying non-compliance and misrepresentation to include: (1) examining the ownership and control of applicant companies as part of CVE's verification process, (2) in-depth document reviews, and (3) announced and unannounced on-site visits.
- e. Ensure uniform and regulatory compliant processing of site visits and Site Visit reports (Appendix 10), by CVE personnel, with the resulting report being used as a factor in approval and denial determinations; cancellation and removal actions; referral to the 8127 Debarment and Suspension Committee; and referral to VA OIG for accountability through prosecution and penalty.

1.2 Scope

This CVE process applies to: Site Visit Coordinator, paralegals, administrative staff; Initiation Team; Intake and Examination Team; Evaluation Team; Executive Team; and Site Visit Examiners.

1.3 Roles

Initiation Team: Receive and review initial application to verify that the concern is eligible for the Veterans First program and ensure the submitted application is complete with the required documentation to make a determination.

Examination Team: Three-fold responsibility: (1) Conducts a thorough examination of documents submitted in support of initial applications, (2) Researches related sources in order to verify the concern's eligibility for inclusion in the Veterans First program; (3) Performs intake function for the Request for Reconsideration (R4R) process, by ensuring the application is a valid and complete request for reconsideration before forwarding to the R4R Team lead for processing.

Evaluation Team: Makes a final determination on verification based on the information obtained and evidence presented by the Examination Team. Includes the Request for Reconsideration (R4R) Team.

Executive Team: Action office responsible to ensure senior level management signature on all letters, upload into VIP, and change the status of the concern to verified or denied for eligibility in the Veterans First program. Communicate any management comments, directives, requirements, and assessments.

Risk Mitigation Team (Risk Team): Perform risk assessments and evaluations. In the context of this standard operating procedure, it encompasses the Site Visit Coordinator, Site Visit Paralegal, and Site Visit Administrative Team.

Request for Reconsideration (R4R) Team: The service-disabled Veteran or Veteran small business owner/applicant submits a Request for Reconsideration in response to an initial denial. The request will be considered based on a finding that the applicant did not adhere to the requirements of 38 CFR Part 74.

Site Visit Coordinator: Manage the Site Visit process and establish procedural guidelines; ensure regulatory compliance of applications; approve and issue letters for signature; conduct quality review of at least 10% per month of all work completed by Site Visit Paralegal(s). Make Site Visit assignments to Site Visit Examiners; track status of returned Site Visit reports in process; maintain internal working files; update VIP; select (random and combination risk based) firms for quality control; quality check Examiner reports; and oversees the execution of special projects, reports, and directives from the CVE Director or Deputy Director.

Site Visit Paralegal(s): Perform legal review and assessment of Site Visit reports and make recommendations based on the findings and risk level; prepare the first notice of intent to perform a Site Visit, and second notice acknowledging the concern's initial refusal, failure to comply, respond, or cooperate. Where necessary, prepare the Notice of Proposed Cancellation Letter (Appendix 9), or Acknowledgement of Withdrawal Request letter (Appendix 6), with VCMS/VIP Status Change Request Form (Appendix 7).

Site Visit Administrative Staff: Maintain electronic and hard copies of internal working files for all site visits; update VIP as required; and print decision letters for CVE Director or Deputy Director review and approval.

Site Visit Examiners: Conduct further document reviews and/or on-site examinations of applicants at the firm's office of record and/or contract performance location(s). In order to verify day-to-day management and control, the Examiner may ask questions of the SDV, employees, stakeholders, and Contracting Officer, including but not limited to: who do you liaise with routinely, who do you contact on resolving issues, what are the issues, do you have any documentation that shows how the issue was resolved (to include e-mails), who is the sender, and provide historical information containing past communications with the concern, who is the primary contact at the firm, who is primarily on the site on a day-to-day basis, who calls with issues, who is the project manager, and what percentage of work is being done through subcontractors. **Within 24 hours of conducting the announced or unannounced Site Visit, the Examiner is responsible for confirming in VIP that the SDV company status has not changed since being assigned to conduct the Site Visit. This is intended to avoid conducting Site Visits of companies whose status in VIP has changed, or no longer participates in the program.**

1.4 Definitions and Acronyms

38 CFR Part 74: This regulation defines the requirements for verification as a Veteran-owned small business or a service-disabled Veteran-owned small business. It requires the Department of Veterans Affairs (VA) to verify ownership and control of Veteran owned small businesses (VOSBs), including service-disabled Veteran-owned small businesses (SDVOSBs) in order for these firms to participate in VA acquisitions set-aside for SDVOSB/VOSBs.

Additional or Further Review: Assignment issued as a Document Review and is due within 30 days. However, if during the review of documents it is determined that an on-site visit is

warranted, Site Visit Examiner will request one. CVE will either approve or deny the request. The report is due within 30 days of request.

Announced Site Visit: Site Visit conducted on behalf of CVE of a SDV, with prior notice. Site Visit entails document review, additional or further document review, and on-site examination and evaluation of the concern. Site Visit Examiner reviews may include but is not limited to: financial statements; federal personal and business tax returns; personal history statements; articles of incorporation or organization; corporate bylaws or operating agreements; organizational, annual, and board/member meeting records; stock ledgers and certificates; State-issued Certificates of Good Standing, contract, lease and loan agreements; payroll records; bank account signature cards; licenses; and communications with the contract officer, contract officer representative, and the project manager.

Applicant: Refers to the Veteran owner.

CCR: Central Contractor Registration

Cmte: Committee.

Concern: Refers to the business or firm. Firm and Concern are used interchangeably throughout this guide.

COR: Contracting Officer Representative.

Document Review: An examination report of the concern's documents on hand as well as results from related on-line research; returned to Site Visit Coordinator within 30 days. No on-site examination is conducted.

D&B: Dun & Bradstreet.

Expedited Document Review: A Report which is returned within a 14-day timeframe. No on-site visit is conducted. This is not to be assigned on a routine basis.

Expedited or 14-day Site Visit: This is a rapid turnaround on-site visit with the report due within 14 days. It can be announced or unannounced. This type of report is usually based upon but not limited to fraud or risk indicators. It may also include aged files in the Evaluation Team queue.

IAW: In accordance with.

Notice of Proposed Cancellation Letter (NOPC): A letter that sets forth the specific facts and reasons for CVE's findings, and will notify the participant that it has 30 days from the date it receives the letter to submit a written response to CVE explaining why the proposed ground(s) should not justify cancellation.

OGC: Office of General Counsel.

On-Site Visit or On-Site Examination: These terms are used interchangeably. The on-site visit can be announced or unannounced. There are two parts to this visit: (1) The Examiner performs an initial document review of the concern which is followed by either an announced or unannounced visit to the firm office(s) and contract performance location(s). Announced visits are preceded by a credential letter (Appendix 3), signed and dated by the CVE Director or Deputy Director identifying the contract Examiner, regulatory justification for the Site Visit, and a list of required documents. After which, the Examiner contacts the Service Disabled Veteran (SDV) to schedule the on-Site Visit. For Unannounced on-Site Visits, there is no contact with

the SDV for an unannounced on-site visit. The Examiner proceeds to the office on record and/or the contract performance location without notice. Once on site, the Examiner provides to the SDV identification and the credential letter signed and dated by the CVE Director or Deputy Director. (2) The Examiner conducts a telephonic or in-person interview with the contracting officer to assess whether the verified firm still complies with the Veterans First program after verification.

POC: Point of Contact.

Quality Checks: The process of either randomly or directly selecting companies for review, to ensure they are operating within 38 CFR Part 74 and established program requirements. Quality Checks emphasizes evaluating companies to uncover program noncompliance.

Random: The process for the selection of companies in no specific pattern, but using certain criteria such as Risk rating and business areas highly susceptible to fraud and misrepresentation, for the selection of Site Visits.

Routine or 30-day Site Visit: Site Visits conducted by the Examiner within 30 days of assignment. The applicant receives a credential letter signed and dated by the CVE Director or Deputy Director via e-mail identifying the regulatory authority for and intent of the Site Visit. It is followed by notification from the Site Visit Examiner containing an introduction of the Examiner, a proposed scheduled time for the visit, and a list of required documentation in advance of the scheduled visit. At least 10% of verified concerns will be selected randomly per month to undergo routine Site Visits. A written Site Visit report is due within 30 days of the announced on-site visit.

SDV: Service-disabled Veteran. For the purpose of this guide only, SDV includes non-service-disabled Veterans.

Site Visit Examiner: Individual conducting Site Visits or Document Reviews.

Site Visit report: A written report produced by the Site Visit Examiner to CVE. The examination includes: a review of company documentation, employee interviews, physical observations, etc. It is used to determine whether ownership and control are established. CVE uses report in conjunction with information on file and publicly available information to make verification determination. If a company is found not to be in compliance with 38 CFR Part 74, cancellation procedures will begin. If a company is found to be in compliance, a letter stating such will be forwarded to company within 30 days of receipt of the site visit report. **If a Site Visit report recommends denial, the Site Visit Coordinator will review and process the report and within five days initiate a NOPC as appropriate.**

SOP: Standard Operating Procedure provides process identification and guidance.

Unannounced Site Visit: Site Visit conducted without prior notification to the SDV company. Once on site, the Examiner provides to the SDV identification and the credential letter (Appendix 2), signed and dated by the CVE Director or Deputy Director. The list of required documentation will be provided to the applicant at the time of meeting. At least ten percent (10%) per month of post-verification concerns will be selected based on the risk matrix (see section 3) and sent forward as an unannounced Site Visit to the Site Visit Examiner.

VA OIG: Veterans Affairs Office of the Inspector General.

VIP: Vendor Information Pages.

1.5 Cancellation, Noncompliance, and Withdrawal

If, after receiving two notices and a concern either: (a) refuses to cooperate with the Site Visit request, (b) will not permit an on-Site Visit, or (c) refuses to support a reasonable request of an Examiner in order to determine eligibility, the examination will be considered complete and a determination will be made based on the information previously provided. The first notice, the Credential and Verification letter, will provide the authorization, intent, and governing statute for the request. The second notice, the Acknowledgement of Noncompliance letter (Appendix 4), will acknowledge the concern’s initial refusal, failure to comply, respond or cooperate and reiterate to the concern that its response may result in a change to its eligibility in the Veteran’s First program. The Site Visit Examiner will report the findings and/or results to the Site Visit Administrative Staff who will in turn ensure the Site Visit Paralegal and Coordinator are informed.

The firm has 7 days to respond to the first notice, the Credential and Verification letter, (announced Site Visit); and 24 hours to respond to the initial request for Site Visit. The concern will have 24 hours to respond to the second notice, the Acknowledgment of Noncompliance letter, for both the announced and unannounced. In the event the firm does not change its position after the second notice:

- a. If the company has been verified, the Site Visit Coordinator will send an email to Cancellation Team listing Company and DUNS number to prepare NOPC. . If Cancellation Team indicates areas of fraud are present they will notify the Site Visit Coordinator who will notify CVE VA OIG Liaison for fraud assessment and potential VA OIG referral.
- b. If the company is in the verification process, the Site Visit Coordinator or Paralegal will forward to the Evaluation team for action.

The concern has the option to withdraw from the program at any time. If the concern elects to withdraw from the program, it must do so in writing or withdraw itself through its VIP profile. If the firm withdraws itself in writing, it must make an unambiguous statement of its intent (Appendix 5). Upon receipt of the notification to withdraw, CVE will immediately annotate the concern’s profile, send it an Acknowledgement of Withdrawal Request Letter, and withdraw it from the program.

1.6 References

- 38 CFR Part 74: Veterans Small Business Regulations

1.7 Risk Mitigation Compliance

The purpose of both announced and unannounced Site Visits is to obtain greater effectiveness and consistency in the verification program. To ensure pre and post verification compliance, Site Visits will be conducted as a result of input criteria as outlined in Sections 2.1 Entry Criteria and 2.2 Inputs. Additionally, unannounced Site Visits at contract performance locations and interviews with contracting officials allow CVE to better assess whether verified firms remain in compliance with program requirements.

1.8 Revisions

Revision Number	Date of Issue	Author(s)	Brief Description of Change
1.0	6/25/2012		Initial SOP

Revision Number	Date of Issue	Author(s)	Brief Description of Change
2.0	2/1/2013		Major revision

2. Process/Procedure (Mapping)

2.1 Entry Criteria

Details of Entry Criteria
<ul style="list-style-type: none"> • Application is determined to need additional review (0 - 60 days from Verification start date) (pre-verification) • Application is determined to need a Site Visit as a result of high risk indicators (from Evaluation Team, Quality Control Team, Executive Team, credible source, or random selection)

2.2 Inputs

Input	Detail of Inputs and remarks
Initiation Team	<ul style="list-style-type: none"> • Evaluates verification application package for completeness and accuracy • Moves the application to the Examination queue
Examiner (Examination Team)	<ul style="list-style-type: none"> • Completes the examination portion noting items of concern • Recommends concern for additional review or Site Visit which would be initiated by the Evaluation Team • Moves the application to the Evaluation queue.
Evaluator (Evaluation Team) Simplified Renewal Approval Random Site Visit	<ul style="list-style-type: none"> • Evaluator randomly selects at least 15% of Simplified Renewal applications for announced and unannounced Site Visit • Evaluator randomly selects at least 10% of recently approved companies for announced and unannounced Site Visits • Evaluator determines whether initial or re-verification application is in need of additional review or a Site Visit • Team can request a Site Visit or Document Review, which would then be returned to the Evaluator to complete the verification package • Sends a courtesy e-mail to Site Visit Team requesting Site Visit (includes type (14 or 30 day, announced or unannounced, or Document Review), and specific concerns or questions •
	<ul style="list-style-type: none"> •
Quality Control Team	<ul style="list-style-type: none"> • Reviews Site Visit Process, and deliverables, providing recommendations as required. • E-mail is sent directly to the Site Visit Team for further evaluation. The evaluation will generate a further document review request or 14-day on-Site Visit. • Updates VCMS

Input	Detail of Inputs and remarks
Request for Reconsideration (R4R)	<ul style="list-style-type: none"> • Evaluator determines application is in need of additional review or Site Visit • Sends an e-mail to Site Visit Team requesting Site Visit ((includes type (14 or 30 day, announced or unannounced, or Document Review), and specific concerns or questions (if any)) Updates VCMS
Site Visit Coordinator	<ul style="list-style-type: none"> • Performs assessment based on risk matrix indicators and credible sources, and then refers concern for appropriate level of Site Visit action • Ensures regulatory compliance of applications • Approves and issues letters for signature • Performs quality review of at least 10% per month of all work completed by Site Visit Paralegal(s) • Performs quality review of 10% per month of all unedited reports submitted by Site Visit Examiners • Coordinates federal level review of all decisions •
Site Visit Paralegal	<ul style="list-style-type: none"> • Prepares Credential and Verification letters (first notice of intent to perform a Site Visit) and Acknowledgement of Noncompliance letter (second notice acknowledging the concern's initial refusal, failure to comply, respond or cooperate) • Performs legal review and assessment of Site Visit reports • Makes recommendations based on the findings and risk • Prepares Acknowledgement of Withdrawal Letter and Notice of Proposed Cancellation Letter (NOPC) • Returns report to Site Visit Examiner for further questions or concerns • Prepares Letter of Compliance
Site Visit Administrative Staff	<ul style="list-style-type: none"> • Selects (random and combination risk-based) firms for quality control • Liaise with and makes Site Visit assignments to Site Visit Examiners • Tracks status of returned Site Visit reports • Maintains internal working files • Reviews determination letters prepared by Site Visit Examiners to ensure accuracy • Performs quality review of reports returned by Site Visit Examiner (spelling, DUNS number match, etc.) • Ensures that the report addressed the pre-identified concerns • Returns reports to Site Visit Examiner for further questions or concerns

Input	Detail of Inputs and remarks
Site Visit Examiner	<ul style="list-style-type: none"> • Conducts further document reviews and/or on-site examinations • Interviews SDV, entity employees, contracting officer, contracting officer representative, and the program manager telephonically or in person • Evaluates day-to-day management, ownership, and control to make an eligibility recommendation •

2.3 Outputs

Output	Detail of Outputs and remarks
Approval Letter	<ul style="list-style-type: none"> • Prepared by the applicable team (Evaluation or R4R) • Signed by CVE Director or Deputy • Signed letters are scanned and loaded to VCMS for close out and forwarding to applicant by the Executive Team
Notice of Proposed Cancellation Letter	<ul style="list-style-type: none"> • Prepared by the Site Visit Paralegal • Signed by CVE Director or Deputy • Signed letter scanned and uploaded to VCMS and forwarded to applicant by the Executive Team • Cancellation action is tracked by the Cancellation Coordinator (see Cancellation SOP for additional process information)
Credential and Verification Letter	<ul style="list-style-type: none"> • First notice of intent to perform a Site Visit • Letter signed by CVE Director or Deputy
Acknowledgement of Noncompliance Letter	<ul style="list-style-type: none"> • Second notice acknowledging the concern’s initial refusal, failure to comply, respond or cooperate
Site Visit Report	<ul style="list-style-type: none"> • Prepared and uploaded into VCMS by the Site Visit Examiner • Copies can also be maintained in Control Folders to meet unique document access requirements
Letter of Compliance	<ul style="list-style-type: none"> • After Site Visit report review is complete, and the concern is found to be compliant with 38 CFR Part 74, a Letter of Compliance will be sent • Prepared by Site Visit Paralegal •

Procedure (Steps)

2.4 Initial Site Visit Random Selection (Complete Action within 2 Days)**Option 1: Manually Select Firms through VCMS Search**

- Step 1** Site Visit Administrative Staff will log into VCMS daily.
- Step 2** Perform a VCMS search. Select the “Advanced” search drop down. Select the following: Status “Approved” and Type: “Registration” and “Reverification” Select the appropriate time frame based on site visit criteria, (See Appendix 12). In the company name box, enter each high risk search term category. Hit Search.
- Note:** High risk firms include: Construction, IT, Medical Supply, and Engineering,
- Step 3** Select the “Export to Excel” option.

Option 2: Manually Select Firms From Verification Master List (VMIL)

- Step 1** Access the Verification Master List (VMIL) Spreadsheet from the Executive Team. (via email)
- Step 2** Select companies from the appropriate time frame based on site visit criteria. (See Appendix 12).

2.5 Ensure Random Selections Meet Site Visit Criteria (Complete Action in conjunction with Step 4.1)

- Step 1** Follow the Post-Verification Site Visit Pull Checklist. (Appendix 12). Thoroughly review each VCMS record and control folder to ensure:
- the most recent signed and dated verification letter to ensure site visit is conducted no earlier than six (6) months after initial verification or six (6) months after reverification,
 - review the documents tab to ensure the 0877 and company documentation is up-to-date.
 - ensure the company is not currently undergoing verification activities (i.e., initiation, examination, evaluation, request for reconsideration)
 - Search all spreadsheets on Risk Mitigation Team SharePoint site to determine whether a site visit was performed within 12 months and whether the company is subject to OIG action, status protest, or debarment. All spreadsheets can be accessed through the following link:
<http://vaww.vaco.portal.va.gov/sites/OSDB/OSDBU/risk/Reports/Forms/AllItems.aspx>
 - Collaborate with other CVE teams about issues discovered, where appropriate.

Note: When determining companies for assignment, the Site Visit Administrative Staff will confirm in VCMS and the control folders that the SDV company status is not expected to change within six months from the period of the Site Visit being assigned to the Site Visit being conducted.

- Step 2** Update “Recommended Site Visit” spreadsheet on SharePoint. Include firm name, DUNS number, approval date, and risk level based upon Evaluator’s remarks in VCMS. If there are no Evaluator comments, leave section blank. Indicate that the Site Visit checklist criteria has been met. Send email notification to Site Visit Coordinator including company information for potential site visits. In spreadsheet, annotate date site visits were recommended. Also annotate any pertinent notes about company.
- Step 3** Site Visit Coordinator:
Send e-mail with the firm name(s), DUNS number, and concerns to VA OIG for clearance (ensure Site Visit will not impact an ongoing investigation, inquiry, etc; ascertain if the applicant/concern is of VA OIG interest.)
- Step 4** Forward assignment to Federal Team Lead for approval. Upon approval, Federal Team Lead will forward assignments to Site Visit Examiner via e-mail with the definition (announced vs. unannounced, 14-day vs. 30-day, or document review only); and the firm name(s) and DUNS number and any other information relating to unique issues associated with Site Visit.
Note: Site Visit Examiner chosen based on number of applications currently assigned.
- Step 5** Annotate in VCMS remarks: Assigned to (insert Site Visit Examiner company name) on (00/00/0000) as (Choose one of the following: 14 day expedited on-site examination, 30 day routine on-site examination, Document Review)
- Step 6** Update internal working files with Site Visit Examiner, type of assignment, date assigned, due date, and any remarks from VA OIG.

2.6 Initial Site Visit Assignment input via Non-Quality Control (Complete Action within 2 Days)

- Step 7** Requests sent via e-mail will be logged by the Site Visit Administrative Staff into internal tracking sheet.
- Step 8** For **Recent Approval Random Site Visits**: Site Visit Administrative Staff will select a minimum of 10% of the previous week’s approvals. Review VCMS record for risk level and noted concerns, and Site Visit Coordination spreadsheet to ensure that a site visit has not been performed within 12 months. Approximately half should be assigned as announced and unannounced. Companies with existing contracts will be a priority for site visit. (Appendix 12)
- a. Criteria for High Risk:
 - 1) Information Technology (IT) firm
 - 2) Engineering firm
 - 3) Medical supply firm
 - 4) Construction firm
 - 5) Existing Contracts (large dollar amounts or VA contracts)
 - 6) 51/49 percent ownership
- Step 9** For **Simplified Renewal**: Site Visit Administrative Staff will select a minimum of 15% of the previous week’s simplified renewals. Review VCMS record for risk level and noted concerns, and Site Visit Coordination spreadsheet to ensure that a site visit has not been performed within 12 months. High risk companies and those that have not had a site visit within the last two years are automatically assigned to unannounced site visit. Conversely,

companies with little or no apparent concerns will be assigned as announced based on risk level. Companies with existing contracts will be a priority for site visit. (Appendix 12)

a. Criteria for High Risk:

- 1) Previously verified as a start-up company (this requires some research, may need to read examiner and evaluator notes in 10.3)
- 2) Engineering firm
- 3) Medical supply firm
- 4) Construction firm
- 5) Information Technology (IT) firm

b. Criteria for Moderate-to-High risk:

- 1) Previously verified as a start-up company (this requires some research, may need to read examiner

Step 10 Gather concerns; put Requestor and company's information in the internal tracking sheet. Forward recommendations to Site Visit Coordinator.

Step 11 If applicable, correspond with CVE verification teams to ensure that performing a Site Visit is not duplicative or will not impede active processes

Step 12 Site Visit Coordinator:

Send an e-mail with the firm name(s) and DUNS number for clearance (ensure Site Visit will not impact an ongoing investigation; ascertain if the applicant/concern is of VA OIG interest). Update internal tracking sheet.

Note: *VA OIG special request for action should not cause the concern to exceed any mandated compliance time restraints except under special circumstance (i.e., CVE Leadership requests)*

Step 13 Forward assignment to Federal Team Lead for approval. Upon approval, Federal Team Lead will forward assignments to Site Visit Examiner via e-mail with the definition (announced vs. unannounced, 14-day vs. 30-day, or document review only); and the firm name(s) and DUNS number and any other information relating to unique issues associated with Site Visit.

Note: *Site Visit Examiner chosen based on number of applications currently assigned*

Step 14 Annotate in VCMS remarks: Assigned to *(insert Site Visit Examiner company name)* on *(00/00/0000)* as *(Choose one of the following: 14 day expedited on-site examination, 30 day routine on-site examination, Document Review)*

Step 15 Send an e-mail to the requesting party confirming the date assigned, Site Visit Examiner, and definition (announced vs. unannounced, 14-day vs. 30-day).

Step 16 Update internal working files with Name, DUNS number, Site Visit Examiner, Type of Assignment, Date Assigned, and Due Date. Move from Future Site Visits tab to Site Visits tab.

2.7 Credential and Verification Letter for Announced and Unannounced Site Visits

Step 1 Site Visit Coordinator assigns site visits to Examiners IAW Section(s) 4.2 and 4.3.

- Step 2** Within five business days of receipt of Site Visit assignments, the Examiner sends Site Visit Coordinator an e-mail containing the completed Credential and Verification Letters. Site Visit Coordinator verifies information on the letters (SDV name, company name, DUNS number). Letters must be received no later than COB Wednesday or letters will not be processed until the following Friday.
- Note:** If any information is incorrect, Site Visit Coordinator will notify the Examiner and Examiner will correct letter and return to Site Visit Coordinator.
- Step 3** Site Visit Coordinator receives the letters either hard copy or via email from the Examiner, prints them and provides the documents to the Executive Team for signature by CVE Director or Deputy Director. Signatures will be processed no later than 2 business days. Executive Team returns hard copies to Site Visit Coordinator, who will give the Examiners the signed documents. The Site Visit Coordinator updates internal working files.
- Step 4** Examiner POC's pick up hard copies from CVE and upload signed letters to VCMS within 2 business days of signature.
- Note:** Site Visit Administrative Staff monitors VCMS to ensure that letters are properly loaded into VCMS profile (or control folders in limited circumstances). Updates internal working files.
- Step 5** Examiner sends letters through VCMS e-mail for announced site visits. For unannounced site visits, Examiner hand-delivers letter at time of examination.
- Step 6** Risk Mitigation Team checks Examiner Confirmation Mailbox at least twice daily. Respond to all positive confirmations.
- Note:** If the Examiner is not confirmed, see Risk Team lead for further instructions.

2.8 Site Visit Examiner Annotation in VCMS

- Step 1** Within 24 hours of conducting the announced or unannounced Site Visit, Examiner confirms in VCMS that the SDV company status has not changed since being assigned to conduct the Site Visit.
- Step 2** Examiner annotates VCMS with the following: Name of Examiner to perform Site Visit, date that VCMS file has been reviewed, date that Site Visit is to be performed.
- Step 3** Examiner annotates VCMS with all pre-communications with the SDV or company representative. Upload email communications in pdf format to VCMS.
- Step 4** Upon return of the Site Visit or Document Review report, Examiner annotates in VCMS that the report and all information/documentation gathered within the process of performing the Site Visit is **“privileged and unreleasable.”**
- Note:** See Section 4.6 for complete instructions on returning the report.

2.9 Site Visit Examiner Request for Extension to Conduct Site Visit or Return Report

- Step 1** Site Visit Examiner sends e-mail to the Site Visit Coordinator requesting an extension to perform the on-site examination or Document Review. E-mail contains the Company Name and DUNS number and the specific reasons for delay.
- Step 2** Site Visit Examiner contacts the Requestor to confirm whether an extension is acceptable.

- Step 3** Extensions are granted for up to an additional 7 days for 14 day Site Visits, and up to an additional 14 days for 30-day Site Visits or Document Reviews.
- Step 4** Site Visit Coordinator updates Requestor, VCMS, and internal working files.

2.10 Site Visit or Document Review Report Return and Review (Complete Action within 2 Days)

- Step 1** Site Visit Examiner returns Site Visit/Document Review report and draft letter (if applicable) in an e-mail addressed to the COR, Site Visit Coordinator, Site Visit Paralegal, Site Visit Administrative Staff, and Evaluation Team Lead (if Evaluation Team requested the Site Visit). Site Visit Administrative Staff will annotate in VCMS that Site Visit Report was received. Within 24 hours of receiving a recommend denial, the Site Visit Coordinator will send email listing company and DUNS number to Cancellation Team for processing of NOPC. Follow up with Cancellation Team after 30 days to determine when letter was sent and close out file.
- Step 2** Site Visit Examiner uploads Site Visit report and any additional relevant documents into VIP under “Document Review” tab, section 10.3. If Site Visit Examiner is unable to upload report and additional documents because of company type issue, Site Visit Coordinator will confirm company type, notify Federal Lead to notify IT staff. Once IT issue has been resolved, Site Visit Coordinator will notify Site Visit Examiner that upload can proceed.
- Note: Examiner annotates that the Site Visit report and all information and documentation gathered within the process of performing the Site Visit is privileged and unreleasable.*
- Step 3** Site Visit Examiner returns all hard copies of documentation to CVE immediately, and process materials per QA Team’s handling procedures.
- Step 4** Site Visit Administrative Staff:
- Confirm report and all supporting documentation is in VCMS
- Step 5** Site Visit Paralegal:
- If report is an approval, and Site Visit Coordinator agrees with findings, return report (and draft approval letter, if any, to Requestor*. Site Visit Coordinator will send an “In-Compliance” letter (Appendix 10) to the Veteran within two weeks of processing Site Visit report.
- Note: *this only applies to the Evaluation Team.*
- Step 6** Site Visit Coordinator:
- Assigns review by the following priority ranking criteria:
 - Recommendations for denial/cancellation
 - Reason for recommendation of denial/cancellation: Control first, Ownership second
 - Length of time remaining on verification period: Longest first
 - Review Site Visit or Document Review report for ownership, control, and undue influence to determine applicant’s eligibility as provided for by 38 CFR part 74: Veterans Small Business Regulations.
 - Make notes on irregularities and/or questionable items found in report
 - Different address on multiple websites (CCR & VIP)
 - Different fax or phone numbers throughout public profiles (CCR & VIP)

- 3) Previous Verification applications (VCMS)
 - 4) Ownership changes (CCR & VIP)
 - 5) Inconsistent public information (CCR & DSBS)
 - 6) Non-Veterans listed as POCs on public websites (CCR, DSBS, VIP)
 - 7) Mention of fraud or misrepresentation
 - 8) Applicant's request for withdrawal before or during the Site Visit
- d. If questions or issues arise in the report or during additional research, contact the Site Visit Examiner POC by e-mail for clarification.
- Copy the following:
1. Site Visit Coordinator
 2. Site Visit Paralegal Lead
 3. VA OIG Liaison
 4. Status Protest and Debarment Liaison
 5. COR
 6. Federal Team Lead
- e. If the Site Visit Examiner's recommendation for approval is accepted, continue to Step 4.9
- f. If a disagreement arises in recommendation, contact the Site Visit Examiner POC to discuss findings:
- 1) If a recommendation is overturned to reflect a negative recommendation, follow Step 1 above.
 - 2) If a recommendation is overturned to reflect an approval, draft approval letter (if applicable) and continue to Step 4 (i) below
- g. Complete Federal Review Fraud Checklist (Appendix 8). This is only completed where the report is a recommended

2.11 Expired Companies that had an on-site examination (Extraordinary Circumstances)

Step 1 Federal Team member will place a call to applicant.

Step 2 Determine if applicant is still interested in participating in the VetBiz Program.

Step 3 If no, tell applicant to send an e-mail to: to confirm they no longer wish to be considered. Explain to them a letter will also be forthcoming with detailed instruction on how to affirmatively disengage from the process.

Step 4 If yes, explain a letter will be forthcoming with detailed instructions on how to re-apply for the verifications process.

Step 5 Send Veteran the letter (see Appendix 13)

2.11 Verification and Validation (Quality Control)

<p>Sample at least 10% of Simplified Renewal applications monthly</p>	<ul style="list-style-type: none"> • Send to unannounced Site Visit • Review Site Visit report • Note concerns to Evaluation Team
<p>Sample at least 10% of Site Visit Examiner reports (pre-and post-edit) monthly</p>	<ul style="list-style-type: none"> • Review reports to ensure concerns, items of interest were addressed • Review reports for accuracy in interpretation and application of 38 CFR Part 74 • Review Business Documents • Review Site Visit Report • Conduct Additional Research • Review report for errors (pre-edited) • Review report to ensure Site Visit Examiner made 100% contact with contract officer, contract officer representative, and project manager
<p>Sample at least 20% of verified concerns monthly (combination risk-based and random selection)</p>	<ul style="list-style-type: none"> • Send to unannounced Site Visit • Review Site Visit report • Conduct additional research as required • Conduct cancellation procedures if required

Appendices

Appendix 1 –

Appendix 2 – Sample Credential Letter – Unannounced

Appendix 3 – Sample Credential Letter – Announced

Appendix 4 – Sample Acknowledgement of Noncompliance letter

**Appendix 5 – Sample Affirmative Statement Requesting
Withdrawal Letter**

**Appendix 6 – Sample Acknowledgement of Withdrawal Request
Letter**

Appendix 7 –

Appendix 8 –

Appendix 9 – Sample Notice of Proposed Cancellation Letter

Appendix 10 – Sample In - Compliance Lettter

**Appendix
11 – Sample Site Visit Report**

Appendix 12 – Post-Verification Site Visit Pull Checklist

Appendix 3 – Sample Credential Letter – Announced



DEPARTMENT OF VETERANS AFFAIRS
Center for Veterans Enterprise
Washington, DC 20420

Reply Refer To: OOVE

Mr./Ms. First Name, Middle Initial, Last Name
Company Name
Duns XXX XXX XXX
Address
City, State and Zip Code

Dear Mr./Ms. Last Name:

Please be advised that **Company Name** has been selected for an on-site examination. You will be contacted via e-mail, telephone, or letter to introduce the Center for Veterans Enterprise's designated on-site examiner. The examiner is authorized to conduct this site visit on behalf of the U.S. Department of Veterans Affairs. If you elect to refuse the site visit, refuse to cooperate, or if within seven (7) days after contact by the examiner, fail to acknowledge this request for an on-site examination, CVE will use the documentation **Company Name** previously provided to CVE, coupled with the information on hand to make a determination of **Company Name's** eligibility for verification as a **Veteran-owned or service-disabled Veteran-owned small business.**

As provided under 38 CFR § 74.28, "[p]ersonnel from the Department of Veterans Affairs, Center for Veterans Enterprise (CVE) and its agents, including personnel from the Small Business Administration, may examine records to ascertain the ownership and control of the applicant or participant." In accordance with this authority, CVE will be assigning an examiner, as identified by his or her Department of Veterans Affairs identification badge, to examine certain records related to the verification of **Company Name** as part of this process.

In accordance with 38 CFR § 74.20(a), "[a] verification examination is an investigation by CVE officials, which verifies the accuracy of any statement or information provided as part of the VetBiz VIP Verification application process. Thus, examiners may verify that the concern currently meets the eligibility requirements, and that it met such requirements at the time of its application or its most recent size recertification. An examination may be conducted on a random basis, or upon receipt of specific and credible information alleging that a participant no longer meets eligibility requirements."

"CVE may conduct the examination, or parts of the program examination, at one or all of the participant's offices. CVE will determine the location of the examination. Examiners may review any information related to the concern's eligibility requirements including, but not limited to, documentation related to the legal structure, ownership and control of the concern." (Emphasis added).

World Class Professionals Protecting the Veteran Advantage, One Veteran at a Time!

Appendix 4 – Sample Acknowledgement of Noncompliance letter

Mr./Ms. First Name, Middle Initial, Last Name

Company Name

Duns XXX XXX XXX

Address

City, State and Zip Code

Dear Mr./Ms. Last Name:

This letter serves as an official notification that **Company Name** has not complied with the U.S. Department of Veterans Affairs (VA), Center for Veterans Enterprise (CVE) request for a site visit examination. Please contact CVE within **24 hours** of your receipt of this letter to assist with rescheduling a site visit examination. Absent your response to schedule the site visit, CVE will evaluate **Company Name** based upon records maintained by CVE and publicly available information. If warranted, CVE may then initiate cancellation procedures of Company's "verified" status, pursuant to 38 CFR §§ 74.21(c)(6), (d), and 74.22.

Please call **Examiner's** phone number **(XXX) XXX-XXXX** or send the response to the following

Sincerely,

Examiner Name

Title

Center for Veterans Enterprise

Appendix 5 – Sample of Affirmative Statement Requesting Withdrawal Letter

Mr./Ms. First Name, Middle Initial, Last Name

Company Name

Duns XXX XXX XXX

Address

City, State and Zip Code

Dear Mr./Ms. Last Name:

Thank you for your [e-mail/letter] dated XXXXXX. Please provide an affirmative statement indicating that Company Name requests to be withdrawn. Upon receipt of the affirmative statement, requesting to be withdrawn from the VIP database, Company Name will be removed from VIP. If you do not respond in writing by DATE (2 business days), CVE will remove Company Name from VIP based upon the [e-mail/letter] dated XXXXXX.

Sincerely,

Examiner Name

Title

Center for Veterans Enterprise

Appendix 6 – Sample of Acknowledgement of Withdrawal Request Letter

Mr./Ms. First Name, Middle Initial, Last Name

Company Name

Duns XXX XXX XXX

Address

City, State and Zip Code

Dear Mr./Ms. Last Name:

On behalf of the U.S. Department of Veterans Affairs (VA), the Center for Veterans Enterprise (CVE), I am writing this letter in response to the Letter of Withdrawal from **Company Name**, a Service Disabled Veteran-Owned Small Business (SDVOSB), dated **XXXXXX**. CVE hereby acknowledges the Letter of Withdrawal. **Company Name** will no longer be eligible to participate in Veterans First Contracting Program opportunities with the VA.

As a part of the reverification process, CVE contacted **Mr./Ms. Last Name** to schedule an announced site examination of **Company Name** on **Date XXXXXX**. At that time, **Mr./Ms. Last Name** directed the CVE examiner that **Company Name** is no longer in operation and as of **date XXXXXX**, **Mr./Ms. Last Name** began employment at **New Employer's Company Name** in a **identify new** role. In addition, **Mr./Ms. Last Name** submitted a written Letter of Withdrawal on **date XXXXXX** from the SDVOSB verification process.

38 CFR § 74.20 vests authority in CVE to investigate and examine any information related to the concern's eligibility on a random or unannounced basis. Pursuant to 38 CFR § 74.21(c)(7), CVE may cancel the 'verified' status button for good cause . . . includ[ing] cessation of the participant's business operations. Based upon **Mr./Ms. Last Name's** statement that **Company Name** is no longer in operation and Letter of Withdrawal **dated XXXXXX**, CVE hereby withdraws **Company Name's** eligibility for the VetBiz Program and Veterans First Contracting Program opportunities with the VA.

Sincerely,

Director
Center for Veterans Enterprise

Appendix 9 – Sample Notice of Proposed Cancellation Letter

Mr. / Ms. Veteran
ABC Company
DUNS #
123 Main Street
Anywhere, USA 12345

Dear Mr. / Ms. Veteran:

On behalf of the U.S. Department of Veterans Affairs (VA), Center for Veterans Enterprise (CVE), I am writing to inform **Company Name** that based upon the following information, CVE is sending this Notice of Proposed Cancellation of your verified status and registration in the VetBiz Vendor information pages (VIP) database.

Findings

ABC Company VIP profile lists the business as a service-disabled Veteran-owned small business (SDVOSB), and VA Form 0877 Verification Application submitted lists you as an owner of **ABC Company**. CVE has confirmed that you have valid service-disabled Veteran status from VA; however, CVE is unable to conclude that **ABC Company** satisfies the requirements set forth in 38 CFR Part 74.

In order for a business to be included in the VA VetBiz VIP Verification Program as a SDVOSB, the company must be at least 51% unconditionally and directly owned by one or more service-disabled Veterans. 38 CFR § 74.3. In addition, the company must be controlled and managed by one or more service-disabled Veterans. Control means both overall control of the company and management of the daily business operations. An applicant's management and daily business operations must be conducted by one or more service-disabled Veterans. 38 CFR § 74.4. Based on the information provided, your company does not meet these requirements. The examination that led to this conclusion follows:

[List findings and reasons for cancellation.]

Conclusion

Pursuant to 38 CFR § 74.22(a), this letter serves as official notification that **ABC Company** verified status as a SDVOSB is being considered for cancellation. **ABC Company** has 30 days from receipt of this notice to provide sufficient evidence to CVE refuting the information identified and explaining why the proposed ground(s) should not justify cancellation.

According to 38 CFR § 74.22(b), “[f]ollowing the 30-day response period, the Director, CVE, will consider any information submitted by the participant. Upon determining that cancellation is not warranted, the Director, CVE, will notify the participant in writing. If cancellation appears warranted, the Director, CVE, will make a decision whether to cancel the participant’s verified status.” In addition, 38 CFR § 74.22(c) states that, “[u]pon deciding that cancellation is warranted, the Director, CVE, will issue a Notice of Verified Status Cancellation. The Notice will set forth the specific facts and reasons for the decision, and will advise the concern that it may re-apply after it has met all eligibility criteria.” 38 CFR § 74.22(d) further reads, that “[a]fter the effective date of cancellation, a participant is no longer eligible to appear as “verified” in the VetBiz VIP database ...” CVE shall then remove the firm from the VetBiz VIP database in accordance with 38 CFR Part 74.

Please be advised that once your response is received, CVE will adjudicate your cancellation paper work as quickly as possible.

Sincerely,

Director
Center for Veterans Enterprise

Appendix 12 – Post-Verification Site Visit Pull Checklist

Post-Verification Site Visit Pull Checklist

Company:

DUNS:

Date Pulled:

Date Assigned:

RANDOMLY SELECTED QUALITY CONTROL SITE VISITS

<p>1. Company <u>MUST</u> be currently verified. Confirm with the signed and dated verification letter. If the letter cannot be located, ask Risk Team Supervisors. (If Supervisors still cannot locate the letter, the Federal lead will check the Quality Assurance (QA) Team’s Verification Master List and notify the QA Team Lead)</p>	
<p>2. Company <u>MUST NOT</u> be within 6 months of re-verification or expiration. This means do not use the company if today’s date is equal to or more than 1 year and 6 months after the last verified date</p>	
<p>3. Company <u>MUST NOT</u> be within 12 months of the last verified date. This means do not use the company if today’s date is 12 months or less than the last verified date</p>	
<p>4. Company <u>MUST</u> have a current 0877 in VCMS/VIP (with exceptions, see Risk Team lead for questions)</p>	
<p>5. Company <u>MUST NOT</u> be in the process of ongoing verification activities (i.e., initiation, examination, evaluation, R4R)</p>	
<p>6. Company <u>MUST NOT</u> be the subject of an open OIG investigation, status protest, or debarment (see spreadsheets, this information will not be in VCMS)</p>	
<p>7. Company <u>MUST NOT</u> have had a site visit within the last 12 months</p>	

SIMPLIFIED RENEWAL SITE VISITS

1. Company <u>MUST</u> be currently verified. Confirm with the signed and dated verification letter	
2. Company <u>MUST NOT</u> be the subject of an open OIG investigation, status protest, or debarment (see spreadsheets, this information will not be in VCMS)	
3. Company <u>MUST NOT</u> have had a site visit within the last 12 months	

NEWLY APPROVED SITE VISITS

1. Company <u>MUST</u> be currently verified. Confirm with the signed and dated verification letter	
2. Company <u>MUST NOT</u> be the subject of an open OIG investigation, status protest, or debarment (see spreadsheets, this information will not be in VCMS)	
3. Company <u>MUST NOT</u> have had a site visit within the last 12 months	