Veterans Administration
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Chapter 4

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1. Transmitted is revised Chapter 4, "VA Public Affairs Policy" (formerly titled "VA Information Policy"), Part I, VA Manual MP-1, "General Administrative."

2. This transmittal encompasses a complete revision of the subject chapter which was last extensively changed in 1974. A variety of practical, nondirective reference materials has since evolved within the VA to supplant the limited treatment of many topics in the chapter. Aside from necessary organizational and editorial changes, the new chapter responds to the increased importance, awareness and visibility within the VA of public affairs matters, particularly as they relate to aspects of organizational and individual performance. The text of this revision mainly clarifies VA policy guidance for media liaison procedures, broadens guidelines applicable to media activity by VA personnel, provides objectives to be sought with internal communications activities, and establishes a formal level of protocol review for Agency ceremonies.

3. **Filing Instructions**

Remove pages	Insert pages
4-i through 4-16	4-i through 4-12

4. **RESCISSIONS:** MP-1, part I, chapter 4, dated March 4, 1974, and changes 1, 2, and 3.

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CHAPTER 4. VA PUBLIC AFFAIRS POLICY

1. PURPOSE

a. Overview

(1) The VA is a vast, complex and dynamic organization that is viewed from many different perspectives that are constantly changing and evolving. An enlightened approach to public affairs provides for sensing and responding to the needs, views, and attitudes of individuals and organizations who affect and are affected by the VA mission.

(2) The primary philosophy of agency public affairs programs is to facilitate the VA's mission and goals by ensuring that the VA communicates with its various publics responsively, clearly and consistently. Such a process should provide descriptions of Agency policy and fact in an honest and forthright manner that minimizes confusion and broadens both individual and public understanding.

(3) The purpose of this chapter is to provide agency-wide policy guidance and authority for the establishment and execution of public affairs programs and practices within the VA. These policies are intended to ensure consistency and sound rationales for the many and varied communication activities and opportunities that are regularly encountered throughout the Agency.

b. Scope

(1) This chapter describes the basis for a public affairs program within the VA, the organization that supports such a program, and how that program is to be executed. These policies are intended to promote open and productive communication between and among the Agency's constituencies and publics. The chapter also provides a policy framework to guide managers and others responsible for public affairs planning and response.

(2) Because the nature of many public affairs practices requires maximum latitude and flexibility, this chapter addresses a limited number of specific instructions and detailed procedures. A variety of other VA resources exist to assist Agency managers and public affairs practitioners in the creative application of an overall philosophy that supports communication of the VA mission.

(3) Although the release or providing of information is a fundamental component of most public affairs activities, this chapter does not circumscribe or replace the various referenced statutes and regulations that provide detailed prohibitions or authorities for specific situations or types of information.

2. AGENCY PUBLIC AFFAIRS ORGANIZATION

a. Overview

(1) Primary authority for establishing VA public affairs policy and program objectives rests with the Administrator of Veterans Affairs. Interpretation and goal definition of these objectives will be provided by the Associate Deputy Administrator for Public Affairs (ADA/PA). The Agency's operating departments execute the bulk of facility-level public affairs initiatives with the support and guidance of the Office of Public Affairs (OPA), which also engages in active execution of many national activities.

(2) Positive and active public affairs programs can and should exist at all Agency organizational levels. Management responsibility is outlined in subparagraph c, which follows, and assumes a consistent level of coordination, guidance and liaison with public affairs elements within the Agency.

(3) Because the Agency is supported by the taxpayer, part of the VA mission is to account for its performance to the public. Despite certain limitations, VA public affairs program objectives provide a framework for the active delivery of information to serve the dual purposes of VA's responsibility to its beneficiaries and its accountability to the American public.

b. Program Components

(1) Public affairs programs generally consist of three functional areas, the implementation of which varies with the level of organizational responsibility involved. Each of these areas — external communications, internal communications, and community relations — seeks to establish and maintain reliable and accurate representations of Agency services and organizational performance in ways that are understood by and relevant to the target audience(s).

(2) The evolution of activities in these functional areas should be preceded by initial analyses and statements of overall communications objectives defined in reasonably narrow terms. The stated objectives must be both realistic and attainable. They may be implemented through specific activities, processes and procedures in one or more of the functional areas. Assessment and review of the results achieved are essential in guiding future public affairs program implementation.

c. Management Responsibilities

(1) Each level of Agency management — no matter how small or large — is considered to have public affairs responsibilities. This principle envisions management's awareness of the need to properly include public requirements, expectations and consequences in the conduct of its operations and in the process of decisionmaking.

(2) As organizational structures increase in size and scope, public affairs activities will generally require more attention. For practical purposes, designated individuals or organizational elements may be assigned to oversee public affairs practices as they relate to larger and more complex units of the Agency.

(3) Nevertheless, the ultimate responsibility for public affairs rests with the individual VA manager. It is the policy of the VA to view overall management performance not only in the context of mission-based results, but also in the condition of the public affairs environment that is established and nurtured by managers themselves.

(4) It is a further policy of the VA that public affairs program components communicate and reflect the full racial, ethnic and sexual diversity of the VA's beneficiaries and workforce. Public affairs activities and communications products must be sensitive to and consistent with Agency nondiscrimination policies. Managers will ensure that adequate safeguards exist to avoid either deliberately or inadvertently offending, alienating or slighting any group or individual.

d. Structure

(1) Central Office

(a) **Associate Deputy Administrator for Public Affairs.** Agencywide public affairs policy and oversight are provided under the direction of the ADA/PA who reports and is accountable to the Administrator and immediate staff. As the Agency's chief public affairs official, the ADA/PA supports and is responsible for a variety of communications activities that are implemented at Central Office and in the field. The ADA/PA also directs the activities of the OPA, a discrete staff office function within the VA's overall organizational structure.

(b) **Office of Public Affairs.** OPA provides full-time professional support for the implementation of national VA public affairs policy from Central Office and through its regional structure which links OPA to field public affairs activities.

1. **Central Office Staff.** OPA's Central Office mission includes direct responsibility for communicating VA's overall systemwide performance to the broadest possible array of publics and interests. It serves as the Agency's principal liaison with national media, coordinates field support of public affairs initiatives, provides central direction to public affairs training and education, produces VA-wide communications media for employees and other interests, and engages in other centrally directed public affairs special activities.

2. **Field Staff.** OPA's regional structure is designed to provide direct liaison with VA field activities and with news media in the implementation of centrally directed public affairs initiatives. Regional OPAs support field activity public affairs responsibilities by serving as consultants, providing guidance and training, and producing information materials.

(c) **Department and Staff Office Directors.** Management responsibility for the Agency's operating departments and staff offices includes an understanding and the support of overall Agency public affairs objectives and commitment to facility and suborganizational involvement in public affairs initiatives.

1. **Department Public Affairs Officers.** The organization of each of the VA's three operating departments provides for staffing a public affairs office reporting directly to the department head. These offices mainly provide specialized public affairs services that are unique to the departments' operating missions. Among these are providing direct public affairs counsel and advice in the formulation of department policy, management of the department's internal communications media, and identifying and implementing public affairs initiatives. These offices also function in direct liaison with OPA to coordinate overall Agency policy, to provide a consistent flow of information concerning department issues and developments, and to ensure that media response is timely and accurate.

2. **Central Office Public Affairs Coordinators.** Each Central Office staff office and/or discrete management entity will designate a public affairs coordinator (PAC). This collateral duty function monitors the organization's activities for its public affairs significance and communications potential. The PAC will also ensure that suitable subject matter experts are identified for the media response requirements of OPA.

(2) Field Facilities

(a) **Management Responsibility.** The principal managment official of each VA field activity is directly responsible for its public affairs performance. Liaison and support resources are available through regional OPAs to assist management in implementing and responding to public affairs situations.

(b) **Facility Public Affairs Officers.** It is the Agency's policy that each facility clearly define its public affairs responsibilities and that associated duties be assigned to a staff member designated as public affairs officer (PAO). PAOs shall be chosen for the work in terms of skills, aptitudes, prior experience and exposure to public affairs training. Directors will ensure that facility PAOs also have regular contact with facility management and participate in discussions of operational and sensitive issues.

3. INFORMATION POLICY

a. It is the express public affairs policy of the VA, at all levels and in all facilities, to promote, assist and support both the flow of, and access to, information that will serve to communicate an understanding of the Agency's mission and the services the VA provides.

b. Except where statutes or regulations limit disclosure; (e.g., Privacy Act (PA) (5 U.S.C. 552a), Confidentiality of Certain Medical Records (38 U.S.C. 4132), Confidentiality of Medical Records Quality Assurance (38 U.S.C. 3305), Confidential Nature of Claims (38 U.S.C. 3301)), the Agency shall, willingly and without requiring justification or written submission, release to any individual or organization that requests it, routinely available information which is customarily furnished to the public.

c. The Agency's policy will be to minimize, to the greatest extent possible, the time and procedures necessary to respond to requests for information.

(1) Requests which can be responded to orally by reference to readily accessible sources such as publications and statistical summaries will be promptly and courteously answered.

(2) Except for the purposes delineated by express direction in VA policy manuals, regulations, circulars and other directive materials, the VA will not require or impose a necessity to submit routine requests in writing.

d. Written Freedom of Information Act (FOIA) requests submitted by media representatives and organizations will be appropriately handled by the Agency FOIA/PA officer or the designated organizational FOI/PA Officer for each department, office of Associate Deputy Administrator, staff office or field facility. In addition, a copy of the request and a copy of the VA response to the request will be provided to the nearest OPA activity. The OPA will also receive timely notification of FOIA appeals to initial Agency determinations and appeal decisions issued by the Administrator.

e. All VA installations are expected to develop and institute centralized procedures to coordinate their public affairs activities and to ensure consistent and appropriate liaison with media and other activities and individuals.

4. PRACTICAL GUIDELINES

a. **Guideline Sources Within OPA.** Because the actual implementation of public affairs practices frequently involves unique and unpredictable circumstances, it is not feasible to incorporate detailed guidelines within an Agency policy manual. A variety of mechanisms effected by OPA are intended to provide practical guidance for the appropriate conduct of public affairs practices and for resolving related issues within the context of overall Agency policy.

(1) **Reference Resources.** OPA publishes non directive materials that provide specific instructions to be applied in many public affairs activity areas; e.g., "VA Public Affairs Handbook" and "Meeting the Media." These and other publications offer suggestions, provide technical advice, and incorporate proven methods for the most prevalent and commonly experienced public affairs situations. Subjects such as news release preparation, speakers bureau management, broadcast interview techniques, and principles of photography are among the many topics addressed in these publications.

(2) **Newsletters.** OPA regional offices will publish a periodic newsletter that identifies specific facility public affairs activities and insights that may be applicable elsewhere. This medium will also provide current guidelines on matters of topical interest. OPA newsletters will frequently be sources of policy direction and program guidance for public affairs initiatives.

(3) **Counsel and Advice.** A principal resource within the entire OPA structure that is available to all organizational levels is access to public affairs counsel and advice. VA facility management is encouraged to establish and maintain a frequent level of contact with a designated regional public affairs office. Candid exchanges of information concerning developments, issues and problems provide valuable advantages in decisionmaking and help

broaden information sharing activities that benefit the Agency at large.

(4) **Training.** The OPA mission involves the creation and presentation of training programs on various aspects of the Agency's public affairs environment. OPA will provide periodic programs emphasizing current VA issues and contemporary public affairs policies and practices as they relate to the VA mission and organization. Other sources for individual public affairs education and training are available through normal Agency training and development channels.

(5) **Periodic Informational Materials.** OPA will develop, publish and distribute materials that provide examples of media treatment of VA issues and subjects.

b. **Photography in VA Facilities.** Public affairs photography is defined for this chapter as the use of equipment for still and motion pictures and video recordings and the subsequent publication, broadcast or other public release of these images. Public affairs circumstances may include the intention to use VA-produced photography in internal or mass media, and access to VA facilities by news or other information gathering organizations. The main criterion in the collection and use of photographic material for public affairs purposes is to ensure that there is no invasion of personal privacy. This may be determined by the circumstances and environment that surround the individual(s) being photographed, or by obtaining a waiver sufficient to obviate invasion of privacy claims. In addition to outright exclusion from photography, privacy considerations may also be addressed by ensuring that individuals are not identifiable even though they may otherwise be visible.

(1) **Employees.** As a general rule, photography of Agency employees in the course of their normal official duties, whether by the Agency or outside organizations, does not require a written consent. By the public nature of most Agency environments or by the implied consent of the employee participating in and cooperating with the photographic activity, further formalizing or documentation should not be necessary.

(2) **Patients, Beneficiaries, and Other Agency Clientele.** Members of the public who present themselves within VA facilities for service or treatment by the Agency have a right to expect reasonable personal privacy. Individuals who are confined to bed or who are otherwise unable to move or communicate, must be appropriately protected in the absence of their expressed written consent.

(a) Persons involved or participating in VA diagnostic or treatment programs for narcotics addiction, substance abuse, sickle cell anemia or human immunodeficiency virus; e.g., AIDS patients, may be photographed so as to be identifiable with consent obtained only under the following circumstances.

1. If the consent is to be effective, the circumstances involved and the ramifications of being identified in the media as having one or more of the four mentioned conditions should be fully explained to the person before obtaining written consent.

2. Each person involved must then provide the VA medical treating facility with prior written consent that permits disclosure to a third party; e.g., news media representative, of personal identification and the condition being treated.

3. A second, separate written consent must be signed that permits redisclosure of identifying information to the public; e.g., via newspaper, television, etc.

4. The VA official in charge of the treatment program involved must explicitly agree that these disclosures will benefit the person involved and will not cause substantial harm to the relationship between the person and the treatment program or to the program in general.

5. VA Form 10-5345, Request for and Consent to Release of Drug Abuse, Alcoholism or Alcohol Abuse, or Sickle Cell Anemia Information from Medical Records, will be used, in addition to other applicable forms required by the Department of Medicine and Surgery, to obtain and document the required consents.

6. There is a criminal penalty for unauthorized disclosure of this type of information (38 U.S.C. 4132).

(b) VA-produced public affairs photography of persons using or occupying VA facilities must involve obtaining written consent on VA Form 10-3203, Consent for Use of Picture and/or Voice, or an equivalent statement. The application of written consent requirements for public affairs purposes should be clearly limited to situations where Agency personnel conduct the photography, or when the element of privacy may not be readily definable.

(c) In general, it is not necessary to obtain written consent when the following precaution is observed: Photography sought by news media and other organizations should be preceded by an announcement or other actions to identify persons who do not wish to be

photographed. For public affairs circumstances, particularly those involving news media and large numbers of people in public settings, e.g., waiting rooms, hallways, auditoriums, outdoor settings, etc., the imposition of written consent requirements is both cumbersome and generally unnecessary. Consultation with a VA District Counsel is recommended for unresolved situations.

c. **Media Access to VA Facilities**

(1) VA officials may encounter situations that involve requests by the media for facility access or news media's unannounced presence at VA facilities. The variety and individual nature of circumstances that could lead to such situations suggest case-by-case handling. Nevertheless, certain guidelines can be established to assist management in responding to and contending with questions of media access to Agency facilities.

(2) The VA has a fundamental obligation and responsibility to its clients through the unimpeded execution of the Agency mission. At no time will media access be permitted to interfere with or compromise that principle. First Amendment rights of the media to gather and report the news and the concept of the "public's right to know" should not interfere with the Agency mission and with VA client rights. Requests for media access can and should be denied if such access would interfere with the VA mission or present unwarranted invasions of client privacy.

(3) Consistent with overall Agency public affairs policy, officials will provide reasonable accommodation to media representatives. The presence of mechanical equipment for the recording or transmission of voice and/or pictures may present problems that cannot be surmounted. Notwithstanding prohibitions which may be applied to such equipment, media representatives are not to be held distinct from the general public in having access to VA facilities as visitors or potential clients, nor may they be obstructed if they conform to facility rules regarding public access.

(4) As a matter of courtesy and propriety, the VA expects media to request access. Such requests will be promptly acted on following, if necessary, consultation with an appropriate OPA representative.

(5) Media activities within VA facilities must involve the presence of a designated escort. This is to ensure compliance with Agency policy, to resolve problems, and to serve as a source of information.

(6) Media personnel with mechanical equipment or who are otherwise disruptive and who, without permission, enter and conduct news gathering activities, are subject to curtailment of their activities. Facility management should feel free to immediately contact an editor or supervisor to resolve access questions and to explain VA media access policy.

d. **Political and Celebrity Activity**

(1) While the Agency generally welcomes and encourages appropriate tours and visits by government officials and celebrities, certain restrictions must be imposed if their purpose is overtly political and involves the conduct of partisan activities. Descriptions and control of political activities on VA premises are governed by 38 CFR 1.218(a)(14)(ii) and 17.71.

(2) Public affairs policy may also enter decisions concerning celebrity access, and to the greatest extent practicable, should be dealt with separately and may involve consultation with an OPA representative. For example, an agreement to provide an official tour of a VA facility for a candidate for public office who consents not to conduct partisan activities would not in and of itself relax media access limitations. Thus, candidates encouraging or soliciting media coverage of their visits risk interpretation by the Agency that the visit constitutes partisan activity.

(3) Certain prominent individuals may be of media interest under any circumstances and may agree to a visit that is free of partisan or political activity. Media access decisions may then be based purely on the celebrity status of the visitor assuming there are no VA client privacy or Agency mission limitations.

(4) Celebrities may also attract media interest at the time they become or are learned to be Agency clients, e.g., patients. Persons who are well known have to a large extent surrendered a certain amount of privacy and media interest can be expected to follow them. Nevertheless, the VA will reconcile public interest with individual privacy and negotiate with the celebrity or personal representative to accommodate requests for information to the greatest extent possible.

e. **Advertising**

(1) The use of paid advertising by the VA will be limited to specific activities for which a specific designation of budget authority exists. In general, and in the absence of additional legislative authority, the Agency engages in the use of paid media advertising for personnel recruitment and for certain loan guaranty activities. Elements of the VA are otherwise prohibited from purchasing advertising time or space to promote VA benefits and services, to present "institutional" messages, to publicize Agency events or activities, to participate in buying congratulatory advertising, or from expending funds for other forms of advertising enterprise.

(2) Neither the VA nor its personnel will endorse or provide testimonials for any product or commericial line of endeavor whether or not intended for use in advertising, promotional or marketing material. Neither will the Agency expressly permit use of the terms "VA-guaranteed" or "VA-approved" in the advertising of real estate, educational and training institutions, or any other endeavor that would lead the public to believe the VA warrants the product or service. Responsible officials should, with District Counsel involvement, seek to curtail known violations of this policy.

(3) The VA has no authority to control the use of the word "veterans" in commercial advertising.

(4) Use of the VA seal, insignia and symbol (logo) shall conform with MP-1, part II, chapter 22.

5. MEDIA LIAISON

a. **Introduction.** The VA relies on the presence, availability and interests of news media to communicate information about the Agency to the publics reached by these organizations. The VA further recognizes the legitimate role of a free press in our society and will not engage in practices designed to discriminate against, favor or otherwise control legitimate access to Agency sources of information. Media liaison policies are established to ensure the availability and release of accurate and appropriate information according to established and structured procedures that provide maximum coordination with the policy interests of the Agency.

b. **Mass Communications Media.** The following types of activities and their representatives are subject to Agency media liaison policies:

Newspapers
Magazines
Wire services
Books
Newsletters
News and photo syndicates and bureaus
Radio and television broadcast stations
Radio and TV networks
Cable television
Broadcast news bureaus
Free-lance representatives of the above

c. **Liaison Defined.** Media liaison within the VA generally encompasses direct personal contact, either orally or in writing, by an Agency employee in the context of his or her official duties or in representing any aspect of the VA, with a representative, either by name or by title, of a mass communications medium.

(1) Such a contact may occur and be subject to Agency policy irrespective of the time, location and circumstances involved when its purpose is clearly related to the employee's involvement with or access to any aspect of VA operations, policies and procedures.

(2) VA media liaison policy is not intended to proscribe exercise of individual personal rights, expression of opinion, or any enterprise not related to employment.

d. **Levels of Contact.** Proper application of media liaison policy will be determined by a combination of the VA organizational level involved, the nature of the subject of interest, and the scope of the mass medium's readership, audience or clientele.

(1) **Organizational Level.** The VA functions primarily at the local, regional or national level.

(a) Individual service delivery facilities; e.g., VAMCs, VAROs, National Cemeteries, Vet Centers, etc., even though responsible for sizable geographic areas, are considered "local" for the purposes of this chapter.

(b) Agency elements that have been regionalized to manage collections of local VA activities or which provide service or support to segments of the agency are considered "regional" in nature.

(c) VA Central Office and any other singular Agency entity serving the entire VA system is considered at the "national" level.

(2) **Nature of Subject Interest.** In determining the application of appropriate media liaison policy, the subject of the contact must also be defined. Subjects which are unique to the operations and performance of local VA facilities are generally considered to be "facility-specific;" i.e., not likely to be of such a nature as to necessitate a higher level of policy coordination. Subjects involving the practices and performance of multiple Agency facilities or organizational elements, or those which typically require Central Office attention, are usually considered to be "agencywide" in nature.

(3) **Media Scope.** Media, the products and services of which are primarily disseminated to a specific geographic locale, may for the purposes of this chapter be considered local media. Regional media usually serve a single broader geographical area. National media include those which clearly offer service or coverage nationwide or to a collection of media regions.

e. **Liaison Authority.** Media liaison authority is vested in the principal management official of each VA local, regional and national organization who shall be responsible for ensuring that Agency policy is implemented and adhered to. The authority may be appropriately delegated within the facility to expedite coordination and liaison activities. However, responsibility for policy compliance remains with the management official.

f. **Liaison Policy**

(1) Because the application of media liaison policy frequently will depend on subjective and interpretive circumstances, the following requirements are intended to establish a basic framework for the exercise of liaison authority by VA officials. The Administrator may from time to time, directly or by delegation, issue memoranda specifying procedures that further define contact, coordination and reporting requirements. Management officials are expected to ensure that liaison policies are delineated within the activities they direct. Guidance concerning the application of media liaison policy is available from, and will be provided by, the relevant OPA activity.

(a) **Local Authority.** Local facilities may engage in and conduct media liaison when the subject matter is facility-specific and the scope of the media involved is considered local.

(b) **Regional Authority.** Agency regional activities may engage in and conduct liaison with local or regional media on facility-specific matters within their jurisdiction. Coordination with an OPA regional office is recommended.

(c) **National Authority.** Media liaison at the national level is primarily directed and coordinated by OPA. National media liaison authority shall prevail in situations that do not clearly meet the criteria outlined in subparagraphs (a) and (b), above. Local and regional facilities confronted with liaison situations beyond their authority must coordinate resolution with the appropriate regional OPA.

1. The VA Central Office News Service is the Agency's principal media liaison coordinating element at the national level. Central Office production of news media materials and media requests for access, information and interviews will be referred to and processed by the News Service with the exception of situations described in subparagraph 2a, b and c, below.

2. For the purposes of efficient and timely liaison, Central Office departments and staff offices may have direct access with limited types of media and for specialized purposes:

a. With technical, trade and professional publications when noncontroversial subjects are involved and when material is limited to the organization's direct area of responsibility.

b. With scientific journals for the publication of research, studies and other analyses for which there is an established internal review process within the pertinent VA organizational element.

c. With local media when the subject involves the internal promotion, appointment or recognition of personnel whose positions are not centralized to the Administrator.

(2) OPA may establish procedures and protocols that ensure compliance with the Administrator's requirements concerning coordination with VA officials and subject matter experts in conjunction with the discussion of Agencywide subjects and/or liaison with national media.

(3) In the absence of directives to the contrary, no liaison involving Agencywide subjects or national media will be conducted by any VA employee without the initial involvement and approval of an OPA representative.

g. **Liaison Reporting.** Development of appropriate and consistent Agency public affairs policies is assisted by an awareness of media interest in VA matters. Individuals involved in media liaison must immediately report to the relevant OPA element accounts of media contacts deemed to be potentially critical, to have external ramifications, or that carry a potential for evolution to an Agencywide issue.

(1) **Clippings.** VA facilities are responsible for establishing and maintaining a systematized process of monitoring, collecting and transmitting accounts of media activity, particularly newspaper and magazine clippings. Included are materials such as news items, features, editorials, op-ed columns, letters to the editor, and editorial cartoons that concern any VA facility or activity, or that deal with veterans affairs at any level of government.

(a) Clippings provide valuable indications of public awareness, interest and sensitivity.

(b) Clippings represent an important form of feedback regarding the efficacy of Agency and facility media liaison and information generation.

(c) Clippings form the basis for a variety of internal communication products that illustrate VA media treatment and coverage.

(d) Clippings should be obtained economically and efficiently.

(2) **Submission of Clippings.** For public affairs purposes, Agency facilities must obtain and forward original newspaper and magazine clippings to their assigned OPA regional office even if providing copies to other VA elements under organizational directives or guidelines.

(a) Forwarding to OPA must be timely in a manner consistent with the urgency and sensitivity of the material. Advance information copies may be telefaxed to OPA if dictated by the time-sensitive nature of the material. Prompt submission ensures the earliest possible response to published errors or misinformation.

(b) Original clippings should be mounted and prepared for mailing to OPA as shown in exhibit A.

6. MEDIA ACTIVITIES AND APPEARANCES BY VA PERSONNEL

a. **Introduction.** There may be occasions when VA personnel pursue or become involved in media contact situations that fall outside the scope of policies delineated under paragraph 5, Media Liaison. The following are among the most common circumstances for which an Agency policy under this chapter is established:

(1) Requests to be interviewed.

(2) Letters to editor.

(3) Broadcast guest appearances.

(4) By-lined material.

(5) Public speaking engagements.

b. **Requests to be Interviewed.** Personnel who are directly requested by media to be the subject of an interview must first ascertain if the request properly should be handled under the Media Liaison (par. 5) provisions of this chapter which relate to the level of contact or scope of subject. If the request for information involves institutional or organizational policies, procedures or actions, appropriate authority must be obtained to participate in the interview.

(1) Before speaking in an official capacity for the Agency or for the organizational activity of which an individual VA employee is a part, the employee is responsible for obtaining appropriate authority.

(2) Employees who are not authorized to speak officially should refer the media request to a proper Agency public affairs source.

(3) Employees who agree to be interviewed concerning information or opinion on a personal basis, whether work-related or not, should make clear that they do so in their personal capacity, and that they are not speaking officially for the VA. Employees are under no obligation to participate in media interviews in their personal, unofficial capacities, and do so on their own.

(4) Individual employee standards of conduct are fully applicable to such activity whether done in an official or personal capacity. (See MP-5, pt. I, ch. 735.)

c. **Letters to Editor**

(1) Individual employees may not use their official titles, VA stationery, or duty time to engage in activities involving the communication of comment or opinions directed to media without the expressed consent of the highest official, or designee, of the facility to which assigned.

(2) This prohibition is to ensure that official communications by and on behalf of the Agency are properly coordinated to be consistent with authorized public statements.

d. **Broadcast Guest Appearances.** VA employees may not accept or seek opportunities to appear on radio, television or cable system programs for or on behalf of any Agency element without authority to act in such a capacity.

e. **By-lined Material**

(1) The preparation and submission of signed articles and other forms of communications media manuscripts, with or without remuneration, is largely governed by standards of conduct rules and regulations. As a matter of general practice, activities covering materials related to Agency subject matter are covered by this chapter's Media Liaison policies (par. 5). (Also see MP-5, pt. I, ch. 735, par. 15 b)

(2) Individuals who are requested or who seek to prepare VA-related material for specialized media such as professional journals, technical publications, and trade

magazines, should determine the existence and applicability of locally pertinent circulars or other directives before engaging in such activities.

f. Public Speaking Engagements

(1) VA employees who are invited or who seek to speak in public on behalf of the Agency and in their official capacity must obtain permission from their immediate supervisor. In addition, the employee must determine if any other VA representative is scheduled or is being requested to speak to the same group and should provide this information to the supervisor for coordination purposes.

(2) Supervisors are encouraged to routinely permit and encourage general local community relations appearances by their employees so long as supervisors are fully aware of the content of these remarks and are satisfied of their consistency with current VA policy.

(3) Invitations to VA personnel to speak before or make presentations to national organizations must be cleared at an appropriate Central Office policy management level in the affected department or staff office. Officials at these levels must further ensure, prior to accepting or approving such invitations, that such an appearance is coordinated with the highest VA official attending the event.

(4) Acceptance of honoraria for public speaking appearances must be consistent with MP-5, part I, chapter 735, paragraph 6, and, as appropriate, MP-5, part II, chapter 13, and its DM&S supplement.

7. INTERNAL COMMUNICATIONS

a. **Overview.** Organization managers are responsible for engaging in various forms of internal communications as an integral aspect of a comprehensive and effective public affairs policy. For the purposes of defining "internal," such communications shall have as their primary objective the conveying of information relevant and pertinent to groups of individuals who have a common association or frame of reference to the specific organizational activity. Thus, for example, internal communications may be directed toward employees and their families of a specific facility; employees within the VA who share a particular function or expertise; and individuals, such as patients, volunteers and visitors, who may need or can benefit from facility-specific information.

b. **Purpose.** Internal communications products can be either recurring or situation-specific. In addition to the authority and basis for various internal media described in MP-5, part I, chapter 790, paragraph 8, the following objectives and criteria should prevail for these media to meet the overall public affairs policy of the Agency.

(1) To provide VA employees with a comprehensive understanding of Agency issues, programs and activities so that they accurately represent these subjects during their official and unofficial interaction with the public.

(2) To broaden an internal audience's awareness of issues currently receiving or likely to receive attention from news media and to impart the full context of current events which may be treated vaguely, incompletely, inaccurately, or unfairly.

(3) To report significant organizational achievements, milestones, and other performance information that serves to improve morale, productivity, and attitudes.

(4) To expand knowledge of VA's magnitude and diversity among internal audiences.

(5) As opportunities to identify successful, effective, and productive personal and organizational achievements that can serve as incentive examples.

(6) As vehicles for the expression of management philosophies, objectives, goals and expectations relating to performance and client relations.

8. FILM AND TELEVISION INDUSTRY LIAISON

a. **Introduction.** The unique and frequently complex requirements of the film and television industry call for special centralized attention to ensure consistent and appropriate Agency liaison. The scope of this paragraph is mainly intended to include contact with or from production organizations which in and of themselves are not news media. Contact with news media employing the use of television or motion picture equipment is governed by policy set forth in paragraph 5 (Media Liaison).

b. **Industry Definition.** Film and television production organizations are typically engaged in the development of materials presented to mass audiences in theaters, on public and commerical TV stations and networks, via cable systems, and for release to subscribers or other types of limited exhibition. Generally, the production utilizes dramatic presentation techniques as distinct from material gathered to represent actual events for news and public affairs purposes.

c. Liaison Responsibility

(1) The VA Regional Office of Public Affairs in Los Angeles (LA/OPA) is designated as the central Agency

organization responsible for day-to-day liaison with the film and television industry irrespective of the geographic location of the intended production or of the production organization itself. Requests received by individual VA facilities from production organizations must comply with the following procedure:

(a) Obtain information concerning the request to include the name, address and telephone number of the organization; the name and title of the requester; and other details contained in published guidelines available from LA/OPA.

(b) Make no commitment offering access to or use of Agency property, equipment or personnel. Indicate only that the request will receive a prompt telephone response from the Agency's industry liaison office.

(c) Refer the request to LA/OPA and concurrently inform the facility's departmental PAO and the OPA regional office assigned to that facility.

(2) The LA/OPA provides the industry with information and guidance concerning production support available from the Agency or at its facilities. It also provides script review and research assistance services and seeks to develop interest in Agency expertise and locales.

(3) The LA/OPA provides the Administrator and all VA facility directors with policy guidance applicable to production requests and related fiscal procedures. The office also maintains and catalogs industry technical and background information.

d. **Liaison Action by LA/OPA**

(1) Initial contact from LA/OPA will be to determine the nature and scope of the production, technical requirements, and potential benefits to the VA or its facilities. Such contacts may also result from direct proposals or "location" suggestions provided by LA/OPA to the industry.

(2) The LA/OPA will review the substance of the request with the VA activity or facility director or designee and provide guidance and counsel. Practical references to film and television production assistance may be found in the VA Public Affairs Handbook and in guidelines published by the LA/OPA.

e. **Support Criteria**

(1) Approval or denial of request for production support should be made at the facility level with the advice and counsel of the LA/OPA.

(2) If LA/OPA determines there is a need for higher level Agency involvement, they will assemble all information and data necessary for the preparation and submission of a decision memorandum and recommendation to OPA at Central Office. Concurrence with the recommendation will be sought from appropriate department, staff office and/or ADA levels within Central Office and, if necessary, from the Office of the Administrator.

(3) Notification to the production company of Agency decisions will be communicated only by LA/OPA.

(4) Liaison following approved requests will be coordinated by LA/OPA for recordkeeping purposes and for the provision of periodic reports to OPA at Central Office.

(5) In the event that production assistance is provided to commercial entertainment ventures, the Agency typically arranges for the imposition and collection of fees for the use of VA facilities and equipment or for the services of VA personnel. Contributions of money and/or equipment may also be accepted over and above amounts received to offset the VA's costs.

(a) Fees will be deposited as miscellaneous receipts in the U.S. Treasury.

(b) Monetary contributions will be deposited to the facility's General Post Fund. Donated equipment will be accepted in accordance with the facility's existing procedures for such donations.

(c) Additional consideration for production support or assitance may be provided in the form of an appropriate film credit.

9. AGENCY CEREMONIES

a. **Overview.** The VA system presents many situations and opportunities for holding public ceremonies. These events categorically fulfill a public affairs objective since they are designed to attract attention to occasions that are deemed significant and worthy of celebration. Ceremonies large enough to involve the presence of government officials and other dignitaries must be guided throughout the VA by the consistent application of protocol elements. These will ensure uniformity and proper attention to detail in the planning and presentation of ceremonial activities.

b. **Scope.** While not intended to be all-inclusive, the following types of Agency ceremonies would typically require attention to protocol requirements: Groundbreakings, dedications, facility anniversary programs, presidentially-proclaimed commemorative observances, and national holiday programs.

c. **Protocol Elements.** Ceremonies generally contain a variety of components that may require attention to elements of protocol. These ceremony components include such matters as site location, size, seating, and access; logistical requirements such as security and parking; program format and sequence of events; music, displays and other enhancement activities; and public communication details such as media liaison, publicity activities and printed materials. These components should be assessed for protocol implications.

d. **Operational Responsibility.** Each Agency organizational element and related field facility is operationally responsible for its own ceremonies. It is recognized that each event and facility is unique and that ceremonies will vary accordingly. Operational responsibility includes attention and adherence to issues involving matters of protocol and the facility's use of and reliance on Agency protocol guidance resources.

e. **Protocol Guidance.** OPA has been designated as the Agency's primary resource for protocol guidance and assistance. As a staff support function, OPA will respond to organizational and facility requests for advice, assistance and recommendations concerning matters of protocol in the conduct of Agency ceremonies.

(1) Responsible facility directors should contact their regional OPA early in the ceremony planning process to identify those areas for which protocol decisions are necessary.

(2) OPA will provide guidance for each pertinent protocol matter as well as ascertain that overall planning for the ceremony addresses fundamental protocol issues on a standardized and uniform basis.

(3) OPA will prepare, maintain and make available guidelines, checklists, sample programs and other forms of materials for use by facility directors planning and conducting Agency ceremonies.

10. INTERNAL AND EXTERNAL COORDINATION

The preparation of reports, documents, literature, responses and the variety of materials that by their nature may attract, invite or produce public attention should always involve coordination with an appropriate VA public affairs element. This process emphasizes the value of applying public affairs insights in the formulation of the content of these materials. This policy also ensures the adequate preparation of individuals ultimately responsible for dealing with public interest issues.

a. **Federal Register Items.** Material intended for publication in the Federal Register should be subjected to a review by the originating organization's PAO prior to presentation for Agency concurrences. The Central Office OPA is a required point of concurrence for all *Federal Register* items with the exception of "information collections" subject to the Paperwork Reduction Act of 1980 (5 CFR 1320) and the Reauthorization Act of 1986.

b. **GAO and OIG Report Responses.** Written responses to draft GAO and OIG reports should be prepared with the concurrences of the subject organization's public affairs element and an OPA representative. Because GAO and OIG reports in final form have the potential for significant media interest, it is essential that report findings be completely and comprehensively addressed and responded to within the document text.

c. **FOIA Requests and Responses.** Requests from and replies provided to media under the provisions of the FOIA should be coordinated in the manner described in paragraph 3d.

d. **Intergovernmental References.** Materials intended for public release which mention by name or which direct the public to contact any other governmental entity at the Federal, State or local level must be fully coordinated with that organization prior to release.

SOURCE
Anytown Daily News
CITY AND STATE
Anytown, U.S.A.
DATE OF PUBL.

(GUMMED AREA)

Figure 1. Completed VA Form 06-4585, News Clip Identification, with lower edge folded ready to attach newspaper clipping

SOURCE
Anytown Daily News
CITY AND STATE
Anytown, U.S.A.
DATE OF PUBL.

LA vets compete February 21

Two Las Animas veterans, Robert Lewis and Steve Martinez, will be competing in the Veterans Administration Winter Sports Clinic on the slopes of the Rocky Mountains during the week of Feb. 21.

The six-day clinic will consist of three days of ski lessons and training, as well as three days of sponsored and self-directed alternative activities. The clinic is designed for disabled veterans to learn adaptive ski techniques at Colorado Discover Ability, the handicap ski school at Powderhorn.

This is the second year for the national competition to be held at the Powderhorn ski area, 45 miles from the host VA medical center at Grand Junction.

The clinic is co-sponsored by the Disabled American Veterans, the American Legion, Veterans of Foreign Wars and the Paralyzed Veterans of America. More than 130 spinal-cord injured or blind veterans are expected to compete.

Figure 2. VA Form 06-4585 with newspaper clipping affixed to folded gummed edge

NEWS CLIPPING MOUNTING INSTRUCTIONS

1. Prepare Form 06-4585 as shown in Fig. 1. Fold lower edge up to expose gummed area.
2. Attach original clipping (not a photocopy) to gummed area (Fig. 2).
3. Attach combined Form 06-4585 and clipping to plain 8½x11 paper.
4. Extra columns or material requiring more than one sheet should be attached with glue, or tape that is doubled and applied to the reverse side of the clipping.
5. DO NOT USE TRANSPARENT TAPE ON THE FACE OF THE CLIPPING.
6. Limit mounting to one or more letter-size sheets. Photos or large layouts that cannot be suitably cut down may be left intact with Form 06-4585 attached, then folded down to letter-size.

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