ENTERPRISE DIRECTIVES MANAGEMENT (EDM)

- 1. REASON FOR ISSUE: To revise the Department of Veterans Affairs (VA) Directives Management policy issued February 26, 2009 and incorporate a number of substantial changes designed to improve the EDM process.
- 2. SUMMARY OF CONTENTS/MAJOR CHANGES: This directive revises the policy and responsibilities for managing and making available VA enterprise directives, handbooks and notices under the VA EDM. This Directive:
 - a. Changes the title from "Directives Management" to "Enterprise Directives Management (EDM)." The title was changed to distinguish between those policies that are applicable Department-wide from those that are only applicable within a VA Administration or Staff Office.
 - b. Codifies the change of responsibility of Enterprise Directives Management from the Office of Information and Technology (OIT) to the Office of Enterprise Integration (OEI). The change of responsibility was directed by the VA Chief of Staff in a memo signed January 18, 2017.
 - c. Refines the roles and responsibilities of all VA Central Office (VACO) components to ensure compliance with this directive and the implementation procedures and processes found in Handbook 0999.
 - d. Changes the functional number of the Directive and Handbook from 6330 to 0999. OEI is part of the General Management and Administration functional number group (0000-0999). The number of the directive and handbook were changed to reflect OEI as the responsible office.
 - e. Adds a requirement for all concurrences on EDM documents to be no more than 12 months old. Concurrences over 12 months old will need to be re-staffed with applicable offices for comment.
 - f. Defines terms for substantive and non-substantive changes to EDM policy documents. Changes to enterprise policy documents were separated into substantive and non-substantive to shorten the EDM process for enterprise policy documents that only need minor changes.
 - g. Adds a requirement for OEI to review enacted legislation to determine the need for new policy or revision of current policy.
 - h. Adds a requirement for EDM document originators to assess their enterprise policy documents to ensure each policy is current and consistent with other enterprise policy documents.

- i. Requires OEI to measure cycle times for EDM policy documents in accordance with the process and standards contained in VA Handbook 0999, and issue monthly reports to OEI leadership on EDM performance. EDM cycle times need to be measured to ensure that the EDM process is functioning effectively and efficiently.
- j. Requires OEI's Enterprise Directive Management Officer to communicate new or updated enterprise policies to Directives Management Officers for each Administration and Staff Office through VA's correspondence system within 7 working days of the policy's publication on VA's publication website (<u>VA</u> <u>Publications Intranet Site</u>). This will ensure uniformity and completeness in the availability of enterprise policies across the Department.
- k. Ensures all EDM documents are compliant with Section 508 of the Rehabilitation Act (29 U.S.C. §794(d)), (<u>VA Section 508 Office</u>.) are in accordance with Office of the Executive Secretariat Correspondence Manual, and use Ariel 12 font.
- **3. RESPONSIBLE OFFICE:** Office of Enterprise Integration (008).
- **4. RELATED HANDBOOK:** VA Handbook 0999, Enterprise Directives Management (EDM) Procedures.
- **5. RESCISSION:** VA Directive 6330, Directives Management, dated February 26, 2009.

CERTIFIED BY:

BY THE DIRECTION OF THE SECRETARY OF VETERANS AFFAIRS:

/s/ Melissa S. Glynn, Ph.D. Assistant Secretary for Enterprise Integration

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ENTERPRISE DIRECTIVES MANAGEMENT SYSTEM (EDM)

1. PURPOSE. This directive provides Enterprise (Department-wide) policy for VA's Enterprise Directives Management (EDM).

2. POLICY.

- a. EDM is the official process by which VA issues enterprise policy documents. The scope of EDM does not include internal policy documents for an Administration or a Staff Office. VA financial and acquisition directives are based on specific government-wide policies and regulations so these directives are not subjected to the EDM process and procedures. These policy documents will be accessible through the EDM web portal via web links.
- b. EDM does not affect the authority of any official to issue policy or regulations. It governs the process and procedures that are used to issue enterprise policy documents to ensure uniformity and completeness in the promulgation and availability of enterprise policies across the Department. Procedures for implementing the policies put forth in this directive are found in <u>VA Handbook</u> 0999, Enterprise Directives Management Procedures.
- c. EDM covers three types of policy documents:
 - (1) **Directive** prescribes permanent or interim mandatory enterprise policies. The length of a directive shall be limited as appropriate to succinctly emphasize and convey the intent of policy. However, if it makes sense from the directive originator's perspective, short procedures (4 pages or less) may be included as an appendix to the directive. A permanent directive must be reviewed and recertified within five (5) years of issuance to ensure the policy is current and consistent with other enterprise directives. An interim directive is temporarily issued to meet an emergent need while a permanent directive is being developed. An interim directive shall expire a year or less from the date of issuance, after which the directive shall be rescinded or replaced by a permanent directive.
 - (2) **Handbook** accompanies a directive to prescribe mandatory Department procedures or operational requirements for implementing the policy requirements in the directive. A handbook can be designated as permanent or interim. A handbook is authorized in a corresponding directive without text length limitation to ensure the policy requirements in the corresponding directive can be implemented consistently and effectively. A permanent handbook must be recertified within five (5) years of issuance to ensure it reflects current procedures and is consistent with other enterprise directives and handbooks. An interim handbook shall have the same expiration date that matches the expiration date of the directive authorizing the handbook.

- (3) Notice is used to announce temporary or permanent changes in a VA directive or a handbook due to changes in law, regulation, Federal policies, or internal VA decisions or guidance. A notice will carry a rescission date of no more than 12 months.
- d. Electronic and signed, original, paper copies of EDM directives, handbooks, and notices are permanent records. While active, electronic records are maintained by OEI. Original paper and rescinded EDM documents are maintained by OIT Enterprise Records Service in accordance with National Archive and Records Administration (NARA) requirements.
- e. There are three types of changes to revisions/updates of existing EDM policy documents as follows:
 - (1) Substantive Change. A directive or handbook requiring major content changes is required to go through the complete EDM process involving the review, concurrence, certification, and publication phases. Criteria for substantive change are based on the effect to at least one or more of the following: legal and programmatic impact, implementation cost, and policy impact to VA staff and/or Veterans.
 - (2) Non-Substantive Change. A directive or handbook requiring changes but does not meet the criteria for 'Substantive Change' will go through an abbreviated EDM process involving the review, concurrence, and certification phases. Examples include changes to the title of a responsible office or technical or grammatical changes that do not change the originally intended meaning. For non-substantive change, the directive or handbook originator must provide OEI a list of all updates or changes to validate the revisions meet the non-substantive change criteria.
 - (3) Limited Applicability. When the scope of a directive or handbook is limited to a specific topic or area, the directive or handbook does not require a complete agency-wide review. For example, a Human Resources (HR) Handbook that applies to pay schedule for title 38 employees will only require review and concurrence from HR, Veterans Health Administration, OEI, Labor Management Relations, and the Office of the General Counsel. Questions related to the Limited Applicability determination can be addressed by the OEI Directives Management Officer before a directive or handbook originator initiates the review and concurrence process.
- f. Originator of new or updated directive/handbook with substantive changes must initiate a request for formal review and concurrence in the VA correspondence management system. Originators shall provide VA Administration and Staff Offices the opportunity to comment and concur.
- g. All concurrences on EDM directives and handbooks must be received within 30 calendar days of the assignment date to ensure EDM policies can be

implemented in a timely manner. Requests for extension must be made to the Enterprise Directive Management Officer within 30 days of assignment. Extension requests will be considered on a case-by-case basis.

- h. Concurrences on EDM directives and handbooks must be less than 12 months old. Documents with concurrences older than 12 months will need to be re-coordinated with the applicable Administration or Staff Office.
- i. All newly enacted legislation shall be reviewed by OEI to determine the potential need for creating new EDM policy documents and/or updating existing EDM policy documents to address the requirements of the newly enacted legislation.
- j. EDM policy documents that contain categories of information described in the <u>Freedom of Information Act of 1966 (FOIA), 5 USC 552(a)(1)</u> must be published in the Federal Register for public notice when issued, revised, or repealed.
- k. Required identification, numbering, format and procedures for EDM directives, handbooks, and notices are detailed in VA Handbook 0999, Enterprise Directives Management System Procedures.
- Administrations and Staff Offices shall use the EDM identification, numbering, format and procedures found in VA Handbook 0999, Enterprise Directives Management System Procedures for policies internal to their respective organizations, e.g., an Administration policy that only applies within a single Administration. This is to ensure appropriate alignment and integration between EDM policies and those internal to the Administrations or Staff Offices to include their field activities where appropriate.
- m. All EDM policy documents shall be approved and signed in accordance with VA Handbook 0999, Enterprise Directives Management System Procedures.
- All EDM policy documents shall be available to VA employees via an electronic repository. The repository shall also provide links to non-EDM VA policy documents to provide employees the ability to find all VA policies in one location.

3. **RESPONSIBILITIES.**

- a. Secretary of Veterans Affairs. The Secretary or designee shall:
 - (1) Issue an EDM document when:
 - (a) There is a change in VA's basic mission, objectives, or policies;
 - (b) The document is used as a mechanism for delegating the Secretary's authority; or

- (c) The policies or procedures govern benefits, rights, or responsibilities of Veterans, their beneficiaries, VA employees, VA contractors or members of the public.
- b. The Assistant Secretary for Enterprise Integration (AS/OEI). The AS/OEI shall:
 - (1) Disseminate effective Enterprise Directive Management (EDM) policy for the Department.
 - (2) Certify EDM policy documents. Certification signifies a directive, handbook, or notice is an authoritative VA policy that meets the EDM policy requirements, and has been reviewed and concurred by all appropriate VA organizational elements.
 - (3) Review newly enacted legislation and support the Administrations and Staff Offices in identifying the need for new EDM policy documents and/or updating current EDM policy documents.
 - (4) Designate an Enterprise Directives Management Officer (EDMO) to oversee the day-to-day operation and maintenance of the EDM.
- c. Enterprise Directives Management Officer (EDMO). The EDMO shall:
 - (1) Serve as the Assistant Secretary's principal advisor for Enterprise Directives Management (EDM) matters.
 - (2) Advise and assist Under Secretaries, Assistant Secretaries, and Other Key Officials in the preparation of EDM policies, and provide necessary training in EDM usage and management.
 - (3) Conduct day-to-day operations of the EDM program, to include assisting staff with training, advice, and compliance with this Directive.
 - (4) Review new and updated EDM policy documents for compliance with this directive and VA Handbook 0999, Enterprise Directives Management (EDM) Procedures.
 - (5) Verify EDM policy documents submitted for certification are in compliance with Section 508 of the Rehabilitation Act (29 U.S.C. §794(d). (<u>VA Section</u> <u>508 Office</u>.) are in accordance with Office of the Executive Secretariat Correspondence Manual, and use Ariel 12 font.
 - (6) Issue changes to VA Directive 0999 and VA Handbook 0999 as appropriate to effectively and efficiently manage the EDM.

- (7) Conduct ongoing performance management reviews to ensure the EDM is functioning effectively and efficiently, and report status periodically to VA senior leadership.
- (8) Maintain and publish an inventory of EDM documents via an electronic repository. The repository shall also provide links to key non-EDM VA policy documents to provide employees the ability to rapidly search VA, Administration, and key Staff Office policy documents. <u>VA Publications</u> <u>Intranet Site</u>.
- (9) Ensure new or updated enterprise policy is communicated to the Directives Management Officer(s) (DMO) for each Administration and Staff Office through VA's correspondence system within 7 working days of the policy's publication on VA's publication website (<u>VA Publications Intranet Site</u>).
- d. Under Secretaries, Assistant Secretaries, and Other Key Officials. Under Secretaries, Assistant Secretaries, and Other Key Officials shall:
 - (1) Comply with this directive and implement procedures and processes found in VA Handbook 0999 in the generation, review, and concurrence of all EDM policy documents.
 - (2) For non-EDM policy documents under their jurisdiction (including field facilities, where appropriate), utilize the functional numbering system detailed in VA Handbook 0999 to ensure consistency, traceability, and integration between EDM policy documents and Administration, Staff Office and Other Key Office internal policy documents.
 - (3) Designate one or more Directives Management Officer(s) (DMO) as necessary to manage the EDM policy document generation, concurrence, approval, and certification processes (for which a particular office is the originator) and concurrence process (for which a particular office is not the originator) internally within their organization in accordance with the provisions of VA Handbook 0999.
 - (4) Review and update or rescind all active EDM policy documents for which they are responsible prior to the 5-year expiration dates. Review will ensure EDM policy is current and consistent with other enterprise policy documents. Interim directives and handbooks must be either converted to permanent or rescinded within 1 year.
 - (5) Ensure all EDM documents for which they are the originator are compliant with Section 508 of the Rehabilitation Act (29 U.S.C. §794(d)) (<u>VA Section</u> <u>508 Office</u>.), are in accordance with Office of the Executive Secretariat Correspondence Manual, and use Ariel 12 font.

- e. Directives Management Officer(s) (DMO). Directives Management Officers shall:
 - (1) Serve as the principal advisor to their Assistant Secretary, Under Secretary, or Other Key Official on Directives Management matters.
 - (2) Assist staff with preparation, concurrence, or rescission of EDM documents.
 - (3) Serve as focal point for their Administration or Staff Office on EDM matters, providing recommendations to the EDMO for improvements in process, procedures, and training.
- 4. ASSESSMENT. Through the "Performance Management" sub-process detailed in VA Handbook 0999, OEI will measure cycle times for EDM policy documents in accordance with the process and standards contained in VA Handbook 0999, and issue monthly reports to OEI senior leadership on EDM performance.

5. REFERENCES.

- a. 36 CFR, Chapter XII, Subchapter B, Pt 1222, National Archives and Records Administration, Records Management, Creation and Maintenance of Federal Records. (<u>Disposition of Federal Records</u>.)
- b. Section 508 of the Rehabilitation Act (29 U.S.C. §794(d)) (<u>VA Section 508</u> <u>Office</u>.)
- c. Freedom of Information Act of 1966 (FOIA), 5 USC 552(a)(1)
- d. Office of the Executive Secretariat Correspondence Manual, <u>Executive</u> <u>Secretariat Correspondence Manual Table of Contents.</u>
- e. VA Handbook 0999, Enterprise Directives Management (EDM) Procedures.