



Department of

Veterans Services

Accreditation Procedures

VS301.1

To Accompany VS301 (Accreditation)

March 28, 2024

Table of Contents

| | |
|--|----|
| PURPOSE | 2 |
| APPLICABILITY | 2 |
| ACCREDITATION PROCEDURES | 3 |
| Accreditation Procedures | 3 |
| Accreditation Recertification and Audit Procedures | 5 |
| Accreditation Termination Procedures | 8 |
| Accreditation of VSOs/CSOs Previously Accredited with TDVS | 10 |
| Other Accreditation Matters | 10 |
| PROCEDURES | 11 |
| TDVS Powers of Attorney | 11 |
| TDVS Representation – Duties, Responsibilities, and Scope of Practice | 12 |
| VA Systems Access | 13 |
| Sensitivity Level Access | 13 |
| CAG Print or CAG Copy / Paste Privileges | 14 |
| Accessing Your Own Record Prohibited | 15 |
| Annual User Review | 16 |
| TDVS Quality Review Program – “The Golden 24” | 18 |
| Representation at the Court of Appeals for Veterans Claims or Federal Courts | 19 |
| RESOURCES | 19 |
| APPENDIX | 19 |

PURPOSE

The purpose of this document is to implement policy and provide procedures for individuals accredited with the Tennessee Department of Veterans Services (TDVS).

APPLICABILITY

These procedures apply to all accredited TDVS and county employees (CSO) and other individuals holding TDVS accreditation.

ACCREDITATION PROCEDURES

Accreditation Procedures

I. Obtaining Accreditation

A. The Assistant Commissioner, Appeals & Accreditation, is TDVS's certifying official and has been delegated the authority to recommend TDVS accreditation to VA's Office of General Counsel.

B. Accreditation with other VA recognized Veterans Service Organizations must be recommended by that specific organization and meet the accreditation requirements established by that organization.

II. The Process

A. The Assistant Commissioner for Benefit Operations or supervisor of a position designated by the Commissioner that requires accreditation will submit a request on behalf of TDVS employees and CSOs for admission to the Veterans Services Accreditation Course.

B. The TDVS Training staff will administer training and an initial accreditation examination to course participants. Course participants must achieve a minimum score of 70% to be recommended for accreditation. TDVS's training consists of successfully completing VA's Training, Responsibility, Involvement, and Preparation of Claims (TRIP) online training and a one-week in-person learning opportunity.

C. Course participants who do not receive a minimum score of 70% will be afforded one opportunity for remedial training and re-testing provided sufficient time remains for recommendation for accreditation within one year of hire.

D. Names and Veterans Services Accreditation Course completion and examination scores will be provided to TDVS's certifying official for preparation of the VA Form 21s (Application for Accreditation).

E. TDVS employees and CSOs will provide TDVS's certifying official with copies of all DD214s. In addition, CSOs will provide TDVS's certifying official with a letter (template at Appendix B) from the County Mayor or Executive certifying:

1. Service as a CSO no less than 1,000 hours per year.
2. Is of good character and reputation and has demonstrated an ability to represent claimants before the Department of Veterans Affairs.
3. Is not employed in any civil or military department or agency of the United States.

4. Will complete the training necessary to ensure continued qualification as a representative in the Department of Veterans Affairs claims process.

F. Within 5 business days of receipt of all required information, TDVS's certifying official will submit the recommendation for accreditation and completed VA Form 21 to VA's Office of General Counsel.

G. Appeals and Accreditation Division staff, in consultation with the Assistant Commissioner for Benefit Operations, shall conduct post-accreditation reinforcement training within 180 days and again within 365 days for a total of two visits. A post-accreditation reinforcement training checklist is included as Appendix K.

H. TDVS's certifying official will maintain accreditation records in accordance with the Records Destruction Authority SW32, Accreditation Records, approved February 25, 2016.

III. Maintaining Accreditation

A. Accredited TDVS employees and CSOs shall be required to attend four quarterly training sessions with dates and locations to be determined by TDVS's Training staff in consultation with Regional and TDVS leadership and published annually. Training may be administered via webinar, teleconference, in-person, or other approved means. The annual training conference and examination will be conducted in an in-person, virtual or blended setting.

B. The Assistant Commissioner for Benefit Operations, or supervisor of a position designated by the Commissioner that requires accreditation, may excuse attendance at a quarterly or annual training session for compelling reasons. Regional Directors or supervisors shall provide written justification when requesting an excused absence of a TDVS employee. CSOs shall provide written justification from a County Mayor when requesting an excused absence. A copy shall be provided to the certifying official for the accreditation record. A sample written justification from a County Mayor is included at Appendix L.

1. The Training staff shall provide a make-up opportunity within 90 days of an excused absence in consultation with appropriate leadership.

a. The Assistant Commissioner of Benefit Operations and Appeals & Accreditation shall send written correspondence to the following when a service officer needs make-up training.

i. At 30 days, to the service officer that needs makeup training.

ii. At 60 days, to the County Mayor, County Executive, or supervisor of the service officer who needs make-up training.

iii. At 90 days, regional leadership shall schedule an in-person visit with the County Mayor or Executive of the service officer who has not completed make-up training.

b. Failure to attend a quarterly training or make-up opportunity within 90 days of an excused absence may result in revocation of accreditation.

c. Attendance at a web-based event shall include:

- i. Log in and remain for the entirety of the web-based training. Calling into the event without the ability to view slides, the presenter, and other interactive features does not constitute attendance.
- ii. Sign-in roster for group viewing with the name of who accessed the training for group access.

C. TDVS employees and CSOs shall maintain an average score of 70% on the annual examination. The average will be based on the last three annual examinations. Those who fail to maintain an average score of 70% will be afforded remedial training and one opportunity for reexamination within 90 days of the last failed examination.

D. Annually and no later than June 30th, CSOs will provide TDVS's certifying official with a letter (template at Appendix B) from the County Mayor or Executive certifying:

1. Service as a CSO no less than 1,000 hours per year.
2. Is of good character and reputation and has demonstrated an ability to represent claimants before the Department of Veterans Affairs.
3. Is not employed in any civil or military department or agency of the United States.
4. Will complete the training necessary to ensure continued qualification as a representative in the Department of Veterans Affairs claims process.

Accreditation Recertification and Audit Procedures

I. Recertification

A. As required by 38 C.F.R. 14.629, TDVS shall certify that representatives continue to meet the accreditation criteria of 38. C.F.R. 14.629(a)(1), (2), and (3) and TDVS's accreditation policy every five years.

38 C.F.R. 14.629 requires that a representative is –

1. Is of good character and reputation and has demonstrated an ability to represent claimants before the VA;
2. Is either a member in good standing or a paid employee of such organization working for it not less than 1,000 hours annually; and
3. Is accredited and functioning as a representative of another recognized organization; or, in the case of a county Veterans service officer or tribal Veterans service officer recommended by a recognized State organization, meets the following criteria:
 - a. Is a paid employee of the county or tribal government working for it not less than 1,000 hours annually;

- b. Has successfully completed a course of training and an examination which have been approved by the appropriate District Chief Counsel;
- c. Will receive either regular supervision and monitoring or annual training to assure continued qualification as a representative in the claim process; and
- d. Is not employed in any civil or military department or agency of the United States.

TDVS requires that a representative –

- 1. Maintain an average passing score of 70% on an annual examination administered by the Department; and
- 2. Attend four quarterly training sessions annually.

II. 5 Year Recertification

A. The Department's certifying official shall conduct the following review for those representatives that require the 5-year certification before their 5-year anniversary:

1. TDVS Employees

- a. Annual Examination – An average score of 70% on the annual examination. The average will be based on the last three annual examinations.
- b. Training Attendance – Attend all quarterly training sessions annually.
- c. Other – Ensure no information calls into question the representative's good character and reputation or demonstrated ability to represent claimants before the VA. Examples include but are not limited to, a conviction of a felony and a conviction of a misdemeanor involving fraud, bribery, deceit, theft, or misappropriation. Demonstrated ability to represent claimants will include reviewing information from various sources including the number and frequency of complaints about service to claimants and TDVS quality review reports.

2. CSOs

- a. County Mayor or Executive Certification – A letter signed by the county mayor or executive certifying that the CSO continues to work a minimum of 1,000 hours each year is of record. This letter is required each year no later than June 30th or the end of the State's Fiscal Year.
- b. Annual Examination – An average score of 70% on the annual examination. The average will be based on the last three annual examinations.
- c. Training Attendance - Attend all quarterly training sessions annually.
- d. Other - Ensure no information calls into question the representative's good character and reputation or demonstrated ability to represent claimants before the VA. Examples include, but are not limited to, conviction of a felony, conviction of a misdemeanor involving fraud, bribery, deceit, theft, or misappropriation. Demonstrated ability to represent claimants will include reviewing information from various sources,

including the number and frequency of complaints about service to claimants and TDVS quality review reports.

B. Upon completion of this review and no later than the due date of the 5-year recertification, the certifying official shall provide VA's Office of General Counsel with a completed VA Form 21 confirming that representatives continue to meet the accreditation criteria of 38. C.F.R. 14.629(a)(1), (2), and (3).

C. Recertification dates shall be maintained in the Department's accreditation tracker by TDVS's certifying official or designee.

III. Annual Review

A. In furtherance of the recertification requirement of 38 C.F.R. 14.629, TDVS shall audit the accreditation of all representatives annually to ensure representatives continue to meet the accreditation standards necessary to provide high quality customer service to claimants.

B. The annual review shall begin on January 1 and conclude on December 31st of each calendar year. The Department's certifying official shall provide Regional Directors with a list of representatives that require an annual review no later than January 31st of each calendar year.

C. For those representatives that do not require the 5-year certification by the Department's certifying official, Regional Directors shall conduct the following review:

1. TDVS Employees

a. Annual Examination – An average score of 70% on the annual examination. The average will be based on the last three annual examinations.

b. Training Attendance - Attend all quarterly training sessions annually.

c. Other – Ensure no information calls into question the representative's good character and reputation or demonstrated ability to represent claimants before the VA. Examples include, but are not limited to, conviction of a felony, conviction of a misdemeanor involving fraud, bribery, deceit, theft, or misappropriation. Demonstrated ability to represent claimants will include reviewing information from various sources including the number and frequency of complaints about service to claimants and TDVS quality review reports.

2. CSO

a. County Mayor or Executive Certification – A letter signed by the county mayor or executive certifying that the CSO continues to work a minimum of 1,000 hours each year is of record. This letter is required each year no later than June 30th or the end of the State's Fiscal Year.

b. Annual Examination – An average score of 70% on the annual examination. The average will be based on the last three annual examinations.

c. Training Attendance – Attend all quarterly training sessions annually.

d. Other - Ensure no information calls into question the representative's good character and reputation or demonstrated ability to represent claimants before the VA. Examples include, but are not limited to, conviction of a felony, conviction of a misdemeanor involving fraud, bribery, deceit, theft, or misappropriation. Demonstrated ability to represent claimants will include reviewing information from various sources including the number and frequency of complaints about service to claimants and TDVS quality review reports.

D. No later than November 30th, provide written confirmation and completed audit checklists through Assistant Commissioner for Benefit Operations or supervisor to the TDVS's certifying official continue to meet the accreditation criteria of 38. C.F.R. 14.629(a)(1), (2), and (3) and TDVS's accreditation policy.

E. At least annually, the Assistant Commissioners for Benefits Operations and Appeals & Accreditation shall communicate annual audit results to County Mayors or Executives using a consistent feedback tool. This feedback may include:

1. Workload and productivity metrics
2. Quality review feedback
3. Annual audit results and information concerning accreditation status

IV. Resources

A. Accreditation folders shall be maintained electronically, and access provided to the Assistant Commissioners for Benefits Operations and Appeals & Accreditation, Regional Directors, Assistant Commissioner's Executive Administrative Assistants, the Training Director, and the Training Officer.

B. TDVS's certifying official, or designee shall maintain an accreditation tracker electronically. The certifying official or designee should be notified of any necessary updates following the annual audit.

A template recertification cover letter is attached as Appendix A.

A template county mayor or executive certification letter is attached as Appendix B.

An audit checklist is attached as Appendix C.

Accreditation Termination Procedures

I. Termination

A. When an accredited service officer leaves their position as an employee of the state or county, it is necessary to revoke their accreditation through TDVS.

II. Process

A. Regional Directors or supervisors of a position designated by the Commissioner that requires accreditation responsibilities:

1. Submit the TDVS Accreditation Removal Memorandum (Appendix D) to TDVS's certifying official.
2. Collect the employee's PIV card and turn-in to TDVS's certifying official.
3. Obtain the employee's signature on the Information Security Topics for TDVS Accredited Representative Clearance (Appendix E) and submit it to TDVS's certifying official.

B. TDVS Certifying Official or designee's responsibilities:

1. Send the Notification of Termination Letter (Appendix F) to the VA's Office of the General Counsel via email. The VA's Office of the General Counsel will acknowledge the removal of accreditation by email.
2. Request the VA's Change Management Agent remove the employee's access to the Talent Management System and Remote Access Portal via the Change Management Agent Notification Email (Appendix G). TDVS will receive email confirmation that TMS is deactivated, and RAP has been deleted.
3. Send the Accreditation Termination Confirmation Memorandum (Appendix H) with off-boarding checking to the Regional Director to confirm termination.
4. Track all steps of the termination process on the Accreditation and Systems Access Removal Checklist (Appendix I). File the Accreditation Removal confirmation email in the employee's accreditation file.
5. File the email confirmation of the removal from the Talent Management System and Remote Access Portal in the employee's accreditation file.
6. Submit a request to VetraSpec to deactivate the employee's VetraSpec profile.
7. As the DPRIS manager, deactivate the employee's DPRIS profile.
8. Submit CSEM Exit VA Request.
9. File the CSEM Exit VA Implementation email in the employee's accreditation file.
10. Submit the Your IT Active Directory Removal request.
11. Turn in your PIV card to the VA Logistics Office. Obtain hand receipt that the PIV card was received.
12. File the PIV Card Hand Receipt in the employee's accreditation file.
13. File the Accreditation Termination Confirmation Memorandum in the employee's accreditation file.
14. Move employee's accreditation file to the "inactive" folder.

Accreditation of VSOs/CSOs Previously Accredited with TDVS

A. A former TDVS or county employee that held TDVS accreditation may be accredited without attendance at the Veterans Services Accreditation Course if their separation was for 12-months or less.

1. The rehired employee shall complete quarterly trainings that were missed during separation.

2. The rehired employee shall complete annual testing that was missed during separation.

Other Accreditation Matters

A. National Guard and Reserves

1. TDVS accredited representatives who are members of the National Guard or Reserves that are called to active duty orders are prohibited from providing claims assistance during the period of active duty in accordance with 38 C.F.R. 14.629(a)(3).

PROCEDURES

TDVS Powers of Attorney

Frivolous Claims

TDVS accredited representatives have the authority to and should decline to represent clients who seek to file a frivolous claim. According to 38 C.F.R. 14.633(c)(4), a claim, issue, or argument is frivolous if the individual providing representation is unable to make a good faith argument on the merits of the position taken or to support the position taken by a good faith argument for an extension, modification, or reversal of existing law.

Examples include filing for the VA's pension program without wartime service.

TDVS Representation and Attorneys

A TDVS accredited representative may accept a power of attorney if a prospective client provides a written statement attesting that representation by an attorney or agent has been revoked. TDVS accredited representatives should counsel prospective clients that although representation may have been revoked, the attorney or agent may still be entitled to a fee based on an existing fee agreement.

TDVS Representation and Non-Tennessee Veterans

TDVS accredited representatives should use a national organization's power of attorney, such as The American Legion or Veterans of Foreign Wars, to serve non-Tennessee Veterans. Currently, both VA Regional Offices and the Board of Veterans' Appeals schedule in-person hearings at the Regional Office in the state where the Veteran resides. TDVS does not travel to other states to provide in-person representation.

Despite this general rule, accredited representatives should use TDVS's power of attorney to serve servicemembers participating in the Benefits Delivery at Discharge (BDD) program. When packaging any forms or documents in support of a servicemember participating in the BDD program, annotate the Package A Claim Note screen with "BDD Claim."

PACKAGE A NEW CLAIM

This form allows you to prepare a claim and send it electronically to the State Department Claims Office. Select the forms and documents you wish to attach, enter any information you'd like to communicate to the State Department and click Send. When you have finished, you may check the History below or the [Claims Status](#) page to see the status of the claim.

| FORMS TO ATTACH | DOCUMENTS TO ATTACH | NOTES |
|--|---------------------|--------------------------|
| <input type="checkbox"/> 200995 | 07-15-21 01:13 | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> 2122 | 07-15-21 01:08 | |
| <input type="checkbox"/> 214138_122017 | 07-15-21 01:16 | |
| <input type="checkbox"/> vacics | 07-15-21 01:41 | |

BDD Claim

Path: p

TDVS accredited representatives shall counsel clients on the need to update power of attorney if they disagree with the VA's decision on the initial BDD claim and relocate outside Tennessee following their separation from service.

TDVS Representation and Disclosure of Information

TDVS accredited representatives shall not release information concerning a claimant to any non-TDVS accredited representative without annotating in VetraSpec's "ADDITIONAL NOTES:" box that a valid VA Form 21-0845 (Authorization to Disclose Personal Information to a Third Party) is of record in VBMS. Non-TDVS accredited representatives include but are not limited to spouses, other family members, friends, or caregivers.

Language verifying a third-party release is of record is "Verified 21-0845 is of record in VBMS for NAME on DATE. NAME OF SERVICE OFFICER."

The screenshot shows a web form with the following sections:

- ADDITIONAL NOTES:** A text area containing the text: "Verified 21-0845 is of record in VBMS for NAME on DATE. Travis Murphy".
- OFFICE AND CVSO INFORMATION:** A section with several fields:
 - REGION/OFFICE/COUNTY: Mt Home Field Office (dropdown)
 - CSO: CSO vet is working with (dropdown)
 - CLAIM MANAGED BY: Claims Office person handling claim (dropdown)
 - RECORD LAST EDITED BY: Lynn Valdez (Mt Home Field Office) on Oct. 20, 2021
 - RECORD ORIGINALLY ENTERED BY: David Batchelder (Mt Home Field Office), on Sep. 03, 2015
 - IS THIS RECORD CONFIDENTIAL?: No (dropdown)
- A "Save" button at the bottom of the form.
- Footer text: "VetraSpec | www.tylertech.com | 1-877-568-7732 | Help Use constitutes agreement of the TOS"

Other inquiries related to a release of information, such as from a law enforcement entity or a request related to civil litigation should be directed to TDVS's Assistant Commissioners for Benefit Operations and Appeals and Accreditation.

TDVS Representation and Contested Claims, i.e., Apportionment

TDVS accredited representatives can provide representation to non-Veterans – i.e., a spouse -- in contested claims. Accredited representatives should check power of attorney for all parties to the contested claims in order to avoid a conflict of interest. TDVS will not represent both parties in a contested claim – i.e., a Veteran and his/her spouse. If TDVS receives a power of attorney from more than one party to a contested claim, it will accept the first Power of Attorney received and facilitate representation for the other party.

TDVS Representation – Duties, Responsibilities, and Scope of Practice

A. The following TDVS employees require accreditation to perform their essential job functions.

1. Assistant Commissioner for Benefit Operations, Assistant Commissioner for Appeals and Accreditation, Veterans Service Officer, Regional Director, Appeals Advocate, Quality and Appeals Specialist, Training Director, Training Officer, and Veterans Outreach Coordinator.

B. The following TDVS employees may be accredited at the request of their supervisor but must adhere to TDVS's VetraSpec limited use policy and will not assist claimants in preparing, presenting, and prosecuting claims for VA benefits.

2. Administrative Assistant, Customer Service Representative, and Executive Leadership personnel, including but not limited to the General Counsel, Commissioner, Deputy Commissioner, and Director of State Operations.

VA Systems Access

TDVS will facilitate VA remote systems access for all accredited representatives through the Department of Veterans Affairs. Representatives are expected to obtain and maintain remote systems access to perform the essential job functions of a TDVS accredited representative.

Accredited representatives must complete VA Talent Management System (TMS) training to establish and maintain remote systems access at least annually. Required training includes:

1. Item ID 10203, Privacy and HIPAA Training
2. Item ID 4009424, Annual Employee Certification of Veteran Status and Veteran-Relatives (VA Form 20-0344)
3. Item ID 10176, VA Privacy and Information Security Awareness and Rules of Behavior (WBT)

VA will monitor completion weekly. If an accredited representative still needs to complete required training, remote access will be removed. If training is still overdue after 7 business days, VA will initiate a ticket to have the accredited representative CSS account in CSEM and active directory account deleted.

Reestablishment of accounts will be the responsibility of TDVS and may take a significant period of time to establish/implement.

Sensitivity Level Access

TDVS's Accrediting Official works with the VA Regional Office to facilitate access to VA systems and applications, such as VBMS, by assisting TDVS employees and CSOs in obtaining a PIV card and access to systems and applications.

Within approved systems and applications, the VA may assign a sensitivity level to certain records to ensure they are accessed and protected in the proper manner. The RO Director or Assistant Director authorizes access to sensitive files.

TDVS shall request Access Level 7 be provided to the Assistant Commissioner of Appeals & Accreditation, Assistant Commissioner for Benefit Operations, Regional Directors, Training Director, and the Veterans Services Advocate Supervisors co-located at the VA Regional Office.

TDVS shall request that Access Level 6 be provided to Appeals and Accreditation Division staff, TDVS employees, and CSOs who either have an office co-located with a VA health care facility or duty station in a County that contains a VA health care facility.

On a case-by-case basis, TDVS may request a temporary increase to an Access Level to serve an identified Veteran or claimant. The request should be directed to the Assistant Commissioner, Appeals & Accreditation through appropriate regional leadership. The request must include:

- The name and social security number of the Veteran or claimant;
- The requested Access Level; and
- Duration of temporary increase to an Access Level (not to exceed 90 days).

CAG Print or CAG Copy / Paste Privileges

As a user of the U.S. Department of Veterans Affairs remote access applications and Citrix Access Gateway (CAG), you can request CAG Print or CAG Copy / Paste privileges. TDVS facilitates this privilege on your behalf, but it requires certain user obligations.

Please work with your regional leadership to complete the "CAG Print User Acknowledgement" (Appendix J). Your regional leadership will notify you when the Acknowledgment has been associated with your accreditation record and TDVS has notified VA of your eligibility for this privilege.

Upon notification from your regional leadership, please request CAG Print and Copy/Paste privileges by accessing the VA's Remote Access Self-Service Portal - <https://vaww.ramp.vansoc.va.gov/pages/dashboard.aspx>

Users requiring print or copy/paste functionality must initiate a

request via the Remote Access Self-Service Portal (**available from the VA intranet only**).

Users must have CAG enabled before seeing the option for 'CAG Print' and 'CAG Copy Paste'.

To request it, click Request Access, identify your device type, and select 'CAG Print' and/or 'CAG Copy Paste'.

****Requesting CAG Print or CAG Copy/Past Privileges must follow these steps to avoid a denial of privileges by VA.**

Accessing Your Own Record Prohibited

As a user of the U.S. Department of Veterans Affairs remote access applications and Citrix Access Gateway (CAG), users acknowledge the requirements outlined in **VA Information Security Rules of Behavior, which provides the specific responsibilities and expected behavior for organizational users and non-organizational users of VA systems and VA information.**

Users agree to the following:

1. Users will continue to complete mandatory security and privacy awareness training using VA's Talent Management System (TMS) within designated time frames.
2. VA's Rules of Behavior provides in relevant part, "[o]nly provide access to sensitive information to those who have a need-to-know for their professional duties, including only posting sensitive information to web-based collaboration tools restricted to those who have a need-to-know and when proper safeguards are in place for sensitive information."
3. The Nashville VA Regional Office interprets this provision to prevent an accredited Veteran Service Organization representative from **attempting** to access their personal record using VA remote access applications.
4. Further, VA's Rules of Behavior provide in relevant part:
 - a. "I will not have any expectation of privacy in my activities while accessing or using VA information systems, as I understand that all activity is logged for security purposes."
 - b. "I understand that authorized VA personnel may review my conduct or actions concerning VA information and information systems and take

appropriate action.”

5. Users understand that failure to follow VA's Information Security Rules of Behavior and these procedures may result in the loss of a user's ability to access VA systems and applications.
 - a. A first violation may result in suspension of remote access privileges for one week.
 - b. A second violation may result in suspension of remote access privileges for two weeks.
 - c. A third violation may result in a complete suspension of remote access privileges.


**DEPARTMENT OF VETERANS AFFAIRS (VA) INFORMATION SECURITY RULES OF BEHAVIOR (ROB) FOR NON-ORGANIZATIONAL USERS
FISCAL YEAR (FY) 2023**

COVERAGE

- *VA Information Security ROB for Non-Organizational Users* identifies the specific responsibilities and expected behavior for non-organizational users of VA information and information systems as required by 38 U.S.C. § 5723(f)(5), Office of Management and Budget Circular A-130, Appendix I, paragraph 4(h) (6-7), VA Directive 6500, VA Cybersecurity Program and VA Handbook 6500, *Risk Management Framework for VA Information Systems – VA Information Security Program*.
- *Organizational users* are VA employees, contractors, researchers, students, volunteers and representatives of Federal, state, local or tribal agencies authorized to access VA information and information systems for the performance of official duties but do not represent a Veteran or claimant. The ROB for organizational users are identified in VA's Information Security Rules of Behavior for Organizational Users.
- *Non-Organizational users* are users other than those explicitly categorized as organizational users. These include affiliates and individuals with a Veteran/claimant power of attorney. Change Management Agents at the local facility are responsible for onboarding power of attorney/private attorneys.
- VA information is the information under the control of VA or stored on a VA information system. This includes both VA-sensitive and non-sensitive information. Information properly disclosed by VA to a non-organizational user (for example, contents of a Veteran's claims file for purposes of representing a Veteran or claimant) is no longer VA information and its security and confidentiality are the recipient's responsibility.
- This ROB for Non-Organizational users does not supersede any policies of VA facilities or other agency components that provide higher levels of protection to VA's information or information systems. The ROB provides the minimum requirements with which individual users of VA information and information systems agree to comply and VA facilities and other agency components may issue requirements for protection that exceed the ROB.

COMPLIANCE

- Non-Organizational users are required to comply with this ROB. Non-compliance with this ROB may result in suspension or removal of access to VA information or information systems. Although such a suspension would not prevent VA from making an authorized disclosure of records to a non-organizational user; a suspension of access may prevent disclosure through a particular method, for example, through a VA information system. Depending on the severity of the violation and management discretion, consequences may include access restriction or suspension of access privileges. Theft, conversion or unauthorized disclosure or disposal of Federal property or disclosure of information may result in criminal sanctions.
- Unauthorized access, upload, download, change, circumvention or deletion of information on VA systems without authorization; unauthorized modification of VA systems; denying or granting access to VA systems without authorization; unauthorized purpose on VA systems; or otherwise misusing VA systems or resources is strictly prohibited and may result in criminal sanctions.
- The ROB does not create any other right or benefit (substantive or procedural) enforceable by law by a party in litigation with the U.S. Government.



Users may seek to reestablish remote access privileges following a first or second violation of VA's Information Security Rules of Behavior and these procedures by re-acknowledging their obligations as a user of the U.S. Department of Veterans Affairs remote access applications and CAG (Appendix N).

Annual User Review

VA policy requires remote access privileges to be reviewed annually. Once a year, users will receive an email to their VA.gov email account requesting action to confirm their continued need to access VA systems. The email text and instructions for completing the annual user review are below:

From: Remote Access Portal <DoNotReply@va.gov>

Sent: Wednesday, May 3, 2023 8:28 AM

To: user@va.gov>

Subject: Action Required: Remote Access User Review – Approving Official Sent to User

Dear User,

Your remote access approving official is requesting you complete a **User Review** with the below comments:

VA policy requires remote access privileges to be reviewed annually. Please confirm your continued required access to VA systems. Failure to do so can result in termination of your CAG account.

Please address the comments and complete your **User Review** by following the steps below:

1. Log into the **Self Service Portal** at: <https://vaww.ramp.vansoc.va.gov/selfservice/> (available via the VA intranet only)
2. Click the **User Review** button
3. A **User Review** form will load and provide you an opportunity to update some of your current remote access settings
4. Review each section and update as needed
5. After reviewing all sections, click **Submit**

IMPORTANT NOTE If you changed your approving official and/or facility, you will not see the changes reflected in RAP until your approving official approves your review.

After clicking **Submit**, your user review will be forwarded to your Approving Official. You may track the status within the **User Review Status** section at <https://vaww.ramp.vansoc.va.gov/selfservice/> (available via the VA intranet only).

Technical Assistance:

1. For instructions on any RAP capability, access the **Online Help** by clicking the *question mark* icon located at the top right of all RAP web pages.
2. If assistance is needed beyond what the **Online Help** provides, please contact the Enterprise Service Desk (ESD) using one of the options below:
 - Agent Live Chat: Click the "Chat with us now" button in the lower right corner of [your IT Service portal](#) to launch Abel the Chatbot and type "chat with an agent."
 - Self-Service: [Create Incident](#)
 - Phone: 855-673-4357
 - TTY (hearing-impaired only): 844-224-6186

**** Please do not reply to this message. Replies to this message are routed to an unmonitored mailbox. ****

TDVS Quality Review Program – “The Golden 24”

The primary purpose of the Quality Review Program is to identify errors and omissions in benefit applications that could negatively impact the Veteran or claimant.

A. Quality Review Procedures

1. Appeals & Accreditation Division Staff shall review packaged forms and documents using objective criteria outlined in [TDVS's Service Office VetraSpec Claims Filing SOP \(Ver 2.1\)](#). This review will occur within 24 hours or 1 business day of filing -- "Golden 24".

2. Bright line issues identified during the review will be returned via Regional Directors for correction.

3. Appeals & Accreditation Division staff shall monitor packages that Need More Information and follow up with VSOs/CSOs until corrections are completed.

4. Appeals & Accreditation Division staff shall maintain a “Golden 24” dashboard that includes total # of packages received, # of packages that Need More Information and the # of outstanding packages that have not been corrected.

B. VSO/CSO Filing Forms and Documents Directly With VA Using VetraSpec Filing Tools

1. VSOs and CSOs will be provided access to and training on VetraSpec’s filing tools (Digits to Digits, Direct Submit and Benefits Claims) at the 365 PART visit.

2. VSOs and CSOs must meet the following prerequisites to obtain VetraSpec filing capabilities:

a. Current on all accreditation training and testing requirements;

b. Have a PIV card; and

c. Have active VA system accounts (i.e. remote access, VBMS, and Caseflow).

3. VSOs and CSOs may file forms and documents directly with VA using VetraSpec filing tools (Digits to Digits, Direct Submit and Benefits Claims) following their 365 PART Visit.

4. VSOs and CSOs will continue to file the following forms or documents via VetraSpec’s package-a-claim function to facilitate Appeals & Accreditation Division review:

a. VA Form 10182 (Decision Review Request: Board Appeal) shall be packaged and filed through Appeals & Accreditation Division staff.

b. VA Form 20-0996 (Decision Review Request: Higher Level Review) shall be packaged and filed through Appeals & Accreditation Division staff.

C. Revocation of Use of VetraSpec Filing Tools

1. VSOs and CSOs will use VetraSpec’s filing tools in accordance with the TDVS VetraSpec Claims Filing Standard Operating Procedure (SOP).

2. Failure to adhere to the TDVS VetraSpec Claims Filing SOP may result in revocation of the use of VetraSpec filing tools.

3. Revocation decisions will be governed by a three strikes rule:

- a. Failure to package a VA Form 10182 or VA Form 20-0996 will result in a strike.
- b. Failure to receive a successful filing message and a form or document not being filed with VA will result in a strike.
 - i. Strike 1 – Benefits Operations Retrain
 - ii. Strike 2 – Appeals & Accreditation Division Staff Retrain
 - iii. Strike 3 – Revocation of Use of VetraSpec Filing Tools
- c. Other failures to follow the TDVS VetraSpec Claims Filing SOP will trigger a retraining by either Benefits Operations or Appeals & Accreditation Division staff.

Representation at the Court of Appeals for Veterans Claims or Federal Courts

TDVS does not represent individuals at the Court of Appeals for Veterans Claims (CAVC) or other Federal Courts.

Through a Memorandum of Agreement with the National Veterans Legal Services Program (NVLSP), TDVS has enhanced the scope of the appellate advocacy that it can provide. NVLSP reviews adverse decisions issued by the Board of Veterans' Appeals to determine if there is an appealable error and provides no-cost representation at the Court of Appeals for Veterans Claims. This agreement extends only to veterans and claimants that TDVS represents. It does not apply to Tennessee Veterans represented by another service organization, such as The American Legion or VFW, which TDVS supports.

For additional details, please see the August 27, 2019, Fact Sheet, TDVS Partnership with the National Veterans Legal Services Program.

RESOURCES

38 [Code of Federal Regulations](#) Sections 14.626 to 14.637
Tennessee Code Annotated, Sections 58-3-109 and 58-3-111
TDVS Policy Number: VS301

APPENDIX

- Appendix A – Recertification Cover Letter Template
- Appendix B – Mayor or County Executive Letter Template
- Appendix C – Audit Checklist
- Appendix D – TDVS Accreditation Removal Memo Template
- Appendix E – Information Security Topics for TDVS Accredited Representative Clearance
- Appendix F - Notification of Termination Letter Template

Appendix G – Change Management Agent Notification Email Template
Appendix H – Accreditation Termination Confirmation Memorandum Template
Appendix I - Accreditation and Systems Access Removal Checklist
Appendix J – CAG Print User Acknowledgement
Appendix K – Post-Accreditation Reinforcement Training Checklist
Appendix L – Sample Request from County Mayor or Executive for Excused Training
Absence
Appendix M – Sample County Mayor or Executive Feedback Tool
Appendix N – Remote Access Privilege – Attempting to Access Your VBA Record

Appendix A – RECERTIFICATION LETTER TEMPLATE

DATE

Richard J. Hipolit
Deputy General Counsel
Office of the General Counsel
Department of Veterans Affairs
810 Vermont Avenue, NW
Washington, DC 20420

Dear Mr. Hipolit:

The Tennessee Department of Veterans Services requests recertification of accreditation, as required by 38 C.F.R. 14.629(a), through the Tennessee Department of Veterans Services. Please find VA Form 21s for each of the below-named individuals:

NAME
NAME
NAME
NAME

Thank you for your prompt assistance with this matter.

Sincerely,

Appendix B - MAYOR OR COUNTY EXECUTIVE LETTER TEMPLATE

DATE

Tennessee Department of Veterans Services
Attention: Assistant Commissioner, Appeals and Accreditation
110 9th Avenue South
Room C-166
Nashville, TN 37043

RE: Tennessee Department of Veterans Services Accreditation for NAME

Dear Assistant Commissioner,

This letter verifies that NAME is currently a paid employee of NAME OF COUNTY and will serve as a Veterans Service Officer for at least 1,000 hours per year. NAME is of good character and reputation and has demonstrated an ability to represent claimants before the Department of Veterans Affairs.

NAME is not employed in any civil or military department or agency of the United States and will complete the training necessary to assure continued qualification as a representative in the Department of Veterans Affairs claims process. Further, it is understood that failure to meet any of the above requirements could result in the suspension or removal of NAME's accreditation.

Sincerely,

County Mayor/County Executive

CC: Assistant Commissioner, Benefit Operations

Appendix C – AUDIT CHECKLIST

VSO or CSO Name: _____

DATE: _____

Audit Completed By: _____

1. YES / NO – (*COUNTY SERVICE OFFICER ONLY*) CSO is a paid employee of the County and works the required hours per year as evidenced by a letter signed by the county mayor or executive certifying that the county service officer continues to work a minimum of 1,000 hours each year is of record. This letter is required each year no later than June 30th.

2. YES / NO – (*TDVS EMPLOYEE ONLY*) Employee is paid as an employee of the Tennessee Department of Veterans Services.

3. YES / NO – Has maintained an average 70 percent or above score on the annual accreditation examination. The average will be based on the last three annual examinations.

4. YES / NO – Has participated in all proficiency training events.

5. YES / NO – Is there information that calls into question the representative’s good character and reputation or demonstrated ability to represent claimants before the VA? Examples include, but are not limited to, conviction of a felony, conviction of a misdemeanor involving fraud, bribery, deceit, theft, or misappropriation. Demonstrated ability to represent claimants will include reviewing information from various sources, including the number and frequency of complaints about service to claimants and TDVS quality review reports.

If the answer to question 5 is YES, please briefly describe the information.

If corrective action is required, please briefly describe the recommended corrective action.

Appendix D – TDVS ACCREDITATION REMOVAL MEMORANDUM TEMPLATE

Memorandum

TO: Travis Murphy, Assistant Commissioner
Department of Veterans Services

FROM: Regional Director's Name, Regional Director
Department of Veterans Services

DATE: Click or tap to enter a date.

SUBJECT: **TDVS ACCREDITATION REMOVAL** – Employee's Name

The Mr./Mrs. Employee's Name was the VSO/CSO for Enter Office location or County. Please remove their Tennessee Department of Veterans Services accreditation and access to Vetra Spec, DPRIS, and VA Systems.

Thank you,

Appendix E - INFORMATION SECURITY TOPICS FOR TDVS ACCREDITED REPRESENTATIVE CLEARANCE

INFORMATION SECURITY TOPICS FOR TDVS ACCREDITED REPRESENTATIVE CLEARANCE

(THIS FORM SHOULD BE ATTACHED TO EMPLOYEE CLEARANCE FORM - REQUIRED PER FISMA PS-4)

AS A FORMER TDVS EMPLOYEE (VA AFFILIATE/CONTRACTOR) WITH ACCESS TO SENSITIVE INFORMATION, YOU ARE REMINDED OF THE FOLLOWING:

- APPLICABLE VA PRIVACY AND SECURITY RULES AND REGULATIONS ARE STILL IN EFFECT
- DO NOT DISCLOSE ANY INFORMATION YOU HAD ACCESS TO AS A VA EMPLOYEE/AFFILIATE/CONTRACTOR THAT YOU ARE NOT AUTHORIZED TO DISCLOSE
- IF YOU HAVE A NON-DISCLOSURE AGREEMENT WITH THE AGENCY, YOU CONTINUE TO BE BOUND BY THOSE TERMS.
- THIS NOTICE DOES NOT GRANT ANY AUTHORIZATION TO SHARE OR USE VA SENSITIVE DATA.
- FROM VA3248: I certify that I am aware of the criminal penalties for the unlawful removal of Federal records (Title 18, U.S. Code 2071) and that I do not have any Government Records or property other than that I am properly authorized to possess.

EMPLOYEE SIGNATURE: _____ DATE: _____

IF THE EMPLOYEE IS UNAVAILABLE TO SIGN, ATTACH AN EMAIL/CERTIFICATION PROVING THAT THIS INFORMATION WAS SENT TO THE EMPLOYEE'S PERSONAL EMAIL OR HOME ADDRESS.

Appendix F - NOTIFICATION OF TERMINATION LETTER TEMPLATE

Click or tap to enter a date.

Richard J. Hipolit, Deputy General Counsel
Office of the General Counsel
Department of Veterans Affairs
810 Vermont Avenue, NW

Washington, DC 20420

Termination of Accreditation: Enter Employee Name
Accreditation Number: the

Dear Mr. Hipolit:

The above-named individual is no longer serving as a County Service Officer, and the Tennessee Department of Veterans Services no longer endorses his accreditation. If you require further information, please do not hesitate to contact me at 615-695-6385.

Sincerely,

Travis Murphy
Assistant Commissioner

Appendix G – CHANGE MANAGEMENT AGENT NOTIFICATION EMAIL TEMPLATE

Good afternoon,

TDVS has been notified that the Terminated Employee's Name has retired as a County Veterans Service Office. Their last day is Click or tap to enter a date.

- We have initiated a request to remove/disable system and application access according to Appendix F of the Nashville – Employee Out-Processing SOP.
- A TDVS representative is attempting to obtain PIV, and a completed "Information Security Topics for Employee Clearance" is attached.

Thanks,

Travis



Travis Murphy | Assistant Commissioner
Middle Tennessee Region
110 9th Avenue South, Room C-166, Nashville, TN 37203
p. 615-695-6329 f. 615-741-6231
travis.murphy@tn.gov
tn.gov/veteran
[Facebook](#) | [Twitter](#) | [Instagram](#) | [LinkedIn](#)

**Appendix H - ACCREDITATION TERMINATION CONFIRMATION MEMORANDUM
TEMPLATE**

Memorandum

TO: Regional Director's Name, Regional Director

FROM: Travis Murphy, Assistant Commissioner

DATE: Click or tap to enter a date.

The Former Choose TDVS/CSO, the Terminated Employee's Name, accreditation, and systems access have been terminated. An off-boarding checklist is enclosed for your records.

Please refer questions to Jonathan Soto at 615-695-6331.

TM/js

Enclosure

Appendix I – ACCREDITATION AND SYSTEMS ACCESS REMOVAL CHECKLIST

Tennessee Department of Veterans Services
Accreditation and Systems Access Removal Checklist

Name:
Title: VSO or CSO

| <u>Action</u> | <u>Date</u> |
|---|--------------------|
| Notification of Employee Termination to Appeals Division | _____ |
| Accreditation Removal Request Emailed to OGC | _____ |
| Accreditation Removal Verified | _____ |
| VetraSpec Deactivation | _____ |
| DPRIS Deactivation | _____ |
| Remove Name Formstack Signature / Document Capture (VSO Only) | _____ |
| VA Regional Office Out Processing Standard Operating Procedures | |
| Email Notification to VA Personnel | _____ |
| Information Security Topics for Employee Clearance | _____ |
| CSEM Exit VA Request | _____ |
| CSEM Exit VA Request Implemented | _____ |
| CSEM Exit VA Implementation Email in Accreditation Folder | _____ |
| Your IT Active Directory Removal Request | _____ |
| Talent Management System Deactivation Email | _____ |
| PIV Card | |
| Turn-in to VA Logistics Office | _____ |
| Hand Receipt in Accreditation Folder | _____ |

Removal Memorandum to Regional Director and Accreditation Folder _____

Appendix J – CAG PRINT USER ACKNOWLEDGMENT

CAG Print User Acknowledgement

As a user of the U.S. Department of Veterans Affairs remote access applications and Citrix Access Gateway (CAG), I acknowledge the requirements outlined in **VA Handbook 6500** and **VA Directive 6371, Destruction of Temporary Paper Record**, as they relate to the applicable VA security, storage, and disposal standards of printed materials. I further agree to the following:

I have been provided a copy and read and understand the requirements in **VA Handbook 6500** and **VA Directive 6371, Destruction of Temporary Paper Record**.

I will follow the policies and requirements outlined in **VA Handbook 6500** and **VA Directive 6371, Destruction of Temporary Paper Record**.

I will not disclose or distribute any documents printed from VA applications, which are part of a federal system of records, to any person(s).

I acknowledge that any documents printed must be kept in a locked drawer or cabinet within a locked room to which only I have access.

I acknowledge that all documents printed from VA applications must be destroyed pursuant to **VA Handbook 6500** and **VA Directive 6371, Destruction of Temporary Paper Record**, and that my office has the means to comply with the requirements.

I understand that failing to follow these policies and procedures may result in my loss of the ability to print and/or access VA systems and applications.

By signing below, I acknowledge my obligation to store and dispose of the printed material properly and have read and agree to comply with the policies set forth herein.

Type or Print Name

Date

Signature

Appendix K – CHECK ON LEARNING CHECKLIST

180-Day Check on Learning

Access to and usage of Tools

VetraSpec _____

DPRIS _____

VA Systems

 VBMS (Including Print and Sensitivity Level if Applicable) _____

 SHARE _____

 Caseflow _____

Requesting DD214 or Other Military Documents

 NPRC _____

 Tennessee War Records _____

 DPRIS _____

Establishing / Updating Veteran Record in VetraSpec _____

Using VetraSpec’s Package-A-Claim Function _____

When and How to File VA Form 21-0966 (Intent to File) _____

365 Day Check on Learning

Filing a Claim for Benefits

 Disability Compensation _____

 Veteran Pension _____

 Survivor’s Benefits _____

Disagreeing with a VA Decision

| | |
|---|-------|
| Options (AMA) | _____ |
| Tools (VBMS, Caseflow & Claims Accuracy Review) | _____ |
| Office Management | |
| Interviewing Clients and Tools | _____ |
| Data and Stakeholder Engagement - VA's GDX, VetraSpec Reports and Other Resources | |
| Virtual BVA Hearing Capability - YES / NO / Further Engagement | _____ |
| VetraSpec Filing Tools | |
| Digits to Digits | _____ |
| Direct Submit | _____ |
| Filing SOP | _____ |

Appendix L - Sample Request from County Mayor or Executive for Excused Training Absence

DATE

Tennessee Department of Veterans Services
Attention: Assistant Commissioner, Appeals and Accreditation
110 9th Avenue South
Room C-166
Nashville, TN 37043

RE: Excused Absence from Mandatory

Dear Assistant Commissioner,

This letter is to justify an excused absence for (NAME OF ACCREDITED REPRESENTATIVE) from the (IDENTIFY REQUIRED TRAINING...I.E., date quarterly training, spring training conference, annual training conference). (NAME OF ACCREDITED REPRESENTATIVE) was unable to participate because (BRIEF DESCRIPTION OF REASON).

I would appreciate facilitating a makeup training opportunity at your earliest convenience.

Sincerely,

County Mayor/County Executive

CC: Assistant Commissioner, Benefit Operations

Appendix M - Tennessee Department of Veterans Services County Feedback Tool

COUNTY:

MAYOR:

ADDRESS:

CSO:

DATE OF VERIFICATION OF EMPLOYMENT:

PHONE:

ACCREDITATIONS: Tennessee Department of Veterans Services, The American Legion

| | | |
|---------------------|-------------------------|------------------|
| | Fiscal Year 2021 | |
| VETERAN POP. | Per U.S. Dept of VA | MONETARY AWARDS: |

| | | |
|---------------------|-------------------------|------------------|
| | Fiscal Year 2020 | |
| VETERAN POP. | Per U.S. Dept of VA | MONETARY AWARDS: |

| TRAINING (Quarterly Proficiency) | | |
|----------------------------------|--------------------------|------------|
| Date | | Attendance |
| TBD | Web Based Training Event | Present |
| TBD | In Person Training Event | Present |
| TBD | Web Based Training Event | Present |
| TBD | In Person Training Event | Present |

Annual Certification Testing Score (2022): xx%

Veterans Claims (Disability, Pension, or Survivor) Submitted During Fiscal Year

| | | |
|-----------------|----------------|--------------------------------|
| July 2021: | January 2022: | Monthly Average #DIV/0! |
| August 2021: | February 2022: | |
| September 2021: | March 2022: | |
| October 2021: | April 2022: | |
| November 2021: | May 2022: | |
| December 2021: | June 2022: | |

VETERANS MANAGEMENT PROGRAMS ACCESS

VetraSpec SHARE
DPRIS VBMS
Caseflow

Notes:
CSO - County Service
Officer

REMARKS

Customer Service Feedback
(Positive or Negative); Lunch &
Learn Participation; Concerns Re:
Accreditation Status; Etc.

Appendix N – TEMPLATE – REMOTE ACCESS PRIVILEGE – ATTEMPTING TO ACCESS YOUR VBA RECORD

As a user of the U.S. Department of Veterans Affairs remote access applications and Citrix Access Gateway (CAG), I acknowledge the requirements outlined in **VA Information Security Rules of Behavior, which provides the specific responsibilities and expected behavior for organizational users and non-organizational users of VA systems and VA information.**

I further agree to the following:

6. I will continue to complete mandatory security and privacy awareness training using VA's Talent Management System (TMS) within designated time frames.
7. VA's Rules of Behavior provides in relevant part, "[o]nly provide access to sensitive information to those who have a need-to-know for their professional duties, including only posting sensitive information to web-based collaboration tools restricted to those who have a need-to-know and when proper safeguards are in place for sensitive information."
8. The Nashville VA Regional Office interprets this provision to prevent an accredited Veteran Service Organization representative from **attempting** to access their personal record using VA remote access applications.
9. Further, VA's Rules of Behavior provide in relevant part:
 - a. "I will not have any expectation of privacy in my activities while accessing or using VA information systems, as I understand that all activity is logged for security purposes."
 - b. "I understand that authorized VA personnel may review my conduct or actions concerning VA information and information systems and take appropriate action."
10. I understand that my failure to follow VA's Information Security Rules of Behavior and these procedures may result in the loss of my ability to access VA systems and applications.
 - a. A first violation may result in suspension of remote access privileges for one week.
 - b. A second violation may result in suspension of remote access privileges for two weeks.

- c. A third violation may result in a complete suspension of remote access privileges.

By signing below, I acknowledge my obligation as a user of the U.S. Department of Veterans Affairs remote access applications and Citrix Access Gateway (CAG).

Type or Print Name

Date

Signature

**DEPARTMENT OF VETERANS AFFAIRS (VA) INFORMATION SECURITY RULES OF BEHAVIOR (ROB) FOR NON-ORGANIZATIONAL USERS
FISCAL YEAR (FY) 2023**

COVERAGE

- *VA Information Security ROB for Non-Organizational Users* identifies the specific responsibilities and expected behavior for non-organizational users of VA information and information systems as required by 38 U.S.C. § 5723(f)(5), Office of Management and Budget Circular A-130, Appendix I, paragraph 4(h) (6-7), VA Directive 6500, VA Cybersecurity Program and VA Handbook 6500, *Risk Management Framework for VA Information Systems – VA Information Security Program*.
- *Organizational users* are VA employees, contractors, researchers, students, volunteers and representatives of Federal, state, local or tribal agencies authorized to access VA information and information systems for the performance of official duties but do not represent a Veteran or claimant. The ROB for organizational users are identified in VA's Information Security Rules of Behavior for Organizational Users.
- *Non-Organizational users* are users other than those explicitly categorized as organizational users. These include affiliates and individuals with a Veteran/claimant power of attorney. Change Management Agents at the local facility are responsible for onboarding power of attorney/private attorneys.
- VA information is the information under the control of VA or stored on a VA information system. This includes both VA-sensitive and non-sensitive information. Information properly disclosed by VA to a non-organizational user (for example, contents of a Veteran's claims file for purposes of representing a Veteran or claimant) is no longer VA information and its security and confidentiality are the recipient's responsibility.
- This ROB for Non-Organizational users does not supersede any policies of VA facilities or other agency components that provide higher levels of protection to VA's information or information systems. The ROB provides the minimum requirements with which individual users of VA information and information systems agree to comply and VA facilities and other agency components may issue requirements for protection that exceed the ROB.

COMPLIANCE

- Non-Organizational users are required to comply with this ROB. Non-compliance with this ROB may result in suspension or removal of access to VA information or information systems. Although such a suspension would not prevent VA from making an authorized disclosure of records to a non-organizational user; a suspension of access may prevent disclosure through a particular method, for example, through a VA information system. Depending on the severity of the violation and management discretion, consequences may include access restriction or suspension of access privileges. Theft, conversion or unauthorized disclosure or disposal of Federal property or disclosure of information may result in criminal sanctions.
- Unauthorized access, upload, download, change, circumvention or deletion of information on VA systems without authorization; unauthorized modification of VA systems; denying or granting access to VA systems without authorization; unauthorized purpose on VA systems; or otherwise misusing VA systems or resources is strictly prohibited and may result in criminal sanctions.
- The ROB does not create any other right or benefit (substantive or procedural) enforceable by law by a party in litigation with the U.S. Government.

