

## PRINTING AND REPRODUCTION MANAGEMENT

**1. REASON FOR ISSUE:** This Veterans Health Administration (VHA) directive establishes policy, responsibilities, and requirements for the procurement of printing, binding, reproduction, and related services provided by the Department of Veterans Affairs (VA), Government Publishing Office (GPO), or external vendors.

**2. SUMMARY OF MAJOR CHANGES:** This Veterans Health Administration (VHA) directive incorporates VHA Handbook 1118.01 and [identifies authority and appropriations for the printing and mailing of condolence cards from VHA treatment teams or other employees to the survivors of deceased Veteran patients.

**3. RELATED ISSUES:** VA Directive 7003, pending publication.

**4. RESPONSIBLE OFFICE:** The Office of Regulatory and Administrative Affairs (10B4) is responsible for the content of this directive. Questions may be referred to 202-461-6050.

**5. RESCISSIONS:** VHA Handbook 1118.01 and VHA Handbook 1118, both dated November 25, 2015, are rescinded.

**6. RECERTIFICATION:** This VHA directive is scheduled for recertification on or before the last working day of January 2022. This VHA directive will continue to serve as national VHA policy until it is recertified or rescinded.

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Under Secretary for Health

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## PRINTING AND REPRODUCTION MANAGEMENT

### 1. PURPOSE

This Veterans Health Administration (VHA) directive establishes policy, responsibilities, and requirements for the procurement of printing, binding, reproduction, and related services provided by the Department of Veterans Affairs (VA), Government Publishing Office (GPO), or external vendors. It establishes this policy and these responsibilities and requirements to ensure compliance with printing laws and regulations, and to ensure design printing and reproduction services are competitively priced. **AUTHORITY:** 44 U.S.C.

### 2. BACKGROUND

a. As authorized by Title 44, United States Code (U.S.C.), the 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 Government Publishing Office nearest to the facility (see Appendix C). Unless there is authority under a specific exception (see below, paragraph 6 i and j), VA is not authorized to purchase, use, or own any equipment designated for printing press or plant purposes.

b. The Joint Committee on Printing, a Congressional joint committee authorized by 44 U.S.C. to ensure effective and efficient printing throughout the Federal government, 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 the GPO and the JCP. Failure to comply with 44 U.S.C. is a violation of Federal law and is punishable by fines, imprisonment, and/or removal from Federal service.

### 3. 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 and/or high volume laser or inkjet printers.

c. **Director, Government Publishing Office.** The GPO Director is responsible for the administration of the GPO. The GPO, a legislative agency of the government, provides electronic access to, and produces most printed matter for government,

including the Congressional Record, Supreme Court decisions, passports, tax forms, internal government documents, and agency publications.

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

e. **Field Based Publication Control Officer liaison.** The field based PCO (FPCO) is a liaison between a VA medical facility and the VHA PCO, as designated by the medical facility director. The FPCO coordinates the facility's printing and reproduction activities.

f. **Government Publishing Office Regional Printing Procurement Office.** Government Publishing Office Regional Printing Procurement Office (GPO-RPPO) means any office established by the Director of the Government Publishing Office; in accordance, with the Joint Committee on Printing's authorization, which shall procure Federal printing needs which are determined to be commercially procurable.

g. **Printing.** The term printing includes and applies to 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. **Publication Control Officer.** A VHA Publication Control Officer (PCO) is an individual who has a responsibility to assist in the administrative management and procurement of forms and publications for VHA Central Office.

i. **Rider.** A rider is an announced order where Agencies, Departments, Administrations and other Federal offices are offered the opportunity to "ride" an authorized order through the Government Publishing Office. Riding an order allows the other government offices to purchase the item at a discounted rate. This is only procured by the VHA Central Office PCO.

j. **Section 504.** Section 504 refers to section 504 of the Rehabilitation Act of 1973, which states that "no otherwise qualified individual with a disability in the United States 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 may include brailled or large print versions of materials, electronic diskettes, audiotapes/ audio files, qualified interpreters or readers, telecommunications devices for deaf persons (TDDs), 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.

k. **Section 508.** Section 508 refers to section 508 of the Rehabilitation Act of 1973, which 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.

l. **Therapeutic Printing Plant.** A therapeutic printing plant has printing and binding equipment authorized for use by VA medical facility Directors with approval from the Secretary of Veterans Affairs for the sole purpose of occupational therapy.

m. **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.

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

#### 4. POLICY

It is VHA policy to comply with applicable GPO and JCP standards for printing and reproduction management, and applicable federal, VA and GPO standards for acquisition and procurement of printing and reproduction services, as referenced in this directive.

#### 5. RESPONSIBILITIES

a. **Under Secretary for Health.** The Under Secretary for Health is responsible for:

- (1) Ensuring VHA compliance with VA Directive 7003.
- (2) Ensuring VHA compliance with this Directive.
- (3) Designating a VHA Publication Control Officer (VHA PCO).

b. **Deputy Under Secretary for Health for Operations and Management.** The Deputy Under Secretary for Health for Operations and Management (10N), or designee, is responsible for:

- (1) Ensuring that any instances of non-compliance by VHA field facilities with this directive or 44 U.S.C. are addressed and resolved.

(2) Communication and reporting of any requested information to the VHA PCO by PCO liaisons based at VA Medical Facilities or VISN offices (“VA Field Based PCO liaisons,” or FPCOs).

c. **VHA Publication Control Officer.** The VHA PCO is responsible for:

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

(2) Facilitating communications between Hines Service and Distribution Center (SDC) and VHACO program offices to ensure adequate stock of print materials.

(3) Facilitating communications between VACO program offices and equivalent offices, VA medical facilities, and VA Publication Services Division to facilitate compliance with sections 504 and 508 of the Rehabilitation Act of 1973, as amended, translation requirements, and printing and design services through appropriate VA and VHA offices.

(4) Maintaining an accurate list of FPCO liaisons.

(5) Coordinating the collection of reporting of requirements, as required. **NOTE:** See below, paragraph 9.

(6) Maintaining the VHA Forms and Publication Web site and Archives (see <http://vaww.va.gov/vhapublications/publications.cfm?Pub=2> and <http://vaww.vhaco.va.gov/pubarchives/>). **NOTE:** These internal VA Web sites are not available to the public.

d. **VHA Central Office Chief Officers and Equivalent Directors.** VHA Central Office Chief Officers and equivalent Directors are responsible for the development of printing material and:

(1) 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.

(2) Ensuring the material has been properly coordinated with interested officials and obtain the necessary approvals.

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

(4) Ensuring the development of all materials is in conformance with VA printing policies and with this directive.

(5) Designating a VHA program office based PCO (POPCO) liaison to coordinate printing and reproduction issues under the jurisdiction of the Chief Officer, or equivalent

Director, and providing the name, telephone number, and email address to the VHA PCO.

e. **VA Office of Logistics and Supply Chain Management; and Office of Logistics Support.** The responsibilities of the VA Office of Logistics and Supply Chain Management (003A3), and Office of Logistics Support (003A3B), or designees, are defined in VA Directive 7003.

f. **VA Publications Service.** The VA Publications Service, as stated in the VA Financial Policies and Procedures Obligations Policy, Appendix 3, Printing Obligations, is responsible for:

- (1) Supporting VA printing programs and functions;
- (2) Providing advice and guidance to all VA Publication Control Officers (PCO) on the creation, printing and storage of printed materials;
- (3) Serving as VA's liaison to the JCP, GPO and the Interagency Council on Printing;
- (4) Developing policies and other guidance necessary for VA to comply with Federal printing laws and regulations.

g. **VHA Veteran Integrated Service Network Director.** Each Veteran Integrated Service Network (VISN) Director, or designee, is responsible for:

- (1) Ensuring that VISN printing and duplication processes, as well as those facilities under their jurisdiction, are compliant with all statutes, regulations, and VA and VHA policy.
- (2) Issuing any supplemental VISN instructions necessary to carry out this directive.

h. **Medical Facility Director.** Each medical facility Director, or designee, is responsible for:

- (1) Establishing local printing and duplication processes that are compliant with applicable statutes, regulations, VA and VHA policy.
- (2) Issuing any supplemental facility instructions necessary to carry out this directive.
- (3) Designating a FPCO liaison that is responsible for coordinating the printing and reproduction within their facility.
- (4) Providing the name of the designated FPCO liaison to the VHA PCO, and ensuring that any change to the designation is reported to the VHA PCO.
- (5) Ensuring the FPCO liaison:
  - (a) Maintains an appropriate supply of forms and publications for the medical facility.

(b) Communicates with the local GPO-RPPO for the procurement of any printing or reproduction services outside the Director's authority (see below, paragraph 6.i.).

(c) Coordinates the reporting of information as required by the VHA PCO. **NOTE:** See below, paragraph 8.b.

## 6. REQUIREMENTS

a. **Use of Government Publishing Office.** All printing, binding, duplication, CD/DVD publishing and blank-book work for VHA will be procured through the GPO or through the GPO-RPPO (see Appendix B), unless one of the following specific exceptions apply:

(1) The printing is authorized under paragraphs 6.i. or 6.j. of this directive;

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

(3) The printing is not of a continuing or repetitive nature, ***and as certified by the Director, Government Publishing Office***, if the printing is included in a class of work that cannot be provided more economically through GPO or a GPO-RPPO; or

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

b. **Appropriated Funds for Printing.**

(1) Funds appropriated may 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.

(2) 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. 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 CFR 17.38. (See Appendix D for guidance.)

(3) 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 7.b.

c. **VA Medical Facility Printing (Printing outside the Washington DC Metropolitan Area)**. All VA medical facilities must submit their external printing requirements to their Regional GPO Printing Procurement Offices, with the exception of GPO Riders, or except as permitted in paragraph 6.i. of this Directive. The GPO-RPPO will determine the area of bid competition, considering all factors, including lead-time and transportation costs.

d. **Washington, DC Metropolitan Area Printing**. VHA program offices and VA medical facilities in the Washington, DC Metropolitan Area must submit their printing requirements in excess of thresholds in paragraph 6.i. to the Office of Acquisition and Logistics (OAL) Publication Services Division (003A3B2) for processing, using VA Form 7700, Requests for Reproduction Services. **NOTE:** *This includes VA Central Offices, and the Baltimore and Washington, DC VA Medical Centers.* Each program office and medical facility is responsible for all costs associated with printing, restocking, and distribution of materials, except by direction of the Under Secretary for Health, or designee. Each 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. All printing must be compliant with all VA and VHA policy and guidance and should be executed where most economical or in the better interest of the government.

e. **Digital Distribution and Local Printing**. 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, see paragraph 6.i. of this directive. This distribution allows printing to be on demand, reduces printing and distribution surcharges, and provides medical facilities greater flexibility as communication is increasingly utilizing digital media. An Information Bulletin (IB) number must be obtained from the VHA PCO and placed on the document consistent with VA and VHA policy and guidance, see paragraph 8.h. of this directive.

f. **Commercial Printing Services**. Use of local commercial contracting for printing services is prohibited by Federal law (FAR Section 8.802 defines GPO as a mandatory source for all federal printing). There are no exceptions to the law without a written waiver from the JCP or the Public Printer, see paragraph 6.h. of this directive. If an exception is necessitated by an atypical emergency requirement, VHA program offices or VA medical facilities must submit a request for a waiver to use commercial printing services to the VHA PCO and VA Publication Services for submission. VA Publication Services will request a waiver from GPO through the Secretary of VA's office on behalf of the service. The Public Printer, head of GPO, located in Washington, DC 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; VA is not aware of any waiver ever being granted. At no time should a VA employee directly procure printing from a commercial printing service (e.g., Kinkos, UPrint, Office Depot) without the involvement of GPO or a GPO-RPPO.

g. **Procuring Printing from Commercial Printing Services via Credit Card.** The procurement of printing from commercial sources with a government credit card, unless coordinated through the GPO (e.g., GPO Express), is a violation of 44 U.S.C., GPO, and VA policy. All credit card purchases for printing procurement must be compliant with all statutes, regulations and VA and GPO policy. There are no exceptions to the law without a written waiver from the JCP or the Director, GPO, see paragraph 6.h of this directive. If an exception is necessitated by an atypical emergency requirement, VHA program offices or VA medical facilities must submit a request for a waiver to use commercial printing services to the VHA PCO and VA Publications Service for submission. 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; VA is not aware of any waiver ever being granted. At no time should a VA employee directly procure printing from a commercial printing service (e.g., Kinkos, UPrint, Office Depot) without the involvement of GPO.

h. **Procurement Limits for Commercial Printing.** 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 the Government Publishing Office. Splitting up a purchase to remain under the single purchase threshold is a violation of Federal Acquisition Regulation (FAR) 13.003(c)(2)(ii). 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.** VA medical facilities are authorized to operate copy/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 shall not exceed 25,000 copies per job in aggregate of multiple pages (a page or production unit is defined as 11 by 17 inches or less; for larger page sizes, please consult the JCP Government Printing and Binding Regulations.) 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); it is illegal for VA medical facilities to purchase digital or traditional printing presses for their facility and should direct these printing requirements to their local GPO Regional Office.

j. **Therapeutic Printing Plant.** VA medical facilities may use printing and binding equipment, with limitations, for the sole purpose of patient treatment as prescribed by a physician, if the printing plant is authorized by the Secretary of Veterans Affairs. Each VA medical facility operating a therapeutic printing plant must notify the VHA PCO and VA's Office of Publication Services Division by the close of the fiscal year of their operation for reporting to JCP/GPO. No printers or reproduction personnel may be employed in these plants. Therapeutic Printing Plants at selected VA medical facilities are the only Joint Committee on Printing authorized exception and their scope is limited by 44 U.S.C. 503.

k. **Printing Requirements in Contracts.** It is a violation of Federal Acquisition Regulations (FAR Subpart 8.8) to include printing in contracts outside of the GPO unless certain conditions have been met. Contracts and grants will not include printing requirements leading to an obligation of funds without specific approval in advance by the Director, GPO. Consistent with VA policy, the Chief, Publication Services (003A3B2), will advise and assist in the submission of approval request to the Director, GPO when appropriate. This does not preclude the procurement of writing, editing, preparation of manuscript copy, or preparation of related illustrative material as part of contracts; or administrative printing, e.g., forms and instructional materials necessary to be used by the contractor or submission of working copies within reasonable numbers for leadership and to use as documentation when final printing is submitted to GPO or a GPO-RPPO.

l. **Printing by Private Publishers of Material Created by Appropriated Funds.** When appropriated funds are used to create information for publication, the printing and binding of that information is subject to the provisions of sections 103 and 501 of 44 U.S.C., and it shall not be made available to a private publisher for initial publication without the prior approval of the Joint Committee on Printing. The Chief, Publication Services Division (003A3B2), will advise and assist in the application of this requirement and request prior authority of the Joint Committee on Printing, when appropriate.

m. **Paper and Envelopes for Government Agencies in the District of Columbia.** All paper, including copier paper, and envelope orders placed within the District of Columbia must be procured through the Government Publishing Office by VA Publication Services (003A3B2). Paper and Envelopes may not be procured in any other manner.

n. **Printing Requirements from Grants.** A grant for the sole purpose of printing is prohibited unless authorized by the Joint Committee on Printing.

## 7. 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. Additionally, 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. Facility Directors must develop local procedures to determine the appropriate use of business cards. Information about content and specific design elements for business cards can be found in Tier 1 Graphics Standards.

b. **Cards.** The printing or engraving of calling or greeting cards is prohibited. Such printing is considered personal rather than official and shall not be done at government expense.

c. **Color Printing.** The Joint Committee on Printing 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 shall contribute demonstrable value toward achieving a greater fulfillment of the ultimate end-purpose of whatever printed item in which it is included. Stationary are 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 shall be ordered through the General Services Administration. 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 the Joint Committee on Printing.

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 or for strictly administrative or operational purposes which have no public interest or educational value and publications classified for reasons of national security, shall be made available to depository libraries for public information; if they are produced or procured through other than GPO sources to VA Publications Service (003A3B2) and VHA Office of Regulatory and Administrative Affairs (10B4). 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 may be accomplished only after approval by the Joint Committee on Printing. Addresses and telephone numbers should be omitted in order to allow greater distribution and prevent the creation of unusable stocks frequently caused by changes. Personalized second sheets will not be produced or procured at government expense.

## 8. 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 Title 38 Code of Federal Regulations (CFR) part 18.

These regulations state that no qualified handicapped person shall, on the basis of handicap, 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 office to ensure that all publications are compliant with Section 504.

b. **Section 508 Compliance.** All published documents (including graphics) must comply with and be accessible in accordance with current requirements/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 Section 508 website <http://www.section508.gov/>. In addition, VHA's Section 508 Program Office provides additional information and guidance at <http://www.section508.va.gov/index.asp>.

c. **The VA Graphic Standards Guide, Tier 1 Graphic Standards, Directive 0023,** 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 Appendix A. Clip art is not appropriate at any time, see VA Directive 0023.

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

(1) **Low-vision.** Authors should ensure that all publications are accessible to Veterans with low vision and for older adults. Publications should 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. Guidance can be found at:

(a) Print Media: <http://www.aph.org/accessible-media-guidelines/>.

(b) Print

Media: [http://www.textmatters.com/resources/pdfs/visImpd\\_typogTM.pdf](http://www.textmatters.com/resources/pdfs/visImpd_typogTM.pdf). **NOTE:** This linked document is outside VA control and may or may not be conformant with Section 508 of the Americans with Disabilities Act.

(c) Print Media: <http://odi.dwp.gov.uk/inclusive-communications/channels/publishing.php>.

(d) Digital Media: <http://www.nlm.nih.gov/pubs/checklist.pdf>. **NOTE:** This linked document is outside VA control and may or may not be conformant with Section 508 of the Americans with Disabilities Act.

(2) **Languages Other than English.** Authors should 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.** Nearly a quarter of the adult population has low literacy skills. Studies related to VA's Veteran Focused Internet Redesign Project recommend a 7th grade reading level for VA Web sites; this directive extends that recommendation to all publications. Microsoft Word and other programs offer readability-scoring features that can evaluate text complexity by grade level.

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](http://vaww.va.gov/6102/graphics_resource_center.asp). NOTE: This is an internal VA Web site which is not accessible 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, shall 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 shall be subordinate in size to that of both text and legends for illustrations. When all materials have come from a single nongovernmental source, credit lines shall be given only in an un-displayed paragraph (i.e., 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 in order that the public is not misled. Privately copyrighted notices shall be subordinate in size of type to that of both text and legends for illustrations. A work of the United States Government, as defined by United States 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, such works are not entitled to domestic copyright protection under United States (U.S.) law.

(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 Publications Control Officer concerned will ensure that a copyright release has been obtained and will be filed and maintained in the history file pertaining to the publication.

h. **Publications, Identification of.** All documents and publications printed at Government expense shall have printed thereon 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 should 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 shall not be printed unless the signature is removed or sufficiently reduced in size. Signatures of technical illustrators, designers, typographers, or layout artists shall not be printed.

j. **Publication Bylines.** The printing of Government employees' bylines in Government publications shall 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 shall be printed in exact juxtaposition with the articles or pictures which they have created.

k. **Publication Mastheads.** The printed mastheads of government publications shall 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 shall 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 the Joint Committee on Printing.

## 9. REPORTING REQUIREMENTS

a. A report listing individual prints or duplication jobs by title, quantity (pages and copies), date, and where done, which exceed either 5,000 or 25,000 reproduction units will be forwarded from the VA medical facility to the VHA Publication Control Officer (10B4), not later than 15 calendar days after completion of the job at [VHA CO 10B4 Actions](#). All reports will then be submitted to VA Publications Service (003A3B2) for reporting to GPO (see VA Directive 7003).

b. **Joint Committee on Printing, Form Number 2 (Commercial Printing Report).** JCP Form Number 2, (Commercial Printing Report) covers all transactions concerning composition, printing, binding, and blank-book work, which are procured direct from commercial sources. VHA program offices or VA medical facilities must submit JCP Form Number 2 (see Appendix B) to VHA PCO (10B4) at [VHA CO 10B4 Actions](#). This report is due on a semiannual basis within 30 calendar days after the close of the reporting periods covered by October through March and April through September. Negative reports are not required.

c. **Annual listing of Authorized Therapeutic Printing Plants.** VA medical facilities with an authorized Therapeutic Printing Plan will notify the VHA Publication Control Officer at [VHA CO 10B4 Actions](#), within 20 workdays after the close of the fiscal year. A combined report identifying the location of all authorized Therapeutic Printing Plants will be prepared for submission to the Joint Committee on Printing, Government

Publishing Office on JCP Form No. 1 (see Appendix A) by VA Publications Service (003A3B2).

**10. REFERENCES**

- a. Public Law 102-392.
- b. 31 U.S.C. 1350.
- c. 44 U.S.C.
- d. Federal Acquisition Regulation (FAR) 8.802 (b). Acquisition of Printing and Related Supplies.
- e. Government Printing and Binding Regulations of the Joint Committee on Printing, 2-1. <https://www.gpo.gov/fdsys/pkg/GPO-CPUB-101spub9/html/GPO-CPUB-101spub9.htm>.
- f. Veterans Affairs Acquisition Regulation (VAAR) 808.801, Acquisition of Printing and Related Supplies. <https://www.va.gov/oal/library/vaar/vaar808.asp>.
- g. GPO Printing Procurement Regulations (GPO Publication 305.3).
- h. VA Directive 0023, Tier 1 Graphic Standards.
- i. VA Directive 7003.
- j. VA Handbook 7002/1, Logistics Management Procedures.
- k. VA Financial Policies and Procedures Obligations Policy, Appendix 3, Printing Obligations. [D 1118 Printing and Reproduction Management RPO to formal draftNov30.docx](#).
- l. GPO Contract Terms (GPO Publication 310.2).
- m. Tier 1: Graphic Standards. [http://www.va.gov/opa/publications/graphicstandards/va\\_graphicstandardsguide\\_508\\_0113.pdf](http://www.va.gov/opa/publications/graphicstandards/va_graphicstandardsguide_508_0113.pdf),

January 12, 2017

VHA DIRECTIVE 1118  
APPENDIX A

### PRINTING PLANT REPORT FORM

Joint Committee on Printing (JCP) Form No.1 (rev. 3-71) is available at <http://www.gpo.gov/pdfs/customers/sfas/jcp1.pdf>. **NOTE:** *This linked document is outside of VA control and may or may not be conformant with Section 508 of the Americans with Disabilities Act.*

January 12, 2017

VHA DIRECTIVE 1118  
APPENDIX B

### COMMERCIAL PRINTING REPORT FORM

Joint Committee on Printing (JCP) Form No. 2 (Rev. 3-71) is available at <http://www.gpo.gov/pdfs/customers/sfas/jcp2.pdf>. **NOTE:** *This linked document is outside of VA control and may or may not be conformant with Section 508 of the Americans with Disabilities Act.*

January 12, 2017

VHA DIRECTIVE 1118  
APPENDIX C

**GOVERNMENT PUBLISHING OFFICE REGIONAL PRINTING AND PROCUREMENT  
OFFICES**

The Government Publishing Office (GPO) Regional Printing and Procurement Offices are listed at <http://www.gpo.gov/customers/offices.htm>. **NOTE:** *This linked document is outside of VA control and may or may not be conformant with Section 508 of the Americans with Disabilities Act.*

## 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, and 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.

(1) Each facility has the option to personalize and customize their approach to communicating condolences, within the guidelines outlined here.

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

(3) 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).

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

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

(6) References to accessing survivor benefits (e.g., Telephone 800-827-1000, online at [www.va.gov/survivors](http://www.va.gov/survivors) or the provision of a local VA 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 you 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](http://www.MyPCNOW.org). **NOTE:** *This linked document is outside VA control and may or may not be conformant with Section 508 of the Americans with Disabilities Act.*

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.