



DEPARTMENT OF VETERANS AFFAIRS
Assistant Secretary for Management
Washington, DC 20420

IL 049-08-06
July 3, 2008

OFFICE OF MANAGEMENT INFORMATION LETTER

TO: Under Secretaries for Health, Benefits, and Memorial Affairs; Assistant Secretary for Management; Executive-In-Charge, Office of Construction & Facilities Management; Veterans Integrated Service Network Directors; Directors, VA Medical Center Activities, Domiciliary, Outpatient Clinics, Medical and Regional Office Centers, and Regional Offices; Directors, Denver Acquisition and Logistics Center, Austin Automation Center, Records Management Center, VBA Benefits Delivery Centers, and the VA Health Administration Center; and the Executive Director and Chief Operating Officer, VA National Acquisition Center

ATTN: Logistics Managers, Property Managers, Accountable Officers, Shipping and Receiving Personnel, OIT Program Managers, Heads of Contracting Activities, Contract Specialists for IT Purchases

SUBJ: Draft Directive and Handbook 7002, Logistics Management Policy and Procedures (Attachments included)

1. The purpose of this Information Letter is to provide guidance and instructions on the use and the early implementation of the attached draft directive and handbook.
2. As a result of the General Accountability Office's (GAO) report released April 2007 titled Inadequate Controls Over IT Equipment at Selected VA Locations Pose Continued Risk of Theft, Loss, and Misappropriation (GAO-07-505), I am directing all VA administrations and staff offices to implement the use of the attached draft directive and handbook 7002 immediately. The policy and procedures contained in the draft documents will be followed and carried out as described.
3. The draft directive and handbook is presently in concurrence within VA Central Office and should be released to field in the very near future. However, the contents of the directive and handbook are of such importance to VA that the policies and procedures contained in both documents need to be implemented as soon as possible.
4. Please direct any questions concerning this IL or the attached draft policies to Mr. Maurice C. Stewart at 202-461-6906.

/s/Robert J. Henke
Assistant Secretary for Management

Distribution: RPC 7029

Attachment (2)

LOGISTICS MANAGEMENT POLICY

- 1. REASON FOR ISSUE.** VA Directive 7002 replaces VA Directive 7125, General Procedures, and VA Directive 7127, Materiel Management Procedures. The intent is to eliminate the number of publications used by logistics personnel and to update VA logistics policy.
- 2. SUMMARY OF CHANGES.** This directive combines VA Directives 7125 and 7127 into one VA policy.
- 3. RESPONSIBLE OFFICE.** The Office of Logistics Policy (049P2A) within the Office of Acquisition and Logistics (OA&L) is responsible for the oversight of VA logistics programs. Any recommendations for modifications to VA personal property management policy must be sent through OA&L for consideration, concurrence, approval, and issuance.
- 4. RELATED HANDBOOK.** VA Handbook 7002, Logistics Management Procedures.
- 5. RESCISSION.** VA Directive 7125, General Procedures, dated November 7, 1994, and VA Directive 7127, Materiel Management Procedures, dated September 19, 1995.

CERTIFIED BY:

Robert T. Howard
Assistant Secretary for
Information and Technology

**BY DIRECTION OF THE SECRETARY
OF VETERANS AFFAIRS:**

Robert J. Henke
Assistant Secretary for Management

Distribution: Electronic Only

LOGISTICS MANAGEMENT POLICY

- 1. PURPOSE AND SCOPE.** To strengthen and enhance VA logistics policy in accordance with Public Law 107-217, Public Buildings, Property, and Works (United States Code, Title 40), and the Code of Federal Regulations Title 41, Public Contracts and Property Management (Federal Management Regulation (FMR)/Federal Property Management Regulations (FPMR)), and to increase security and accountability requirements vital for VA personal property.
- 2. POLICY.** The Office of Acquisition and Logistics (OA&L) has the departmental responsibility for personal property inventory management, utilization, and disposition. Inventories will be managed based upon the most effective and economical practices.
- 3. RESPONSIBILITIES.** The DAS for A&L is responsible for the oversight of VA logistics programs and policies. The Office of Logistics Policy (049P2A) is responsible for establishing consistent policies supporting VA logistics operations. Under Secretaries, Assistant Secretaries, and Other Key Officials shall develop, implement, maintain, and enforce a structured personal property program in order to carry out VA policy established herein.
- 4. REFERENCE.** Title 41, Code of Federal Regulations, Public Contracts and Property Management, Chapter 101 of the Federal Property Management Regulations and Chapter 102 of the Federal Management Regulation.

PART 1. SUPPLY AND PERSONALLY OWNED PROPERTY

1. Factors that will be considered in determining if an item will be included in the posted stock supply fund inventory are bulk purchase discounts, usage rates, and specialized requirements that would necessitate maintaining on-hand stock.
2. VA Form 2235 will be used for personally owned property placed in official/unofficial use. The facility Accountable Officer (AO), or designee, will ensure Engineering Service and Safety are aware of all personally owned property placed in use for the purposes of performing a safety inspection and ensuring space and utilities are available.

PART 2. ACCOUNTABILITY

1. Responsibilities. Any employee who uses, supervises the use of, exercises control over, or has custody of public property in their personal possession or in possession of employees under their jurisdiction is responsible for such property.

a. Personal responsibility for government property is the obligation of every employee, whether such property has been issued to, is specifically assigned for personal use, or is used by them on occasion.

b. Supervisory responsibility is an obligation assumed by every employee who accepts an administrative or supervisory position in a service, section, or division of an organization.

c. Staff responsibility is an obligation of the facility AO, or designee, to assure management that all government property assigned to the facility is accounted for and entered into the proper automated system.

d. Custodial Officer Equipment Inventory Listing (EIL) responsibility is an obligation for the Custodial Officer (i.e., service chief, component head, or equivalent employee designated by the facility organizational director) to assume responsibility for nonexpendable property under their jurisdiction by signing their EIL. The Custodial Officer's signature acknowledges their responsibility to the AO for all property listed on their signed EIL. The Custodial Officer will remain responsible for such property unless relieved.

2. Accountability and Delegations.

a. Administrations and Staff Offices. These organizations are tasked with ensuring AO support is established for all offices under their respective jurisdiction. The establishment of AO support functions for Veterans Benefits Administration (VBA) and National Cemetery Administration (NCA) will be accomplished through a support agreement or memorandum of agreement (MOA) with the nearest Veterans Health Administration Medical Center or established AO facility.

b. The AO will be relieved of accountability for personal property when it is issued or transferred to another entity, disposed of in accordance with established excess procedures, reclassified to real property, or an approved adjustment voucher is posted to the perpetual inventory account.

c. AO Listings. Administrations shall submit a listing containing AO contact information for each VA facility within a Veterans Integrated Services Network (VHA), Memorial Service Network (NCA), or Veterans Benefits Administration regional office annually by the end of the fiscal year through the appropriate channels to OA&L.

3. Relief of Equipment Inventory Listing (EIL) Custodial Officer Responsibility for Government Property. An employee will be officially relieved from their EIL Custodial Officer responsibility for government property if:

a. A valid receipt is secured and property is returned to the AO;

VA Directive 7002

b. An inventory of all property for which a custodial officer is responsible has been inventoried by them and their successor, all overages and shortages properly adjusted, the EIL has the successor's signature, and signed copies of the EIL have been delivered to the AO, and;

c. An official facility clearance has been secured by the employee.

Note: Where vacancies remain unfilled, the acting service chief, as designated in writing, will assume EIL custodial official duties and responsibilities and sign for the EIL.

4. Transfer of Accountability. When an AO is relieved of official duties, all property accounts must be verified for completeness and accuracy before transfer of accountability is official (this process needs to be included in the HR clearance sheet for VA facilities). Formal accountability, as distinguished from liability, will be immediately transferred to the temporary or permanent successor who is designated via memorandum.

5. Accountable Officer (AO)

a. In Central Office, the accountable officer is the Deputy Assistant Secretary for Administration (03) and shall provide OA&L with the AO delegation letter and contact information.

b. All VHA field facilities shall establish AO positions. At these facilities, the AO designation will be accomplished in writing by the director. The AO shall be the individual at each facility responsible for Logistics Services personal property management functions and can further delegate responsibility in writing to carry out the day-to-day requirements. However, further delegation does not relieve the AO of overall responsibility concerning property accountability.

c. The facility AO shall be a senior manager who maintains the facility's inventory accounts, has oversight over personal property assets, and who selects and assigns staff personnel to receive and manage those assets.

d. This manager is responsible for accounting for all personal property assigned to the facility and for documenting all transactions affecting personal property.

6. Logistics Liaison Office: Each VA Administration will establish a designated office as a liaison on logistical matters which will report to the VA Chief Financial Officer/Senior Procurement Executive CFO/SPE (004) through the Deputy Assistant Secretary for Acquisition and Logistics (DAS/A&L). OA&L will be accountable for all logistics activities and will ensure compliance with all federal laws and VA logistics rules and regulations.

PART 3. CLASSIFICATION OF PROPERTY. The Centralized Acquisition Analysis Team within the Office of Business Services (049A2-1) under the National Acquisition Center will classify property. Property will be classified as real property (e.g., buildings, land, building service equipment) or personal property (expendable or nonexpendable).

1. Personal Property (expendable or nonexpendable) classifications will not be revised unless authorized by the DAS/A&L.

2. Expendable Property

a. The Deputy Assistant Secretary for the Office of Acquisition and Logistics (DAS/A&L), is responsible for the classification of standard items or categories of items in accordance with the federal supply catalog system to support the federal inventory system, e.g., equipment using Category Stock Numbers (CSN) or supplies with National Stock Numbers (NSN).

b. Expendable items will have an NSN assigned by the CAAD in accordance with Public Law 82-436 and FPMR 101-30.202. In addition, the CAAD is responsible for assisting in the standardization of personal property within VA.

3. Nonexpendable Property

a. A nonexpendable equipment item will have a CSN assigned; nonexpendable equipment items with assigned CSNs will be found in VA Catalog Number 3, section V. The CAAD will assign a CSN to new nonexpendable equipment items.

b. Sensitive property shall be subject to more stringent controls than other property. Property is classified as sensitive, regardless of cost, due to its capability to contain sensitive information, when it is subject to pilferage, or when it may be easily converted to personal use. Facilities may identify additional items as sensitive property.

4. Special Classifications. For the purpose of accounting control, all government-owned personal property has been further classified as Supply Fund, Non-Supply Fund (Appropriated), Trust Fund, Compensated Work Therapy (CWT), Medical Care Collections Fund (MCCF) and Recyclable Fund property.

PART 4. ACCOUNTING REQUIREMENTS

1. Property Voucher, Register, and File

VA Directive 7002

a. Documents for receipts, services, transfers, and miscellaneous transactions (e.g., turn-ins, donations, excess documents, Reports of Survey, and inventory adjustments) will be assigned computer-generated common numbers from the appropriately assigned series obtained from the facility computerized accountability system each fiscal year as established by the Fiscal/Financial Service (currently this is the Integrated Funds Distribution, Control Point Activity, Accounting and Procurement program). Copies of nonexpendable receipts for property will be filed with the appropriate EIL and will be maintained for 3 fiscal years (1 year active and 2 years inactive).

b. A controlled substance register, containing documents relating to controlled substances only, will be maintained by Logistics Services.

c. Schedule II Controlled Substances and Schedule III Narcotics will be tracked by the Accountable Officer and the Chief, Pharmacy Service, or their designees, for receipt, posting into the authorized automated inventory system, and disposal actions.

Note: The Accountable Officer, or designee, must not be under the supervision of the Chief, Pharmacy Service.

2. Validity of Vouchers

a. Representatives of contracting officers shall be designated for accepting and receipting supplies and equipment in accordance with VA Acquisition Regulation (VAAR) 801.603-71. Signature (written or electronic) of the contracting officer or designee, e.g., receiving personnel, must certify the receipt and acceptance of property that was purchased on behalf of the contracting officer.

b. Documentation, e.g., receiving reports, VA Form 2237, issue book, picking ticket, must contain an appropriate signature of a person having delegated authority to sign such documentation. All vouchers will bear the date on which actual receipt, issue, disposal, transfer, or adjustment is accomplished.

c. Adjustments to all perpetual inventory accounts shall be signed by the Accountable Officer or designee.

d. It is the responsibility of the receiving facility to ensure that receiving reports for items purchased or requisitioned from or by the Veterans Affairs National Acquisition Center (NAC), VACO, or any centralized procurement activity are accomplished by facility personnel authorized to receipt for equipment and supplies in accordance with (2) (a) of this section. The requesting program official of the centralized ordering activity will be responsible for providing advance copies of purchase order information (either in hard copy or electronic format) to each facility scheduled to receive items prior to their arrival.

3. Receipt of Security Items. The Accountable Officer, or designee, must be involved in the receipt of the following items: Schedules I and II Controlled Substances, Schedule III Narcotics, alcoholic preparation fit for beverage. Software costing \$5,000 or more will be accounted for in the appropriate automated inventory system, tagged with a barcode label, and inventoried annually.
4. Receipt of Equipment and Supplies. All vendor deliveries of equipment, unposted supplies, processed stores supplies, and government purchase card procurements will be made to the authorized receiving activity to ensure proper inspection, distribution, and processing of receiving reports.
5. Free, Donated or Leased Personal Property
 - a. Free or donated personal property given to a facility with the understanding (written or verbal) that the facility must purchase the donor's products is strictly prohibited.
 - b. Property donated to VA as a gift or bequest by a manufacturer, an individual, or service organization will be recorded in the inventory account as Trust Fund property.
 - c. Cost-per-test equipment must be recorded in the appropriate automated inventory system as leased equipment with a notation in the comments or specifications field that it is cost-per-test equipment.
 - d. Unclaimed and voluntarily abandoned property have special procedures which are delineated in the accompanying handbook.
6. Credit Memorandums.
 - a. All Credit Memorandums will be forwarded to the fiscal activity for processing and routed to Logistics Services for determination of the appropriation or fund control point from the original order.
 - b. Credit memorandum listings prepared by Fiscal Service will be forwarded to Logistics Services for action. If no future purchases from the vendor are anticipated, Logistics Services will request collection action through Fiscal Service.
 - c. Credits pertaining to purchase card orders must be processed against the applicable purchase card and will be reconciled in accordance with VA Handbook 4080.
7. Sales of Special Items

VA Directive 7002

a. Beneficiary Items. Sales documents and receiving reports containing items for direct release to a beneficiary will be annotated to identify each such item.

b. Sales to Veterans Canteen Service. Posted stock sold to the Canteen Service will be processed as an issue book request through the authorized automated computerized inventory program maintained by Logistics Services.

c. Burial Flags. Upon receipt of properly executed sections of VA Form 2008, Application for United States Flag for Burial Purposes, Logistics Services will furnish replacement burial flags to authorized issue points.

d. Limitations

(1) Narcotics, whiskey or other consumable alcohol products, and drugs for therapeutic use will be sold only to the Chief, Pharmacy Service, or designee.

(2) Isopropyl alcohol will be issued only in original containers. Distribution will be confined to the Chief, Pharmacy Service; Chief, Pathology and Laboratory Medicine Service; and Chief, Research and Development Service.

e. Subsistence for Other Approved Programs. Subsistence required by other services for approved programs will be issued to the service involved in accordance with VHA Manual M-2, Part III, Paragraph 5.07.

f. Pacemaker Prostheses. Prostheses and implants will be tracked and accounted for from purchase to disposition.

8. Delivery of Nonexpendable. A receipt signature of the EIL custodial officer, or designee, will be obtained upon delivery of nonexpendable property utilizing a properly executed document. The Accountable Officer or designee will establish an equipment record for all nonexpendable property in the authorized automated inventory system. A property voucher copy of the receiving report may be used.

9. Processed Stores/Office Supplies. Logistics Services will ensure that an authorized method of inventory control (preferably automated) is in place for all office supply items contained in processed stores.

10. Turn-ins. All property turn-ins will be tracked through final disposition. The authorized automated turn-in package, i.e., Equipment Request/Turn-In Package, will be utilized to the maximum extent possible for all nonexpendable property.

11. Expendable

a. Expendable property that is no longer needed or that is in long supply will be deemed as unrequired and will be turned in to Logistics Services for utilization or disposition.

b. Serviceable supplies turned in to Logistics Services will be redistributed to other issue points within the facility to fill immediate needs. If not needed within the facility the supplies will be offered to other VA facilities for re-utilization where the need exists, or entered into the Agency Asset Management System (AAMS).

c. Property that is neither serviceable nor economically repairable shall be turned in to Logistics Services. If Logistics Services deems the property has value for its basic material content, it will be sold to the maximum extent possible for recycling as scrap.

d. Drugs, biologicals, and reagents (serviceable and unserviceable) that are eligible for exchange or allowance from the vendor/manufacturer will not be picked up in VA excess accounts. Items ineligible for exchange or allowance will be processed for disposition in accordance with current procedures.

12. Nonexpendable

a. When property is serviceable or economically repairable, it shall be reissued and accountability will be transferred to the applicable EIL.

b. When property is serviceable or economically repairable and is deemed unrequired by the facility, but has not yet been determined to be excess to VA, it will be advertised to other VA facilities through the appropriate reporting system in accordance with VA Directive and Handbook 7348.

13. Leased (Rental) Personal Property

a. Personal property leased or rented for a period exceeding 90 days will be barcoded and recorded in the appropriate EIL.

b. A copy of the lease document and other conditions pertinent to the lease will be maintained in the appropriate EIL.

Note: Equipment leased or rented for a beneficiary's home use is exempt from this provision.

14. Adjustment Vouchers. Adjustment vouchers will be used to process appropriate modifications to perpetual inventory accounts and general ledger accounts and to correct erroneous posting data. An adjustment voucher recap report captured from the authorized automated inventory system will be reviewed, signed, and dated on a monthly basis by the Accountable Officer or designee.

VA Directive 7002

15. Review of Adjustment Vouchers. If an Adjustment Voucher and/or Journal Voucher is required due to government property being lost, stolen, or damaged, a Report of Survey action must be completed. Adjustment vouchers for discrepancies over \$5,000 require a Board of Survey action. A copy of such voucher, along with appropriate supporting documentation, must be forwarded to VA Central Office (VACO), Office of the Deputy Assistant Secretary for Acquisition and Logistics (OA&L).

16. Survey Action. A copy of the Report of Survey will be filed with the adjustment voucher to support entries made to the inventory account.

17. Adjustment of Discrepancies Between Receiving Reports and Invoices. Invoices that do not coincide with receiving reports in quantity and price will be brought to the attention of the contracting officer, who will make a written determination for the record as to whether payment will be made or further contact with the vendor is required. Purchase card orders require an amendment for all discrepancies over the threshold amount established in accordance with VA Handbook 4080, Government Purchase Card Procedures, and local procedures. All adjustments will be made in the appropriate accountability system.

18. Property Acquired Under Research Contracts. Personal property acquired under research contracts will be maintained in accordance with Title 31 USCS §6306, Authority to Vest Title in Tangible Personal Property for Research, and Federal Acquisition Regulation (FAR) Part 35, Research and Development Contracting.

19. Retention or Transfer of Title. Title to personal property acquired under research contracts may vest in the research contractor or the government in accordance with Title 31 USCS §6306, Authority to Vest Title in Tangible Personal Property for Research, and Federal Acquisition Regulation (FAR) Part 35.014, Government Property and Title.

20. Research Contracts Property Records. Personal property records for VA property furnished to contractors under research contracts, or any other contract providing a contractor with government furnished equipment (GFE), will be maintained in accordance with FAR Part 45.105, Records of Government Property.

PART 5. USE STANDARDS. The Use Standards established for VA are in accordance with FPMR 101-25.301.

1. In authorizing specific items for use, it must be determined that the item benefits VA.

2. Items shall not be put into use for the sole purpose of benefiting an employee/contractor or certain group of personnel (exceptions: safety considerations or handicapped persons).
3. Generally, kitchen appliances shall not be purchased utilizing appropriated funds for employee use (exceptions noted in the handbook).
4. VA has set an authorized limit of \$5,000 for furnishing executive level employee areas (GS 15 and SES).

PART 6. REPLACEMENT STANDARDS.

1. VA replacement standards are a required method VA employs to maximize the utilization of personal property. They provide policy and guidance in support of FPMR 101-25.4 for the replacement of equipment and furniture.
2. Each administration will ensure VA and federal mandates are adhered to regarding premature replacement, trade-in allowances, and accurate disbursement of funds received from sales.

PART 7. HAZARDOUS PRODUCT/EQUIPMENT REPORTING. The identification, tracking, and removal of potentially hazardous products that could endanger the life or safety of VA beneficiaries, visitors, or employees will be adhered to in accordance with established federal and VA policies. The identification of hazardous material will be in accordance with FPMR 101-42.002.

1. The facility director will designate a program coordinator for hazardous materials who will work with the AO to ensure inventory management and disposal actions are properly executed.
2. Hazardous products and materials will be reported to the designated coordinator at the facility.
3. The program coordinator shall consult with appropriate authority to determine to what extent the hazard may affect the safety of the facility.
4. Action to limit, restrict, or remove the product from use will be immediately implemented.

PART 8. PHYSICAL INVENTORIES.

1. Expendable Inventories (Supplies). Items repetitively purchased will be maintained in the authorized automated inventory system, currently Generic Inventory Package (GIP). Stock levels will be established in coordination with the using activity for each repetitively used item.

VA Directive 7002

a. A complete physical inventory of all stock will be taken annually. The minimum acceptable accuracy rate is 90 percent.

b. Controlled substances require a biennial inventory in accordance with the Controlled Substance Act, Public Law 91-513 (reference 21 CFR §1304.11).

2. Nonexpendable Inventories (Equipment). Nonexpendable property in using activities will be only the amount necessary to perform the assigned functions. Using activities will continually evaluate the need for assigned equipment. When unrequired property is identified, it will be turned-in for reassignment, reutilization, or disposal.

a. All property requires basic accountability.

b. Sensitive items, regardless of cost, and property valued at \$5,000 or greater will be considered as accountable and maintained in the automated equipment inventory system, listed on the appropriate EIL, and inventoried annually. This includes loans to and from VA of nonexpendable property.

c. Property costing \$100,000 or more will be accounted for as capitalized, maintained in the automated equipment inventory system, listed on the appropriate EIL, and inventoried annually. Logistics Service records will be reconciled with fiscal records on a monthly basis for all capitalized nonexpendable property.

d. EILs that have a 95 percent or above accuracy rate will be required to be inventoried annually. EILs that fall below a 95 percent accuracy rate will be inventoried again in six months.

e. All completed EIL inventories will have a 5 percent verification inventory conducted by the accountable officer or designee, a disinterested party, and the custodial officer or designee.

PART 9. INVENTORY ACCOUNTING

1. Accounting Methods

a. Automated inventory accounting systems for expendable and nonexpendable inventories will be utilized at field facilities to provide data for inventory management, financial management, and reporting needs.

b. For proper identification and control of property, a National Stock Number (NSN) field will be included in any automated inventory system and will be populated to the maximum extent possible in accordance with cataloging regulations (reference 41 CFR 101-30.202 and 101-30.501).

c. The Category Stock Number (CSN) field in the automated equipment inventory system is required for all nonexpendable items.

2. Equipment Inventory Listing

a. VACO Deputy Assistant Secretaries or staff office directors will be designated as custodial officers and will assume responsibility for nonexpendable property assigned to their organization. This responsibility may be delegated to an Associate Deputy Assistant Secretary (ADAS) or a service director within an organization.

b. The facility director shall designate, in writing, one employee to each of the various services/activities (e.g., service lines, sections of service lines, departments) to assume custodial officer responsibility for assigned nonexpendable property (maintained on appropriate EIL). The facility director will coordinate with the Chief, Information Technology, before designating an IT EIL Custodial Officer charged with management oversight responsibilities over all IT equipment. Designations will be confined to members of the director's immediate staff, normally division and service chiefs. An exception may be made in research activities by designating either the research coordinator or the individual investigator as the custodial officer.

c. A custodial officer who designates, in writing, an employee to act in their behalf in performing inventory management functions does not relinquish responsibility as the custodial officer.

d. The EIL will be kept current and accurate. Upon receipt by Logistics Services, any required updates will be processed within 5 working days. Any modifications to the signed EIL will be supported by documentation that will be filed with the EIL until the next scheduled inventory.

e. Each EIL will be assigned a number in accordance with standardized department numbers.

3. Reporting Requirements.

a. Reconciliation of standard general ledger accounts is a department-wide requirement of Logistics Services and Fiscal or Financial Services (VHA, VBA, NCA, etc.) and will be accomplished at the end of each month.

b. Each VA facility will provide a year-end certification of property signed by the facility director, financial officer, and Accountable Officer, to the appropriate office as specified in the Year-End Financial Reports and Statements Certification memorandum sent annually from the VACO Chief Financial Officer prior to the end of the fiscal year.

VA Directive 7002

4. Receiving and Sales. A copy of the signed receiving report or VA Form 2237 is the required document for receipts and/or sales for nonexpendable property and will be filed in the appropriate EIL.
5. Equipment Installed as Part of Initial Construction. Nonexpendable property installed as part of initial construction will, on completion of the project, be picked up in property records at the acquisition value or the current market value.

PART 10. REPORT OF SURVEY PROGRAM. The Report of Survey (ROS) program is the required method used to obtain an explanation of the circumstances surrounding the loss, damage, or destruction of government property.

1. Any employee who detects a loss of or observes damage to government property will immediately make an oral report to the supervisor who, in turn, will advise the VA police (if required) and Logistics Services.
2. If the item contains sensitive information, the Information Security Officer must be notified within 59 minutes after realization of loss by the employee (reference OMB Memorandum 6-19).
3. It is mandatory to establish a board of survey comprised of three impartial and qualified members when there exists the possibility of assigning pecuniary liability to an individual or the value of the loss/damage is \$5,000 or greater.
4. A ROS register is required to be maintained by the facility AO on a fiscal year basis.
5. The overall ROS process will not exceed 60 days unless there is the possibility of pecuniary liability or there is an ongoing law enforcement investigation.

PART 11. LOAN OF PROPERTY

1. Loans of VA Personal Property. Loans of VA property to employees and non-employees are authorized when they support VA's mission, goals, and objectives and are for the convenience of the government. VA facility Directors and the VACO Deputy Assistant Secretary (DAS) for Administration (03) have the responsibility for management oversight and accountability of VA property. As such, these individuals have the option of designating loan approval authority to Accountable Officers and Information Technology (IT) EIL Custodial Officers for the purpose of enhancing security and accountability requirements for the loaned property. The AO and IT EIL officers are responsible for verifying, issuing, and tracking VA property loans. In addition, if the property loaned contains sensitive data, the Information Security Officer (ISO) will also sign the loan form. Facility

directors or the VACO DAS for Administration will be responsible for personally approving loan requests if no designations of this responsibility are made.

2. Loans of Personal Property to VA. Loans will be confined to those from other VA facilities, other government agencies; or local, state, and charitable institutions. Loans will be accepted through the AO and the facility director.

3. Affiliated Institution-owned or Institution-administered Grant Fund Purchased Equipment Utilized by a VA Investigator. Equipment owned by an affiliated institution or purchased by such institution from grant funds to be used by a VA investigator in a research project at a VA installation will be accounted for in the appropriate VA property accountability system regardless of cost of the equipment. The investigator or designee responsible for all such equipment will maintain a jacket file.

4. Issuance of VA Owned Property by Revocable License.

a. The facility director may authorize, through Logistics Services, issue of personal property by revocable license to an institution, organization, or other authorized group. Duration of the license will not exceed a 1-year period.

b. Each request for a revocable license will be forwarded to the District Counsel for review and concurrence prior to implementation of the loan. Request for renewal of an existing license agreement will require the facility director's approval and review and concurrence of the District Counsel.

c. Upon expiration of the license, the property will be promptly returned to the field facility by the licensee.

PART 12. MISCELLANEOUS SPECIAL REQUIREMENTS.

1. Scales used in weighing shipments, gasoline pumps and other similar devices when deemed necessary by the facility head, will be tested once each year at a minimum or more often if local law or ordinance so requires. Any requirements for inspections of these items will be coordinated with the Chief of Engineering Service.

2. Schedules I and II controlled substances, precious metals, vehicle titles, and certificates of origin will be maintained in a safe, vault, or other type of depository as defined in U.S.C, Title 21, § 812.

3. Custody of combinations to safes, vaults, or depositories will be kept under the jurisdiction of the facility director. Combinations will be changed every 5 years, when the equipment is initially placed in use, when changes in personnel occur, or when deemed necessary by the facility director.

VA Directive 7002

4. Gifts or donations can be accepted in accordance with U.S.C, Title 38, § 8301.
5. The facility AO must receive annual logistical training. Documentation of the required training will be made part of the employee's personnel file.

PART 13. CONTROL AND INVENTORY OF INFORMATION TECHNOLOGY EQUIPMENT.

1. Each facility's IT Custodial Officer shall institute procedures necessary to ensure full accountability for nonexpendable IT equipment items including sensitive equipment items regardless of cost, from receipt of the item through sanitization and disposal. Sensitive and removable media items will be handled in accordance with VA Handbook 6500.
2. Facility directors will delegate, via a signed Delegation of Authority memo, IT equipment inventory responsibilities to the IT Custodial Officer tailored to the unique constraints of the facility.
3. For IT equipment assigned exclusively for individual use, a loan form will be signed by the receiving employee who shall agree not to process or save any sensitive information on the equipment, not to install any software on the equipment, not to add any additional hardware or make any changes to current hardware configurations, and to always maintain possession of the assigned equipment.
4. VA sensitive information must be in a VA protected environment at all times or it must be encrypted in accordance with VA Directive 6500. VA employees are responsible for ensuring the security of VA information and the equipment items on which it resides, whether the equipment is entrusted to them solely for their use or used by them on occasion.
5. IT equipment procured with a government purchase card will be entered into the proper EIL and included in the physical inventory along with all other IT equipment items.
6. All IT equipment will be maintained in an automated equipment inventory system and will be listed on the proper EIL which will be in the 78 series in accordance with established Standardized EIL Department Numbers.
7. Whenever an individual identifies that nonexpendable IT property (including sensitive items regardless of cost) cannot be accounted for and a potential loss of sensitive data exists, the issue will be reported immediately, within 59 minutes of the detection of the potential loss, to the Facility Information Security Officer (FISO) and the IT Custodial Officer (reference OMB Memo 06-19).

8. IT equipment storage locations must be physically secured under the same guidelines as established for computer rooms/data centers in National Institute of Standards and Technology (NIST) Special Publication 800-53, Paragraph PE-3. Access to these areas will be restricted to authorized IT staff with the written approval of the IT Custodial Officer at each facility. Collaboration between IT and Security and Law Enforcement is essential in ensuring protection of sensitive information.

9. The Department's Chief Information Officer (VA CIO) is responsible, at the Department level, for ensuring the integrity and security of VA's IT assets, including physical inventory as well as data protection and the sanitization of data when IT resources are retired from service.

10. Training of personnel in both inventory control and the protection of sensitive and personally identifiable information will be standardized by functional role throughout the facility and conducted on a periodic basis (no less than annually). Personnel without any direct inventory control responsibilities will be provided familiarization training including an overview of the inventory control and accountability program, protection of sensitive information, hand receipt requirements, and proper handling of inventory movement. All new personnel will receive training in their responsibilities related to IT inventory control before accessing the IT system.

LOGISTICS MANAGEMENT PROCEDURES

1. REASON FOR ISSUE. This handbook sets forth department wide procedures which implement and supplement materiel management policies and responsibilities found in the Federal Property Management Regulations (FPMR) and Federal Management Regulations (FMR) as appropriate. Together, they comply with requirements established in Title 40, U.S. Code, Public Buildings, Property, and Works, and Title 41, Code of Federal Regulations. This document combines the information originally contained in VA Handbook 7125 and 7127.

2. SUMMARY OF CHANGES. This handbook provides updated policy and procedures pertaining to subject matter in the general area of materiel management and property management. The following areas are a summary of major changes to this handbook:

- a. Prohibits the purchase of refrigerators and microwaves for employee use from appropriated funds.
- b. Adds clarification and guidance concerning the use of furnishings and equipment pools.
- c. Adds information on replacement criteria to be considered when replacing an equipment item.
- d. Adds information/requirements under "Accountability" regarding the following:
 - (1) Delegations of Authority
 - (2) A listing of Accountable Officers (AOs) in each Veterans Integrated Service Network (VISN) will be submitted to the Office of Acquisition and Logistics (OA&L) (along with copies of the Delegation of Authority) for review and concurrence
 - (3) Sections discussing the AOs and the Chief Logistics Officer's (CLO) responsibilities and required review process
- e. Added annual training requirements for the AO
- f. Changed system references to generic terms.
- g. Changed references to Chief, Acquisition and Materiel Management Services to Logistics Services.
- h. Incorporated federal terms from 7127, Change 4.
- i. Incorporated change in capitalization threshold and further explained capitalized property classification.

- j. Removed Section 5102-5 originally in 7127, Administrative Certifications.
- k. Added information on unclaimed and voluntarily abandoned personal property.
- l. Added disposal condition codes and definitions.
- m. Added information on sanitization of property containing data sensitive material.
- n. Added information regarding sensitive items to reflect Change 4, originally contained in 7127.
- o. Condensed Sections 5108-1, 5108-2 and 5108-3 originally in 7127 to references.
- p. Added information addressing loans of property to employees separately from loans to institutions, added establishment of Loan Register, and added authority to establish nonexpendable equipment loan pools.
- q. Added information to reflect Change 5 to 7127.
- r. Added information to reflect authority to change inventory time frames, addition of sensitive item information, removal of authority to waive a scheduled inventory, and redefined extension of scheduled inventory.
- s. Removed Part 5 in 7127 (Supply Fund) in its entirety which will be separated into its own distinctive Directive and Handbook.
- t. Added recommendation to use the automated Equipment Request/Turn-in Package, added requirement to use Cataloging and National Stock Numbers (NSN) to maximum extent possible, and to add requirement of documentation of property loans and Loan Register to be maintained with appropriate Equipment Inventory List (EIL).
- u. Requirements for Year-end Certification Reports and for Equipment Not Installed reports to OA&L is no longer required.
- v. Added section addressing IT equipment inventory and control.
- w. Added Report of Survey (ROS) timelines.

3. RESPONSIBLE OFFICE. Logistics Policy (049P2A), Office of the Deputy Assistant Secretary for Acquisition and Logistics (049M).

4. RELATED DIRECTIVE. VA Directive 7125, Supply and Procurement – General Procedures, dated November 4, 1994 and VA Directive 7127, Materiel Management Procedures, dated September 19, 1995

5. RESCISSION. VA Handbook 7125, General Procedures, dated April 5, 1996 and VA Handbook 7127, Materiel Management Procedures, dated September 19, 1995.

CERTIFIED BY:

**BY DIRECTION OF THE
SECRETARY OF VETERAN AFFAIRS:**

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Supervisor, Office of Information and Technology

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Distribution: Electronic Only

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PART 1. SUPPLY AND PERSONALLY OWNED PROPERTY

1. Supply Through Storage and Issue. Factors to be considered when determining if an item will be included in the posted (warehouse) supply fund inventory are:

- a. An item for which a price advantage will be realized from volume buys resulting in more economical costs to using activities (e.g., bulk purchase discounts);
- b. An item with a high rate of usage; or
- c. An item of which stock must be on-hand due to its particular or specialized use.

2. Personally-owned Property Placed in Official Use. VA Form 2235 will be used for personally owned property placed in official/unofficial use. A written policy for privately-owned property will be established at the local level which will inform employees of the following:

- a. Official use. Personally-owned property placed in use for the convenience of the Government. The Government is responsible for loss, service, or repair of property placed in use for the convenience of the Government. Excluded from this authorization are personally-owned vehicles.
- b. Unofficial use. Personally-owned property placed in use for the convenience of the employee. The Government is not responsible for loss, service, or repair of property placed in use for the convenience of the employee. Exception: devices needed to assist an employee due to a disability or impairment.
- c. The facility Accountable Officer (AO) or designee will ensure Engineering Service and Safety is aware of all personally-owned property placed in use (e.g., radios, cup warmers, etc.) for the purposes of ensuring a safety inspection is performed. And, if appropriate, also ensure space and utilities are available to properly accommodate the item in accordance with safety and Joint Commission on Accreditation of Health Organizations (JCAHO) standards.

PART 2. ACCOUNTABILITY

1. General

a. Responsibility. Any employee who uses, supervises the use of, exercises control over, or has custody of public property in their personal possession or in possession of employees under their jurisdiction is responsible for such property. Responsibility may be divided into four categories: personal, supervisory, EIL, and staff and each category are discussed more in depth in paragraphs 3, 4, 5, and 6 of this part.

b. Definitions: (See Appendix A for more definitions used in Property Management)

(1) Accountability. The tracking and reconciling of property items from acquisition to disposition (cradle to grave); the ability to account for personal property by providing a complete audit for property transactions from receipt to final disposition.

(2) Control. The ongoing function of maintaining physical oversight and surveillance of personal property throughout its complete life cycle using various property management tools and techniques.

(3) Accountable Officer (AO). The facility's appointed AO or designee who has the obligation imposed by law, administrative order, or regulation to render an accounting to another official for funds, property, or supplies entrusted to them, whether VA-owned, leased, or acquired by loan from any source. It is recommended each VA facility should have a single Accountable Officer.

c. The following areas will have designated liaisons for AO functions and will ensure agreements for AO support services are established with the nearest VHA facility:

(1) VBA

(2) NCA

(3) CIO

(4) District Counsel

2. Accountability and Delegations

a. All VHA field facilities shall establish AO positions. The facility's Chief of Logistics Services, or designee, will be the accountable officer at a VHA field facility. VHA facilities shall provide AO support to NCA and VBA through support agreements. In Central Office, the AO is the Deputy Assistant Secretary for Administration (03).

b. The AO will ensure that all inventories are accurate and maintained in accordance with VA directives and handbooks and any other pertinent guidance.

c. The AO will be relieved of accountability for personal property when:

(1) Expendable property is issued to another VA activity or sold from Supply Fund stock.

(2) Expendable or nonexpendable property is transferred to another VA facility, federal agency, or otherwise disposed of in accordance established excess procedures.

(3) Property is reclassified i.e., from personal property to real property.

(4) An approved adjustment voucher or Report of Survey is posted to the perpetual inventory account. If the AO is the custodial officer for the property, the adjustment voucher should have an additional higher level of approval (e.g., Associate Director, facility Director, or designee).

(5) Relieved of official duty as provided for in this part, paragraph 7.

d. The facility AO shall be delegated by the facility director in writing. The AO may further delegate this responsibility in writing as needed in order to carry out the mission of logistics.

e. A listing of the AO located at each facility within a VISN (VHA), MISN (NCA), or Region (VBA) will be submitted annually by the end of the Fiscal Year through the established logistics office within each administration to OA&L, and will be kept on file for reference purposes. This list will include name, a job title, series, grade, and telephone number. In addition, a copy of each AO's delegation from their facility director will be attached to this listing.

3. Personal Responsibility

a. Personal responsibility for government property is the obligation of every employee, whether such property has been issued to, is specifically assigned for personal use, or is used by them on occasion. Employees who, in the performance of their duty, are required to operate or use government equipment or devices have an obligation to perform first echelon care in the daily use of such property.

b. An employee may be held pecuniarily liable for the loss, damage, or destruction of government property when the loss, damage, or destruction is due to the employee's negligence or misuse of such property, or to dishonesty or willful destruction of the property.

NOTE: *The extract from Public Law 772, 80th Congress (18 U.S.C. 641), will be posted on bulletin boards and other conspicuous places for the information and guidance of all concerned.*

4. Supervisory Responsibility. This is an obligation assumed by every employee who accepts an administrative or supervisory position in a service, section, or division of an organization. Personnel having this responsibility shall be held pecuniarily liable for the loss, damage, or destruction of property under their supervision only when it is positively shown that the employee was guilty of neglect or carelessness, as outlined in Part 10, paragraph a., subparagraph (2), (a) or (b). In addition to these responsibilities, a supervisor may be assigned an Equipment Inventory Listing (EIL) that would require them to perform Custodial Officer duties which are discussed in paragraph 6 of this part.

5. Staff Responsibility. The facility AO, or designee, has “staff responsibility”. This obligation is to assure management that all government property assigned to the facility is accounted for and entered into the proper automated system. Also the AO is to ensure that all property is properly utilized, maintained, and conserved during its useful life, and that procedures are in place to avoid theft, abuse, and loss.

6. Custodial Officer EIL Responsibilities. The Custodial Officer (i.e., service chief or component head), or equivalent employee designated by the facility organizational director to assume responsibility for nonexpendable property will do so by personally signing the EIL. In signing this receipt, the employee certifies that all property placed into official use, including VA-owned, leased, loaned, or donated, is listed on the EIL and is present and accounted for as of that date, or the appropriate documentation has been submitted as indicated on the EIL signature page. They also acknowledge that they are, as of that date, responsible to the AO for all property listed on their signed EIL. Additions to, or deletions from, this account made subsequent to the date of signature will be supported by the appropriate signed documentation. The Custodial Officer will remain responsible for such property unless relieved, as provided for in paragraph 7 of this part. Additionally, it is highly recommended that when conducting the official EIL inventory, the Custodial Officer also conduct an inventory of expensed equipment items as well. This allows the Custodial Officer the opportunity to ensure all their equipment items are being adequately utilized and still needed to carry out the service’s mission/function. Appendix I is a listing of required standardized department numbers that must be used when entering an item into the property accountability system.

7. Relief From Responsibility. Custodial Officer responsibility for accountable EIL property, which has been formally charged to them or they have further issued to an employee by means of either the EIL, VA Form 2237, or computer generated form, will terminate when:

- a. Property has been returned to the AO and a valid receipt secured,
- b. They have, with their successor (or person designated in writing as acting in that capacity), inventoried all property for which they are charged, and
 - (1) Have had all overages and shortages properly adjusted,
 - (2) Obtained the signature of their successor (successor could also imply the person acting in that capacity) on the EIL,
 - (3) Delivered the signed copies to the AO, and
 - (4) Secured their clearance.

8. Transfer of Accountability. When an accountable official is relieved of official duties, formal accountability, as distinguished from liability, will be immediately transferred to the temporary or permanent successor. Via memorandum (routed

through the facility Director), the official assuming accountability will verify the completeness and accuracy of all property accounts, and with the outgoing official, will affix his or her signature. An adjustment voucher or ROS will be prepared for any additions or missing items, as appropriate. In the event that the outgoing official is prevented from executing this action by reason of death or disaster, the justification will appear on the memorandum in lieu of the signature. The original memorandum will be filed in the Delegation of Authority file maintained in the office of the facility's AO, and copies will be provided to the incoming and outgoing officials.

9. General Scope of Accountable Officer's Mandate and Required Review Process.

a. The AO shall be a senior manager who has direct control of personal property assets and who selects and assigns staff personnel to receive and manage said assets. This manager is responsible to account for all personal property assigned to their facility and for the documentation of all transactions affecting personal property. The AO oversees the materiel management activities associated with the property under his or her control.

b. Each administration, staff office, and program office will ensure AO activities are accomplished within all offices under their respective jurisdiction. If AO resources are not resident at the facility, a Memorandum of Understanding will be established with the local supporting VHA facility. This includes, but is not limited to the following:

- (1) Conduct searches for unrequired/excess supplies and equipment
- (2) Inventory maintenance and documentation
- (3) Disposal of unrequired/excess property

c. The AO will mandate the use of all official automated inventory systems at their facilities. The AO will ensure the usage and implementation of a VA approved and authorized inventory system for all inventory functions. The AO will ensure that action is taken to populate and maintain these automated inventory systems for both expendable and nonexpendable items. The AO will make sure that use of the standardized EIL department numbers, Category Stock Numbers (CSNs), and National Stock Numbers (NSNs) are utilized appropriately in each inventory system.

d. The AO will minimize long supply and eliminate unofficial expendable inventories by monitoring the inventories in the official inventory system.

e. The AO will comply with VA Handbook 7348, "Utilization, Sale, Abandonment or Destruction of personal property". This includes the screening of excess property listings, electronic or physical, circulated by other VA activities, GSA, and other Federal agencies in order to fill required requisitions at their facility in lieu of acquisition whenever possible.

10. General Scope of Chief Logistics Officer's (CLO) Mandate and Required Review Process. Within VHA, the CLO will ensure that the following managerial and oversight functions are accomplished as follows:

- a. Provide policy guidance and compliance responsibility over inventory management, property management, and acquisition activities.
- b. Ensure training for key personnel is obtained and provided as required.
- c. Monitor logistics and acquisition performance measures and initiate corrective action to address out-of-line situations;
- d. Ensure compliance with federal and VA regulations and procedures;
- e. Coordinate corrective actions identified in reviews, audits, or inspections;
- f. Serve as point of contact for acquisition and logistics matters within their sphere of responsibility;
- g. Review medical center, regional office, or cemetery (as appropriate) acquisition and logistic plans and objectives;
- h. Indirectly monitors and establishes reporting requirements for each facility logistics officer; and
- i. Ensures required and annual reports are submitted in a timely manner and in the correct format.

11. General Scope of the Logistics Liaison Office Mandate and Required Review Process. Within each Administration, a designated office will be required to report to the VA Chief Financial Officer/Senior Procurement Executive (CFO/SPE) through the Deputy Assistant Secretary (DAS) for the Office of Acquisition and Logistics (OA&L - 049). This office will provide oversight for all logistics activities and will ensure compliance with all Federal and VA logistics rules and regulations. The designated office will keep the VA CFO/SPE informed concerning all major changes, decisions, and required reports.

Part 3. CLASSIFICATION OF PROPERTY. This part provides VA property managers with a resource for the proper classification of property items. Within VA, property is further classified as real (i.e. buildings/land and building service equipment) and personal (both expendable and nonexpendable).

1. Categories:

a. **Personal Property.** All property other than real property and all property on Federal compounds that is disposed of as trash (reference Handbook 7348 for further guidance on this subject). Items in the personal property category are further classified as expendable or nonexpendable. The classification of property into these categories provides the basis for:

- (1) Segregation of equipment assets from operating supplies.
- (2) Data collection to support a planned maintenance and replacement program.

b. **Real Property.** Buildings, land, structures, and building service equipment (e.g. equipment that is permanently installed in or attached to buildings and structures which when installed, become an integral part of real property for the purpose of rendering the building or structure usable or habitable such as heating and light fixtures, elevators, fire alarms and air conditioning systems).

2. Classification.

a. The Centralized Acquisition Analysis Division (049A5S) classifies property with either a National Stock Number (NSN) for supplies, or a Category Stock Number (CSN) for equipment.

b. Except as stated in paragraph e of this section, the DAS/OA&L (049), in conformance with the policy in paragraphs c. and d. of this section, shall determine the classification of standard items (or categories of items) in accordance with the Federal supply cataloging system.

c. The Centralized Acquisition Analysis Division (CAAD) will consider the following criteria when classifying property:

(1) Expendable

- (a) Has a life expectancy when put to use of less than 2 years.
- (b) When put to use, becomes an integral part of another item, thereby losing its individual identity.

(c) Is purchased for permanent release to beneficiaries. (Prosthetics and Sensory Aids Service usually orders items for beneficiaries.)

(2) Nonexpendable

(a) Normally has, but is not limited to, an acquisition cost of \$300 or more (an item classified as nonexpendable may cost less than \$300, i.e. refrigerators, microwave ovens, toasters, some typewriters, printers).

(b) Has a life expectancy of 2 years or more.

(c) Is of a sensitive nature which requires accountability/control regardless of cost, life expectancy, or maintenance requirements.

NOTE: Sensitive property is defined as property, regardless of acquisition cost, that by its nature, is subject to theft, loss, conversion to personal use, or for some other reason, must be subjected to more stringent controls than other property (see Part 8, Inventory of Equipment in Use for a listing of sensitive items).

d. Personal Property (expendable/nonexpendable) classifications, once established, will not be revised as a result of price fluctuations reflected in subsequent purchases unless authorized by the DAS/OA&L (049).

e. Personal property, which may come into being as a result of fabrication and/or the assembly of parts or components, will be reclassified by the facility to correctly identify the unit as a whole.

f. A nonexpendable item will have a CSN assigned; nonexpendable items with assigned CSNs will be found in VA Catalog Number 3, section V. When requested, the CAAD will assign a CSN to new nonexpendable items.

g. Expendable items will have an NSN assigned by the CAAD in accordance with Public Law 82-436 and FPMR 101-30.202. In addition, the CAAD is responsible for assisting in the standardization of personal property within VA.

3. Special Classifications. For the purpose of accounting control, all Government-owned personal property has been further classified as Supply Fund, Non-Supply Fund (Appropriated), Trust Fund, Compensated Work Therapy (CWT), Medical Care Collections Fund (MCCF) and Recyclable Fund property.

a. Supply Fund Property. This term is applied to all property procured by or donated to the Supply Fund and includes the following:

(1) Capital Leasing Equipment Program from OA&L (see VA Directive and Handbook 7132).

(2) Expendable property issued from Supply Fund posted stock inventory that is turned-in by the using divisions and returned to inventory accounts.

(3) Silver and precious metals reclaimed under the silver reclamation program.

(4) Unrequired nonexpendable property that is shipped to the Service and Reclamation Division for rehabilitation prior to disposition of the property.

(5) All supplies, materials, and equipment owned by OA&L.

b. Trust Fund. Is personal property received as a gift or bequest from individuals or non-Government organizations including equipment purchased from or through the General Post Fund (e.g., motor vehicles from Veterans Service Organizations). Trust Fund (General Post Fund) transactions are non-Appropriated Funds. The General Post Fund authority and reference is US Code Title 38, Chapters 83 and 85.

c. Compensated Work Therapy (CWT). Is personal property acquired for a Compensated Work Therapy program from the proceeds derived from such program. Funds used are neither appropriated nor donated. This is a self-sustained program for the benefit of patients.

d. Medical Care Collections Fund (MCCF). In Fiscal Year 1997, Congress terminated Medical Care Cost Recovery (MCCR) and established Medical Care Collections Fund (MCCF). This is a separate fund which allows VHA to retain medical collections from third party reimbursements. Funds from this account are held in medical care appropriation and remain available for expenditures for supplies and equipment. MCCF consists of personal property purchased and used exclusively in and by program personnel responsible for recovering medical care cost funds.

e. Recyclable Fund. Public Law 108-199, Section 607, authorizes agencies to receive and use funds from sale of materials recovered from recycling and waste prevention programs (see VA Handbook 7348 for guidance on expenditures of funds).

f. Non-Supply Fund. All items not included in a. through e. These items use appropriated funds.

g. Nonexpendable Capitalized Property. Is property within the nonexpendable category which costs \$100,000 or more per aggregated line item, and is accountable on the Equipment Inventory Listing (EIL).

NOTE: The capitalization threshold is met in the following circumstances:

(1) When a single stand-alone item costs \$100,000 or more;

(2) When the aggregate cost of an item with its integrated (not separately identifiable) pieces is \$100,000 or more;

(3) When the combined cost of an item (parent) and its major components (children) meet or exceed the \$100,000 threshold; or

(4) When an upgrade or update is purchased whose cost added to the value of the original item causes the value of the item to meet or exceed the \$100,000.00 threshold. If the aggregate cost is \$100,000 or more, the capitalization threshold is met regardless of whether the total asset value is assigned to the original item only or separately assigned among the original item and its major components.

For accountability and depreciation purposes, it is strongly recommended that the value of capitalized assets be assigned individually among the original item and its major components. The parent/child relationship is identified in the automated equipment inventory system as follows: if Item A is a component (child) of Item B (parent), then the Parent field of Item A should contain the Control Number of Item B.

If Item B is, in turn, a component (child) of an even larger Item C (parent), then the Parent field of Item B should contain the Control Number of Item C, and so on.

Inventory items with no entry in the Parent field are either freestanding devices or major systems with one or more levels of components beneath them. An item must already be in the Equipment File before it can be named as the Parent of another item.

Part 4. ACCOUNTING REQUIREMENTS.

1. Property Voucher, Register, and File.

a. Documents for posted and unposted receipts, services, nonexpendable receipts, transfers, and miscellaneous transactions (e.g., turn-ins, donations, excess documents, Reports of Survey, and inventory adjustments) will be assigned computer-generated common numbers from a series obtained from the Logistics Services' computerized accountability system each fiscal year (currently this is the Integrated Funds Distribution, Control Point Activity, Accounting and Procurement (IFCAP) program). Common numbers assigned will be from the appropriation to which the transactions apply. Copies of posted Supply Fund receipts may be filed or maintained within Logistics Services' computerized accountability program, in accordance with the Department record control schedules. Copies of nonexpendable receipts will be filed with the appropriate Equipment Inventory Listing (EIL) and will be maintained for three fiscal years (one year active, two years inactive).

b. Posted Supply Fund issues will be assigned a sequential voucher number by Logistics Services' computerized accountability program on a monthly basis using a numerical prefix designating the month in which the transaction occurred. Completed vouchers will be filed in voucher number sequence, in accordance with the Department record control schedules.

c. Schedule II Controlled Substances and Schedule III Narcotics will be tracked by the Facility Accountable Officer (AO), or designee, and the Chief, Pharmacy Service, or designee for receipt and disposal actions. These items are ordered on U.S. Department of Justice, Drug Enforcement Agency, Form DEA-222 (Official Order Form for Schedules I and II Controlled Substances). A consecutive document number will be assigned by Logistics Services from a separate Controlled Substance Register maintained in a log book in Logistics Services. The register will show:

- (1) DEA document control number assigned to the DEA Form 222
- (2) Date of receipt by pharmacist
- (3) Department number or location of Pharmacy Service receiving issue,
- (4) Common or voucher number assigned to the document, and
- (5) A listing of the names of the items received.

A copy of each document listed in this register will be given to the designated facility controlled items inspection official (cannot be Logistics Services or Pharmacy Service personnel) for validation prior to inspection.

The facility AO, or designee, will personally witness the posting of the items received into the Pharmacy Service automated inventory system by the Chief, Pharmacy Service, or designee. The facility AO, or designee, will document the National Drug Code (NDC), quantity received, and date received on the blue copy of the DEA Form 222 which is maintained by Logistics Services in the Controlled Substances Register.

NOTE: The facility AO, or designee, cannot be under the control of the Chief, Pharmacy Service.

2. Validity of Vouchers. Vouchers will be executed and validated as follows:

a. Signature (written or electronic) of the contracting officer, or designee (e.g., Storage and Distribution receiving personnel), must certify the receipt and acceptance of the property purchased (other than nonexpendable equipment which requires signature of the Facility Accountable Officer or the EIL Custodial Official or the respective designee). Representatives of contracting officers shall be designated in accordance with VA Acquisition Regulation (VAAR) 801.603-71.

b. Signature (written or electronic) of the Facility Accountable Officer or designee must be on the documentation certifying all other receipt or disposition transactions (property acquired by VA, property dropped as excess or otherwise disposed of, and property pending disposition).

c. Signature (written or electronic) of the Facility Accountable Officer or designee must be on vouchers covering adjustments to perpetual inventory accounts.

d. All vouchers will bear the date on which actual receipt, issue, disposal, transfer or adjustment is accomplished.

NOTE: Alteration, change, or correction of a voucher with intent to falsify the record constitutes a violation of 18 U.S.C. 2071. The individual responsible for such action is subject to penalties prescribed by law.

e. It is the responsibility of the receiving facility to ensure that receiving reports for direct delivery items purchased or requisitioned from or by VANAC, VACO or any centralized procurement activity are accomplished by facility personnel authorized to receipt for equipment and supplies in accordance with paragraph b of this section. It will also be the responsibility of the receiving facility to ensure the validity of any documentation messages sent to the centralized procurement activity (i.e., VANAC and VACO) indicating the receipt of direct delivery items. The requesting Program Official of the centralized ordering activity will be responsible for providing advance copies of Purchase Order information (either in hard copy or electronic format) to each facility scheduled to receive items. Facilities shall notify VANAC upon receipt of VANAC-purchased items to schedule acceptance inspections and any other required inspections by VANAC as appropriate for the type of equipment purchased.

3. Processing Vouchers, Receiving Reports, and Invoices.

a. Except when inspection or technical assistance is required to accept item(s) of a complex nature, receiving reports will be electronically processed and forwarded to Fiscal within 2 workdays after items have been received or requested services have been rendered. Acceptance will be by either the contracting officer, the Facility Accountable Officer, or the contracting officer's authorized representative as stated in VAAR, Section 801.603-71 (e.g., Storage and Distribution receiving personnel; authorized purchase card holder for purchase card orders). This includes receiving reports for the following:

- (1) Item(s) received;
- (2) Item(s) transferred, dropped as excess, or otherwise disposed of.

b. Vouchers affecting the current month's receipts will be processed to Fiscal not later than the close of business on the last workday of the current month.

c. In lieu of receiving reports from beneficiaries, for carrier deliveries of direct shipments of supplies and equipment to beneficiaries, the following documents will be provided to the Fiscal activity for payment:

- (1) Invoices with signed bills of lading.
- (2) Freight bills and parcel post receipts.
- (3) Signed receipts from the carrier.

NOTE: Certification on the invoice by the vendor stating that direct shipment was made to a beneficiary is sufficient proof to support receipt and payment processes for carrier deliveries of direct shipments. Vendors will be instructed to bill only for those items shipped and to indicate on their invoice that shipment was made directly to a beneficiary. If the vendor makes shipment through other than a commercial carrier, or if the beneficiary receives an item at the vendor's business location, the vendor should be instructed to indicate this on the invoice.

d. In lieu of receiving reports for services, a certification on the invoice stating that the service has been rendered, will be sufficient proof to support receipt and payment processes.

NOTE: Under no circumstances does this constitute authority, other than as reflected in paragraph c. of this section, to use certified invoices for receipt of supplies or equipment.

e. Invoices covering fee-basis transactions will be processed by Medical Administration Service or applicable service. Logistics Services' personnel are not authorized to certify these type invoices.

4. Receipt of Security Items. The facility AO or designee is required to be involved in the receipt of the following items: Schedules I and II Controlled Substances; Schedule III Narcotics; alcoholic preparation fit for beverage purposes (e.g., bourbon, scotch, beer, whiskey, rye) excluding sacramental wines; firearms; ammunition; and precious metals. The shipment of controlled items will be examined jointly by the facility AO or designee and the person designated to accept delivery or check-in property to ascertain whether the shipping containers show any signs of tampering. The shipments will be opened, inspected and the contents and quantities will be verified. The facility AO or designee will sign an appropriate certification on the receiving document. The employee designated to accept delivery will receipt (sign) on the receiving document. Deliveries of controlled and narcotic drugs will be signed for by an authorized pharmacist or licensed practitioner on the date of receipt. The facility AO or designee will personally witness the posting of the items received into the Pharmacy Service automated inventory system by the Chief, Pharmacy Service or designee. The facility AO will record the National Drug Code (NDC), the number of containers received of each item and the date of receipt on the blue copy of the DEA Form 222 (U.S. Department of Justice, Drug Enforcement Agency, Official Order Form for Schedules I and II Controlled Substances) that is maintained by Logistics Services in the Controlled Substances Register. As noted in paragraph 1, subparagraph c of this Part, the Facility Accountable Officer or designee may not be under the control of the Chief, Pharmacy Service. Software costing \$5,000 or more will be accounted for in the appropriate automated inventory system, tagged with a barcode label, and inventoried annually. Software licenses will be tracked and accounted for by the appropriate program manager for which the software was originally purchased.

5. Receipt of Equipment and Supplies. All vendor deliveries of equipment, unposted supplies, processed stores supplies, and government purchase card procurements, will be made to the authorized receiving activity to ensure proper processing of receiving reports where other arrangements have not formally been made. After performance of required incoming procedures (e.g., electrical safety check, overall incoming inspection), the item(s) will be released to the requesting activity. By signature, the employee designated in paragraph 6 of this part will acknowledge receipt of the property as delivered. For items purchased with the government purchase card and picked up by the card holder, the electronic signature in the computerized accountability system serves as certification of receipt of the items on the purchase card order. Purchases of nonexpendable equipment with the government purchase card will be approved by the facility equipment committee and receipt coordinated through the facility accountable officer. Specific authority to purchase nonexpendable equipment (accountable) by a nonwarranted cardholder must be granted by the head of the contracting activity, based on the facility Agency Program Coordinator (A/OPC) recommendation.

6. Authorization to Receipt for Supplies, Equipment, and Services. Employees (e.g., Storage and Distribution receiving personnel; authorized purchase card holder for purchase card orders) designated in accordance with VAAR 801.603-71 and the facility Accountable Officer or designee will receipt for and accept supplies, equipment and services, including prime vendor orders, on behalf of VA.

7. Free, Donated, or Leased Personal Property

a. Free or donated personal property given to a facility with the understanding (written or verbal) that the facility must purchase the donor's products is strictly prohibited. Facilities are permitted to accept free or donated personal property only if there is no obligation on the part of the facility to purchase the donor's products or services. The competitive bidding process will be accomplished for the purchase of supplemental supplies for the free or donated property; once the competitive bidding process has been completed, it is acceptable for VA to receive such items. Facilities will not enter obligations for the equipment/supplies, not even a zero dollar obligation.

b. Bonus or free goods furnished by a vendor in lieu of a price reduction will be recorded in the appropriate inventory point. The exact quantities received will be identified as "Free Goods" on the receiving report. When free goods and items purchased are identical, the total quantity received (free goods plus purchased goods) will be used to establish a new unit price for the purchased goods. This quantity and price will be recorded in facility accounts. If the free goods are not the same as the item purchased, the free goods will be recorded as a separate item on the receiving report. The Free Goods will be recorded in the facility's accounts at the manufacturer's suggested wholesale price.

c. Property, other than that listed in paragraphs a and b of this section, donated to VA by a manufacturer, an individual, or a service organization will be recorded in the inventory account as Trust Fund property. When acquisition cost is unknown, the item will be priced at the manufacturer's wholesale price if known or a fair market value price will be assessed for the item.

d. Cost per test equipment must be recorded in the appropriate automated inventory system as leased equipment with a notation in the equipment file that it is a cost per test item. Under cost per test, the facility pays a fee for tests performed by the facility on the manufacturer's equipment. A Cost per test contract will be solicited on a competitive basis.

e. The following procedures will be used for unclaimed personal property not proven to belong to a veteran:

(1) Property must generally be held for 30 calendar days. If the previous owner does not file a claim, title vests to the Government after the 30 days.

(2) If unclaimed personal property is not retained for official use or abandoned or destroyed, it must be reported to GSA as excess in accordance with FMR 102-41.140. When reported to GSA, a fair market value (i.e., the Blue Book value for vehicles adjusted for the condition and mileage of the vehicle) will be assigned to the property.

(3) Proceeds of sales of unclaimed personal property must be held in a special account for 3 years pending a claim by the former owner. If no claim is received, the proceeds must be deposited in the U. S. Treasury as miscellaneous receipts.

(4) For further details regarding unclaimed personal property, see FMR 102-41.120 through FMR 102-41.180.

f. The following procedures will be used for unclaimed personal property belonging to a deceased veteran:

(1) If the deceased veteran has a written designation for the property on file, the Secretary of the Department of Veterans Affairs or designee (facility director) will transfer possession of the property to the person designated.

(2) If no such person has been designated by the deceased veteran, or if the designated person has not claimed the property within 90 days of being mailed a notice of death, transfer of the property may be accomplished in accordance with Title 38, USCS, §8502.

(3) If the property is not transferred or claimed, the Secretary or designee (facility director) may dispose of the property by public or private sale in accordance with Title 38, USCS, §8502. Proceeds of the sale must be held in a special account for 5 years. If the property is not sold, it may be used, destroyed, or otherwise disposed of.

(4) For further details regarding unclaimed personal property belonging to a deceased veteran, see Title 38, USCS, §8502.

g. Voluntarily abandoned personal property may be retained for official use or abandoned and destroyed in accordance with FMR 102-41.85. If voluntarily abandoned personal property is neither retained for official use nor abandoned or destroyed, it must be reported to GSA as excess in accordance with FMR 102-41.95. Proceeds from sales of voluntarily abandoned personal property must be deposited in the U. S. Treasury as miscellaneous receipts. For further reference for this type property, see FMR 102-41.80 through FMR 102-41.115.

8. Property Accompanying Patients to VA Facilities

a. When beneficiaries are transferred between VA facilities, nonexpendable property normally will not accompany them because each facility should have standard equipment requirements established for the care of all VA patients. In the event that a beneficiary has a unique item that the VA has purchased specifically for his/her care or

comfort (e. g., invalid chairs, stretchers, etc.) the nonexpendable property will normally be considered as VA property shipped to the facility receiving the beneficiary. The property may be retained or returned in accordance with an agreement established between the facilities involved. Property transferred will be dropped from the shipping facility's records at the time of shipment. Where the volume of property transferred results in a budget problem, the shipping facility may arrange with the receiving facility for the return of property when it has been determined that returns can be shipped economically. Transportation costs will be borne by the facility requesting the return of the property. Transfer of property or funding of transportation may be documented on VA Form 134, Combination Requisition and Shipping Ticket.

b. All property other than VA-owned property accompanying beneficiaries to VA facilities will be returned to the owning facility if requested and transportation expenses will be borne by the owning facility. Property will be properly cleaned before return is initiated. If return of the property is not requested by the owning facility, the facility at which the item resides may either dispose of the item in accordance with VA Handbook 7348 using proper turn-in procedures or place the item into use and perform an inventory pick up.

9. Credit Memorandums. All credit memorandums will be forwarded to the Fiscal Activity for processing.

a. Credit memorandums will be maintained in Fiscal Service as prescribed in MP-4, Part III, Paragraph 2.07b, and routed to Logistics Services for determination of the appropriation or fund control point from the original order. If not identifiable, it will be determined by the last order placed with the vendor. The credit memorandum(s) will then be returned to Fiscal Service.

b. A list prepared by Fiscal Service of credit memorandums will be forwarded to Logistics Services for action. If no future purchases are anticipated and there are no outstanding payables with the vendor, Logistics Services will prepare a memorandum to Fiscal Service requesting collection action from the vendor. The memorandum will cite the applicable appropriation and fund control point for debit.

c. Credits due the VA on purchase card procurements must be processed against the affected purchase card. Under no circumstances is the credit due on a purchase card procurement to be issued as a credit memorandum. This is to insure the purchase card order is properly reconciled and an adequate audit trail exists for the procurement.

10. Prevalidation of Funds. Prevalidation of funds is automated within the current computerized accountability system by application of the control point official's, or designee's, signature approving a VA Form 2237 Request, Turn-In and Receipt for Property or Services, prior to release to Logistics Services for action.

11. Control Procedures for Expendable Items – refer to FPMR 101-25.107. The facility AO may establish controls on expendable personal property items when the local

situation indicates a need. When a control is established it will be documented. Controls should be restricted to sensitive items which may be easily converted to private use, subject to abuse, or involve security issues.

12. Sales of Special Items

a. Beneficiary Items. Prosthetics sales documents and receiving reports containing items for direct release to a beneficiary will be annotated to identify each item.

b. Sales to Veterans Canteen Service. If Posted Stock is maintained at the facility for Canteen Service, their sales will be processed as an issue book request through the automated computerized inventory program maintained by Logistics Services.

c. Burial Flags

(1) Upon receipt of properly executed sections of VA Form 2008, Application for United States Flag for Burial Purposes, Logistics Services will furnish replacement burial flags to authorized issue points, e.g., Postmaster; Chief, Medical Administration Service or appropriate using service; Veterans Service Officer; VA National Cemetery Directors; and Arlington National Cemetery. The bottom section of the properly executed forms will be maintained in Logistics Services by the month in which the replacements were issued and will be filed with the replacement requests to support issues.

(2) Arlington National Cemetery, Washington, DC, is established as an issue point for burial flags.

(3) For further reference on burial flags, see Title 38, USCS, §2301.

d. Limitations

(1) Narcotics, whiskey or other alcohol products, and drugs for therapeutic use will be sold only to the Chief, Pharmacy Service, or designee.

(2) Alcohol will be sold only in original containers. Sales will be confined to the Chief, Pharmacy Service; Chief, Pathology and Laboratory Medicine Service (PALMS); and Chief, Research and Development Service.

(3) Supplies will not be issued directly to physicians or other personnel rendering service on a fee basis, nor will Government supplies be made available for their use, except in the performance of their official duties at VA installations.

e. Subsistence for Approved Programs. Subsistence required by other services for approved programs will be issued to the service involved in accordance with VHA Manual M-2, Part III, Paragraph 5.07.

f. Pacemaker Prostheses.

(1) The Chief, Logistics Services, or designee, is accountable for the purchase, issue, and disposal of all pacemaker prostheses.

(2) A separate accountable record for pacemaker prostheses containing the following entries will be maintained:

(a) Receipts. The make, model, serial numbers, and date received. When a pacemaker has been implanted, the original entry in the record will be annotated accordingly and accountability discontinued.

(b) Disposition. Pacemakers that cannot be implanted and those that are explanted will be returned to the Logistics Services, or designee, in accordance with local turn-in procedures, indicating make, model, serial numbers, and reason for turn-in. Final disposition action will be made to the accountable record. Turn-in units may be exchanged for credit or disposed of according to existing procedures. Explanted cardiac pacemaker prostheses may be used for research or training purposes. Appropriate entries listing make, model, serial number, and final disposition action will be made to the accountable record.

(3) When reserve stock of pacemaker prostheses is kept at the facility, the Chief, Logistics Service, or designee, and the responsible service maintaining and accounting for the stock will jointly conduct a monthly physical inventory of all units which will be reconciled with entries on the accountable record required by paragraphs (a) and (b) of this section. Discrepancies will be investigated and corrected.

13. Delivery of Nonexpendable. The Facility Accountable Officer will establish an equipment record for all nonexpendable property in an approved VA automated inventory system. A receipt signature of the EIL Custodial Officer, or designee, will be obtained upon delivery of nonexpendable equipment utilizing a properly executed document. A property voucher copy of the receiving report may be used. Reference paragraph 2, subparagraph a of this Part.

14. Processed Stores/Office Supplies

a. Logistics Services will ensure that a method of inventory control (preferably automated) is in place for all office supply items classified as processed stores. The inventory system will be used to maintain stock control data including inventory levels, receipts and issues, distribution worksheets (picking tickets), and auto generation for stock replenishment.

b. Processed Stores/office supplies may be sold to all VA activities.

15. General Turn-in Procedures. An automated turn-in package (i.e., the Equipment Request/Turn-In Package) should be utilized to the maximum extent possible and shall be used for all nonexpendable property.

a. Expendable or nonexpendable property that is no longer needed by a using activity, or property that has become unserviceable through normal use, will be considered as unrequired. Unrequired property will be returned to Logistics Services utilizing VA Form 2237 in accordance with local turn-in procedures. Acknowledgment of receipt of the turned-in property will be furnished to the using activity.

b. Property turned-in to Logistics Services will be classified as Supply Fund, Non-Supply Fund or Trust Fund. Logistics Services will determine if turned-in personal property can be reutilized within the VA, disposed of by the VA, or replaced pursuant to the exchange/sale authority in accordance with FMR 102-39. Logistics Services must advertise/post unrequired property in accordance with VA Directive and Handbook 7348. When unrequired property cannot be reutilized within VA, it is then considered to be VA excess and must be reported to GSA in accordance with VA Handbook 7348.

c. Coding for each item will be properly documented by Logistics Services to indicate the action necessary to continue, establish or terminate accountability utilizing the following action codes on the turn-in document:

(1) **C** Item continued in service

(2) **P** Item held pending disposition as facility unrequired property

(3) **X** Item held pending disposition as VA excess

(4) **D** Item destroyed. Accountability terminated

(5) **S** Item disposed of as scrap or salvage. Under excess property procedures, property coded with an action code **S** will be assigned a disposal condition code based solely on the definition of respective terms (salvage or scrap) as shown in FMR 102-36.40. Salvage material is required to be reported to GSA.

d. When Logistics Services makes a determination for disposition, turned-in property will be assigned a disposal condition code in accordance with FMR 102-36.240. The disposal condition codes will denote an accurate description of the condition of the property at the time it is turned-in. The disposal condition codes are as follows:

(1) **1** - New. Property is in new or unused condition and can be used immediately without modifications or repairs.

(2) **4** - Usable. Property shows some wear but can be used without significant repair.

(3) **7** - Repairable. Property is unusable in its current condition but can be economically repaired.

(4) **X** - Salvage. Property has value in excess of its basic material content, but repair or rehabilitation is impractical and/or uneconomical. **(Note: such items are required to be reported to GSA)**

(5) **S** - Scrap. Property has no value except for its basic material content.

NOTE: Since salvage is normally disposed of as an item of property identified by its original nomenclature, jacket accountability will be maintained pending its disposition.

e. For items disposed of using abandonment or destruction procedures, the justification will contain a complete summary of all actions taken and efforts made prior to disposal by this means in accordance with VA Handbook 7348.

16. Expendable Property

a. Serviceable supplies returned to Logistics Services may be redistributed to other issue points within the facility to fill immediate needs.

b. When the property returned is neither serviceable nor economically repairable, but has value for its scrap content, it will be sold as scrap. Unrequired property that meets the criteria for recycling should be recycled if at all possible.

c. Unrequired items, or items in long supply, will be advertised for reutilization within the agency unless justified in writing (e.g., items retained that will ultimately be used; and/or items that are more economical to retain than to dispose of and then reacquire at a later date). Long supply is defined as the quantity on hand of an item that is above the established stock level criteria for that item (the stock level should be designated in the automated inventory system). Items that cannot be reutilized will be determined to be VA excess and should be processed for disposition in accordance with VA Directive and Handbook 7348.

d. Drugs, biologicals, and reagents (serviceable and unserviceable) eligible for exchange or allowance with the contractor or manufacturer, will be returned to the contractor or manufacturer in accordance with FMR 102-39 and will not be picked up in the VA excess accounts. Items not disposed of by this means will be processed for disposition in accordance with current procedures in VA Directive and Handbook 7348.

17. Nonexpendable Property

a. When property is serviceable or economically repairable, and is to be reissued, the accountability will be transferred to the applicable EIL (See Appendix B for guide regarding economical repair costs).

b. When property is serviceable or economically repairable, and unrequired by the facility, but has not been determined to be VA excess, it will be advertised to other VA facilities through the appropriate reporting system in accordance with VA Directive and Handbook 7348.

c. When property is serviceable or economically repairable, and is determined to be VA excess, it must be reported to GSA in accordance with VA Directive and Handbook 7348.

d. When property is to be disposed of by trade-in to offset the purchase cost of a similar piece of equipment or similar supplies:

(1) The turn-in document will be cross-referenced to the purchase order document to which the trade-in applies;

(2) The trade-in item will be cross-referenced to the EIL file;

(3) An adjustment will be made to remove the property from the inventory account.

e. When property is to be disposed of by using the exchange/sale authority, and the proceeds applied toward the purchase of new equipment, a written determination is required to be documented in the contract for the purchase of the similar or like item (reference FMR 102-39.50).

f. When the property returned is neither serviceable nor economically repairable, and its unserviceability is due to normal usage, disposition will be effected in accordance with VA Directive and Handbook 7348.

g. Logistics Services will annotate the equipment record with the turn-in date when nonexpendable property is removed from service.

h. Engineering Service will be notified by Logistics Services when nonexpendable personal property is transferred, relocated, or removed from service. Notification will be accomplished using the automated nonexpendable inventory system or via e-mail.

i. Sanitization of Automatic Data Processing (ADP)/Information Technology (IT) nonexpendable property shall be in accordance with VA Directive and Handbook 6500. Turned in IT property/equipment must be sanitized in the least destructive manner and a certification of sanitization signed by a minimum of an IT technician and the Information Security Officer (ISO) prior to any type of disposal or donation action being taken. VA Form 0751, Information Technology Equipment Sanitization Certificate, will be used for the certification of sanitization. See Part 13 of this Handbook for more guidance regarding this subject.

18. Trust Fund Property.

a. When Trust Fund property is turned-in, it will be offered back to the donor.

b. Trust Fund property shall be handled in accordance with the provisions of the preceding sections except documents will be marked "Trust Fund Property." Proceeds from sales will be deposited in the General Post Fund account only.

19. Unrequired Property for Purchase/Hire Construction Contracts. Unrequired property of this type will be handled in accordance with the provisions of the preceding paragraph 15, subparagraph a. All documents will be clearly marked "Purchase and Hire, Construction of Medical Centers and Domiciliary Facilities Excess." Property may be picked up on the Engineering Service EIL if there is a need for it.

20. Leased (Rental) Personal Property

a. Personal property leased/rented exceeding a 90-day period will be accepted and recorded in the appropriate EIL.

b. Cost per test equipment should be recorded in the appropriate automated inventory system as leased equipment with a notation in the comments or specifications field that it is cost per test equipment. Under cost per test, the facility pays a fee for tests performed by the facility on the manufacturer's equipment.

c. The value entered for the item(s) will be the annual rental cost.

d. A copy of the lease document and other conditions pertinent to the lease will be maintained in the EIL folder.

e. Equipment leased/rented for a beneficiary's home use is exempt from this provision.

21. Adjustment Vouchers

a. An adjustment voucher will be used for the following purposes:

(1) To adjust Supply Fund inventory account discrepancies.

(a) Discounts greater than 3% should be adjusted to the inventory, e.g., the discount should be credited to the appropriate stock item in the automated inventory system. Discounts less than 3% can remain in the discount (variance) account.

(2) To adjust general ledger for discrepancies in inventory of EIL nonexpendable accounts.

(3) To adjust general ledger accounts when property is turned-in for disposition action (including controlled substances) that may be eligible for replacement/credit from the manufacturer or under an established drug return policy for outdated drugs.

(4) To effect transfer between inventory accounts when no other document is specified.

(5) To advise the Fiscal activity when adjustments are required as a result of erroneous posting data. Adjustment vouchers of this type will be cross-referenced to the erroneously prepared voucher and routed to the Fiscal activity for correction of general ledger postings.

(6) To record in the inventory accounts property acquired from other than purchase or requisition such as donation, unrequired/excess, or transfer.

(7) To remove from inventory accounts property that has been disposed of by exchange or sale when no other documentation relative to the transaction is used.

(8) To adjust general ledger accounts when and if Reports of Survey findings and recommendations have been approved and signed.

b. Circumstances necessitating the preparation of adjustment vouchers will be described in sufficient written detail to allow for proper accounting actions and management analysis.

c. Documents will contain the required accounting information for the Fiscal activity including cross-reference to original voucher(s).

d. A report captured from the automated inventory system recapping all posted adjustment transactions will be reviewed, signed, and dated on a monthly basis by the Chief, Logistics Services or designee.

e. Unposted adjustment transactions will update the appropriate Fund Control Point (FCP).

22. Review of Adjustment Vouchers

a. If an Adjustment Voucher/Journal Voucher is required due to Government property being lost, stolen, or damaged, a Report of Survey action shall be completed. Adjustment Vouchers for discrepancies over \$5000 require a Board of Survey action. A copy of such voucher, along with appropriate supporting documentation, must be forwarded to VACO, Office of DAS/OA&L.

b. Reference VA Directive and Handbook 7132 for Adjustment Vouchers regarding Supply Fund discrepancies.

23. Survey Action. Upon completion of survey action, the Facility Accountable Officer will assign the same common number to the Report of Survey as on the adjustment voucher. A copy of the Report of Survey will be filed with the adjustment voucher to support entries made to the inventory account.

24. Adjustment of Discrepancies Between Receiving Reports and Invoices. Invoices that do not coincide with receiving reports in quantity and price will be brought to the attention of the contracting officer, who will make a written determination for the record as to whether payment will be made or further contact with the vendor is required. If in the best interest of the Government and if appropriate funding can be secured, the purchase order will be amended to reflect the actual quantity and correct price. Purchase card orders require an amendment for all discrepancies over the threshold amount established in accordance with VA Handbook 4080, Government Purchase Card Procedures, and local procedures. All adjustments will be made in the computerized accountability system and, if affected, the automated inventory system.

25. Property Acquired Under Research Contracts. Personal property acquired under research contracts will be maintained in accordance with Title 31 USCS §6306, Authority to vest title in tangible personal property for research, and Federal Acquisition Regulation (FAR) Part 35, Research and Development Contracting.

26. Retention or Transfer of Title. Title to personal property acquired under research contracts may vest in the research contractor or the government in accordance with Title 31 USCS §6306, Authority to vest title in tangible personal property for research, and Federal Acquisition Regulation (FAR) Part 35.014, Government property and title.

27. Research Contracts Property Records. Personal property records for VA property furnished to contractors under research contracts, or any other contract providing a contractor with government furnished equipment (GFE) will be maintained in accordance with FAR Part 45.105, Records of Government property.

PART 5. USE STANDARDS

1. General. In accordance with FPMR 101-25.301 (a), this part prescribes the Use Standards established for VA. Use Standards are the criteria used to determine when specific types of personal property are authorized for use. In authorizing specific items for use, it must be determined that the item benefits VA. Items shall not be put into use for the sole purpose of benefiting an individual or certain group of personnel (exceptions: safety considerations or handicapped persons).

2. Telephone Monitoring Devices. Telephone monitoring instruments, mechanical or electronic, are authorized for use by field facilities only in accordance with and under the controls applicable to the use and operation of the item(s) as outlined in MP-6, Part VII, Chapter 2.

3. Refrigerators

a. Appropriated funds may not be used to purchase refrigerators for employee use (exception – VA quarters and Resident Engineers).

b. Only explosion proof refrigerators approved by Underwriters' Laboratories, or other nationally recognized testing laboratories will be used for storage of flammable and combustible liquids (i.e., solvents). Explosion proof refrigerators are those which are constructed to meet the requirement for class I, division I locations, as described in Article 500, National Electrical Code NAPA No. 70.

c. All regular household refrigerators, other than in personnel quarters, assigned for use at the facility will be distinctly labeled in a conspicuous place as follows: NOT FOR THE STORAGE OF FLAMMABLE LIQUIDS.

d. Refrigerators for specimens and reagents will be clearly labeled as: NOT FOR STORAGE OF CONSUMABLE FOOD PRODUCTS.

4. Flags and Reproduction of the VA Seal

a. The United States flag, the VA flag, and a plastic or wood reproduction of the VA seal are authorized for display in the respective offices of administration heads, assistant secretaries, deputy assistant secretaries, other key officials, and facility directors and in auditoriums used and operated by VA. At installations where VA is the sole occupant of the building, and at Manila, Philippines, these flags and seals are also authorized for display in the main lobby. In addition, at Manila, Philippines, the Philippine flag is authorized for display with the United States flag. The directors of memorial service networks may authorize display of a VA flag in the administration building of the national cemeteries under their jurisdiction when such action is approved by the Director, National Cemetery Administration.

b. Directors of VA regional offices and memorial service networks may authorize display of a United States flag and a plastic or wood reproduction of the VA seal in VA offices and national cemeteries under their jurisdiction, where the size and activity of the office indicate such action to be in the best interest of the Government.

c. In accordance with the U.S. Code: Title 4, the United States flag is authorized for display in:

- (1) Chapels or other buildings used for religious purposes.
- (2) Theaters used and operated by VA.
- (3) Rooms established to conduct formal hearings for veterans.
- (4) The reception area of veterans services divisions.
- (5) The reception area of outpatient clinics.
- (6) The personnel office where the oath of office is administered.

d. A plastic or wood reproduction of the VA seal is authorized for display in areas where display of the VA flag is not authorized, but where display of the seal is desirable due to the presence of beneficiaries or the public.

e. The United States flag and the VA flag may be carried in burial ceremonies and other outdoor ceremonies, with appropriate escort, at the discretion and under the responsibility of the facility director or the national cemetery director.

f. Where services are held, one flag, indoor type, indicating the appropriate religious faith, as applicable, is authorized for each chapel.

g. Destruction of national, state, local, or VA flags will be coordinated with local service organization and accomplished by burning or shredding;.

5. Furniture, Furnishings, and Office Equipment Pools

a. New furniture or furnishings (e.g., lamps, filing cabinets, pictures, draperies, etc.) will not be purchased unless no suitable furniture exists in excess or is available from a property rehabilitation program. Open market purchases will not be made unless there is a written determination that the General Services Administration (GSA) does not have a suitable item.

b. Beyond use in administrative offices, office furniture and furnishings may be provided for use in laboratories, clinics, wards, diagnostic rooms, and in other non-administrative areas where there is a demonstrated need for items of this nature. Use

of office furniture and furnishings in other than administrative areas does not change the categorization as office furniture and furnishings.

c. Office furniture such as desks, tables, etc., shall not be substituted for benches or other equipment for which technical or specialized fixtures or equipment may be obtained.

d. The least expensive items of standard metal, wood, or renovated furniture available from GSA should be obtained when excess or unrequired property is not available. To the maximum extent possible, furniture and furnishings shall be made from recyclable material.

e. VA has set a \$5,000 limit on expenditures to furnish or redecorate VA Central Office and field facility employee offices, including those occupied by Senior Executive Service, GS-15, or Title 38 equivalent employees. This limit applies to conference rooms, briefing rooms, and reception areas supporting or serving the individual's personal office.

f. Each facility may establish office equipment pools and sharing programs to reduce procurement and increase utilization for, including, but not limited to, such items as facsimile, transcribing, duplicating, calculating, typing, automatic data processing (i.e., laptops, etc.) cell phones, pagers, and audiovisual equipment. Procedures will be in place to control these items and to know to whom and where assigned.

g. Carpeting is only authorized for use where it can be justified over other types of floor coverings that are less expensive. The need to maintain an environment commensurate with the purpose for which the space is allocated may be taken into consideration. Cost, safety, insulation, acoustical control and the degree of interior decoration required are all factors that may be considered in the justification for purchasing carpet over other type of flooring. To the maximum extent possible, carpet made from recyclable material will be purchased and utilized.

6. Personnel Quarters Established within VA

a. Each set of housekeeping quarters will be equipped with smoke detectors, fire extinguishers, cooking stove, refrigerator, microwave and, where not installed, kitchen cabinets and a medicine cabinet. Items essential to the protection or maintenance of housekeeping quarters may also be furnished. Such items are:

- (1) Fireplace equipment (irons, tools, and screens).
- (2) Doormat.
- (3) Rods, curtains, or draperies.
- (4) Waste receptacles (outside use only).

b. Quarters designated for use by and occupied by an employee will also be provided with a dishwasher, a clothes washer and dryer or a washer-dryer combination, carpeting (wall-to-wall) or rugs and/or rug cushions.

c. In addition, housekeeping quarters may be equipped with furniture and furnishings in order to accommodate a married resident. Items furnished will be limited to those necessary to provide a reasonable degree of livability and will be obtained from excess sources. These quarters will not be furnished with the equipment listed in paragraph (b) of this section.

d. Furniture and furnishings presently assigned to housekeeping quarters may be repaired provided that the immediate or cumulative cost of such repairs, including labor and material, shall not exceed 75 percent of the cost to replace the item. The facility director will, under any one of the circumstances cited in this paragraph, have all furniture and furnishings not authorized by this section removed from housekeeping quarters when:

(1) The quarters are vacated, and it is determined that the condition and quantity of the furniture are such that the quarters may not be considered adequately furnished.

(2) The incoming occupant of the quarters requires less than 50 percent of the furniture presently in the quarters.

(3) The facility director determines that the quarters will be rented at the unfurnished rate.

e. Furniture will not be stored when removed from housekeeping quarters, but may be used to upgrade similar furniture in other housekeeping quarters or utilized elsewhere at the facility. Items not utilized will be disposed of in accordance with excess property procedures.

7. Motor Vehicle Components

a. Fire fighting vehicles may be equipped with a siren and red or blue emergency warning lights. Facility ambulances and police patrol vehicles will be equipped with emergency running lights and accessories in conformance with the motor vehicle code of the state in which located. All vehicle warning accessories must conform to the vehicle manufacturer's electrical system tolerances. Subject to approval of GSA, in accordance with FMR 101-39.304, accessories will be temporarily installed on GSA-owned vehicles by use of detachable roof cross bars.

b. Radio transmission equipment is authorized for use by field facilities only in accordance with and under controls applicable to the use and operation of the item as

outlined in VA Manual MP-6, Part VIII, Chapter 5. All radio frequencies must be within the narrow band range in order to comply with federal regulations.

8. Microwave Ovens

a. Microwave ovens will not be purchased for employee use utilizing appropriated funds. Exceptions are as follows:

- (1) Temporary living quarters used to house employees on TDY;
- (2) Engineering and construction services, e.g., resident engineer;
- (3) Regional Medical Education Centers and educational training centers;

(4) Hospital wards for patient use. Any use of microwave ovens must comply with VA Safety, Occupational Health, and Fire Protection Standards, as set forth in VA Manual MP-3, Part III, Appendixes 5H and 5N.

9. Reproduction Equipment

a. Requests for approval will be forwarded to the Publications Service (0497), VA Central Office, on VA Form 134, Combination Requisition and Shipping Ticket.

b. In accordance with the Government Printing and Binding regulations, Title 3, General Provisions, paragraph 30, Central Office approval is required for the lease or acquisition of copiers meeting one or more of the following criteria:

- (1) Exceeds 65 copies per minute,
- (2) Costs more than \$10,000, or
- (3) Requires a dedicated operator.

c. All related commercial print-shop capacity items, such as cameras (composing and process), composition devices, offset presses, paper cutters (power operated), paper drilling machines (power operated), collating machines (sheet and signature), and binding equipment (adhesive, perfect, wire or plastic, power operated), must have Central Office approval.

PART 6. REPLACEMENT STANDARDS

1. General

a. Purpose. To provide policy and guidance in support of FPMR 101-25.4 regarding the replacement of equipment and furniture.

b. Definitions:

(1) Replacement means acquiring an item for the specific purpose of using it in place of an item that will no longer perform the tasks for which it is needed.

(2) Exchange means to trade or trade-in an item to reduce or offset the cost of the acquired item.

(3) Acquired means obtained in any manner, e.g., purchased, transferred, donated, manufactured, leased, or rented.

2. Program Objectives and Responsibilities

a. Objectives:

(1) To maximize utilization.

(2) To provide for orderly replacement of equipment and furniture.

(3) To facilitate projected estimates of equipment and furniture replacement

(4) Provide an estimate of projected costs for planning purposes.

(5) Enable management to maintain a balance between equipment and furniture investment and actual needs.

b. Responsibilities. It is the responsibility of each administration, (i.e., NCA, VHA, and VBA) to ensure VA Handbook 7348 and FMR 102-39 are adhered to regarding premature replacement, trade-in allowances, and accurate disbursement of funds received from sales.

3 Replacement Criteria

a. VA facilities should retain equipment items in service which are in usable condition even though they have met their given life expectancy, provided the item can continue to be used or operated without excessive maintenance cost or substantial reduction in trade-in value. In determining the need to replace a piece of equipment, there are three overarching factors to be considered, and then there are sub-factors within each category. They are as follows:

(1) Function:

- (a) Obsolete and does not meet established standards i.e., safety.
- (b) New modality or need to support a new mission or program.
- (c) Improve customer service.

(2) Reliability/Regulating Compliance:

- (a) Age.
- (b) Excessive down time.
- (c) Parts and service no longer available.
- (d) Documented regulating deficiency i.e., JCAHO, OSHA, etc.

(3) Economy:

- (a) Payback period through reduced recurring cost.
- (b) Increased workload or productivity.
- (c) Sharing with other sites with potential to generate income.
- (d) Excessive repair costs.

b. Furniture (office, household, quarters, and institutional) shall not be replaced unless the estimated cost of repair or refurbishing (based upon GSA term contracts, including any transportation costs) exceeds 75 percent of the cost of a new item of the same type and class.

c. Replacement of motor vehicles will be in accordance with FMR 102-34.280.

d. Replacement of materiel handling equipment will be in accordance with FPMR 101-25.405.

NOTE: It is not an accepted practice to retain replaced equipment. However, if approved by the facility Accountable Officer or designee for retention at the facility, each item retained will be identified on the applicable Equipment Inventory List (EIL) and within the property accountability program to ensure they are not included in future replacement or budget forecasts.

PART 7. HAZARDOUS PRODUCT/EQUIPMENT REPORTING

1. General. Policy for the identification, tracking, and removal of potentially hazardous products, including medical devices, equipment, and subsistence items that could endanger the life or safety of VA beneficiaries, visitors, or employees will be in accordance with the Safe Medical Device Act; Public Law 101-629 dated November 28, 1990; Public Law 102-300 dated June 16, 1992 (21 CFR); and VHA Directive 2004-047. The facility director will designate a program coordinator.

a. The Food and Drug Administration (FDA) has the authority to ban or recall devices which present unreasonable risks or substantial harm. When a manufacturer or the FDA recognizes that a product is potentially hazardous, action must be taken to notify all users of the product and to provide instructions for its removal or recall. The FDA recalls the devices and field corrections are classified into three categories:

(1) Class I. A situation in which there is a reasonable probability that the use of or exposure to a hazardous product will cause serious adverse health consequences or death.

(2) Class II. A situation in which the use of or exposure to a hazardous product may cause temporary or medically reversible adverse health consequences, or where the probability of serious health consequences is remote.

(3) Class III. A situation in which the use of or exposure to a hazardous product is not likely to cause adverse health consequences.

b. The GSA issues "Safety Alerts" on potentially hazardous products under its contracts. Other Government agencies issue notices of hazardous products under their jurisdiction. Manufacturers may also issue warnings or recalls on their products.

c. Each VA facility shall establish written procedures for the identification, handling, storage, transport, and disposal of hazardous products. VA employees who routinely come into contact with hazardous products shall be trained in proper procedures.

2. Externally Identified Hazardous Products. A facility plan will be written to outline procedures for externally identified hazardous products and materials. The following elements shall be included:

a. VHA will ensure that all health care facilities subscribe to the "FDA Enforcement Report." For a current listing of FDA Enforcement Report or recalls, refer to www.fda.gov.

b. The facility AO, or designee, will assure the maintenance of a file of all recalls and hazardous product notifications. A listing of the notices will be maintained on file with final disposition for accountability purposes.

c. Upon receipt of a hazardous notice, the Facility AO, or designee, will promptly send a copy of the notice to affected management official(s) to include safety and risk management for review and response. The original notice will be retained on file at the facility.

d. When responses from the using organizations are received, appropriate action will be initiated by the facility AO, or designee.

3. Internally Identified Hazardous Products. As defined in accordance with FMR 101-42.001, a facility plan will be written to outline procedures for internally identified hazardous products and materials. The identification of hazardous materiel will be in accordance with FMR 101-42.002. The facility AO will ensure proper storage and distribution of hazardous products and materials. The following elements will be included in the facility plan:

a. Hazardous products and material will be reported to the designated coordinator. That official shall consult with the appropriate authority to determine to what extent the hazard may affect the safety of beneficiaries, visitors, or employees. When the degree of risk has been established, action to limit, restrict, or remove the product from use will be immediately implemented.

b. Action should be taken on validated hazards within 72 - hours through the following channels:

(1) VA Central Office, Office of Asset Enterprise Management (004B2).

(2) Medwatch Form 3500 and 3500A will be submitted to the FDA Medical Products Reporting Program. Assistance is available through www.fda.gov/medwatch or call 1-800-332-1088. Copies of form 3500 and 3500A will be submitted to the manufacturer, in accordance with 21 Code of the Federal Regulations (CFR) part 803.

c. This policy involves hazardous products only when the degree of risk has been established by appropriate authority and action has been taken to limit, restrict, or remove the product from use. The Federal Supply Classification (FSC) groups which contain hazardous materiel have been identified and are listed in FMR 101-42.1101. The VA Quality Improvement Program, as outlined in VAAR 846.70 and VHA Directive/Handbook 1761.2 Inventory Management remains in effect.

Part 8. PHYSICAL INVENTORIES

1. Using Department Inventories (Expendable). Control of expendable property inventories in using activities is a part of the staff responsibility of the field facility. This responsibility is exercised through the application and enforcement of consumer levels in an automated inventory system. A level will be established in collaboration with Logistics Services and the using activity for each repetitively used item.

2. Using Department Inventories (Nonexpendable)

a. Nonexpendable property on hand in using activities will be only the amount necessary to perform the assigned functions. Each facility will establish controls to ensure that all using activities continually evaluate the need for assigned equipment. When unrequired property is identified, it will be turned-in for reassignment, reutilization or disposal in accordance with excess procedures.

b. When a project has been approved and funded through the major/minor construction program or the nonrecurring maintenance (NRM) program to expand existing programs or establish new programs, equipment may be retained to activate such programs.

3. Nonexpendable Property Required to be Inventoried. All property requires basic accountability in the automated equipment inventory system. Sensitive items, regardless of cost, and accountable property valued at \$5,000 or greater will be maintained in an automated equipment inventory system and listed on an Equipment Inventory Listing (EIL). Property costing \$100,000 or greater will be accounted for as a capitalized asset. Logistics Services' records will be reconciled with Fiscal's records on a monthly basis for all capitalized nonexpendable property. All sensitive items as designated in paragraph 5, subparagraph a, of this part, will be accounted for during the inventory process. In addition, the AO will ensure that at the completion of each physical inventory the property records have been updated correctly and there is no required field entry left blank. (See Appendix G for a guide to conducting a successful nonexpendable inventory).

NOTE: Due to required preventive maintenance or JCAHO requirements, some items below the accountable thresholds will also need to be added to the automated inventory system in accordance with local Engineering policy.

4. Expendable Stocks Maintained in Inventory Records

a. A complete physical inventory of all stock, posted and unposted, will be taken within a 12-month period, either wall-to-wall or by cycle. Cycle inventory may be by class, account, location, inventory group, or by the ABC Principle. The ABC Principle is a concept whereby a small percentage of the inventory is equal to the largest fraction of value. The ABC Principle is more fully explained in the Materiel Handlers Training

Guide TG-90-1. The accuracy rate will be determined based on the number of line items inventoried in relation to the number of line items discrepant. The minimum acceptable accuracy rate is 90 percent. If a 90 percent accuracy rate is not achieved, another stock inventory shall be completed in 6 months. For posted stock (Supply Fund inventory), the accuracy rate is based on all valid inventory quantity adjustments made during the 12 month period, from the previous annual inventory to the current one, to include spot checks and warehouse refusals. For more information on Supply Fund, reference VA Directive and Handbook 7132. The criteria used for determining long supply will be if the stock on hand is 10% or greater than the established stock level (this also includes items due in from procurements) in accordance with FPMR 101-27.300. The accountable record will be reconciled with the appropriate inventory point, and all discrepancies will be promptly adjusted (See Appendix H for a guide in conducting a successful expendable inventory).

b. Public Law 91-513 requires a biennial inventory of items subject to the Controlled Substances Act (reference 21 CFR §1304.11). The biennial inventory may be taken on any date within two years of the previous biennial inventory. The inventory must remain on file until the next inventory.

5. Inventory of Equipment in Use

a. Annually, a physical inventory of all nonexpendable accountable property and designated sensitive items will be conducted. Accountable personal property is defined as nonexpendable property with an acquisition value of \$5,000 or more and property that is of a sensitive nature regardless of acquisition cost. The inventory is conducted on an annual basis which is from the month of completion to the next 12 month period; however, 25% of the established EILs will be completed quarterly. The inventory due date can be changed in the following three circumstances:

- (1) EIL custodial officer request a change (requires adequate justification)
- (2) Accuracy rate falls below 95%
- (3) Management decision to balance workload

Property Management will reconcile the inventory to the automated property accountability system through adjustments, Reports of Survey, and turn-in documents.

b. Physical (which includes electronic means) inventory is the process of reconciling accountable personal property records with the property actually on hand. At a minimum, when the inventory process is being conducted the following elements will be verified against the EIL: serial number, model number, and location. Annual inventories will include the following sensitive items:

(1) Handheld and portable telecommunication devices, e.g., Palm Pilots, Blackberries, two-way pagers and personal digital assistants (PDAs). Keynote pagers are not included.

(2) Printers.

(3) Data storage equipment, e.g., desktop computers, laptops and fixed CD drives, copiers, and facsimile machines.

(4) Video imaging equipment, e.g., surveillance monitoring equipment, CRT monitors, LCD monitors, smartboards, panaboards, video projectors, cameras, VCR and DVD players and recorders.

(5) Cell phones and telephone monitoring devices.

(6) Radios, e.g., two-way radios and base stations (but not household type).

(7) Motor vehicles including donated, leased or rental for 90 days or longer.

NOTE: Firearms and ammunition are addressed in VA Directive 7347.

For improved accountability, facilities may include additional items to be inventoried. Above is a minimal listing of items designated as sensitive that must be inventoried annually. Facilities may establish local policy that identifies additional items as sensitive property as the facility deems appropriate. Sensitive items include all items containing memory storage capability for retaining personally identifiable information that is protected and/or confidential as specified in the Privacy Act and in the Health Insurance Portability and Accountability Act (HIPAA), whether or not the item is classified as information technology (e.g., ID card embossing machines).

b. Facilities may use 'inventory by exception' (meaning the item has been sighted during scheduled preventive maintenance or movement of the item) which will negate the requirement to physically count the item during an annual inventory. However, when inventory by exception is utilized, at a minimum, the serial number and location will be verified. In addition, EILs that have a 95 percent or above accuracy rate will be required to be inventoried annually. EILs that fall below a 95 percent accuracy rate must be inventoried again in 6 months. EILs not attaining a 95 percent accuracy rate on initial inventory shall be reported to the facility director and to the VISN CLO. EILs not attaining a 95 percent accuracy rate when re-inventoried shall be reported to the ADAS for Acquisition and Logistics Programs and Policy (049P), OA&L, through the facility director's office for consultation and advisement.

c. To the maximum extent possible, EIL inventories will be conducted using barcode technology that is compatible with the automated equipment inventory system.

Inventory data collected on the barcode scanner will be uploaded to the automated equipment inventory system. Upon initial receipt of any new equipment item, Logistics Services shall populate the automated equipment inventory system with the following data (comments and specifications (spex) fields are optional):

- Manufacturer name;
- Serial number;
- Model number;
- Category stock number (CSN);
- Life expectancy (LE - may automatically populate when CSN entered);
- Manufacturer equipment name (brief narrative identifying the equipment; facility decision to identify as common equipment name or manufacturer name of equipment, but should be formatted as noun first with adjectives following);
- EIL number of responsible service or section;
- Purchase Order (PO) number (should contain station number followed by a dash and 5-digit PO number);
- Acquisition method;
- Vendor purchased from (could be different from manufacturer name);
- Lease cost (if applicable);
- Asset value (acquisition cost);
- Acquisition date;
- Warranty expiration date;
- Replacement date (may automatically populate after LE and acquisition date entered);
- Acquisition source code of procurement;
- Type of item;
- If replacement equipment, Equipment Entry (EE) number of item being replaced;
- Use status;
- Parent system (if applicable);
- Using service (could be different from service aligned with EIL number);
- Location (will be populated automatically when inventory data uploaded from barcode scanner; can be updated manually; location must be contained in Engineering Space File to be accepted);
- Last inventoried date (will be populated automatically when inventory data uploaded from barcode scanner and can be updated manually);
- Turn-in date (populated only after item turned in to Warehouse; location field must be updated to reflect proper location of turned in item);
- Final disposition date (populated only after final disposition of item occurs);
- Disposition method (populated only after final disposition of item occurs)
- Disposition value (populated only after final disposition of item occurs);
- Ownership (station number);
- Investment category (capitalization designation);
- Fund (Treasury Symbol appropriation fund code of procurement; i.e., AMAFMC);
- Fund Control Point (FCP) from purchase order (may automatically populate when PO number entered);

- Budget Object Code (BOC) from purchase order (may automatically populate when PO number entered);
- Standard General Ledger (SGL) account number pertaining to type of equipment;
- Administration Office (AO) - accounting classification identifying office or administration equipment purchased for;
- Equity account (accounting classification, i.e., 3299 for medical)

Normally, Engineering Service is responsible for entering certain information in the automated equipment inventory system which includes the following:

- Category (used for Preventive Maintenance (PM) scheduling)
- Service contract designation
- Contract cost amount
- JCAHO requirement designation
- All data for Building Service Equipment (BSE) and expendable items requiring engineering maintenance

d. The EIL inventory schedule in the Logistics Services will include the following:

- (1) Date(s) of scheduled inventory (by month, quarter, or fiscal year as appropriate).
- (2) Title of custodial officer.
- (3) Date of notification of custodial officer.
- (4) The date of completion of all adjustments made by the Logistics Services.
- (5) Accuracy rate of inventory.
- (6) Next scheduled inventory month.
- (7) Five percent verification completion date

When an inventory is due, the custodial officer will be notified (electronic mail notification is acceptable) and provided a copy of the applicable EIL for inventory and the following will apply:

(a) If the EIL contains less than 100 line items the custodial officer, or designee, will, within 15 working days after receipt of the notice, conduct a physical count of all nonexpendable property listed.

(b) If the EIL contains 100 or more line items, the physical count will be conducted within 20 working days after receipt of the notice.

(c) Inventories will be considered complete when the EIL custodial officer has conducted the inventory and signed the EIL within the specified time frames as stated in (a) or (b) above.

NOTE: Using services can request preliminary working copies of their EIL prior to the official scheduled inventory period. These advance copies can be used to identify and correct any issues before the scheduled inventory period begins. The time frames listed above pertain to the official scheduled inventory period.

e. During the inventory process, the custodial officer will evaluate the need for all equipment assigned to them and will certify on the EIL by selecting and checking the applicable statement, personally signing on the EIL, and dating. At a minimum, when conducting the inventory process, the following elements will be verified on the EIL listing: serial number, model or model number, and location.

f. All completed EIL inventories will have a 5 percent verification inventory conducted by the accountable officer or designee, a disinterested party and the custodial officer or designee.

g. A scheduled inventory may be extended for extraordinary reasons which include natural disasters, fire, or an act of terrorism. If circumstances warrant, an extension may be granted for any number of days not to exceed of 60 days, as deemed appropriate by the facility director or designee. The maximum extension is established as 60 days based on EIL inventory cycles (i.e. a portion of the total number of EIL inventories are conducted each quarter so the 60-day extension will eliminate the EIL inventories from crossing quarters and increasing the EIL inventory workload for the next quarter). Circumstances requiring an extension will be specified in the written request (memo or e-mail format). A copy of the approved request will be forwarded to Logistics Services and maintained with the EIL.

h. Medical centers will establish a method of accountability covering furniture and equipment in VA quarters. Nonexpendable property located in VA quarters shall be maintained on individual EILs for each unit of established quarters.

i. A physical count of all property on loan to or from VA will be taken as scheduled by the accountable official, with action taken on all discrepancies.

j. For improved accountability, the use of an automated Equipment Request/Turn-In Package that is compatible with the computerized accountability system shall be utilized to the maximum extent possible.

6. Tenant Property Inventory Responsibility. Facility directors and accountable officers, or their designees, are responsible for accountability and oversight for all equipment stored or utilized in their facility regardless of ownership and will ensure that certain functions are properly implemented.

a. A tenant may be a virtual entity and is defined as a location having physical control of the receipted item but that does not have an established inventory tracking system and requires inventory management, tracking and accountability support functions from a VAMC in proximity to the tenant or virtual entity.

b. EIL custodial officers who have oversight of tenant equipment will report operational status or physical location changes to the facility accountable officer or designee.

c. Facility AOs are responsible for coordinating inventory management information with tenant inventory EIL custodial officers and program managers to ensure proper accountability of all property maintained within the facility.

d. Tenant EIL custodial officers are responsible for communicating new purchases or changes in inventory quantities with facility accountable officers by email. A constant flow of communication between the tenant EIL custodial officer and the facility accountable officer is critical to ensuring the security and accountability of VA property.

Part 9. INVENTORY ACCOUNTING

1. Accounting Methods. Automated inventory accounting systems will be utilized at field facilities for expendable and nonexpendable inventories and Logistics Services programs, to meet materiel management requirements and to provide data for reporting needs, including the integration of inventory accounts with standard general ledger accounts. Regulations require the use of Cataloging for proper identification and classification of property (reference 41 CFR 101-30.501). For proper identification and control of property, a National Stock Number (NSN) field will be included in any automated inventory system utilized for personal property management functions. The NSN field should be populated to the maximum extent possible. The Category Stock Number (CSN) field in the automated equipment inventory system is required for all nonexpendable items.

2. Valuation of Excess Property

a. Supply Fund stocks determined to be unrequired by the facility will be transferred to the applicable property pending disposal account at record value.

b. Unrequired Non-Supply Fund property will be transferred between VA facilities at record value and to other Government agencies without reimbursement. Transfer documents for Non-Supply Fund property will show the dollar value at which the property is currently recorded. Transfer documents for Supply Fund property will show the value of the property for the purpose of recording the inter-facility transfer.

c. Unrequired Trust Fund property will be transferred between VA facilities without reimbursement and will remain classified as Trust Fund property.

3. Equipment Inventory Listing (EIL)

a. Accountable nonexpendable property valued at \$5,000 and greater will be listed on the EIL. In addition, nonexpendable sensitive items as defined in Part 8, paragraph 5, subparagraph b, will be included on the EIL regardless of cost.

b. VA Central Office department heads and staff office directors or their deputies will be designated as custodial officers and will assume responsibility for nonexpendable property assigned to their departments or staff offices. This responsibility may be delegated to one service director or equivalent within a department or staff office.

c. For the following determinations, consideration shall be given to the inventory management responsibilities required for the proper control, utilization and replacement of property:

(1) The facility director shall designate, in writing, one employee to assume custodial officer responsibility for nonexpendable property (maintained on appropriate EIL) assigned to each of the various services/activities (i.e., service lines, sections of service lines, departments).

(2) Designations will be confined to members of the director's immediate staff, normally division and service chiefs. An exception may be made in research activities by designating either the research coordinator or the individual investigator as the custodial officer.

(3) Unless otherwise designated by the director or designee, Logistics Services is responsible for ward property and will perform administrative functions relative to control, replacement, maintenance, and repair of this property, in coordination with the using service.

d. Custodial officers specified in paragraphs b. and c. may designate, in writing, administrative or other employees to act for them in handling inventories and other paperwork involved in equipment management and control. The written designation must state that the custodial officer acknowledges that designating an employee to act in their behalf does not relinquish their responsibility as custodial officer. They must continue to personally sign the EIL and mark the appropriate certifications. The original of this designation will be furnished to the Facility Accountable Officer.

e. Any changes to the EIL, accomplished subsequent to the date on which the EIL is signed, will be supported by appropriate documentation. Upon receipt by Logistics Services, any required updates to the EIL will be processed within 5 working days. The documentation will be filed with the EIL until the next inventory is completed and the custodial officer has personally signed it and made the appropriate certifications. A

copy of the supporting documentation for changes shall be furnished to the custodial officer.

f. Each EIL will be assigned a number in accordance with standardized department numbers which are provided in Appendix I of this handbook.

g. Nonexpendable property used by the resident engineer will be assigned a standardized department number EIL and the property will be listed on the EIL. When the project has been completed and disposition instructions have been received from the Office of Construction and Facilities Management, VA Central Office, the following actions will be completed:

(1) Property not to be shipped to another facility and declared unrequired will be disposed of in accordance with current excess procedures contained in VA handbook 7348.

(2) Property to be shipped to another facility will be transferred by the receiving facility executing VA Form 134, Combination Requisition and Shipping Ticket.

h. Prior to disposing of property containing data sensitive material, refer to VA Directive and Handbook 6500. Property containing data sensitive material must be sanitized in the least destructive manner possible and the sanitization must be certified by the technician and the Information Security Officer (ISO) at a minimum. VA Form 0751 may be used for certification of sanitization.

i. Information pertaining to government-owned property on loan will be maintained with the appropriate EIL. This information could be a copy of the VA Form 0887a with a copy of the Property Pass or a copy of the applicable section of the Loan Register which shall be maintained by Logistics Services and the IT EIL custodial official. A copy of VA Form 0887b, Non-VA Employee Personal Property Loan Form and VA Form 0888, Revocable License, shall be filed in Logistics Services/IT EIL custodial official and a copy provided to the custodial officer. A copy of the agreement shall be maintained with the EIL for the duration of the agreement.

4. Reporting Requirements

a. Reconciliation of standard general ledger accounts is a Department-wide requirement of Logistics Services and Fiscal or Financial Services (VHA, VBA, NCA, etc.) and will be accomplished at the end of each month. Research will be conducted on all discrepancies to include verification of the original document. Corrections will be promptly completed. Documentation supporting the reconciliations must be maintained by the medical center for three years after the close of the fiscal year.

b. The facility Accountable Officer, or designee, will submit, in letter form, a certification that inventory values have been reconciled and are in balance with those of

Fiscal or Finance Service as of the fiscal year-end. In addition, the Chief, Fiscal or Finance Service, will cosign the certification thereby attesting to accuracy of the year-end standard general ledger account balances for equipment and Supply Fund stock inventories. Certifications will be submitted to the appropriate office as specified in the Year-End Financial Reports and Statements Certification memo sent annually from the VACO Chief Financial Officer prior to the end of the fiscal year. A certification regarding compliance requirements of the Government-wide Purchase Card Program will be signed by the Agency/Organization Purchase Card Coordinator (A/OPC), the Facility Accountable Officer and the Chief, Fiscal or Finance Service. Certifications will be submitted in accordance with VA Directive 4540 and VHA Handbook 1730.1. These year-end certification reports are maintained in the VACO Fiscal/Finance office.

5. Receiving and Sales. A copy of the signed receiving report or VA Form 2237 is the required document, for receipts and/or sales for nonexpendable property. A copy of the receiving report or 2237 will be filed in the appropriate EIL.

6. Turn-ins. Documentation for the turn-in of nonexpendable property will be properly annotated with the intended action code. A common number will be assigned to the document. After action is taken, the document will be filed with the applicable EIL. Automatic Data Processing (ADP)/Information Technology (IT) nonexpendable property, in accordance with VA Directive and Handbook 6500, must be sanitized and a certification of sanitization signed by an IT technician and the ISO, at a minimum, prior to any type of disposal or donation action being taken. VA Form 0751 may be used for certification of sanitization.

7. Adjustment Vouchers. Discrepancies discovered as a result of an inventory will be adjusted by preparing appropriate debit and credit adjustment transactions. A computer prepared "Adjustment Voucher" (AV), or manually prepared VA Form 140, Adjustment Voucher, shall be used for documentation. For adjustments resulting from Reports of Survey actions, reference Part 10 of this handbook.

8. Equipment Installed as Part of Initial Construction. Nonexpendable property installed as part of initial construction will, on completion of the contracts, be picked up in property records at the acquisition value or the current market value. After a construction project is completed and accepted, title to property furnished and installed by construction contractors is transferred to the facility through the resident engineer. It is the joint responsibility of Logistics Services and Engineering Service to ensure all items have been identified and entered into property records. The resident engineer will transfer all descriptive literature, warranty data, and maintenance manuals to Engineering Service.

PART 10. REPORT OF SURVEY PROGRAM

1. General

a. The Report of Survey (ROS) system is the method used by VA to obtain an explanation as to the circumstances surrounding the loss, damage, or destruction other than through fair wear and tear of Government property. VA Form 1217, Report of Survey, will be used to document the findings, determine responsibility; record pecuniary liability, if any, established by a board of survey or surveying officer, and will be used as the official document to adjust the record account. The term board, wherever used in this part, refers to the board of survey or the surveying officer. Each facility will ensure that training regarding the ROS process will be established.

(1) Surveying officials are personnel charged with the review or investigation of incidents involving loss, damage, or destruction of Federal property; determination of financial liability for loss or damage of such property; and authorization for removal of items from official property records. Local policy will be established which addresses who may be designated as a surveying official. A surveying official should be at least a GS- 9 or equivalent.

(2) Definitions for Negligence:

(a) Simple. An act, failure, or omission on the part of the responsible employee(s) to exercise the appropriate degree of care, precaution, or vigilance resulting in loss, damage, or destruction of government property.

(b) Gross. An act, failure, or omission on the part of the responsible employee(s) to a greater degree and deemed by competent authority to be misconduct or willful, wanton or reckless disregard for government property resulting in the loss, damage, or destruction of government property.

b. When the findings indicate the possibility of holding a beneficiary responsible for the action investigated, VA professionals (e.g., nurses, doctors, therapists for VHA; Cemetery administrative staff for NCA; and Judiciary personnel for VBA) should be added to the board. The findings and recommendations pertinent to the incident will be completed by the board, annotated as to the action taken, and submitted to the facility director.

2. Initiation of Report of Survey

a. Any employee who detects a loss of, or observes damage to, Government property will immediately make an oral report to the supervisor, who, in turn, will advise the VA police and property management activity. If the item contains sensitive information, the Information Security Officer must be notified within 59 minutes after realization of loss by the employee. For further information, please read the Office of Management and Budget (OMB) memorandum 06-19, dated, July 12, 2006. The AO will

confirm that the VA police were notified. After the oral report has been submitted, the supervisor will formalize the findings on VA Form 1217, ROS, within 24 - hours. If this is identified as nonexpendable property, VA Form 1217 must be signed by the EIL official. The ROS will be submitted to the AO within 72 hours. Employees failing to report, and supervisors failing to initiate a ROS, may be subject to disciplinary action.

b. If appropriate, VA police will be included in the preliminary investigation conducted by the supervisor or their subordinates. If required, a copy of VA Form 1393, Uniform Offense Report, will be submitted along with VA Form 1217 to the property management activity. VA Form 1217 must be submitted to the AO within 72 - hours of theft, loss, damage, or destruction of VA property. Under no condition will such a report be delayed longer than the time required to search the immediate area or question persons who might have knowledge of the incident. Except where circumstances make it necessary, damaged property will not be moved until inspected by the board. If removal is necessary, the reasons will be listed on the certificate of circumstances for later review. When property is lost by a suspected theft, local authorities will be requested to assist in recovering the property, in accordance with instructions contained in VA Manual MP-1, General Administrative, Part I, Chapter 2. Notation of such action will be incorporated in the ROS. Police Service will provide the AO with a monthly listing and status of any ongoing investigations involving loss, damage, or destruction of government property.

c. VA Form 1217 may not be required when a government motor vehicle is damaged or destroyed and the approving authority determines that there is sufficient evidence contained in the accident report to establish whether pecuniary liability or disciplinary action will or will not be initiated. In this instance, copies of VA Form 1393, Uniform Offense Report, with additional supporting documents, will be made a part of the file and may be used as the official document to adjust the inventory record.

d. Upon the discovery of any shortages in inventory of a Schedule I through V, Controlled Substance, regardless of dollar value, the AO will be notified and VA Form 1217 will be prepared to substantiate adjustment actions and submitted to the AO. The registrant shall complete DEA Form 106, Report of Theft or Loss of Controlled Substances, in accordance with 21 CFR 1301.76b, and notify the DEA field division officer of the loss or theft and the VA police.

3. Report of Survey Register

a. The AO will establish and maintain, on a fiscal year basis, a ROS register and file. The register will be maintained as shown in Appendix C of this handbook.

b. Each VA Form 1217 will be assigned a number in sequential order. Follow-up procedures will be established to expedite action. A copy of each ROS will be retained on file and under the purview of the AO.

4. Surveys Involving Loss. To eliminate the possibility of clerical error and assure that the property is actually missing from the facility, the VA police investigating officer will check with the AO or designee to review all related records in cases of reported loss to include outstanding repair service records, as well as the loans from the VA file and property pass file.

5. Surveys Involving Damage. In cases involving damage, the AO or designee will inspect the damaged property and verify reported information. The assistance of technically qualified persons (Government employee or commercial representative) will be obtained to assess the extent of damage, feasibility of repairs with respect to operating efficiency, cost of repairs, and reasonable estimate of depreciation from acquisition or construction cost. This information will be documented on or attached to VA Form 1217.

6. Surveys Involving Sensitive Information. Special requirements apply when there is potential loss of sensitive information. The Facility Information Security Officer (FISO) approves and provides oversight for procedures implemented to address potential loss of sensitive information to ensure compliance with all related security requirements. At the direction of the FISO, the ROS process will be initiated to investigate the loss of the property containing sensitive data (even when the media on which it is stored is not classified as nonexpendable property). OMB memorandum 06-19, requirements apply.

7. Admission of Responsibility for Loss or Damage. In the event that an individual admits responsibility for the loss or damage and volunteers payment, the collection will be completed without need for a ROS investigation or police report. The AO will provide the responsible official with the facts and circumstances so that possible disciplinary action may be assessed.

8. Approving Authority.

a. The approving authorities for the ROS involving the loss, damage, or destruction of Government property are:

(1) VA Medical Center, Outpatient Clinic, or VISN - Director

(2) National Cemetery Administration facilities- Director

(3) Regional Office Director (VBA)

(4) Denver Acquisition and Logistics Center - Director

(5) National Acquisition Center – Executive Director/Chief Operating Officer, National Acquisition Center.

(6) Corporate Franchise Data Center – Director

(7) Austin Financial Services Center – Director

(8) VA Central Office - Deputy Assistant Secretary for Administration (03)

b. Delegation of this authority will be limited to the Assistant/Associate Director or equivalent at a facility or within a department/organization. This approval or disapproval authority is directly related to the recommendations of the survey board or surveying officer.

c. In cases where the ROS item exceeds the capitalized threshold, the approving authority may refer the ROS to higher authority for approval. For purposes of this system, the higher approving authorities are:

(1) VHA field facilities – VISN Director

(2) VBA field facilities - Deputy Under Secretary for Benefits

(3) CIO field activities – Executive Director, Field Operations and Security

(4) Denver Acquisition and Logistics Center - Associate Deputy Assistant Secretary for Acquisitions

(5) National Acquisition Center - Associate Deputy Assistant Secretary for Acquisitions

(6) Corporate Franchise Data center – Deputy Assistant Secretary for Enterprise Operations and Infrastructure

(7) Austin Financial Service Center – Deputy Assistant Secretary for Finance

(8) VA Central Office - Assistant Secretary for Human Resources and Administration.

(9) National Cemeteries - Directors, Memorial Service Network

9. Approving Authority Action

a. A survey official or board will be appointed by the approving authority, or Administrative Officer, if so delegated, from a standing list of trained officials.

b. The approving authority may designate the AO to appoint a survey officer and board when a previously approved group of trained individuals has been appointed to conduct survey investigations.

c. The approving authority may make recommendation of no board and no further investigation and instruct AO to remove property from inventory records. There should

exist adequate justification or information pertaining to the circumstances which would convince the approving authority to make such a decision.

10. Establishment of Board of Survey

a. It is mandatory that a board of survey, comprised of three impartial and qualified persons, be appointed when:

(1) There is a possibility that a VA employee may be assessed pecuniary liability or disciplinary action as a result of loss, damage, or destruction of property; and/or,

(2) The value of lost or destroyed property involved (estimated value of real property or value of personal property carried in the perpetual inventory accounts) is \$5,000, or a fair market value of \$5,000 can be assessed for other property, or the estimated cost of repairs to damaged property is \$5,000 or more.

(3) If sufficient information is available and present to make an accurate determination (i.e., through a VA police investigation or civilian police investigation) regarding the circumstances revolving around the incident, a board of survey will not be mandatory. However, a board of survey may still be convened at the discretion of the approving official.

NOTE: *Local management may establish policy to establish a board of survey for inventory losses of a lower value than \$5,000*

b. A copy of VA Form 1393, Uniform Offense Report, and any other supporting documents will be made a part of the ROS file. Documentation will provide satisfactory explanation of the circumstances surrounding the loss, damage, or destruction of Government property and contain sufficient evidence to determine that pecuniary liability or disciplinary action is or is not involved.

c. The person formally charged with the responsibility for the property in question will not serve on the board, nor will any person involved in the circumstances surrounding the property loss or damage or who may be involved with processing a collection action from an employee (see paragraph 24 of this part). The AO will not be appointed to the board but may act as an advisor unless he/she is responsible for the property involved.

d. A permanent board and alternates may be appointed to handle these surveys. All persons serving on the board will be advised of the importance and extent of their responsibility by the approving authority. The board will have a maximum of 30 days to conduct an investigation and make recommendations to the AO. It is recommended that the board members and alternates receive refresher training at a minimum of every 2 years.

11. Responsibility of Board of Survey. The board will give their full attention to the survey action, arrange their official duties accordingly, be thoroughly familiar with, conduct investigations according to, and arrive at findings and recommendations in compliance with the provisions of Part 10 of this handbook.

12. Preliminary Board Agreement. The board will carefully study all available information, e.g., VA Form 1217, supporting statements, exhibits, and other related documents. An agreement will be reached on certain critical points relative to identity of property involved, nature of action affecting its property status, and existence of evidence indicating fault on the part of a particular individual or group.

13. Conduct of Board of Survey. The board will determine the method and extent of investigation. Where the facts, such as suspected theft or violation of criminal statutes indicate a need for more extensive investigation, the matter will be referred to the approving authority with recommendation for further investigative action by a facility board, facility police, or the Federal Bureau of Investigation, in accordance with the authority outlined in 38 CFR 1.452(a) and (c).

14. Determinations by Board of Survey. The board will conclude and document, on the ROS, one or more of the following determinations:

- a. Property recovered without loss or cost to the Government.
- b. Property recovered - Government required to suffer cost of repair, servicing, or replacement.
- c. Property not recovered.
- d. Extent and nature of damage to property.
- e. Identification of the person or group responsible for loss or damage.
- f. A finding of pecuniary liability or of insufficient evidence to support a charge or pecuniary liability.
- g. A finding that the evidence establishes a degree of negligence or a violation of regulations for which some disciplinary action is required. Disciplinary action will be taken in accordance with current human resources policies.

15. Findings and Recommendations. The Findings and Recommendations section of VA Form 1217 will be completed based on the board's findings and determination. The board will include recommendations for corrective action, i.e., training, update local policy, etc. In presenting the findings, all evidence will be clearly described or cross-referenced. A copy of the ROS file will be forwarded to Police Service upon final approval by the director. At the beginning of this process, the VA Police Service will be

responsible for reporting lost or stolen property to the Federal Bureau of Investigation, or the appropriate law enforcement agency.

16. Pecuniary Liability. A recommendation of pecuniary liability must be based on evidence which clearly shows intent, neglect, or carelessness.

a. No one is to be held liable for performing, or failure to perform, an action because of a reasonable human error of judgment or a normal physical limitation. In arriving at a recommendation, especially one where a charge of pecuniary liability will result, the board will consider the following:

(1) The existence of adequate evidence contained in the findings to support the recommendation.

(2) Evidence of prior incidents of negligence, misuse, abuse, or acts of a questionable nature with respect to handling property by the persons involved.

(3) Evidence of attempts by persons involved to improve or correct conditions causing the action being investigated.

(4) Evidence that officials charged with the responsibility failed to establish and enforce sound property utilization, training, protection, and security measures.

(5) Factual statements of acquisition or construction costs, applicable depreciation, reliable repair or replacement estimates, and estimate of salvage or sales value relative to the property in question.

(6) Evidence that property responsibility upon the individual(s) was incompatible with the requirements of their assignments.

b. Whenever there is a dissenting opinion relative to the findings or recommendations among the members of a board, the majority opinion will be the recommendation. However, the minority view will be included for the approving official's review.

c. When it is recommended that an employee be held financially liable, a copy of the ROS, complete with findings and recommendations, will be sent directly to the employee, instructing them to submit a written reply within 10 working days to the approving official. The reply must state the employee's concurrence or objection to the findings. Failure to reply to the approving official, in writing within the 10 working days, will be considered as acceptance of the pecuniary liability (see paragraph 25 of this handbook).

17. Disposal of Property Prior to Completion of Board Action

a. Except when property constitutes a hazard to health or other danger, it will not be disposed of until it has been determined by the board that it is no longer needed for investigative purposes.

b. Property turned in to the accountable official will be receipted for on VA Form 2237 and disposed of in accordance with the FMR and VA Handbook 7348.

18. Completion of Board Action. The board will complete, sign, and forward the ROS to the approving official through the AO. Under no circumstances will any documentation that is required to support the ROS be withheld. Official documents are not to be removed from their proper location; however, copies will be provided and certified to be true by the surveying officer or chairman of the board. Information, no matter how confidential or delicate in nature, will be presented in written form.

19. Review. Upon receipt of the completed VA Form 1217, the approving official will personally review the entire file, giving special attention to the following:

- a. Thoroughness of investigation.
- b. Clarity and validity of findings and recommendations.
- c. Completion of applicable criteria in recommendations, including statements of person(s) held liable by the board in cases involving pecuniary liability.

20. Additional Data. The approving official may request that the board conduct further inquiries to obtain additional data, whenever such action may assist in more fully supporting the recommended action.

21. Decision. The approving official, after careful consideration of factors and recommendations, extenuating circumstances, and the effect of their decision upon the policy of sound property utilization will either:

a. Concur and sign. When this will require collecting pecuniary charges from any person other than an employee of the United States acting within the scope of their employment, the original file will be forwarded to the District Counsel at the regional office having jurisdiction over the area where the facility is located. Collection will be accomplished by the District Counsel pursuant to 38 CFR 14. 618.

b. Disapprove by entry on or attachment to the VA Form 1217, state their exception to the recommendation, and request reconsideration by the board. The board's reply will be made part of the survey file.

c. Forward the original and one copy of the file to the higher approving authority when a reversal of the board's original recommendation will result in holding an individual pecuniarily liable.

d. Forward the original and one copy of the file to the higher approving authority when the facility approving authority and the survey board are unable to reach a unanimous decision.

22. Responsibility of the Facility Accountable Officer

a. Upon completion of the survey action, the entire file will be forwarded to the AO for coordination of the appropriate action required by the report.

b. If the ROS was required for items originally recorded on an adjustment voucher, the ROS will cross-reference the same adjustment voucher number for audit trail purposes.

c. The approved ROS will be filed with the adjustment voucher to support entries made in the accounts, and a copy will be maintained in the ROS file. The ROS covering items which are not accounted for in the perpetual inventory accounts will not be assigned a common or voucher number.

d. Timelines and actions concerning the ROS process are provided below:

:

(1) In the event a VA employee detects a missing or a damaged piece of property, they will immediately report the situation to the responsible individual (supervisor or Equipment Inventory Listing Custodial Officer).

(2) Upon report of a missing item, the responsible individual will conduct an immediate search of the area in an attempt to locate the missing property and question individuals concerning their knowledge of the missing item or circumstances surrounding damaged property.

(3) If suspicious evidence exists and deemed appropriate, the VA police (in VA Central Office, Office of Security and Law Enforcement) will be contacted, and a completed Uniform Offense Report (VA Form 1393) and forward it to the Accountable Officer (AO) along with the completed ROS (VA Form 1217). Both forms are required to be submitted by the responsible individual no later than 3 working days from the discovery of the missing or damaged property.

(4) If the facility Accountable Officer (AO) is responsible for conducting all inventories at a facility and locates the missing item, the AO will inform the custodial officer for who has responsibility for the EIL being inventoried within 1 working day of the discovery of the missing item.

(5) The AO will assign a ROS surveying official for all items below \$5,000. If the item is worth \$5,000 or more, or the assignment of pecuniary liability is likely, the AO will establish a board of survey. Both are required to be performed within 5 working days after receipt of the ROS from the responsible individual. The ROS, along with accompanying information (e.g., police report; or statement from an interested party; or a Security Operations Report from the ISO on whether or not the item could or did contain sensitive data) will be forwarded to the approving official for review and approval of the personnel assigned to conduct the ROS investigation. The approving official may not be any grade lower than the associate director or equivalent.

(6) The approving official has 8 working days to approve the assignment and return the ROS to the AO.

(7) Once approval of the assignment has been received from the approving official, the AO has 3 working days to conduct a meeting to brief the assigned surveying official or board members on their role in the ROS process.

(8) After receipt of the ROS and the briefing is conducted, as appropriate, by the AO, the ROS surveying official or board members will conduct the survey and submit a completed and signed ROS by the close of business on the 10th working day after the receipt and briefing.

(9) After the AO receives the completed and signed ROS, it must be forwarded within 7 working days to the approving official for review and approval.

(10) The approving official has 2 working days to review and approve, or recommend more action if deemed necessary. If more action is required by the ROS surveying official or board, the ROS package will be forwarded back to the AO for completion of the action recommended by the approving official.

(11) Upon receipt of the request from the approving official for more action by the ROS surveying official or board, the AO has 2 working days to ensure the recommended action is completed and forwarded back to the approving official for final approval.

(12) Except when property constitutes a hazard to health or other danger, damaged property will not be disposed of or put back into service until it has been determined by the surveying official or board that it is no longer needed for investigative purposes. Once this is determined, the property will be disposed of within established VA guidelines and will be removed from property records as appropriate.

(13) When property cannot be found, it will be designated as lost or stolen and removed from property records.

e. The overall ROS process will not exceed 60 days unless there is an ongoing law enforcement investigation requiring additional time. If the process exceeds

60 days, as a result of law enforcement activity, the ROS should be noted and annotated by the facility director.

NOTE: When the AO is responsible for the property involved in the report, the final action will be completed under the direction of the approving official.

23. Disposal of Property After Completion of Board Action. When directed by the approving authority, the property involved will be disposed of in compliance with the provisions of the FMR and VA Handbook 7348. All disposal documents covering surveys will be cross-referenced to VA Form 1217.

24. Pecuniary Liability. When the survey requires for collection of pecuniary charges from a Government employee acting within the scope of employment, a memorandum citing the circumstances and referencing the ROS number will be prepared by the AO and forwarded to Fiscal Service for action.

25. Employee's Right of Review. An employee has the right to have an adverse survey finding reviewed by higher authority. A request for such review will be submitted, in writing, to the approving official within 10 working days of receiving notification of the findings. The employee's request should detail the specific reasons why the findings should be reviewed. The approving official will forward the request, his/her comments, and the complete ROS record to the appropriate higher approving authority. The decision of the higher approving authority will be final.

Part 11. LOAN OF PROPERTY

1. Loans of Department of Veterans Affairs-Owned Personal Property

a. Loans of VA property to employees and non-employees are authorized when they support VA's mission, goals, and objectives and for the convenience of the government. VA facility Directors, or in VACO the Deputy Assistant Secretary (DAS) for Administration have the option of designating loan approval authority to AOs and Information Technology (IT) Equipment Inventory Listing (EIL) Custodial Officers for the purpose of enhancing security and accountability of the property to the individual level. The designated AO (non-IT property) and IT EIL Custodial Officers (IT property) are responsible for verifying, issuing, and tracking VA property loans. In addition, the Information Security Officer (ISO) must also approve loans of property containing sensitive data. If no designations are made, facility Directors or in VACO the DAS for Administration must approve loan requests personally in writing.

b. VA Form 0887a (See Appendix D) has been created and will be used to track government property loans to VA employees. Part one is the Employee Loan Description, part two is the Employee Property Return Receipt, part three is the VA

Property Pass. The form will be used to track the return of loaned property and the issuance of a property pass, as required.

Note: VA Form 0887a can be issued for up to one year. The VA employee loan process should not be confused with the revocable license process. Revocable licenses are used to allow institutions, organizations, or other groups (not VA employees) to borrow VA property when authorized by facility directors and approved by District Counsel.

c. Employees will sign for all loans of property. The employee's signature is considered certification that the loan is for official government use only. Upon return of the property, the employee will sign part two of VA Form 0887a (Employee Property Return Receipt) and will be provided with a copy for their records. If a property pass was issued, the employee must return the property pass along with the property.

d. When designated, the accountable officer (AO) or Information Technology (IT) Equipment Inventory List (EIL) custodial officer will assume the responsibility for oversight and inventory management of VA property. At VA facilities where no AO or EIL officials exist, the director will assume responsibility (to include loan approval) over all property.

e. VA field directors have the responsibility for management oversight and accountability of VA property to include donated, grant, IT, and other types of government property. As such, directors must execute one of the following options:

(1) Designate, in writing, loan approval authority to any of the following individuals: AO for non-information technology (IT) property and the Chief IT Equipment Inventory List (EIL) custodial officers for IT property.

(2) Directors who do not designate loan approval authority must sign each loan request.

(3) At Veterans Benefits Administration (VBA) facilities where no AO positions exist, the director will delegate (in writing) loan approval authority for non-IT property to a designated official. IT loan requests must be submitted in writing through the service chiefs and sent to the facility IT EIL custodial officer (or designated official) for approval.

(4) At National Cemetery Administration facilities and other VA field staff offices where no AO position exist, directors will be responsible for approving loan requests for both IT and non-IT property. When loans are approved, VA Form 0887a will be utilized to track loans.

(Note: VBA and NCA will establish a memorandum of understanding or agreement with the nearest VA medical center to acquire AO support for the purpose of inventory management and other logistics functions performed by the AO.)

f. The IT EIL custodial officer and AO shall maintain and manage the official property inventory system (currently the Automated Engineering Management System/Medical Equipment Reporting System or AEMS/MERS).

(1) VA Form 0887a will be initiated by the appropriate facility custodial officer (IT/non-IT) for the purpose of removing property from the facility.

(2) The IT EIL custodial officer and AO shall maintain the loan register and jacket files for loaned property.

(3) Jacket files will contain the original signed VA Form 0887a. Loan registers will include the borrower's name; item nomenclature; serial number; equipment entry number, if applicable; and the date the property is due to be returned.

(4) For security purposes, Part three of VA Form 0887a shall serve as a "property pass" for commonly loaned property. Within VA, loaned property shall always be accompanied by a property pass.

(Note: If the loan period exceeds 2 weeks, OA&L recommends that property passes be wallet size and laminated.)

g. Within VA Central Office (VACO), the Deputy Assistant Secretary (DAS) for Administration (03) has the responsibility for management and oversight of VA property. The VACO DAS for Administration will designate in writing custodial officers responsible for IT/non-IT property. When designated, these individuals will be charged with the verification, issuance, and tracking of VACO property.

(1) The head of each organization within VACO shall execute one of the following options:

(a) Designate, in writing, to the DAS for Administration, property loan approval authority to the following individuals within their organization:

1. IT EIL custodial officers for IT property.

2. Non-IT custodial officers for non-IT property.

(b) If the head of the organization does not designate loan approval authority to other individuals, they must approve all loan requests personally in writing.

(2) Loan requests will be submitted to the respective VACO custodial officer (IT/non-IT) for approval.

(Note: If the property is for or contains sensitive data, the local information security officer must also sign VA Form 0887a.)

h. Employees will report any loss or theft of IT property to the supervisor within 24 hours of occurrence. Property containing sensitive data must also be reported to the Information Security Officer (ISO) immediately upon realization of the theft.

i. EIL custodial officers (or designated officials) will be granted AEMS/MERS access to edit location and comment fields as well as print barcode labels. In addition, the following actions must be accomplished prior to the loan of property:

(1) Ensure all IT equipment with data storage capabilities are approved by the facility information security officer.

(2) Ensure that the most recent versions of encryption and security software are properly loaded and operational on all IT equipment.

j. VA Personal Property may be loaned to non-employees on a temporary basis utilizing VA Form 0887b, Non-VA Employee Government Property Loan Form (See Appendix E). The process for non-employee loans will be similar to those established for VA employee loans. Loans to non-employees will not exceed 60 days. VA discourages loans to non-employees; however, consideration for such loans must only be made when the loan is determined to benefit VA.

2. Loans of Personal Property to the Department of Veterans Affairs. When a facility obtains a loan of property, the following will apply:

a. Loans will be confined (except as indicated in paragraphs d. through f. of this section) to those from other VA facilities, other government agencies, local, state, and charitable institutions.

b. Once approved by the Facility Director, loans will be accepted through Logistics Services. All property will be tagged or labeled to identify the owner, and the AO will maintain records to reflect the following:

(1) Date of loan.

(2) Ownership of property and who arranged loan.

(3) Description of property.

(4) Quantity.

(5) Estimated value.

(6) Other terms and conditions as may be pertinent to the arrangement.

c. Funds may be expended to place borrowed property (from other VA facilities or Government agencies) in as good condition as when loaned provided that such action is agreed upon as a condition of the loan. Equipment loaned to VA from other sources may be repaired to the extent necessary for the continued use of such equipment. However, repairs are not authorized to return the equipment in good condition after the use has terminated. The purchase of operational supplies required in connection with loaned property will be done on a competitive basis.

d. Loans of recreational and other supplies and equipment (except vehicles) by individuals or organizations for use of beneficiaries will be made through one of the welfare organizations with the understanding that VA will not assume responsibility. Representatives of VA will not accept or receipt for such loans, except books obtained on inter-library loan.

e. Articles used in Religious Services which have been purchased from the Chaplain's Fund or donated as gifts and are blessed, sanctified or consecrated, do not become the personal property of the chaplain or the property of VA. Such items are regarded as the property of the ecclesiastical endorsing commission of the chaplain concerned, placed at the field facility by the commission on a continuous loan basis. Each article will be listed on a memorandum forwarded through the facility director to the Logistics Services to be filed with the EIL file for the Chaplain Service. The chaplain will be responsible as custodian for these articles.

f. An offer by a contractor to loan VA a piece of equipment, pending the repair of VA-owned equipment, may be accepted provided such loan is at no cost to VA. Loaned equipment may be repaired at VA expense only to the extent necessary to maintain it in operating condition essential to perform the tasks for which it was borrowed. Some vendors will loan property to a VA facility for the purpose of evaluation of the equipment. Should this occur, the loan to the VA will be at no cost to the VA, and this shall be documented on the form that is signed by the vendor representative.

g. Loan of equipment by a commercial establishment for use in the Compensated Work Therapy (CWT) program will be approved by the facility director and processed in accordance with paragraph b. of this section. Repair of this equipment will be in accordance with paragraph c. of this section.

3. Affiliated Institution-owned or Institution-administered Grant Fund Purchased Equipment Utilized by a VA Investigator.

a. Equipment owned by an affiliated institution, or purchased by such institution from grant funds, used by a VA investigator in a research project at a VA installation will be accounted for in the appropriate VA property accountability system (the current system being AEMS/MERS), regardless of cost of the equipment. The investigator or designee responsible for all such equipment will maintain a jacket file containing an Equipment Inventory Listing, as appropriate, or a list providing the nomenclature, location, and ultimate disposition of all such equipment under their jurisdiction.

b. As indicated in OMB Circular A-110, all grant-purchased equipment will be entered into the appropriate property accountability system (currently AEMS/MERS). No dollar value should be entered into the Acquisition Cost field; however, the below listed information marked with an asterisk (*) must also be entered in the property system in the comments field. The remaining information listed below should be included in the property accountability system as well.

(1) A description of the equipment.

(2) Manufacturer's serial number, model number, federal stock number, national stock number, or other identification number.

(3) Source of the equipment, including the award number (i.e., the Purchase Order (P.O.) number).

*(4) Whether the title vests in the recipient or the federal government.

*(5) Acquisition date (or date received, if the equipment was furnished by the federal government).

*(6) Information from which one can calculate the percentage of federal participation in the cost of the equipment (not applicable to equipment furnished by the federal government).

*(7) Location and condition of the equipment, and the date the information was reported.

*(8) Unit acquisition cost (no costs will be entered into the Acquisition Cost field in AEMS/MERS). This info will be entered in either the Comments field or the Specs field.

(9) Ultimate disposition data, including the date of disposal and sales price or the method used to determine current fair market value where a recipient compensates the federal awarding agency for its share.

c. Such equipment, while in the possession of the investigator and used at the VA installation, may be maintained in operating condition by VA. In addition, if the equipment is being used on a veteran or VA employee, it will have preventive maintenance performed in the same manner as any other VA-owned property.

4. Authority to Issue VA Owned Personal Property by Revocable License. A revocable license is a license required for the loaning of VA property to an institution, organization, or authorized group. VA Form 0888 will be used for this purpose. Original copy will be kept on file in Logistics services. A revocable license can be terminated at any time by either party pending proper notification.

a. The facility director may authorize, through Logistics Services, issue of personal property by revocable license.

b. An agreement utilizing VA Form 0888 shown in Appendix F will be prepared by Logistics Services and submitted to the facility director for approval prior to execution. Justification for the license will include specific benefits to be derived by VA.

c. Duration of the license will not exceed a 1-year period.

d. Each request for a revocable license will be forwarded to the District Counsel for review and concurrence prior to implementation of the loan.

e. The facility director may authorize the issue of hemodialysis equipment by revocable license method to a state, local, or community hospital subject to the following circumstances and conditions:

(1) A hardship exists for the veteran to receive dialysis at a VA facility.

(2) House conditions preclude installation of home self-dialysis units, or the cost of installation and servicing in the home is greater than total cost of arrangement for dialysis at a community hospital and this arrangement is acceptable to the patient. (M-2, Pt. IX, Change 2, addresses loan of hemodialysis equipment under the purview of prosthetic activity).

(3) In exchange for the use of the hospital's facilities and staff in dialyzing the veterans, the hospital is permitted to dialyze non-veterans when the equipment is not needed for treatment of a veteran.

f. Upon expiration of the license, the property will be promptly returned to the field facility by the licensee.

g. Request for renewal of an existing license agreement will require the facility director's approval and review and concurrence of the District Counsel.

h. Personal property issued by revocable license will be tagged or labeled to clearly identify VA-ownership and is subject to the inventory requirements contained in Part 8, paragraph 5 of this handbook. Items will remain on the EIL. A copy of the revocable license will be maintained in Logistics Services and provided to the Custodial Officer.

PART 12. MISCELLANEOUS SPECIAL REQUIREMENTS

1. Weighing Scales and Fuel Pumps. The services of state, county, municipal, or other equally reliable agencies to accomplish inspections will be utilized as required by local ordinances and laws. Any requirements for inspections of these items will be coordinated with the Chief of Engineering Service, as appropriate.

2. Safes, Vaults, and Other Depositories.

a. Safes, vaults, and other depositories for valuables, Schedules I and II controlled substances as defined in 21 U.S.C. 812, and precious metals from all sources of supply will be located so as to provide maximum security and will be locked at all times when not in use. In addition, vehicle titles and certificate of origins will be maintained in an appropriate depository.

b. Firearms and ammunition will be stored in accordance with VA Directive 7347.

3. Custody of Combinations.

a. A copy of the combination to each safe, vault, or depository at a VA facility will be kept in a sealed envelope in a safe or vault under the custody of the facility director. The envelope will be properly labeled, sealed in the presence of the facility director, service chief concerned, or designee. Each of these officials will sign the envelope in such manner that it cannot be opened without detection.

b. If, in the absence of personnel having knowledge of the combination, it becomes necessary to open any safe, vault, or depository, the only one authorized to do so is the facility director, service chief concerned, or designee.

c. Combinations will be entrusted to the fewest possible individuals consistent with good operations. Those individuals will be held personally responsible for safeguarding this information and shall keep any combination in their personal possession at all times.

4. Changing Combinations. Combinations of safes, vaults, or depositories shall be changed at least once every 5 years, or immediately under the following conditions:

a. When such equipment is placed in use upon receipt from the manufacturer or other sources.

b. When a person knowing a combination is transferred, separated, or reassigned to a position where such knowledge is not warranted.

c. When deemed necessary by the facility director.

5. Exceptions. The provisions of paragraph 2, 3, and 4 of this Part do not apply to safes, vaults, or other depositories assigned to an agent cashier or those under the control of the facility director used for the safeguarding of classified information. Policies and procedures with respect to such equipment are set forth in MP-1, Part I, Chapter 5, and MP-4, Part I.

6. Trust Fund Property. Policy regarding gifts and donations is found in VHA Supplement, MP-4, Part VII and Title 38, section 8301.

7. Training Requirements.

a. At a minimum, the AO will receive annual training in the following areas:

(1) Utilization and Disposal Program (including Recycling requirements).

(2) Report of Survey Program.

(3) Supply Fund.

(4) Planning for Equipment Needs:

(a) 5 year Plan.

(b) Capital Asset Planning.

(c) Equipment Request Process and Equipment Committee Procedures.

(5) Materiel Management Requirements

(6) Proper Storage and Handling of Hazardous Materials

(7) Methods of Sales and their Requirements

b. To fulfill this annual training requirement, all AOs will be required to attend training each calendar year regarding the above topics. Documentation of the required training will be made part of the employee's personnel file.

Part 13. Control and Inventory of Information Technology Equipment

Note: *For the VA IT Inventory Tiger Team's full text version, see appendix J.*

1. General. The following section of the handbook is designed for field personnel responsible for tracking and controlling Information Technology (IT) equipment assets. This policy requires each facility's IT Custodial Officer to institute procedures necessary to ensure: (1) full accountability for nonexpendable IT equipment items, including sensitive equipment items regardless of cost, from receipt of the item through sanitization and disposal, and (2) full compliance with the guidance and information provided within this handbook.

2. Sensitive Information. OI&T defines sensitive information as all Department data, on any storage media or in any form or format that requires protection due to the risk of harm that could result from inadvertent or deliberate disclosure, alteration, or destruction of the information. The term includes information whose improper use or disclosure could adversely affect the ability of an agency to accomplish its mission, proprietary information, records about individuals requiring protection under various confidentiality provisions such as the Privacy Act and the HIPAA Privacy Rule, and information that can be withheld under the Freedom of Information Act. Examples of VA sensitive information include the following: individually-identifiable medical, benefits, and personnel information; financial, budgetary, research, quality assurance, confidential commercial, critical infrastructure, investigatory, and law enforcement information; information that is confidential and privileged in litigation such as information protected by the deliberative process privilege, attorney work-product privilege, and the attorney-client privilege; and other information which, if released, could result in violation of law or harm or unfairness to any individual or group, or could adversely affect the national interest or the conduct of federal programs. Sensitive and removable media items will be handled in accordance with VA Handbook 6500.

3. IT Inventory Responsibilities.

a. The Facility Director has overall accountability for all assets and information at the facility. During an audit, it is the Facility Director that will be held accountable for full control of the assets and the protection of sensitive information. The Facility Director provides oversight to the asset management program at the Facility. The asset management program function is under the cognizance of Logistics Services.

b. The Facility Director delegates IT equipment inventory responsibilities to the IT Custodial Officer and the control and oversight for property management functions to the Facility Accountable Officer. This structure will be tailored by the Facility Director to the unique constraints of the facility (e.g., if there is no Senior Property Management Official at the facility, for IT inventory, the Facility Director will delegate the associated responsibilities to an IT staff member directly reporting to the Facility Director/Associate Director).

c. The IT Custodial Officer may assign inventory control responsibilities to subordinate personnel (referred to as Custodial Officer Designees). However, the IT Custodial Officer retains responsibility for all facets of inventory control under their respective purviews in accordance with the signed Delegation of Authority (DOA) provided to them by the Facility Director.

d. Documentation required to track the delegation of signature authority for IT Inventory Control requirements defined in this Handbook will be established and maintained in a centralized repository. The intent of this requirement is to establish clear accountability for IT inventory items at all times. Electronic systems are approved for use for this purpose. A copy of each Delegation of Authority memo related to the control of IT inventory is to be provided to the IT Custodial Officer.

e. The designated employees are bound by the terms of the DOA until officially relieved of responsibility in accordance with Part 2 of this handbook.

f. The IT Custodial Officer at a facility is required to ensure that a current, accurate inventory of all nonexpendable IT equipment, including all sensitive items regardless of cost, at the facility is established and maintained. IT equipment will be inventoried, assigned and tracked throughout its life; disposal procedures will ensure the protection of any personally identifiable information and the security of sensitive data.

4. Accountability (Loan Form Usage).

a. For IT equipment assigned exclusively for individual use, a loan form will be signed by the receiving employee. For common use IT equipment items within a department (i.e., equipment used or accessible by more than one individual), the Department Head/Service Chief will sign the receipt indicating accountability for the equipment item. For IT equipment used to support multiple departments, the Facility Director will identify the Custodial Officer who will be assigned asset owner responsibilities.

b. VA Form 0887a or VA 0887b will be used to document accountability for individual assigned equipment, depending on whether the individual assigned the equipment is a VA employee or non-employee (e.g., support contractor). These forms must be recertified at least annually (i.e., because these forms document accountability for VA property, it is essential that they be maintained current). AEMS/MERS provides the ability for authorized personnel to assign equipment to an individual and produce the VA Hand Receipt/Loan Form. The IT Custodial Officer must provide a delegation of authority memo to VA personnel authorized to assign IT equipment to individuals using this mechanism.

c. VA Form 0887a (for Government employees – see appendix D) and VA Form 0887b (non-government personnel – see appendix E) will be used as the hand receipt to document receipt of the equipment assigned to the individual and the individual's acknowledgement of personal accountability for the equipment (see Part 11 of this handbook for further guidance on Loan Form requirements).

d. When IT equipment is loaned to an individual on a temporary basis, the individual will agree, on VA Form 0887a/b, not to process or save any sensitive information on the equipment. The individual will agree not to install any software on the equipment. Only OI&T technicians are authorized to load software on loaned IT equipment. The individual will agree not to add any additional hardware or make any changes to current hardware configurations and will agree to always keep the equipment in his/her possession.

5. Sensitive Information Used Outside the Facility. For IT equipment that will be used outside of the facility, all Department staff, contractors, business partners, or any person who has access to and stores VA information must have written approval from their respective VA supervisor and Facility ISO (FISO) before sensitive information can be removed from VA facilities. VA sensitive information must be in a VA protected environment at all times, or it must be encrypted in accordance with the requirements of VA Directive 6500. The FISO must approve the protective conditions being employed.

6. Purchase Card Use.

a. Purchase card holders will not purchase nonexpendable IT equipment with a government purchase cards unless they are authorized Purchasing Agents and are authorized to make such procurements.

b. Purchase cardholders will inform the AO of all nonexpendable IT equipment, including sensitive items regardless of cost, procured with purchase cards so as to ensure the items are entered into the appropriate inventory management system.

c. Equipment purchased with a purchase card will be entered into the proper EIL and included in the physical inventory along with all other IT equipment items.

d. Any issues associated with the implementation of these requisite procedures are to be brought to the attention of the IT Inventory Control Process Improvement Forum for resolution.

7. Equipment Inventory List (EIL). It is required that all of VA utilizes the Standardized EIL Department Numbers. The EIL will begin with the 78 series followed by one additional character either alpha and/or numeric to indicate the appropriate assigned EIL. All IT equipment will be maintained in an automated equipment inventory system and listed on the proper EIL in accordance with Part 2 of this handbook (see appendix I for listing of EIL numbers).

8. Conduct of Physical Inventory (see Part 8 of this handbook)

9. Potential Loss of Sensitive Information. There are special requirements that apply when there is a potential loss of sensitive information. Whenever an individual identifies that non-expendable IT property (including sensitive items regardless of cost) cannot be accounted for and there exists a potential for loss of sensitive data (e.g., loss of laptop, thumb drive, or other IT equipment), **the issue will be reported immediately, within 59 minutes of the detection of the potential loss**, to the FISO and the IT Custodial Officer. (Reference OMB memo 06-19.)

10. Removable Storage Media. Per VA Directive 6500, Removable storage media presents additional security risks and must be tracked from receipt through disposal.

a. Universal Serial Bus Flash Drives:

(1) To comply with the FIPS 140-2 standard, VA Directive 6500 requires that specific actions be taken with regard to Universal Serial Bus Flash Drives (USBFDs), also referred to as Thumb Drives. USBFDs will be encrypted and the level of encryption must comply with Federal Information Processing Standards (FIPS) 140-2. Any other (non-FIPS compliant) Thumb Drives are not authorized and are to be sanitized to remove all VA data. Note that new software tools will soon prevent the use of non-FIPS-compliant USBFDs.

(2) The IT Custodial Officer is required to validate the need for USBFDs. The risk of exposure of personally identifiable information can be best mitigated by first ensuring that only those VA employees whose positions require the transit of information on USBFDs are provided such a device.

(3) Employees wishing to check out a USBFD will be required to complete a USB Flash Drive Request Memo in accordance with VA Handbook 6500 and obtain approval from their immediate supervisor.

(4) If there is a need to store, transport and/or utilize sensitive information outside a VA protected environment, then an additional approval step is required. The employee must complete a request to take VA information offsite and seek approval from the Director of the local VA facility or his/her designee.

(5) Local facility management will submit the justification forms to the Facility ISO (FISO). The FISO will review the requests, provide concurrence and forward the spreadsheet to the local IT Operations Service for action. The FISO will keep all request memoranda on file.

(6) USBFDs are considered IT items for the purpose of acquisition, operations and maintenance. USBFDs will be procured at the National level and distributed to the Regional Directors based on the USBFD requests that were submitted for procurement. Local IT Operations Services will be responsible for the issuance, tracking and recovery of USBFDs.

(7) Only 1 gigabyte and 2 gigabyte drive types are on the approved list of USBFDs to procure.

b. With regard to the issuance of USBFDs, the IT Custodial Officer will ensure that the following actions are performed:

(1) Testing USBFDs for functionality.

(2) Configuring USBFDs to ensure all authentication and encryption features are set appropriately. This includes steps to register the USBFD and obtain a serial number. The serial number should be recorded on the Hand Receipt and be shared with the local Acquisition and Material Management or Logistics Service to ensure appropriate inventory accountability.

(3) Demonstrating appropriate USBFD use to the employee, including the appropriate transfer of files to and from the USBFD.

(4) Obtaining employee signature on the Hand Receipt. Proxies are not acceptable. A photocopy of the Check-Out Sheet should be provided to the employee once all information is obtained and all signatures are recorded.

(5) Maintaining a file of all Hand Receipts issued in a secure location under lock and key (e.g. lockable file cabinet).

(6) All existing FIPS 140-2-compliant USBFDs will be returned, inspected and reissued using the new IT Equipment Hand Receipt.

(7) Facility Information Security Officers (FISOs) will accept existing, government-furnished USBFDs and will dispose of all legacy USBFDs in a secure manner.

(8) Other removable media (e.g., external hard drives) will be provided on an approved basis, following the same procedures described above for USBFDs.

11. IT Inventory Storage.

a. IT equipment storage locations must be physically secured under the same guidelines as have been established for computer rooms/data centers in National Institute of Standards and Technology (NIST) Special Publication 800-53, paragraph PE-3.

b. Access to these areas will be restricted to authorized IT staff with the written approval from the IT Custodial Officer at each facility.

c. IT spaces are required to be protected with physical access control systems (PACS). Electronic entry systems will be used so that any access will be logged and regularly reviewed by the IT Custodial Officer and Facility Information Security Officer (FISO). Security cameras and sensors/alarms will be installed in the storage locations to raise the level of security.

d. In accordance with NIST requirements:

(1) All physical access points (including designated entry/exit points) to facilities containing information systems (except for those areas within the facilities officially designated as publicly accessible) will be controlled; individual access authorizations will be verified before access is granted to restricted areas. The facility will also control access to areas officially designated as publicly accessible, as appropriate, in accordance with the facility's assessment of risk.

(2) Physical access devices (e.g., keys, locks, combinations, card readers) and/or guards will be used to control entry to facilities containing information systems. Keys, combinations, and other access devices will be secured and such devices will be inventoried regularly. Combinations and keys will be changed: (1) periodically; and (2) when keys are lost, combinations are compromised, or individuals are transferred or terminated.

(3) After an emergency-related event, reentry to facilities will be restricted to authorized individuals only. Workstations and associated peripherals connected to (and part of) an organizational information system may be located in areas designated as publicly accessible with access to such devices being appropriately controlled. Collaboration between IT and security is essential in ensuring the protection of sensitive information. In accordance with Security and Law Enforcement policy (0730/1), each VA facility will establish a Security Management Committee (SMC). One of the tasks of the SMC is to develop a local strategic security plan (SSP). The SSP is intended as a framework for identifying a facility's physical and procedural security needs and resolutions.

(4) Access to IT equipment storage locations will be provided to facility security personnel to perform regular inspections. Security personnel will provide a Report of Physical Security Inspection of IT Equipment Store Rooms to the IT Custodial Officer at the facility within 10 days of completing a physical security inspection. The report will document corrective actions necessary to establish full compliance with applicable security regulations.

(5) The IT Custodial Officer will coordinate with the SMC to develop a plan of action to address IT-related security requirements identified in the SSP. **(Note: this does not mean that all identified requirements will need to be met in a prescribed manner)**. The IT Custodial Officer may identify alternative measures to address concerns raised by security. Security will have to approve such alternatives and validate that they adequately address the security concerns in question. The plan will be approved by the Facility Director.

(6) A plan of action to address all corrective actions identified in the Report of Physical Security Inspection of IT Equipment Store Rooms will be completed by the IT Custodial Officer within 10 days of receipt of the Report of Physical Security Inspection of IT Equipment Store Rooms; it will be submitted to the Facility Director for approval.

12. Oversight and Compliance.

a. The Department's Chief Information Officer (VA CIO) is responsible, at the Department level, for ensuring the integrity and security of VA's IT assets, including physical inventory as well as data protection and the sanitization of data when IT resources are retired from service. Responsible for IT operations and maintenance, the CIO will monitor, review, and evaluate compliance with this policy.

b. As such, the VA CIO established the Office of IT Oversight and Compliance (OC) in February 2007. The mission of the VA IT OC is to ensure the effective management of VA information. As such, this office provides independent, objective, and consistent assessment services in the areas of cyber security, privacy, records management and physical security. The objective is to ensure the protection and integrity of sensitive VA data through the consistent application of VA policies and regulations and full compliance with established regulations. The three areas of focus established for the OC are described in the following paragraphs:

(1) Compliance. Initial emphasis will be placed on areas of known weakness (i.e., those that have led to low FISMA scores). This includes compliance with: NIST SP 800-53 security controls; VA OIG 17 recurring audit findings; Certification & accreditation Plans of Actions and Milestones (POA&Ms). Many of the activities required to address identified deficiencies are described in this Handbook. As such, compliance with the requirements herein will be assessed through scheduled and unscheduled audits.

(2) Remediation. The intent of the OC initiative is to ensure the establishment of standardized, sound information management practices. As such, the lessons learned during the audit process will be used to define best practices which will be made available to facilities. In addition, a community of practice will be established to promote collaboration and standardization. The objective is to ensure that the right people have the right information when they need it so that VA becomes a model for information management and security.

(3) Audits. Audits will be conducted at all VA facilities and support facilities, including medical centers, outpatient clinics, Vet Centers, regional offices, cemeteries, program offices, data centers, off-site storage facilities and media destruction vendors.

c. Emergency Response. VA IT OC will establish an Emergency Response Team (ERT) to help coordinate activities required to address critical incidents.

d. Artifacts. Audit activities related to compliance with this policy will include interviews, physical inspections and documentation reviews. The artifacts that will be reviewed during the Inventory Control portion of the audits include: EILs; ROS file; Loan Forms/Hand Receipts; documented procedures, training records, roles and responsibilities and delegations of authority; proceedings from collaboration sessions; sanitization records; and other products documenting compliance with this policy. In addition, there will be additional areas audited by OC to ensure assessment of all of the areas of information control (e.g., verifying that laptops are encrypted, patched, and have latest antivirus software; conducting vulnerability scanning). OC will be developing and disseminating checklists and process guides to support the facilities in preparing for audits.

13. Training.

a. Training of personnel in both inventory control and the protection of sensitive and personally identifiable information will be standardized by functional role throughout the facility and conducted on a periodic basis (no less than annually). For example, Custodial Officers and Custodial Officer designees will receive training on all aspects of their assigned roles, including the specific requirements associated with maintenance of the Equipment Inventory List (EIL), information protection, and the procedures associated with loss of equipment; Security personnel will be trained in the integration of inventory control and security activities. Those personnel without any direct inventory control responsibilities will be provided familiarization training, including an overview of the inventory control and accountability program, protection of sensitive information, hand receipt requirements, and proper handling of inventory movement.

b. All new personnel will receive training in their responsibilities related to IT inventory control before accessing the IT system.

APPENDIX A**Definitions**

1. Accountable Officer (AO) – individual (usually the Chief, Logistics Services at field facilities) having overall accountability for all personal property at a facility to include personal property functions from cradle to grave (acquisition to final disposition)
2. Accountable personal property – personal property having an acquisition cost at or above \$5,000 and personal property that is considered sensitive in nature (includes capitalized personal property which has an acquisition cost of \$100,000 or more in aggregate)
3. Action code – a code assigned by Logistics services to turned-in personal property that indicates the intent of the action to be taken with the property (i.e., whether the item will be kept in service, or will be processed for disposal, etc.)
4. Chief of Logistics Services. The individual responsible for the management and oversight of facility logistical operations including personal property management and inventory functions (may also be known as the Chief Acquisition and Materiel Management; Chief, Materiel Management; Chief, Supply Service; Chief, Personal Property Management or Logistics Manager)
5. Custodial Officer – individual (usually service chief at field facilities) responsible for personal property under his/her purview to include EIL and inventory responsibilities
6. Disposal condition code – a code assigned by Logistics services to turned-in personal property that determines the process to be taken for final disposition of the property (whether the item will be processed through excess procedures for reutilization or sale, abandonment or destruction procedures, or scrap procedures)
7. Expendable Property – property that may be consumed in use or loses its identity in use and may be dropped from stock record accounts when it is issued or used
8. Information Technology (IT) Equipment Inventory Listing (EIL) Custodial Officer. The individual responsible for management oversight of all facility IT property. This individual has loan authority for IT property and has similar authority to the facility accountable officer for loans. The IT EIL Custodial Official shall coordinate inventory requirements and the application of rules and regulatory requirements with the facility accountable officer
9. Long Supply – the quantity of inventory of an item that exceeds the established stock level by a greater than 10% margin.
10. Nonexpendable property - is property which has a continuing use, is not consumed in use, is of a durable nature with an expected service life of two or more years, has an

acquisition cost of \$300 or more, and does not become a fixture or lose its identity as a component of other equipment or plant

11. Posted Stock – supply items maintained in bulk in the Warehouse section for issue to various using departments within the medical center facility (some facilities may not have posted stock). The automated inventory system should be used for autogeneration, maintenance and replenishment of posted stock inventory

12. Process Stores – a bulk distribution area that maintains office supply type items for issue throughout the medical center facility. Process stores inventory should be maintained using the automated inventory system, including autogeneration and replenishment of stock

13. Unclaimed personal property – personal property that has been unknowingly abandoned and found on premises owned or leased by the Government (i.e., lost and found property)

14. Unrequired property – property that is no longer needed by the using activity and at the facility level, and/or property that has become unserviceable through normal use. This property must be turned in to Logistics services for proper disposition (reutilization, recycling or disposal)

15. Voluntarily abandoned property – personal property that the owner has intentionally and voluntarily given up title to and title vests with the Government. Documentation should be maintained that supports the voluntary relinquishment of title by the owner

APPENDIX B

ILLUSTRATIONS

Economical Repair Costs As a Percent of Acquisition Cost

		Years in Use (Year After Year of Manufacture)																		
		2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
A v g 4 Y r s 8 U s e f u l 15 L i f e -- N e w --	1																			
	2	40	0																	
	3	50	25	0																
	4	60	40	20	0															
	5	80	60	40	20	0														
	6	80	64	48	32	16	0													
	7	80	67	53	40	27	13	0												
	8	80	68	57	46	34	23	11	0											
	9	80	70	60	50	40	30	20	10	0										
	10	80	71	62	53	44	36	27	18	9	0									
	11	80	72	64	56	48	40	32	24	16	8	0								
	12	80	73	65	58	51	44	36	29	22	15	7	0							
	13	80	73	67	60	53	47	40	33	27	20	13	7	0						
	14	80	74	68	62	55	49	43	37	31	25	18	12	6	0					
	15	80	74	69	63	57	51	46	40	34	29	23	17	11	6	0				
	16	80	75	69	64	59	53	48	43	37	32	27	21	16	11	5	0			
	17	80	75	70	65	60	55	50	45	40	35	30	25	20	15	10	5	0		
	18	80	75	71	66	61	56	52	47	42	38	33	28	24	19	14	9	5	0	
	19	80	76	71	67	62	58	53	49	44	40	36	31	27	22	18	13	9	4	0
	20	80	76	72	67	63	59	55	50	46	42	38	34	29	25	21	17	13	8	4
		[% of acquisition costs considered economical]																		

APPENDIX C


SAMPLE FORMAT OF REPORT OF SURVEY REGISTER FILE

1. Report of Survey Number - Item Description and Acq Cost – Date of actual incident - Date ROS initiated - Date Processed (assigned surveying official and forwarded for approval of assignment) - Voucher Number (if applicable) - Date ROS has final Approval (signature of Facility Director).

2. REPORT OF SURVEY (R/S) REGISTER FILE. The accountable official will establish and maintain, on a fiscal year basis, a report of survey register and file that at a minimum contains the following information:

R/S No.	Item Description & Acq. Cost	Date of Report	Date of ROS Report	Date R/S Processed	Voucher Number	Date Completed
1/05	Theft of computer (\$1436)	2/1/05	2/2/05	2/4/05	A3A043	3/1/05
2/05	Loss of paint from paint shop (\$70 est.)	4/7/05	4/8/05	4/10/05	N/A	5/1/05

APPENDIX D

 Department of Veterans Affairs		VA EMPLOYEE GOVERNMENT PROPERTY LOAN FORM	
PART I - EMPLOYEE LOAN DESCRIPTION			
<i>NOTE: This agreement sets forth the conditions under which the facility has agreed to loan the following property to a VA employee. VA defines a loan as "for the borrower's temporary use."</i>			
A. DESCRIPTION OF PROPERTY ON TEMPORARY LOAN <i>(Borrower must insure property is operating and functioning properly prior to issue)</i>			B. EQUIPMENT ENTRY (EE) NO.
<input type="checkbox"/> LAPTOP <input type="checkbox"/> BLACKBERRY <input type="checkbox"/> PAGER <input type="checkbox"/> MONITOR <input type="checkbox"/> PRINTER <input type="checkbox"/> MOBILE PHONE <input type="checkbox"/> BROADBAND CARD <input type="checkbox"/> REMOVABLE MEDIA <input type="checkbox"/> DESKTOP COMPUTER <input type="checkbox"/> OTHER <i>(Specify)</i>			
C. VALUE OF EQUIPMENT	E. SERIAL NO.	F. MODEL	
G. JUSTIFICATION FOR LOAN OF VA PERSONAL PROPERTY			
H. ISSUE DATE	I. EXPECTED RETURN DATE <i>(Note: Loan not to exceed one (1) year)</i>		
J. NAME OF IT EIL CUSTODIAL OFFICER/ACCOUNTABLE OFFICER		K. SIGNATURE OF IT EIL CUSTODIAL OFFICER/ACCOUNTABLE OFFICER	L. TELEPHONE NUMBER
M. SIGNATURE OF INFORMATION SECURITY OFFICER <i>(if data sensitive item)</i>			N. DATE SIGNED
AGREEMENT: I hereby accept the responsibility of the item referenced above in item A, and agree to return the item in as good condition as when loaned, fair wear and tear excepted.			
O. NAME OF EMPLOYEE <i>(Type name of employee)</i>	P. EMPLOYEE SIGNATURE ACKNOWLEDGING RECEIPT OF LOAN	Q. DATE SIGNED	
R. ADDRESS OF VA PERSONAL PROPERTY <i>(other than home)</i>	S. OTHER PERTINENT INFORMATION		
PART II - VA EMPLOYEE PROPERTY RETURN RECEIPT			
A. IDENTIFICATION OF EXCEPTIONS, DISCREPANCIES, CONDITION CODE ISSUES, AND PROBLEMS <i>(Please note N/A if property is returned in as good condition as when loaned, fair wear and tear excepted, and there are no other problems with the returned property.)</i>			
ACKNOWLEDGEMENT OF RECEIPT: The property identified in Part I, Item A, of this form has been returned without any exceptions, discrepancies, condition code issues, and/or problems except as noted. A signed copy of this form (VA Form 0887a) shall be forwarded to and maintained in the Property Management Division for Central Office property. Within 72 hours of receipt the IT EIL Custodial Officer/Accountable Officer will annotate corrective changes to the "location" and "comments" fields in AEMS/MERS.			
B. RETURN ACKNOWLEDGED BY IT EIL CUSTODIAL OFFICER/ACCOUNTABLE OFFICER <i>(Signature of IT EIL Officer/Accountable Officer)</i>	C. DATE SIGNED	D. EQUIPMENT ENTRY (EE) NO.	
EMPLOYEE ACKNOWLEDGEMENT OF RECEIPT: A copy of this signed form has been received for my files. ▶		E. EMPLOYEE INITIALS	F. DATE
PART III - VA PROPERTY PASS			
 Department of Veterans Affairs		DESCRIPTION OF PROPERTY ON TEMPORARY LOAN	
PROPERTY PASS		<input type="checkbox"/> LAPTOP <input type="checkbox"/> BLACKBERRY <input type="checkbox"/> PAGER <input type="checkbox"/> MOBILE PHONE <input type="checkbox"/> BROADBAND CARD <input type="checkbox"/> MONITOR <input type="checkbox"/> REMOVABLE MEDIA <input type="checkbox"/> DESKTOP COMPUTER <input type="checkbox"/> PRINTER <input type="checkbox"/> OTHER <i>(Specify)</i>	
ISSUE DATE	EXPECTED RETURN DATE	<i>NOTE: Cut and fold Property Pass for placement in wallet for quick access and reviewing by Security or Law Enforcement Officials.</i>	
NAME OF EMPLOYEE			
NAME OF IT EIL CUSTODIAL OFFICER/ACCOUNTABLE OFFICER			
TELEPHONE NUMBER			
		SERIAL NO.	MODEL

GFE USAGE GUIDELINES		
<ul style="list-style-type: none"> • Do not loan GFE to anyone. • Do not install personal software. • Save data only to secure locations, such as FIPS 140-2 compliant storage devices. • Do not attach non-approved portable devices to this equipment. • Secure and store GFE under lock and key when not in use. • Do not check GFE as checked luggage when traveling. • Do not modify the configuration of the GFE. 		
USER RESPONSIBILITIES		
<ul style="list-style-type: none"> • I understand this equipment is provided for official use only. • I understand the transit of VA Information off-site is strictly prohibited unless accompanied by express written authorization. • I am required by my supervisor to utilize this equipment to perform the duties of my job. • I accept responsibility for the equipment identified on this form issued to me by the Department of Veterans Affairs. • I fully understand that I will be billed for the replacement cost for any damage or loss occurring as a result of negligence. • I have read and understand VA Directive 6504 and 6601. • I will care for and protect equipment from loss or damage and will notify IT staff of any damage or operation failures incurred. • I understand that it is my responsibility to periodically return the equipment for routine maintenance. 		
CERTIFICATION STATEMENT: I have read the above guidelines and accept responsibilities. <input style="width: 20px; height: 15px; vertical-align: middle;" type="checkbox"/>		EMPLOYEE INITIALS
ANNUAL RECERTIFICATION		
DATE	EIL/AO INITIALS	EMPLOYEE INITIALS

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APPENDIX E

 Department of Veterans Affairs		NON-VA EMPLOYEE PERSONAL PROPERTY LOAN FORM	
PART I - NON-EMPLOYEE LOAN DESCRIPTION			
<i>NOTE: This agreement sets forth the conditions under which the facility has agreed to loan the following property to a Non-VA employee. VA defines a loan as "for the borrower's temporary use."</i>			
A. DESCRIPTION OF PROPERTY ON TEMPORARY LOAN (Lender must insure property is operating and functioning properly prior to issue)			B. EQUIPMENT ENTRY (EE) NO.
<input type="checkbox"/> LAPTOP <input type="checkbox"/> BLACKBERRY <input type="checkbox"/> PAGER <input type="checkbox"/> MONITOR <input type="checkbox"/> PRINTER <input type="checkbox"/> MOBILE PHONE <input type="checkbox"/> BROADBAND CARD <input type="checkbox"/> REMOVABLE MEDIA <input type="checkbox"/> DESKTOP COMPUTER <input type="checkbox"/> OTHER (Specify)			
C. VALUE OF EQUIPMENT	E. SERIAL NO.	F. MODEL	
G. JUSTIFICATION FOR LOAN OF VA PERSONAL PROPERTY			
H. ISSUE DATE	I. EXPECTED RETURN DATE (Note: Loan not to exceed 60 days.)		
J. NAME OF IT EIL CUSTODIAL OFFICER/ACCOUNTABLE OFFICER	K. SIGNATURE OF IT EIL CUSTODIAL OFFICER/ACCOUNTABLE OFFICER	L. TELEPHONE NUMBER	
M. SIGNATURE OF INFORMATION SECURITY OFFICER (if data sensitive item)			N. DATE SIGNED
O. NAME OF APPROVING DIRECTOR	P. SIGNATURE OF APPROVING DIRECTOR	Q. DATE SIGNED	
AGREEMENT: I hereby accept the responsibility of the item referenced above in item A, and agree to return the item in as good condition as when loaned, fair wear and tear excepted.		R. SIGNATURE OF NON-VA EMPLOYEE ACKNOWLEDGING RECEIPT OF LOAN	S. DATE SIGNED
T. ADDRESS WHERE VA PERSONAL PROPERTY WILL BE LOCATED	U. OTHER PERTINENT INFORMATION		
PART II - NON-VA EMPLOYEE PROPERTY RETURN RECEIPT			
A. IDENTIFICATION OF EXCEPTIONS, DISCREPANCIES, CONDITION CODE ISSUES, AND PROBLEMS (Please note N/A if property is returned in as good condition as when loaned, fair wear and tear excepted, and there are no other problems with the returned property.)			
ACKNOWLEDGEMENT OF RECEIPT: The property identified in Part I, Item A, of this form has been returned without any exceptions, discrepancies, condition code issues, and/or problems except as noted. A signed copy of this form (VA Form 0887b) shall be forwarded to and maintained in the Property Management Division for Central Office property. Within 72 hours of receipt the IT EIL Custodial Officer/Accountable Officer will annotate corrective changes to the "location" and "comments" fields in AEMIS/MERS.			
B. RETURN ACKNOWLEDGED BY IT EIL CUSTODIAL OFFICER/ACCOUNTABLE OFFICER (Signature of IT EIL Officer/Accountable Officer)		C. DATE SIGNED	D. EQUIPMENT ENTRY (EE) NO.
NON-VA EMPLOYEE ACKNOWLEDGEMENT OF RECEIPT: A copy of this signed form has been received for my files.		E. NON-VA EMPLOYEE INITIALS	F. DATE
PART III - VA PROPERTY PASS			
 Department of Veterans Affairs		DESCRIPTION OF PROPERTY ON TEMPORARY LOAN	
PROPERTY PASS		<input type="checkbox"/> LAPTOP <input type="checkbox"/> BLACKBERRY <input type="checkbox"/> PAGER <input type="checkbox"/> MOBILE PHONE <input type="checkbox"/> BROADBAND CARD <input type="checkbox"/> MONITOR <input type="checkbox"/> REMOVABLE MEDIA <input type="checkbox"/> DESKTOP COMPUTER <input type="checkbox"/> PRINTER <input type="checkbox"/> OTHER (Specify)	
ISSUE DATE	EXPECTED RETURN DATE	NOTE: Cut and fold Property Pass for placement in wallet for quick access and reviewing by Security or Law Enforcement Officials.	
NAME OF INDIVIDUAL			
NAME OF IT EIL CUSTODIAL OFFICER/ACCOUNTABLE OFFICER			
TELEPHONE NUMBER			
		SERIAL NO.	MODEL

GFE USAGE GUIDELINES		
<ul style="list-style-type: none"> • Do not loan GFE to anyone. • Do not install personal software. • Save data only to secure locations, such as FIPS 140-2 compliant storage devices. • Do not attach non-approved portable devices to this equipment. • Secure and store GFE under lock and key when not in use. • Do not check GFE as checked luggage when traveling. • Do not modify the configuration of the GFE. 		
USER RESPONSIBILITIES		
<ul style="list-style-type: none"> • I understand this equipment is provided for official use only. • I understand the transit of VA Information off-site is strictly prohibited unless accompanied by express written authorization. • I am required by my supervisor to utilize this equipment to perform the duties of my job. • I accept responsibility for the equipment identified on this form issued to me by the Department of Veterans Affairs. • I fully understand that I will be billed for the replacement cost for any damage or loss occurring as a result of negligence. • I have read and understand VA Directive 6504 and 6601. • I will care for and protect equipment from loss or damage and will notify IT staff of any damage or operation failures incurred. • I understand that it is my responsibility to periodically return the equipment for routine maintenance. 		
CERTIFICATION STATEMENT: I have read the above guidelines and accept responsibilities. <input style="float: right; margin-left: 10px;" type="checkbox"/>		NON-EMPLOYEE INITIALS
EXTENTION RECERTIFICATION		
DATE	EIL/AO INITIALS	NON-EMPLOYEE INITIALS

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APPENDIX F

 Department of Veterans Affairs		REVOCABLE LICENSE		
<p><i>NOTE: This agreement sets forth the conditions under which the following described personal property is licensed for use by the individual, institution, or organization named below.</i></p>				
A. DESCRIPTION OF PROPERTY			B. EQUIPMENT ENTRY NO. (if applicable)	
C. ACQUISITION COST	D. ACQUISITION DATE		E. CONDITION CODE	
<p>F. NAME AND ADDRESS OF BORROWER (Individual, institution, or organization to be charged with responsibility for the property.) <i>NOTE: If an institution, provide name of individual primarily involved as the user.</i></p>				
<p>G. PURPOSE OF LOAN (Describe benefits to be derived by VA or cite other reasons for license. Identify research project, if applicable. If joint usage is involved, identify participating VA employee(s):</p>				
<p>DURATION OF LICENSE (Indicate specific date for termination. <i>NOTE: License not to exceed 1 year.</i>)</p>				
H. LICENSE BEGINS (MM/DD/YYYY)		I. LICENSE TERMINATES (MM/DD/YYYY)		
<p>TERMS OF AGREEMENT</p>				
<p>(1) VA reserves the right to terminate the license at any time, at the will of the government.</p> <p>(2) The loanee will:</p> <ul style="list-style-type: none"> (a) Not acquire any enforceable rights pursuant to use of the property described herein. (b) Assure the property is properly used and safeguarded. (c) Maintain the property in good operating condition during the loan of use and return it in equally good condition. (d) Bear all expense incident to transportation of property to and from point of proposed use. (e) Reserve the right to terminate the license at any time. (f) Agree to return the property to VA at an earlier date if the purpose is accomplished sooner. <p>(3) Liability: VA accepts no liability for any loss or injury resulting from, arising out of, or in any way connected with the use of the equipment herein identified while in custody and under responsibility of the licensee.</p> <p>(4) Effective Date: (This agreement becomes effective on the date the property is physically removed from VA premises and accepted by licensee.)</p> <p>(5) Other pertinent agreement information:</p>				
<p>APPROVED BY (Department of Veterans Affairs field facility)</p>			<p>ACCEPTED BY</p>	
J. PRINTED NAME OF VA DIRECTOR OR DESIGNEE			M. PRINTED NAME OF BORROWER	
K. SIGNATURE OF DIRECTOR/DESIGNEE	L. DATE SIGNED	N. SIGNATURE		O. DATE SIGNED
<p>DISTRICT COUNSEL ACTION</p>				
<p>P. ACTION:</p> <input type="checkbox"/> CONCUR <input type="checkbox"/> NONCONCUR	Q. SIGNATURE, DISTRICT COUNSEL	R. DATE SIGNED	S. SIGNATURE OF AUTHORIZED OFFICIAL	T. DATE SIGNED

APPENDIX G

Keys to a Successful Nonexpendable Inventory

1. Send an official memorandum notifying the service with 100 line items or less with at least 18 working days remaining in the anniversary month. Services with more than 100 line items should be notified at least 23 days before the end of the anniversary month.
2. Along with the memo, provide two copies of the EIL (one for working inventory, the second for signature) to the Custodial Officer. In addition, provide the service with an exception listing.
3. Provide service with barcode scanner and ensure service is familiar with barcode operation.
4. In trust the service to identify new locations, update serial numbers, model info, if this data is discrepant during inventory (on working EIL copy). In addition, the service should look at such things as underused assets, misplaced items, poor maintenance, increased operational costs, financial reporting errors, and purchasing of unnecessary assets found during the inventory.
5. In trust the service to make every effort to find missing items.
6. The service is required to submit Report of Surveys for items not found during EIL inventories.
7. The service should evaluate the need for equipment that is not currently being used and provide logistics with turn-ins for these items.
8. Service will send a signed copy of the completed EIL inventory along with all appropriate documentation (e.g., updates, and Reports of Surveys) back to logistics.
9. Logistics will process Report of Surveys (ROS) and update property records within 5 working days with the information provided by service personnel (e.g., correct serial numbers, model numbers, locations, etc.).
10. Logistics will update property records when all ROSs are completed.
11. All documentation related to an equipment inventory will be filed with the appropriate EIL for a period of 15 months, in accordance with VA Records Control Schedule 10-1, V5, Item 90-23.

Appendix H

Keys to a Successful Expendable Inventory

1. Establish the inventory date.
2. Ensure that Custodial Officers are made aware of the inventory date and cutoff date through official memorandum.
3. Request that all inventory issues/receipts be processed prior to the date of inventory, with a cut-off date at least two days prior to inventory.
4. Establish two work teams consisting of the inventory account manager and an inventory manager from a different account (disinterested party). There is one counter and one recorder per team.
5. Request that on-hand inventory count sheets for both teams be printed the day of the scheduled inventory, with no quantities listed on the count sheets. Request another inventory count sheet with quantities (do not share findings with team members prior to inventory).
6. Establish pre-training conference of both teams who will conduct inventory to describe responsibilities, requirements and plans.
7. Each team will conduct full wall-to-wall inventory of all items.
8. Inventory managers and team members must jointly compare inventory counts on both worksheets and inventory count worksheet with actual quantities.
9. Recount any discrepant items to ensure actual discrepancy exists and not just a counting error. Corrected findings will be initialed by all parties.
10. Have all parties sign and date all inventory worksheets.
11. Have a 5% verification check done by disinterested party and Accountable Officer.
12. Determine reason for any actual discrepancies.
13. Adjust inventory values and quantities as appropriate, utilizing adjustment vouchers, with detailed explanations for adjustments.
14. Notify Fiscal Service of any inventory adjustments.
15. Reconcile inventory balances with Fiscal Service.
16. Notify using services upon completion and regular business can resume.

17. Maintain all worksheets and records used to conduct the inventory for a period of 15 months, in accordance with VA Records Control Schedule 10-1, V5, Item 90-23.

Appendix I

Listing of Standardized EIL Departments

Numbers are to be assigned according to department responsibility within a series using an additional digit, for example: 130 Engineering, 131 Plumbing Shop, 132 BIO-MED, etc.

- **00** Director/Manager
- **01** Assistant Director/Manager
- **02** Chief of Staff
- **03** Intensive Care
- **04** Building Management
- **05** Building Management
- **06** Canteen Officer
- **07** Chaplains
- **08** Clinical Psychology
- **09** Continued Treatment
- **10** Dental
- **11** Dietetic Service
- **12** Medical Education
- **13** Engineering
- **14** Fiscal/Finance
- **15** Intermediate
- **16** Laboratory
- **17** Library
- **18** Medical Administration
- **19** Medical Media
- **19V** Test and Maintenance
- **19W** Video Production Equipment

- **19X** InterIntra Distribution System
- **19Y** Individual Utilization
- **19Z** Specialized TV System
- **20** Medical Service
- **21** Neurology
- **22** Neuropsychiatric
- **23** Nursing Service
- **24** Outpatient
- **25** Paraplegia
- **26** Personnel
- **27** Pharmacy
- **28** Rehabilitation Medicine
- **29** Prosthetic & Sensory
- **30** Psychiatry/Neurology
- **31** Psychology
- **32** Psychology Training
- **33** Quarters Housekeeping(1)
- **34** Quarters Housekeeping(1)
- **35** Quarters Housekeeping(1)
- **36** Radiology
- **37** Radioisotope
- **38** Research
- **39** Research
- **40** Research
- **41** Social Work Service
- **42** Acquisition & Materiel Management
- **43** Surgical Service

- **44** Tuberculosis
- **45** Voluntary
- **46** Vocational Counsel
- **47** Wards
- **48** Wards
- **49** Wards
- **50** Quarters, Nonhousekeeping
- **51** Domiciliary
- **52** Domiciliary
- **53** Nursing Home
- **54** Nursing Home
- **56** Comp. Work Therapy
- **57** Cemeteries
- **58** Cemeteries
- **59** Mental Health
- **60** Accounting
- **61** Adjudication
- **62** Administration
- **63** Services
- **64** Chief Attorney
- **65** Contact
- **66** Insurance
- **68** Operations
- **69** Ambulatory
- **70** Health Care Training
- **71** Recreation
- **72** Resident Engineer

- **75** OGA
- **76** Readjustment Counseling
- **77** Audiology/Speech Pathology
- **78** Information Resource Management
- **80** Research
- **81** Research
- **82** Security Service
- **83** Fire Department
- **86** MCCR
- **88** Invalid Lifts, Other Devices & Equipment (SGL 1756 only)
- **90** OA&MM Supply Fund Equipment
- **98** Uninstalled Equipment
- **99** Reserved

APPENDIX J

VA IT INVENTORY TIGER TEAM'S FULL TEXT FOR "CONTROL AND INVENTORY OF IT EQUIPMENT" (PART 13)

1. Background

While overall inventory control policy and procedures are under the purview of the Office of Acquisition and Logistics (OA&L), the tracking of, and accountability for, Information Technology (IT) equipment has come under increasing scrutiny due to the sensitive data it frequently stores. The Office of Information and Technology (OI&T) has therefore defined an increased role for those who manage and use IT equipment. Ultimately, this means almost every member of the VA workforce. And it means that a special partnership must be established at the facility level between Logistics and OI&T leadership and staff.

The references cited in this section identify the existing requirements for, and provide comprehensive guidance on, inventory control and tracking within VA. It is therefore essential that individuals charged with inventory control responsibilities possess a thorough knowledge of the referenced policies. This section should be regarded as augmenting the established policies to improve the degree of control over VA's IT equipment inventory.

2. PURPOSE

This section of the handbook is designed for field personnel responsible for tracking and controlling IT equipment assets.

3. Responsibilities

a. Department of Veteran Affairs Chief Information Officer

The Department's Chief Information Officer (VA CIO)/Assistant Secretary for Information Technology is responsible, at the Department level, for ensuring the integrity and security of VA's IT assets, including physical inventory as well as data protection and the sanitization of data when IT resources are retired from service. Responsible for IT operations and maintenance, the VA CIO will monitor, review, and evaluate compliance with this policy. The VA CIO has delegated day-to-day management of IT asset control to the Executive Director, Field Operations and Development.

b. Deputy Assistant Secretaries

The Deputy Assistant Secretaries within OI&T are responsible for ensuring that all personnel under their purview are informed of and adhere to the requirements of this policy. This includes ensuring that collaboration is established with all VA components within and outside of OI&T as required to support full implementation of this policy.

c. Executive Director, OI&T Field Operations and Development

The Executive Director, OI&T Field Operations and Development is responsible for directing IT inventory control activities across OI&T and for ensuring coordination across the department to ensure full implementation of this policy. The Executive Director, OI&T Field Operations and Development also ensures adherence to this policy by contractor personnel and other non-Government employees through incorporation by reference in contracts or memoranda of agreement as a condition for using Government equipment and/or space. The Executive Director, OI&T Field Operations and Development charters, appoints members to and provides direction to the IT Asset Advisory Group (ITAAG) and defines the reporting, performance measure and other requirements associated with establishing IT inventory status and compliance with this policy.

The Executive Director, OI&T Field Operations and Development is responsible for ensuring that this policy is disseminated to all VA facilities and field offices that use IT equipment, that this policy is fully implemented at each facility, and that periodic training (at least annually) is conducted on IT inventory control procedures, associated roles and responsibilities, and the control of sensitive and personally identifiable information stored on those assets. In addition, the Executive Director, OI&T Field Operations and Development is responsible for ensuring compliance with established reporting requirements.

Executive Director, Enterprise Infrastructure Engineering (EIE)

The Executive Director, EIE, is responsible for collecting requirements associated with IT inventory control and control and developing technical solutions to enhance information security and IT asset control. The Executive Director, EIE, is also responsible for establishing priorities and expediting deployment of technical solutions designed to enhance control of IT assets.

d. IT Asset Advisory Group (ITAAG)

The ITAAG is established by the Executive Director, OI&T Field Operations and Development and serves as a cross-functional advisory and coordinating group on matters relating to the control of VA's IT assets. The ITAAG comprises decision-making representatives from each of the VA administrations, Security, Logistic Services and other components of VA as required to ensure full stakeholder representation. The purpose of the ITAAG is to recommend policies and projects to define and address the requirements associated with controlling VA's IT assets. The ITAAG serves as a forum to gather best practices, define standardized processes and delineate requirements for technical solutions to the VA IT inventory control challenge. The ITAAG provides direct advisory support to, and coordinates established reporting requirements with, the regions/sites through the respective Regional IT Logistic Officer.

e. IT Regional Director/Regional CIO

The IT Regional Directors are responsible for ensuring that all facilities account for and track as required the IT assets under their cognizance. They are responsible for ensuring that this policy is implemented throughout their respective regions, appointing Regional IT Logistic Officers to oversee the implementation of IT inventory control

requirements at the regional level, and ensuring that periodic and recurring reports are submitted to the ITAAG on time and in accordance with VA's quality standards.

f. Network Chief Information Officers (Network CIOs)

The Network CIOs are responsible for coordinating with the Regional IT Logistic Officer to ensure that all facilities within their respective regions adhere to the requirements of this policy and that established reporting requirements are fulfilled on time and in accordance with VA's quality standards.

g. Regional IT Logistic Officer

1) The Regional IT Logistic Officer (RILO) is appointed by the IT Regional Director (Regional CIO) to coordinate IT inventory activities at the regional level. With a background in both Logistic Services and IT, the RILO reports to the IT Regional Director (Regional CIO) and is responsible for coordinating with Network CIOs and Facility CIOs to ensure that all facilities in the region are informed of, and adhere to, the requirements of this policy. The RILO is the liaison from the IT Asset Advisory Group (ITAAG) to the Network CIOs and the individual sites. As such, the RILO is responsible for:

- ensuring effective communication from the ITAAG to the Network CIOs and the individual VA facilities;
- identifying barriers to full implementation of this policy and raising those barriers to the ITAAG for mitigation/resolution;
- compiling and submitting required reports based on data obtained from the individual facilities within the respective region in accordance with requirements established by the ITAAG;
- resolving data discrepancies; and
- maintaining the Regional IT Inventory Control Training Plan and ensuring that all facilities implement training programs as required under this policy and as prescribed by the ITAAG.

2) As a member of the ITAAG, the RILO contributes to the strategic planning effort associated with the control of IT assets, identifies best practices, defines risks, and assists in the development and implementation of risk mitigation plans.

h. VA Facility Director

For those facilities that do not have Facility Directors, the responsibilities identified in this paragraph will be assigned to the senior manager at the facility.

1) The Facility Director is responsible for ensuring that the requirements of this policy are implemented by all facility personnel and throughout all areas of the facility. If Logistic Services (Property Management) representatives are not resident at the facility, collaboration between the facility and Logistic Services at the servicing medical center will be established by the Facility Director to ensure requisite support is provided. The terms of such support will be documented in a Memorandum of Understanding (MOU).

2) The Facility Director is responsible for instituting and maintaining collaboration mechanisms and processes required to engage all business units at the facility level in safeguarding VA's IT assets and the information they store. The Facility Director will establish an *IT Inventory Control Process Improvement Forum*, comprising representatives from Logistic Services, Ol&T and IT Security at a minimum, where issues and barriers to compliance with this policy may be raised for discussion and resolution. Unresolved issues related to the implementation of this policy may be raised to the ITAAG by any member of the facility for resolution.

3) The Facility Director will ensure that periodic and recurring reports as required by the ITAAG and as communicated by the RILO are submitted on time and in accordance with VA standards of quality.

4) Each facility and each space in the facility must be assigned a unique identifier – the Facility Director is responsible for ensuring that this requirement is met and that the assigned unique identifier is prominently displayed and barcoded at each location. In addition, procedures will be established to ensure periodic inspection is conducted to ensure that correct signage and barcodes are in place and in readable condition.

5) The Facility Director will implement procedures to ensure only authorized personnel procure IT equipment items with Purchase Cards and that such purchases are entered into the inventory control system and managed with the same diligence applied to all other IT assets in accordance with this policy.

6) The Facility Director will implement procedures to ensure that IT equipment is relocated/moved only by IT personnel and that location data is properly recorded at the time the equipment is relocated/moved.

i. Facility Information Security Officer (FISO)

The FISO is the agency official's assigned representative to ensure that the appropriate operational security posture is maintained for an information system or program. The FISO's areas of responsibility with regard to IT Inventory Requirements include the following:

1) The FISO will participate in the Facility's *IT Inventory Control Process Improvement Forum* to support the development, implementation and improvement of processes and training required to effect this policy.

2) The FISO will review and approve local procedures associated with the control of sensitive items.

3) The FISO will ensure that procedures are implemented to protect information when IT equipment is to be transferred to another facility.

4) The FISO will coordinate, in cooperation with the Facility Director, all facility-level activities when there is a suspected loss of equipment containing sensitive information.

5) The FISO will ensure that media sanitization and other security procedures are performed in accordance with VA Handbook 6500.

j. IT Custodial Officer (Senior IT Official/Facility CIO)

1) The Senior IT Official is the agency official's assigned representative to ensure that IT assets are managed in accordance with this policy. This individual is responsible for the ensuring the implementation of this policy for all nonexpendable IT property, specified sensitive IT property and expendable IT items capable of storing information electronically that are under the cognizance of the facility. As such, this individual will work with Logistic Services, IT Security and other organizations represented at the facility to ensure the identification, tracking and control of all nonexpendable IT equipment, including sensitive IT equipment regardless of cost, and all expendable IT items capable of storing information electronically. This includes ensuring that all nonexpendable IT equipment items, and sensitive IT items, classified as Sensitive per this Handbook, are received and entered into the Equipment Inventory List (EIL) by Logistic Services and that expendable IT items capable of storing information electronically are received and entered into a standardized tracking system (Sensitive Expendable IT Items Listing - SEIIL) and tracked through end of use.

2) The Senior IT Official will participate in the Facility's *IT Inventory Control Process Improvement Forum* to support the development, implementation and improvement of processes and training required to implement this policy. The Senior IT Official will maintain the Facility IT Inventory Control Training Plan and ensure that required training is conducted for all facility personnel as prescribed by the ITAAG and coordinated by the RILO.

3) The Senior IT Official will ensure that the IT Hand Receipt/Loan Form program is implemented throughout the facility in accordance with this policy.

4) The Senior IT Official will submit, on time and in accordance with VA standards of quality, periodic and recurring Facility-level reports as required by the ITAAG and as communicated by the RILO.

5) The Senior IT Official will ensure that IT procurement packages under the cognizance of the facility are reviewed for compliance with this and related VA IT policies. The Senior IT Official is also responsible for ensuring that personnel responsible for IT inventory control activities, including the receipt and sanitization of returned IT equipment, are informed of, and kept current on, relevant contractual requirements. Unresolved conflicts with contractual terms will be reported to the Facility Director in writing; the memorandum will document the nature, scope and impact of the conflict and the action recommended to resolve the matter.

6) When the Senior IT Official identifies deficiencies in the IT Inventory Control processes or procedures, s/he is to identify and describe such deficiencies in writing to the Facility Director for resolution by the *IT Inventory Control Process Improvement Forum*. If the matter is not addressed in a manner that fulfills the requirements of this policy, the Senior IT Official will forward the initial correspondence, along with actions taken, to his/her direct supervisor within the OI&T organization for resolution.

7) In the role of IT Custodial Officer, the Senior IT Official (also referred to as the IT Equipment Inventory Listing/Sensitive Expendable IT Item Listing (EIL/SEIIL) Official), assumes responsibility for all IT items under the cognizance of the facility in accordance with the Custodial Officer roles and responsibilities delineated in this handbook. In addition:

a) The IT Custodial Officer may designate, in writing, other individuals to support inventory control efforts. The IT Custodial Officer and designees will coordinate with Logistic Services as necessary to obtain written/electronic documentation required to verify the accountability of all nonexpendable and specified sensitive IT property covered under this policy.

b) The IT Custodial Officer is responsible for establishing and implementing a process to identify, account for, track, monitor, inventory and dispose of IT items that are capable of storing information electronically but are not assigned Catalog Stock Numbers (i.e., expendable IT items not tracked by Logistic Services). This process will include those activities required to protect sensitive information through the control of IT physical assets. These efforts will be coordinated with the Facility Director, FISO, Logistic Services and Business Unit Leads to ensure full understanding of the requirements and full implementation of the procedures.

c) The IT Custodial Officer will coordinate perpetual inventory activities and conduct an annual inventory of IT equipment items assigned a Catalog Stock Number (CSN) in accordance with the schedule established by Logistic Services to verify the data contained in the EIL. The IT Custodial Officer will document and report any discrepancies identified during inventory activities.

d) The IT Custodial Officer will coordinate perpetual inventory activities and schedule and conduct an annual inventory of expendable IT items capable of storing information electronically to verify the data contained in the SEILL. The IT Custodial Officer will document and report any discrepancies identified during inventory activities.

e) Following an inventory of IT items, or whenever an IT equipment item is identified as 'not accounted for,' the IT Custodial Officer will review the documentation of discrepancies and coordinate with Logistic Services regarding a determination as to the need for Report of Survey (ROS) action. Logistic Services retains responsibility for the ROS process, including the ROS process for those items tracked on the SEILL.

f) When a potential loss of sensitive information is detected, either through identification of an item unaccounted for during inventory activities, or through report by an employee or other individual, the IT Custodial Officer will report the matter immediately (within 59 minutes) to the FISO, coordinate with Logistic Services as necessary to initiate a Report of Survey, and provide support as needed through resolution of the matter.

g) The IT Custodial Officer will ensure that all required turn-in documentation, such as Sanitization Certificates and other pertinent documents, are maintained in accordance with VA record retention policy.¹

h) The IT Custodial Officer will ensure adherence to any contractual terms that apply to the introduction, use, sanitization or disposal of Government-Furnished Equipment (GFE). Should the contractual terms conflict with the requirements of VA

¹ Reference RCS 10-1, Section V, page V-8; items Numbered 90-22, 90-23, & 90-24 are to be followed regarding the retirement of CMRs/EILs, Monthly Summary Files (Vouchers), and Excess Property Files.

policy, the IT Custodial Officer will report the conflict to the Facility Director in writing; the memorandum will document the nature, scope and impact of the conflict and the action recommended to resolve the matter. If the matter is not addressed in a manner that fulfills the requirements of this policy, the IT Custodial Officer will forward the initial correspondence, along with actions taken, to his/her direct supervisor within the OI&T organization for resolution.

k. **IT Custodial Officer Designees**

Designated employees will assist the IT Custodial Officer in conducting perpetual and annual physical inventory activities of: (1) nonexpendable IT equipment items, including sensitive items assigned a Category Stock Number (CSN) and (2) IT items capable of storing information electronically. Annual inventories for these items will be scheduled by: (1) Logistic Services and (2) OI&T respectively. IT Custodial Officer Designees are also responsible for reporting any process deficiencies to the IT Custodial Officer and for recommending improvements to support full implementation of this policy.

l. **VA Employees**

VA Employees are responsible for ensuring the security VA information and the equipment items on which it resides. This responsibility holds true, whether the equipment is entrusted to them solely for their use or used by them on occasion. In accordance with this policy and the VA Rules of Behavior, employees will sign hand receipts for Government IT equipment assigned exclusively for individual use and will obtain appropriate authorizations to remove VA equipment items and/or sensitive information from the VA facilities². They will also employ only approved nonexpendable and specified sensitive IT property, ensure the security of Personally Identifiable Information (PII) and other sensitive data in accordance with VA policy, abide by the requirements of this policy and report non-compliance issues to the facility Senior IT Official. Employees may be held pecuniarily liable for the loss, damage, or destruction of Government property.

4. **DEFINITIONS**

a. **Hand Receipt/Loan Form.** VA Form 887a or VA 887b, referred to as the VA Loan Form, will be used as the official form to document accountability for Tier 1 IT equipment items, depending on whether the individual assigned the equipment is a VA employee (Form 887a) or non-employee (Form 887b). It is used to document accountability to the lowest level in accordance with this policy. In accordance with the VA Rules of Behavior³, individuals are required to sign for any Government equipment assigned exclusively for their use. Accountability for IT equipment items is to be documented in the appropriate inventory tracking system.

b. **Information Technology.** Information technology means any equipment or interconnected system or subsystem of equipment that is used in the automatic

² Reference VA Handbook 6500 for requirements associated with removing sensitive information from a facility.

³ Ibid

acquisition, storage, manipulation, management, movement control, display, switching, interchange, transmission, or reception of data or information.

c. **Information Technology (IT) Equipment.** All nonexpendable equipment related to automated data processing (ADP) including, but not limited to, personal computers, printers, networking equipment (servers, controllers, etc) and telecommunications equipment. Medical equipment (i.e. telemetry monitors, computers attached to laboratory instruments, EMG machine computers) is not included as IT Equipment. *Note that, as used in this policy, IT equipment includes nonexpendable items classified as Sensitive per this Handbook and all items capable of storing data electronically.* There are three **categories** of IT equipment that must be tracked and accounted for:

- 1) IT Equipment valued at \$5,000 or more – tracked by Logistic Services and assigned a Category Stock Number
- 2) IT Equipment designated as Sensitive, assigned a CSN and tracked by Logistic Services
- 3) IT items not assigned a CSN and not tracked by Logistic Services, but which are identified as sensitive due to their ability to store data electronically. This equipment is tracked by IT.

For the current list of IT equipment, go to the OI&T Logistics Approval Acquisition Guidance SharePoint site (see the *Definition of IT*): <http://vawww.vhaco.va.gov/itaae> .

For IT asset control purposes, each asset is assigned to one of three **tiers** that relate to the degree of risk associated with the type of item:

- 1) Tier 1. This tier represents mobile computing devices that are that are deemed high risk due to their portability and ability to store sensitive data. Tier 1 devices may be signed out to individuals and may be taken off-station with proper authorization. This group of equipment includes such IT items as laptops, hand-held devices, and authorized USB drives. In addition, if any other IT equipment item (e.g., desktop computer) is assigned to an individual for off-station use, it is considered a Tier 1 asset.
- 2) Tier 2. Included as medium risk equipment are those items that can store information but are not portable and are employed by end users on station. This includes such items as desktop computers, servers, stationary cameras, and network devices, as well as printers, copiers, or scanners with electronic storage capability.
- 3) Tier 3. This final tier represents low risk IT assets such as monitors, printers, and scanners that have no electronic data storage capability. Tier 3 equipment is tracked in the same manner as non-IT equipment. That is, if it is assigned a CSN, it is entered into the inventory tracking system by Logistics and tracked. However, because these are IT items, they are inventoried by IT.

d. **IT Custodial Officer.** The IT Custodial Officer, also referred to as the IT EIL/SEIIL Official and the Senior IT Official, is designated by the Facility Director and certifies that all IT property, including VA owned, leased, loaned, or donated, listed on the EIL/SEIIL is present and accounted for. This official acknowledges personal responsibility for all IT property listed on the designated EIL/SEIIL (including all IT property designated as Sensitive per this Handbook) in accordance with existing policy on Custodial Officer

responsibilities. The IT Custodial Officer is also responsible for ensuring that personnel under their respective jurisdiction comply with the inventory procedures as provided in this handbook. The IT Custodial Officer is designated EIL/SEIL responsibilities by the Facility Director through the utilization of Delegation of Authority (DOA) memorandum. The IT Custodial Officer, in turn, designates IT Custodial Officer Designees by means of a DOA.

e. **IT Custodial Officer Designee.** An individual to whom responsibility for an IT EIL/SEIL and/or expendable IT property designated as Sensitive per this Handbook has been delegated by the IT Custodial Officer. This individual is responsible for conducting inventories and accounting for all nonexpendable and other specified IT property items assigned and is designated through the use of a DOA memorandum and signs acceptance of the associated responsibilities.

f. **IT EIL/SEIL Official.** Refer to IT Custodial Officer.

g. **IT Equipment Inventory Listing (EIL).** The EIL is the document on which IT equipment items, including sensitive items assigned Catalog Stock Numbers (CSNs), are listed; these items are tracked by Logistic Services and recorded in the Automated Engineering Management System/Medical Equipment Reporting System (AEMS/MERS). IT inventory items are coded as 78-series items in accordance with this Handbook. In addition to the EILs, which may be developed at the Division level, an equipment listing of other IT items capable of storing information electronically will be maintained on an SEIL. Because these lists are used as the foundation of the annual inventory process, they must be maintained current in a standardized tracking system.

h. **Sensitive Expendable IT Inventory Listing (SEIL).** The complete listing of those items that are not tracked by Logistic Services (not included in EILs) but are required to be tracked due to their ability to store data electronically. Until a Class 1 solution is deployed to track these items, each facility is responsible for establishing a local, standardized means for documenting the required set of data for such items.

i. **Physical Inventory.** Physical inventory is the process of reconciling accountable personal property records with the property actually on hand. Each VA activity will conduct an annual inventory of all EILs including sensitive items regardless of cost. IT has the additional responsibility of accounting for, on an annual basis, IT items capable of storing data electronically and reconciling the items on the SEIL with the items actually on hand.

j. **Sensitive Items.** The list of sensitive items is provided in this Handbook. Sensitive items will be inventoried regardless of cost, are tracked by Logistic Services and are included on the EIL.

Note that sensitive items that are not classified as equipment (i.e., not assigned a CSN) must be tracked and managed from receipt through end of use by OI&T. As such, the procurement and inventory of these items will be accomplished using the SEIL under the direction and control of OI&T.

k. **Telemedicine Systems.** Telemedicine Systems including Teleradiology, Telepathology, Telemental Health, etc (excluding videoconferencing equipment) are NOT considered IT equipment for inventory control purposes. Telemedicine modalities

exclude videoconferencing equipment **unless** the videoconferencing equipment is exclusively used for patient care communications in real time. **Thus, multi-purpose videoconferencing equipment is considered IT equipment.**

5. IT Inventory Governance

a. Department Level Governance

The Assistant Secretary for Information and Technology provides oversight and direction for all IT activities within VA. The management of VA's IT inventory control efforts is delegated to the Executive Director, OI&T Field Operations and Development who provides direction on IT inventory control, appoints stakeholder representatives to and directs the ITAAG, and reports to the Assistant Secretary for Information and Technology on IT inventory control matters.

b. Regional Level Governance

IT Regional Directors provide oversight and direction for IT inventory control activities within their respective regions. The RILO reports to the Regional CIO and serves as the coordinator of IT inventory activities for the region. The RILO coordinates with the Network CIOs and the IT Custodial Officer at each facility within his/her region to ensure full dissemination of IT inventory control guidance/direction, full compliance with the IT inventory control requirements, the timely submission of required reports, the identification of risks and the implementation of risk mitigation activities.

c. Facility Level Governance

1) The Facility Director has overall accountability for all assets and information at the facility. During an audit, it is the Facility Director that will be held accountable for full control of the assets and the protection of sensitive information. The Facility Director provides oversight of the inventory control program at the Facility. The asset management program function is under the cognizance of Logistic Services.

2) The Facility Director is responsible for establishing the processes, procedures and governance structures required to fulfill the requirements and intent of this handbook. Each Facility Director is responsible for establishing clear lines of accountability for all IT equipment under the facility's cognizance.

3) The Facility Director delegates IT equipment inventory responsibilities to the IT Custodial Officer and the control and oversight for property management functions to the Facility Accountable Officer. This structure will be tailored by the Facility Director to the unique constraints of the facility (e.g., if there is no Senior Property Management Official at the facility, for IT inventory, the Facility Director will delegate the associated responsibilities to a senior IT staff member).

4) The IT Custodial Officer may assign inventory control responsibilities to subordinate personnel (referred to as IT Custodial Officer Designees). However, the IT Custodial Officer retains responsibility for all facets of inventory control under his/her respective purview in accordance with the signed Delegation of Authority (DOA) which is signed by the Facility Director.

5) Documentation required to track the delegation of signature authority for IT Inventory Control requirements defined in this Handbook will be established and maintained in a centralized repository. The intent of this requirement is to establish clear accountability for IT inventory items at all times. Electronic systems are approved for use for this purpose. A copy of each Delegation of Authority memo related to the control of IT inventory is to be provided to the IT Custodial Officer.

6) The designated employees are bound by the terms of the DOA until officially relieved of responsibility in accordance with the policy in this Handbook.

7) Collaboration tools and processes will be used to support the coordination required to ensure all Business Unit leads standardize inventory control procedures at the facility level. Collaboration tools and processes can include scheduled meetings and reviews, online repositories for points of contact, processes and procedures, and other mechanisms to ensure stakeholder groups have visibility into and can participate in the implementation of the inventory control processes as appropriate.

8) The Facility Director, in coordination with the Facility CIO, will establish working groups and teams as required to ensure integration of IT Inventory control and accountability procedures across the facility. An *IT Inventory Process Improvement Forum*, comprising at a minimum IT, Logistic Services, Security and Operations, will be established with the objective of early identification of, and response to, IT Inventory Control issues. Additional working groups will be established to address targeted issues and will include cross-functional representation appropriate to the groups' objectives.

5. TRAINING

a. Training of personnel in both inventory control and the protection of sensitive and personally identifiable information will be standardized by functional role throughout the facility and conducted on a periodic basis (no less than annually). For example, IT Custodial Officers and IT Custodial Officer designees will receive training on all aspects of their assigned roles, including the specific requirements associated with maintenance of EILs/SEILs, information protection, and the procedures associated with loss of equipment. Security personnel will be trained in the integration of inventory control and security activities. Those personnel without any direct inventory control responsibilities will be provided familiarization training, including an overview of the inventory control and accountability program, protection of sensitive information and associated authorization/documentation requirements, hand receipt/loan form requirements, and proper handling of movement inventory.

b. All new personnel will receive training in their responsibilities related to IT inventory control before accessing the IT system.

6. PURCHASE OF IT EQUIPMENT ITEMS

- a. The Facility Director is responsible for ensuring that IT equipment items (Tier 1, Tier 2 and Tier 3 IT Assets) are procured through a centrally managed process that supports the requisite identification and tracking of IT equipment.
- b. The procurement of all IT items will be coordinated with OI&T. IT procurement requirements are provided by accessing the OI&T Logistics Approval Acquisition Guidance site: <http://vaww.vhaco.va.gov/itaae/> .
- c. For Tier 1 and Tier 2 expendable equipment items, the procurement will be accomplished under the direction and control of OI&T. Such items will be entered into the proper SEIL and included in the physical inventory along with all other IT equipment items.
- d. Any issues associated with the implementation of the procedures addressed in this paragraph are to be brought to the attention of the facility's *IT Inventory Control Process Improvement Forum* for resolution.

7. PURCHASE CARD USE

- a. Purchase card holders will not purchase IT equipment with government purchase cards unless they are authorized Purchasing Agents and are authorized to make such procurements. VHA Handbook 1730.1 provides the requirements associated with authorizing the use of purchase cards.
- b. The Facility Director is responsible for oversight of procedures to ensure that IT items procured with purchase cards are entered into the inventory control system and managed with the same diligence applied to all other IT assets in accordance with this policy. Such items will be entered into the proper EIL/SEIL and included in the physical inventory along with all other IT equipment items.
- c. Procedures must be implemented to ensure nonexpendable IT equipment items, including sensitive items regardless of cost and expendable IT items that must be tracked due to their ability to store data electronically, procured by authorized individuals with purchase cards, are entered into the inventory control system and managed with the same diligence applied to all other IT assets in accordance this policy. Tier 1, Tier 2 and Tier 3 IT equipment will be entered into the facility's EIL/SEIL and included in the physical inventory process. The IT Custodial Officer is responsible for ensuring such procedures are developed, documented and implemented.
- d. Any issues associated with the implementation of these procedures are to be brought to the attention of the *IT Inventory Control Process Improvement Forum* for resolution.

8. GEOGRAPHIC MANAGEMENT OF IT INVENTORY ITEMS

IT equipment will be managed geographically. A Memorandum of Agreement (MOA) will be established between the hosting facility and each tenant organization. The MOA will specify the terms of the tenant agreement, including inventory control responsibilities (i.e., that the hosting facility will assume responsibility for inventory and

control of all IT equipment assets within its physical domain). Such MOAs will be signed by the Facility Director and the tenant organization. Exceptions to geographic management of IT equipment assets will be documented in the MOA and approved by the IT Regional Director of the host region. A copy of the MOA will be retained by the host Facility Director and the tenant Accountable Officer.

9. RECEIPT OF IT EQUIPMENT ITEMS

a. When items are received by a Facility, but were not ordered by the Facility (e.g., in the case of national, Central Office and VISN procurements), it is the Program Manager's (individual who ordered the item) responsibility to ensure that an advance copy of the Purchase Order is provided to the Accountable Officer at the receiving facility. When the item will be managed by the receiving facility, the Accountable Officer is responsible for notifying the Program Manager of receipt of the item and normal Logistic Services transfer procedures apply. Logistic Services is responsible for entering the item into the receiving facility's inventory tracking system; the facility will retain responsibility for the equipment through end of use or until transferred in accordance with approved policy.

b. If the item will NOT be managed geographically (that is, the item will be entered into the inventory tracking system and managed by the Program Office that ordered the item), the following information will be provided by the receiving facility's Accountable Officer to the Logistic Services Division that will be managing the EIL for the item:

- Receiving Report
- Nomenclature of the item
- Serial number
- Barcode Number
- Manufacturer's Name
- Model Number
- Acquisition Date
- Acquisition Cost

c. For items with a Catalog Stock Number (CSN):

The item is entered into the inventory tracking system and assigned to an EIL by Logistic Services.

For items that are not sensitive but are assigned CSNs, Logistic Services will process them in accordance with established Logistic Services policy.

For sensitive items that are assigned CSNs:

- 1) Logistic Services will deliver the item to the assigned EIL Official who will complete the receiving documentation.

2) If the item is required immediately, it will be delivered to the accountable person, hand-receipted as required, and the location will be documented in the inventory tracking system.

3) If the item is not required immediately, it will be delivered to secure storage (reference VA Handbook 6500) and the location will be documented in the inventory tracking system.

For IT items that are not assigned a CSN, Logistic Services will forward the item to the IT Custodial Officer. The IT Custodial Officer will confirm receipt of the item and will complete the receipt/acceptance process in accordance with established policy.

1) If the item is capable of storing information, the item must be tracked. In this case, the item will be barcoded and entered into the inventory tracking system established for IT items not tracked by Logistic Services. The item will then be forwarded to secure storage (per VA Handbook 6500) or to the specified department and the location entered into the tracking system. Hand receipts will be employed as required under the hand receipt/loan form section of this Handbook.

2) If the item is not capable of storing information, the item is forwarded to storage or to the specified department and its location recorded in the inventory tracking system in accordance with established logistics policy.

10. SOFTWARE

Logistic Services tracks physical software assets with a procurement value of \$5,000 or more. The procuring program manager is responsible for assigning and tracking licenses to ensure compliance with contract requirements; licenses for software are managed by the procuring program manager using approved automated tools. Facility IT support personnel are responsible for assisting the procuring program manager with reconciliation and validation of license usage at the facility level.

11. ACCOUNTABILITY – LOAN FORM/HAND RECEIPTS

a. A Hand Receipt/Loan Form is required for all Tier 1 IT equipment items, whether used on or off station. The VA Hand Receipt/Loan Form is also used to document accountability for GFE assigned to individuals and signed by the individual in accordance with VA's Rules of Behavior⁴. (Refer to the VA Handbook 6500 for requirements associated with the removal of sensitive information from a VA facility.)

1) AEMS/MERS provides the ability for authorized personnel to assign equipment to an individual and produce the VA Hand Receipt/Loan Form. For facilities using AEMS/MERS, the IT Custodial Officer must provide a delegation of authority memo to

⁴ In accordance with the Office of Management and Budget (OMB) Circular A-130, VA Handbook 6500, Appendix G, provides VA's Rules of Behavior which must be signed annually by all VA employees who are provided access to VA information or VA information systems (reference VA Handbook 6500, Appendix G, paragraph 2.a). One of the provisions of VA's Rules of Behavior requires those assigned GFE for their exclusive use to sign accountability for the item(s).

VA personnel authorized to assign IT equipment to accountable individuals. VA personnel so authorized will be granted access to options within the IT inventory tracking menu associated with equipment assignment. The accountable individual will electronically sign for receipt of the equipment. AEMS/MERS will automatically update the equipment file to include the name of the individual that is accountable for the equipment item.

It is essential that the accountability information be maintained current and that any reassignment of accountability for an equipment item to be entered into the system at the time of transfer.

2) For facilities not using AEMS/MERS, and for SEIL items not entered into AEMS/MERS, a hard copy of the VA Loan Form (VA Form 887a (for Government employees) or VA 887b (non-government personnel)) will be used to document individual accountability for Tier 1 Government Furnished Equipment (GFE)⁵. The appropriate form will be signed by the individual to whom the item is assigned; the form is then retained by the IT Custodial Officer. Again, the accountable individual is to be identified in the asset tracking system as responsible for the given equipment item.

b. Tier 1 equipment that is accessible by multiple individuals is to be assigned to the supervisor (assigned asset owner) responsible for the area in which the equipment is located. If the equipment is used to support multiple departments, the Facility Director will identify the Supervisor who will be assigned asset owner responsibilities. For those facilities not using AEMS/MERS, the assigned asset owner will sign the Hand Receipt/Loan Form indicating accountability for the IT item.

c. In the event that different individuals are assigned accountability for a single item (e.g., individuals working different shifts using the same piece of equipment), AEMS/MERS will accommodate the assignment of equipment items to multiple individuals. IT personnel authorized by DOA memorandum to loan equipment are to use the multiple assignment capability **only** when a limited number of specific individuals have access to the equipment item. Otherwise, the supervisor will be identified as the individual accountable for the item and can sub-receipt the item as required (e.g., for a loaner laptop that is used by department personnel on travel).

d. All VA employees and non-Government individuals who will access the VA IT system will be trained on the requirement to complete this form fully and the responsibilities associated with using VA IT property prior to accessing the VA IT system.

e. Individuals who have signed hand receipts for IT equipment will have adequate access to inventory control records so that they can validate the accuracy of data concerning the IT equipment assigned to them. Local procedures will be established so that employees can report errors in the inventory control records to the facility's IT Custodial Officer or designee.

1) If an individual identifies an error in the inventory tracking system with regard to items assigned to the individual, the individual is to report the error in writing to the IT Custodial Officer or designee.

⁵ Hard copy of the Loan forms may be obtained from: <http://vaww.va.gov/vaforms/>

2) Inventory control record error reports will be reviewed by the facility's IT Custodial Officer or designee, who will make disposition within 5 days of receipt of the report.

3) The inventory record will be corrected as necessary within 7 days of receipt and verification of the inventory control record error report.

4) The reporting employee will be notified of disposition and action taken within 10 days of submitting the inventory control record error report.

f. For IT equipment items entered into AEMS/MERS, the use of electronic signature is approved for hand receipts. The individual assigned responsibility for the equipment item will be provided a copy of the hand receipt.

g. For IT equipment items not entered into AEMS/MERS, all signed hand receipts for items assigned a CSN will be retained by the Accountable Officer; all signed hand receipts for IT equipment required to be tracked but NOT assigned a CSN will be retained by the IT Custodial Officer. The individual assigned responsibility for the equipment item will be provided a copy of the hand receipt.

h. The annual EIL/SEIL inventories will include an audit of these forms and the accurate documentation of the asset owner in the asset tracking system. The AEMS/MERS system (or manual forms for IT items not entered into AEMS/MERS) will be maintained and updated any time changes are made to the status of the equipment assigned to the employee or the status of the employee changes.

12. TRACKING OF IT EQUIPMENT

VA is dedicated to the protection of sensitive information; the requirements associated with securing such information, including encryption requirements, are documented in VA Directive and Handbook 6500. VA must be able to account for all assets – especially those with electronic storage capability. It is therefore essential that the location of each item be documented correctly in the asset tracking/inventory system.

a. There are two critical requirements associated with correct location identification:

1) First, each facility and each space in the facility must be assigned a unique identifier – the Facility Director is responsible for ensuring that this requirement is met and that the assigned unique identifier is prominently displayed and barcoded at each location. Periodic inspection is required to ensure that correct signage and barcodes are in place and in readable condition.

2) Second, IT equipment is to be moved/relocated only by authorized IT personnel. When equipment is moved, the authorized IT individual assigned to move the item will scan the item and new location and will update the location file to reflect the new location. This applies to both permanent relocation and temporary transfer of equipment for such purposes as maintenance/repair.

b. For asset tracking purposes, IT equipment items are categorized into three tiers, depending on the degree of risk they represent. The 3-tier structure is defined under

Definitions. The following paragraphs describe the tracking requirements associated with each tier of IT assets.

1) Tier 1 IT Assets - Because Tier 1 assets represent the highest risk to VA (in that such devices are capable of storing data electronically and are portable), tracking of these items must be considered a priority. These items must be hand-receipted and inventory control records (including identification of the accountable individual) must be maintained current.

Each employee is responsible for ensuring that the required documentation (i.e., hand receipts/property passes/authorization to remove sensitive information) is in place before equipment is removed from the facility.

The Facility Director is responsible for ensuring:

- (a) That adequate security measures are in place at the Facility entrances/exits to validate authorization to remove IT items from the facility;
- (b) That procedures are in place to ensure IT equipment is returned to the Facility's IT support team for updates and scanning in accordance with policy (i.e., every 90 days at a minimum); and
- (c) That procedures are in place to update the inventory record each time the item is returned for service/update.

2) Tier 2 IT Assets - Because of their ability to store data electronically, Tier 2 assets must be closely monitored. Approved auto-discovery tools may be employed to verify IT items connected to the network. The deployment of such tools will be coordinated by OI&T. Again, any movement of a Tier 2 asset will be accomplished by IT personnel only and the new location will be recorded in the inventory tracking system upon completion of the move.

3) Tier 3 IT Assets - This final tier represents low risk IT assets such as monitors, printers, and scanners that have no electronic data storage capability. The Tier 3 equipment items are tracked and inventoried in the same manner as non-IT equipment. However, again, only authorized IT personnel are to move/relocate IT assets and the location file is to be maintained current.

13. USE OF AEMS/MERS

AEMS/MERS is the current asset tracking system of record and will constitute the baseline for migrating inventory data to the future enterprise asset management system.

If a facility does not have access to AEMS/MERS, the Facility Director is responsible for notifying Logistic Services at the servicing medical center about the lack of access. An MOU will be established with the servicing medical center to define the level and scope of Logistic Services support to be provided, including access to AEMS/MERS.

14. IT INVENTORY STORAGE

- a. IT equipment storage locations must be physically secured under the same guidelines as have been established for computer rooms/data centers by the National Institute of Standards and Technology (NIST) and documented in VA Directive and Handbook 6500.
- b. Access to these areas will be restricted to authorized IT staff with the written approval from the IT Custodial Officer at each facility.
- c. Workstations and associated peripherals connected to (and part of) an organizational information system may be located in areas designated as publicly accessible; in such cases, access to such IT equipment must be controlled in accordance with VA Directive and Handbook 6500. Collaboration between IT and Security is essential to ensure the protection of sensitive information in common access areas.
- d. Physical Security
 - 1) In accordance with VA Handbook 6500, the FISO is required to develop a local System Security Plan (SSP). Part of the SSP is intended as a framework for identifying a facility's physical and procedural security needs and resolutions.
 - 2) The IT Custodial Officer will provide a list of all IT storage areas to the FISO. This list will be updated as necessary to ensure it is maintained current.
 - 3) Access to IT equipment storage locations will be provided to facility security personnel to perform regular inspections. Security personnel will provide a Report of Physical Security Inspection of IT Equipment Store Rooms to the IT Custodial Officer at the facility within 10 days of completing a physical security inspection. The report will document corrective actions necessary to establish full compliance with applicable security regulations.
 - 4) The IT Custodial Officer will coordinate with the FISO to develop a plan of action to address IT-related security requirements identified in the SSP. (Note that this does not mean that all identified requirements will need to be met in a prescribed manner. The IT Custodial Officer may identify alternative measures to address concerns raised by security. Security will have to approve such alternatives and validate that they adequately address the security concerns in question.) The Plan of Corrective Action is to be completed and forwarded for approval within 10 days of the IT Custodial Officer's receipt of the SSP. The plan will be approved by the Facility Director.

15. PROPERTY PASSES

A Property Pass is required whenever property is removed from a VA facility. The accountable individual will retain a copy of the form so that it may be produced upon inspection (e.g., when leaving the VA facility). [Note: VA Forms 887a/b, Part III, constitute the approved Property Pass. AEMS/MERS may be used to produce the Property Pass; facilities using other inventory tracking systems may download VA Forms 887a/b from the VA Forms website.]

Facility Directors will implement procedures to ensure that Property Passes are verified at the facility exits before equipment is taken out of the facility.

16. SENSITIVE INFORMATION USED OUTSIDE THE FACILITY

a. VA sensitive information must be in a VA protected environment at all times and must be encrypted in accordance with the requirements of VA Directive and Handbook 6500. The FISO must approve the protective conditions being employed.

b. In accordance with VA Directive and Handbook 6500, written approval must be obtained from the VA supervisor, Privacy Officer and FISO before sensitive information is removed from VA facilities. This requirement applies to all Department staff, contractors, business partners, or any person who has access to and stores VA information.

17. EQUIPMENT INVENTORY LISTING (EIL)/SENSITIVE EXPENDABLE IT ITEMS LISTING (SEIL)

a. All IT nonexpendable equipment items, including sensitive IT equipment regardless of cost (that is, all IT items assigned a CSN), will be entered into the EIL by Logistic Services. The IT EIL will begin with the 78 series followed by one or two additional characters either alpha and/or numeric to indicate the appropriate assigned EIL.

Note: It is required that all of VA utilize the Standardized EIL Department Numbers. The IT EIL will begin with the 78 series followed by one or two additional characters either alpha and/or numeric. The Consolidated Memorandum Receipt (CMR) can accept 4 characters for the purpose of IT equipment service use identification, example 7820 would represent IT equipment (78) used by Medical Service (20) by combining EIL Department numbers.

b. For Tier 1 and Tier 2 sensitive items not tracked by Logistic Services (not assigned a CSN), and not entered into AEMS/MERS by Logistic Services, IT will establish a tracking system (i.e., the SEIL) to ensure all such items are documented, assigned and tracked with the same diligence applied to all other IT equipment items.

c. In accordance with established Logistics policy, the IT Custodial Officer at the facility will assume responsibility for assigned IT property by personally signing the EIL/SEIL. In signing this receipt, the IT Custodial Officer certifies that all assigned IT property, including VA-owned, leased, loaned, or donated, listed on the EIL/SEIL is present and accounted for as of the given date.

d. Additions to, or deletions from, the EIL/SEIL made subsequent to the date of signature will be supported by the appropriate signed documentation in accordance with requirements of this handbook.

18. POTENTIAL LOSS OF SENSITIVE INFORMATION

Special requirements apply when there is a potential loss of sensitive information. Whenever an individual identifies that a Tier 1 or Tier 2 equipment item cannot be accounted for, and there exists a potential for loss of sensitive data, **the issue will be reported immediately, within 59 minutes of the detection of the potential loss**, to the FISO, the Privacy Officer and the IT Custodial Officer. (Reference OMB memo M-06-19.) The Facility Director will ensure that this requirement is prominently displayed throughout the facility and that contact information for the FISO and IT Custodial Officer is provided to all facility personnel.

19. CONDUCT OF PHYSICAL INVENTORY

- a. The Accountable Officer will schedule EILs for physical inventory once per year. The IT Custodial Officer will schedule SEILs for physical inventory once per year.
- b. Facilities will employ perpetual inventory practices for IT equipment assets. This means barcode scanning to update location data each time IT equipment items are moved and scanning IT equipment in batches throughout the year using an organized, systematic scanning process.
- c. Facilities will employ inventory by exception practices for the conduct of required physical inventories. For inventory purposes, an item will be considered accounted for if it has been physically identified and the location has been scanned into the inventory tracking system within a year prior to the date of the current inventory event.
- d. Custodial Officer responsibilities associated with the conduct of required inventories, the timelines associated with the conduct and reconciliation of required inventories, and the post-inventory verification requirements addressed elsewhere in the handbook apply.

Note: Auto-discovery tools can register the existence of an asset connected to the network, but this is not considered physical verification of the asset's location. Items must be physically verified to be considered 'accounted for' for physical inventory purposes. Exceptions to this rule may be approved by the Regional CIO and Regional ISO for specific auto-discovery tools and specific IT equipment items. Exceptions will be documented by the Regional CIO and signed by the Regional CIO and Regional ISO; a copy will be provided to the Facility Director and IT Custodial Officer before inventory by auto-discovery is implemented at the facility.

20. UNACCOUNTED FOR ITEMS

- a. The Report of Survey program for items not accounted for is managed by Logistic Services and is described elsewhere in this handbook. Special requirements apply when there is a potential loss of sensitive information. These requirements are covered in VA Handbook 6500.
- b. The IT Custodial Officer has the responsibility to initiate Reports of Survey for IT items that are unaccounted for, either during the inventory process, or when an item is

reported as missing. Logistic Services will keep the IT Custodial Officer informed of progress on ROS activities associated with the resolution of unaccounted for IT equipment items.

c. IT items on ROS must be resolved within 60 days of initiation of the ROS process for the 'unaccounted for' item. Any exceptions to this time requirement (e.g., due to the necessity for police involvement in the investigation) will be documented in a plan of action that details the plan for ROS resolution. The plan of action will be approved by the Facility Director.

21. DISPOSITION OF UNREQUIRED PROPERTY

a. There are numerous regulations that apply to the disposition of unrequired equipment (refer to VA Handbook 7348). From an IT perspective, the risk of inadvertent loss of sensitive data drives the need to secure electronic storage devices through the full sanitization process.

b. IT equipment will be turned in to Logistic Services for disposition at end of service life. However, it is IT's responsibility to ensure that the equipment delivered for disposition contains no sensitive data. IT is thus responsible for securing devices awaiting sanitization and performing required sanitization procedures before an IT item is turned over to Logistic Services for disposition. Refer to the VA Handbook 6500 for electronic sanitization procedures.

c. Logistic Services will provide written documentation to the IT Custodial Officer certifying receipt of the turned-in equipment. As addressed elsewhere in this Handbook, Logistic Services is responsible for management of the asset, including removal from inventory and disposal, upon turn-in by IT.

d. All employees are to be trained in procedures associated with returning unneeded equipment and completing the associated documentation. This includes the completion of Part II of VA Form 887a/b as required to document the satisfactory return of equipment.

22. OVERSIGHT AND COMPLIANCE

a. The Department's Chief Information Officer (VA CIO) is responsible, at the Department level, for ensuring the integrity and security of VA's IT assets, including physical inventory as well as data protection and the sanitization of data when IT resources are retired from service. Responsible for IT operations and maintenance, the VA CIO will monitor, review, and evaluate compliance with this policy.

b. Reporting

The VA CIO will establish periodic and recurring reporting requirements associated with the status of IT inventory control and implementation of this policy. Reporting requirements will be provided to Facility Directors, the Network CIOs and Facility Senior IT Officials by the RILO; facilities will submit reports through their RILO for compilation and analysis by the ITAAG. Summary reports will be submitted to the VA CIO via the Executive Director, OI&T Field Operations and Development.

c. Office of IT Oversight and Compliance

1) The VA CIO established the Office of IT Oversight and Compliance (ITOC) in February 2007. The mission of the VA ITOC is to ensure the effective management of VA information. As such, this office provides independent, objective, and consistent assessment services in the areas of cyber security, privacy, records management and physical security. The goal is to ensure the protection and integrity of sensitive VA data through the consistent application of VA policies and regulations and full compliance with established regulations. The three areas of focus established for the ITOC are as follow:

(a) Compliance. Initial emphasis will be placed on areas of known weakness (i.e., those that have led to low FISMA scores). This includes compliance with: NIST SP 800-53 security controls; VA OIG 17 recurring audit findings; Certification & accreditation Plans of Actions and Milestones (POA&Ms). Many of the activities required to address identified deficiencies are described in this Handbook. As such, compliance with the requirements herein will be assessed through scheduled and unscheduled audits.

(b) Remediation. The intent of the ITOC initiative is to ensure the establishment of standardized, sound information management practices. As such, the lessons learned during the audit process will be used to define best practices which will be made available to facilities. In addition, a community of practice will be established to promote collaboration and standardization. The objective is to ensure that the right people have the right information when they need it so that VA becomes a model for information management and security.

(c) Audits. Audits will be conducted at all VA facilities and support facilities, including medical centers, outpatient clinics, Vet Centers, regional offices, cemeteries, program offices, data centers, off-site storage facilities and media destruction vendors.

2) Emergency Response. VA ITOC has established an Emergency Response Team (ERT) to help coordinate activities required to address critical incidents.

3) Artifacts. Audit activities related to compliance with this policy will include interviews, physical inspections and documentation reviews. The artifacts that will be reviewed during the Inventory Control portion of the audits include: EILs; ROS file; Loan Forms/Hand Receipts; documented procedures, training records, roles and responsibilities and delegations of authority; proceedings from collaboration sessions; sanitization records; and other products documenting compliance with this policy. In addition, there will be additional areas audited by ITOC to ensure assessment of all of the areas of information control (e.g., verifying that laptops are encrypted, patched, and have latest antivirus software; conducting vulnerability scanning). ITOC will be developing and disseminating checklists and process guides to support the facilities in preparing for audits.

23. REFERENCES

VA Directive 6500, *Information Security Program*, dated August 4, 2006

VA Handbook 6500, *Information Security Program*, dated September 18, 2007

VA Handbook 7002

VHA Directive 1730.1, *Use of the Government Purchase Card in VHA*, dated May 19, 2003

VA Directive 7401.6, *Limited Authority to Pay by Purchase Card*, dated November 19, 2003

VA Handbook 7348, (*in draft form*⁶)

VA Handbook 0730, *Security and Law Enforcement, Appendix B*, dated

FIPS Standard 140-2, *Security Requirements for Cryptographic Modules*, dated 3 Dec 2002

NIST Special Publication 800-53, *Recommended Security Controls for Federal Information System*, dtd Feb 2005

OMB Memo M-06-19, *Reporting Incidents Involving Personally Identifiable Information and Incorporating the Cost for Security in Agency Information Technology Investments*, dtd 12 Jul 2006

⁶ Title of VA Handbook 7348 to be provided by OA&L.