

DEPARTMENT OF VETERANS AFFAIRS

OFFICE OF INSPECTOR GENERAL

Office of Inspector General

DEPARTMENT OF VETERANS AFFAIRS

Style, Language, and Usage Guide for Writing and Editing VA OIG Reports

GUIDANCE JANUARY 2019



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Terms and Chicago Manual of Style Alternative Rules

This glossary is a quick reference for commonly used terms and acronyms in OIG products. It includes VA OIG-specific rules that differ or make use of alternative rules from the *Chicago Manual of Style* (CMOS). Unless specified as an exception here, follow CMOS and Merriam-Webster online dictionary.



acting

In Recommendations and Management Comments, avoid acting/interim. Use language such as, "All recommendations in this report addressed to VA leaders are directed to the individual in that position—whether in an acting or permanent capacity."

Antideficiency Act

Statute protecting Congress's power of the purse (you cannot obligate federal dollars if there is not enough money "in the bank" to cover the expense; it is pay-as-you-go). ADA—not to be confused with the Americans with Disabilities Act

В

Bluebook

A legal citation book used by lawyers

cardholders

One word for purchase cardholders contract phases **Planning** Solicitation cause Part of charge paragraph, elements of a Evaluation finding. See the Yellow Book, page 158. Award **CFR** Code of Federal Regulations. Use **Contract Review** CRB present tense for laws, regulations, Board policy, and directives. contracting officer's COR charge paragraph Forms the elements of a finding representative Plural: contracting officer's (condition, criteria, cause, effect,). representatives (CORs) See the Yellow Book, Elements of a Finding, page 157. contracting officer's COTR technical Plural: contracting officer's technical Chicago The Chicago Manual of Style, CMOS representative representatives (COTRs) Choice Short form for Veterans Choice COR Contracting officer's representative Program. Use instead of VCP. cost-benefit analysis Hyphenate as shown CIGIE Council of the Inspectors General on Integrity and Efficiency cost-effective Always hyphenated Use CIGIE standards for Reviews. cost plus fee Not hyphenated claims processing OIG style does not hyphenate. cost-plus-fixed-fee Hyphenate as shown claims-related basis Hyphenated before a noun, claimsrelated documents cost-plus-incentive-Hyphenate as shown fee contract **CMOS** The Chicago Manual of Style cost-type contract Hyphenate as shown Code of Federal CFR. Note the "s" at the end of the last Regulations word. Use present tense for regulations. **COTR** Contracting officer's technical representative commercial off-the-COTS, hyphenate as shown shelf council An advisory body, e.g., Council of the Inspectors General on Integrity and community based CBOC (not hyphenated), lowercase outpatient clinic Efficiency (CIGIE) when not part of proper noun counsel Advice or attorney providing advice, community-based Hyphenated except for CBOCs e.g., Office of General *Counsel* (OGC) comprise Comprise vs compose. To comprise is criteria Part of charge paragraph, elements of "to include" {the whole comprises the a finding. Standards, rules, or tests parts, such as "the team comprises four used to evaluate the agency being women and one man"}. To compose is audited. See the Yellow Book, page "to make up" {the parts compose the 158. whole). Avoid using the phrase "comprised of." Use "consists of" or "is composed of" instead. condition

Part of charge paragraph, elements of a finding. Should address the allegation. See the Yellow Book, page 158.

data Always plural

The data **were** reliable.

demonstrate Also use show and prove.

deobligate Not hyphenated directive As in VA directive, VHA directive.

Capitalize only when part of a title

dual-source Type of contract, hyphenate as

shown

eBuy An online Request for Quotation

> system under the U.S. General Services Administration (GSA); not

hyphenated

eCMS Electronic Contract Management

> System eCMS

Electronic Contract

Management System

elements of a finding

Condition

Criteria

Cause

Effect

These might be in a different order

depending on the type of report.

email Not hyphenated

explanatory

Best practice: use this type of footnote

footnote to define a term or concept

and reduce distraction from the main

point.

F

facility names	Use the complete facility name in the	FOIA	Freedom of Information Act
	report, as an introduction, at least in the Executive Summary and		OIG FOIA staff review every report
	Introduction of the report. After that,		before publication.
	use the short name to save space and	follow-on award	Humbanata as abaum
	be less wordy. For example, <i>The</i>	Tollow-oll award	Hyphenate as shown
	Captain James A. Lovell Federal Health		
	Care Center, located in North Chicago,	follow-up action	Hyphenated in "contract action" but
	Illinois, consistently in the first instance, but could later use The		not hyphenated (open compound) when the team <i>followed up</i> on the
	North Chicago HCS staff diligently		plan.
	or simply "the center."		p.s
fair and reasonable	Not hyphenated	formatting and Section 508	Here's language to add in the Appendix dedicated to management comments and whose format has
FAR	Federal Acquisition Regulation. Use		been modified, and to request extra
	present tense. The FAR requires that		copies:
federal	The following are not capitalized		For accessibility, the format of the
	except as part of proper noun:		original documents in this appendix
	federal, the federal government,		has been modified to comply with
	federal agencies.		Section 508 of the Rehabilitation Act
Federal Acquisition	FAR. Note the absence of "s" at the		of 1973, as amended. OR
Regulation	end of the last word. Use present		For accessibility, the format of the
	tense.		original memo has been modified to
			comply with Section 508 of the
Federal Procurement Data System—Next	Can establish the acronym, FPDS-NG.		Rehabilitation Act of 1973, as
Generation			amended.
Federal Register	Initial caps and italicized		Any request for copies of the
	miliar caps and rameized		attachments may be submitted to VA
firm-fixed-price	Hyphenate as shown		OIG's Release of Information Office.
contract		Freedom of	FOIA
fiscal year	Spell out <i>fiscal year</i> unless followed by	Information Act	
•	numerals (<i>The work was started in</i>	FTE	Full-time equivalent
	one fiscal year, but it was completed		
	in FY 2018.)	full-time equivalent	FTE; hyphenate as shown
fixed price	Not hyphenated when price is a noun	FY	fiscal year
	(purchased at a fixed price).		,
fixed-price contract	Hyphenate <i>fixed-price</i> when used as an adjective.		
		i	

G

GAGAS See the **Yellow Book** entry. These are

the "generally accepted government auditing standards" or justification for any planned deviations from the

standards.

GAO The Government Accountability Office

is the supreme audit institution for the United States. Federal and state auditors look to GAO to provide standards for internal controls, financial audits, and other types of

government audits.

Government Accountability

Office

Green Book Commonly used name for *Standards*

for Internal Control in the Federal

Government (GAO)

GSA General Services Administration

GAO

General Services Administration Acquisition Manual **GSAM**



HAS Health Administration Services

health care and healthcare

Two words if used as a noun; one word if used as an adjective (for example, provide quality health care

and healthcare services)

Health Net Short form for Health Net Federal

Services LLC

Health Net Federal Services LLC Full name of contractor for the Choice

Program

Hotline Initial cap when referring to OIG

Hotline

House Go to house.gov/ to find the names of

the representatives to be listed in the *Distribution* page of your reports.

improper payment

A term used to describe overpayments, underpayments, but also a lack of documentation. See OMB definition and Improper Payments Elimination and Recovery Improvement Act of 2012

(IPERA).

indefinitedelivery, indefinitequantity Four-word phrase used as an adjective; usually describes a type of contract

quantity independent

dent IGCE

government cost estimate

Technology Systems Appropriation

Information

Capped, including *Appropriation*; often used in PMAS reports

internal control

Process used by management to help

an entity achieve its objectives. See

Green Book.

Inspector General The plural is *Inspectors General*.

Office of Inspector General

Inspector General Act of 1978

(Pub. L. 95–452, §1, Oct. 12, 1978, 92 Stat. 1101.) 5 USC App. 1 — (§§ 1–13)

IG

Inspector General

(The Inspector General advised . . .)

J



keywords

When a report is published, the team prepares a list of keywords to populate the ERD form and search engines.

leaders vs. leadership

Leaders take action (VA leaders reviewed... VHA leaders will ensure...) whereas leadership is the position of a leader or a demonstrated action of a leader (e.g., assumed a leadership role or there was a lack of leadership) See also, managers vs. management

legal case citations

See the Bluebook.

life-cycle cost

Life cycle is hyphenated as an adjective but not hyphenated as noun (e.g., the contract has a long life cycle)

life-cycle-cost techniques

Hyphenate as shown

make-or-buy program

management comments

The appendix dedicated to comments sent by VA managers: specify whose comments are being incorporated *only if* more than one responsible office sends comments.

Hyphenate as shown

management vs managers

Management is always singular (unlike staff, which is always plural). Do not use in place of *managers* who conduct actions. Poor management vs. managers failed to act (same rule applies to leaders vs leadership)

Merriam-Webster

micro-purchase threshold

Hyphenate as shown

mission-critical

Hyphenate as shown unless used as a noun (e.g., She went on a mission critical to her job.)

OIG's reference dictionary

mission-essential

multiple-award

Hyphenate as shown

Adjective is hyphenated, but not as noun (e.g., given

multiple awards)

N

nonbreaking hyphen nonbreaking space

Use these steps to keep items together.

Select Insert tab, Symbol tab, More Symbols tab, Special Characters tab, Nonbreaking Hyphen or Nonbreaking Space.

OR use keys:

Shift+Ctrl+Hyphen or Shift+Ctrl+Space Bar

nonconcur Not hyphenated

nonduty Not hyphenated

nonrecurring Not hyphenated

Non-Recurring Maintenance This is a VA program.

Hyphenate as shown

nonservice-connected Hyphenate as shown

non-VA care NVC

Lowercase *care* when generic, as in *non-VA* care providers, access/referrals

to non-VA care

Non-VA Care Coordination

NVCC; when spelled out it is hyphenated because *non* precedes a capital letter

numbers

Always spell out numbers zero through nine. This is an alternative rule in CMOS. Use numerals for

10 and above.

Round numbers when possible. Try to round to two decimal places unless needed. Rounded numbers: add note under your table, such as: NOTE: Detail may not sum to totals because

of rounding.

Always write out a number at the beginning of a sentence. Seventy-six veterans made claims.

0

OALC Office of Acquisition,

Logistics, and Construction. This VA entity must appear on the *Distribution* page of all reviews or audit reports.

Office of Acquisition, Logistics, and Construction OALC

OIG

Office of Inspector General. Write "the" OIG, unless used as an adjective, as in an OIG audit team. Avoid the use of "we" and "our."

option year

Not hyphenated

overobligation

Not hyphenated; closed

compound

ОНІ

Office of Healthcare

Inspections

P

Post-9/11 GI Bill Note the punctuation for this

bill

postaward No hyphenation for postaward

contracts

posttraumatic Posttraumatic stress disorder

has no hyphenation (PTSD)

Potential Monetary Also

Benefits

Also known as PMBs: must appear in several areas of the

OAE report—Executive

Summary, Conclusion, and the

Appendix of the report.

PMB Potential Monetary Benefit

preaward No hyphenation for preaward

contracts

preexisting contract Leg

Legacy contract

Not hyphenated

pre-solicitation review

Can leave hyphenated to avoid

misreading

price negotiation

memorandum

prompt-payment

discount

Hyphenate as shown

prorated

Not hyphenated

Q

Quadrad VA jargon for a committee

of four or for the Facility Director, Chief of Staff, Nurse Executive, and Associate Director

R

recommendations Stand-alone statement. No

acronyms except VA. If no recommendations, use this language: *Because [insert reason]*, the OIG made no

recommendations.

Red Book Principles of Federal

Appropriations Law

Report Processing Center RPC

review appraisal

Not hyphenated

review appraiser

Not hyphenated

risk analysis

Not hyphenated

RPC

Report Processing Center

RPT

Report Process Tracker

S

Section 508

veteran-owned

small business

(of the Rehabilitation Act of 1973, as amended)

Federal law: *Rehabilitation Act of 1973*. See <u>Section 508</u>

Compliance

See also the formatting and

Section 508 entry.

Senate Go to <u>senate.gov</u> to include

the names of senators in your report's Distribution

page.

service-connected Hyphenate as shown

service-disabled Hyphenate as shown

service-disabled SDVOSB; hyphenate as

shown

set-aside Hyphenated for noun (a part

that has been reserved) but not as a verb (e.g., they set

aside their cares)

should-cost analysis Hyphenate as shown

sizable Preferred spelling is without

the "e"

SLUG Style, Language, and Usage

Guide

sole source Not hyphenated when used

as a noun.

sole-source Used as an adjective, it is

hyphenated; often used in

contracts

Special Agent in Charge SAC; not hyphenated

stop-work order Hyphenate as shown

Т

team You may use it in place of

the OIG when appropriate (e.g., before an action). The OIG team audited . . .

titles Titles of people or the

positions they occupy are lowercase unless followed by the person's name or if the title is used instead of a proper name. *The directors* are responsible . . .; however, Denver VAMC Director Hammond

stated . . .

TriWest Short form for TriWest

Healthcare Alliance

Corporation

TriWest Healthcare Alliance

Corporation

Full name of contractor for

the Choice Program

U

United States Spell out if used as a noun;

abbreviate if used as an adjective as US (without

periods).

United States Code U.S.C.

United States Court of Appeals for Veterans Claims Go to the <u>United States</u> <u>Court of Appeals for</u> <u>Veterans Claims website</u>.

V

VA Financial Policies and Not hyphenated

Procedures

veteran Always lowercase, except if

part of a proper noun/entity.

veteran-owned Hyphenate as shown

Veterans Affairs Department of Veterans

Affairs; always use VA; no need to establish an acronym in report.

veterans benefits No apostrophe after the "s"

Veterans Choice Program Established by *The Veterans*

Access, Choice, and Accountability Act of 2014

See **Choice** entry.

Veterans Integrated Service

Network

VISNs

VISN (in titles use proper name and when needed, the VISN number in

parentheses)

Plural as in there are multiple VISNs in the VA

system.

Find VISNs here.

Place a nonbreaking space between VISN and number.

(VISN 6)



wait list

Open as a noun; wait-list hyphenated as a verb

wait time

Not hyphenated

wide

Wide-awake, system-wide, and government-wide, but citywide, nationwide, statewide, worldwide (look it up in Merriam-Webster when in doubt) wifi

Wireless network in plain

language

working papers

Not work papers

workload

Not hyphenated

X

Xerox

Not a verb. Use *photocopy*.



Yellow Book

The Generally Accepted Government Auditing Standards also known as the Yellow Book your you're Your (possessive pronoun); you are (you're). Avoid contractions in report writing.

Z

zero-base budgeting

Hyphenate as shown

zero-day wait time

Hyphenate as shown

Commonly Used Abbreviations

The following acronyms *should be* set up if used in the text five or more times, but *can be* set up if used even twice. The exception to spelling out a frequently used word is if a section is so acronym-heavy that it is necessary to spell out some or all consistently for readability. Only those mentioned in the text should be included in the Abbreviations list of OIG reports. If you need to look up a VA-specific acronym, use the <u>VA Acronym Lookup</u>.

AAS American Association of Suicidology

ACLS Advanced Cardiac Life Support

ADPCS Associate Director for Patient Care Services

AED automated external defibrillator

AES All Employee Survey

AHRQ Agency for Healthcare Research and Quality

ASAC Assistant Special Agent in Charge

AUD alcohol use disorder

AUDIT-C Alcohol Use Disorder Identification Test Consumption

BLS basic life support

C&P credentialing and privileging

CAB Clinical Advisory Board

CABG coronary artery bypass graft

CAM complementary and alternative medicine

CAP Clinical Assessment Program

CAP College of American Pathologists

CARF Commission on Accreditation of Rehabilitation Facilities

CBC complete blood count

CBOC community based outpatient clinic
CCP Care in the Community Program

CFO central field office

CFR Code of Federal Regulations

CHIP Comprehensive Healthcare Inspection Program

CI confidence interval

CIO Chief Information Officer

CLABSI central line-associated bloodstream infection

CLC community living center
CLO Chief Logistics Officer

CMOP Consolidated Mail Outpatient Pharmacy

CMS Centers for Medicare and Medicaid Services

CNH community nursing home

CO₂ carbon dioxide

COHRS Central Office Human Resources Services

COS Chief of Staff

COT chronic opioid therapy

CPR cardiopulmonary resuscitation

CPRS Computerized Patient Record System

CRNA certified registered nurse anesthetist

CS controlled substances

CSC controlled substances coordinator
CSI controlled substances inspector

CT computed tomography
CVC central venous catheter

DEA Drug Enforcement Agency

DNA deoxyribonucleic acid

DNR do not resuscitate

DUSHOM Deputy Under Secretary for Health for Operations and Management

DWHP designated women's health provider

electrocardiogram (same measure as EKG)

eCMS

Flactronic Contract Management System

eCMS Electronic Contract Management System

ED Emergency Department
EHR electronic health record

EIC executive in charge

EKG electrocardiogram (same measure as ECG)

ELC Executive Leadership Council

EMS Environmental Management Service

ENT Ears, Nose, and Throat
EOC Environment of Care
EWL electronic wait list

FAR Federal Acquisition Regulation FDA Food and Drug Administration

FPPE Focused Professional Practice Evaluation

FY fiscal year

FR Federal Register

FTE full-time employee equivalent (OIG does not use FTEE)

GEM Geriatric Evaluation and Management

GI gastrointestinal

GIP generic inventory package

HAS Health Administration Services

HBPC Home Based Primary Care
HEC Health Eligibility Center

HIPAA Health Insurance Portability and Accountability Act

HR human resources

HRA Human Resources and Administration

HT Home Telehealth
IC infection control
ICU Intensive Care Unit
IP Infection Prevention

IPEC Inpatient Evaluation Center ISO information security officer

IV intravenous

JC Joint Commission

LIP Licensed Independent Practitioner

LTC long-term care

LTCI Long Term Care Institute

M&M Morbidity and Mortality

MAFO Mid Atlantic Field Office

MEDD Morphine Equivalent Daily Dose

MH Mental Health

MHS Mental Health Services

MOA Memorandum of Agreement

MOU Memorandum of Understanding

MRI magnetic resonance imaging

MRSA Methicillin-resistant Staphylococcus aureus

NCA National Cemetery Administration

NCP National Center for Health Promotion and Disease Prevention

NCPS National Center for Patient Safety

NEAR New Employee Appointment Request

NEFO Northeast Field Office

NFPA National Fire Protection Association

NIAAA National Institute on Alcohol Abuse and Alcoholism

NIH National Institutes of Health

NP nurse practitioner

NPSG National Patient Safety Goal

NSO National Surgery Office

NSPL National Suicide Prevention Line

NUMI National Utilization Management Integration

NVC non-VA care

NVCC Non-VA Care Coordination

NWFO Northwest Field Office

 O_2 oxygen

OALC Office of Acquisition, Logistics, and Construction

OAWP Office of Accountability and Whistleblower Protection

OHRM Office of Human Resources Management

OIG Office of Inspector General

OMHO Office of Mental Health Operations

OMI Office of Medical Inspector

OPC outpatient clinic

OPIA Office of Public and Intergovernmental Affairs

OPPE ongoing professional practice evaluation

OR operating room

OSC Office of Special Counsel

OSHA Occupational Safety and Health Administration

OSI Opioid Safety Initiative

OSP Office of Suicide Prevention

P&F Pension and Fiduciary

P&LO Procurement and Logistics Office

PA physician assistant

PACT Patient Aligned Care Team
PACU Post-Anesthesia Care Unit

PAID Personnel and Accounting Integrated Data

PC primary care

PC3 Patient-Centered Community Care

PCC Primary Care Clinic PCP primary care provider

PDMP Prescription Drug Monitoring Program

PHI protected health information
PI performance improvement

PII personally identifiable information

PIV personal identity verification

PKI public key infrastructure

PMC Pension Management Center POV personally owned vehicle

PPE personal protective equipment

PRC Peer Review Committee

PSAS Prosthetic and Sensory Aid Service

PSI patient safety indicator PSM patient safety manager

PT physical therapy

PTSD posttraumatic stress disorder

PUMA physician utilization management advisor

QASP quality assurance surveillance plan

QI quality improvement QM quality management

QMO quality management officer

QRT quality review team

QSV Quality, Safety, and Value

QUERI quality enhancement research initiative

RAC resident agent in charge

RBC red blood count RCA root cause analysis

RME reusable medical equipment

RN registered nurse

RNCM registered nurse care manager

RRTP Residential Rehabilitation Treatment Program

RVSR rating veterans service representative

SAC Special Agent in Charge

SAIL Strategic Analytics for Improvement and Learning

SCFO Southcentral Field Office SEFO Southeast Field Office SES Senior Executive Service

SHEP Survey of Healthcare Experiences of Patients

SICU Surgical Intensive Care Unit
SMC special monthly compensation
SOP standard operating procedure
SPC suicide prevention coordinator

SPH safe patient handling

SPS Sterile Processing Service
STD sexually transmitted disease
STI sexually transmitted infection

SWG Surgical Work Group
TBI traumatic brain injury
TJC The Joint Commission

TMS Talent Management System

UDS urine drug screen

UM utilization management
USH Under Secretary for Health

VA Department of Veterans Affairs

VACAA Veterans Access, Choice, and Accountability Act of 2014

VACO VA Central Office

VAMC Veterans Affairs Medical Center VARO Veterans Affairs Regional Office VBA Veterans Benefits Administration

VBMS Veterans Benefits Management System

VCL Veterans Choice List VCL Veterans Crisis Line

VHA Veterans Health Administration

VHACO Veterans Health Administration Central Office

VISN Veterans Integrated Service Network

VistA Veterans Information Systems and Technology Architecture

VSC Veterans Service Center
WBC white blood cells/count
WFO Western Field Office

Job Titles

To determine whether to capitalize job titles, consider whether it is a function or a position. We do not capitalize functions like a manager, a writer, or an auditor, but we do capitalize positions like the *VAMC Director*, the *Chief of Staff*, and the *Secretary of the VA*.

Use the following guidelines for capitalizing job titles: Use initial caps for professional titles that come immediately before a name, indicate distinction either right before a name or right afterward to indicate that person, and for jobs that are national in scope.

Examples of Titles			
Capped Titles			
Chief Education Liaison Officer	r Secretary (of a federal depart	artment or VA administration)	
Chief Information Officer	Special Agent		
Chief of Staff/Surgery/etc.	Special Agent in Charge		
Inspector General	Under Secretary		
President (of a country)	When a job title takes the p	place of a person's name	
Resident Agent in Charge			
Not Capped (Whe	Not Capped (When Not Placed Directly Before a Named Individual)		
administrative assistant agent assistant director/manager associate director audit manager case manager contracting officer contracting officer's technical representative coordinator director doctor executive in charge executive nurse	general surgeon information security officer inspector lead xxx licensed practical nurse manager medical support assistant nurse nurse manager/practitioner officer patient safety manager physician physician assistant project manager	provider quality management manager registered nurse risk manager scheduler service chief specialist speciality technician supervisor supervisory medical support assistant surgeon technician surgical quality nurse technician	

Citations

Legislative (bills, acts, public laws, rules, and codes)

Reference	Narrative (cue phrases)	Footnote/Endnote
House/Senate Bill	Veterans received benefits under a 2008 law that requires	H.R. 2642., Supplemental Appropriations Act of 2008, the short title for this portion of the bill is Post-9/11 Veterans GI bill
Act	The Post-9/11 Veterans Educational Assistance Act of 2007 requires that	Post-9/11 Veterans Educational Assistance Act of 2007, Pub. L. No. 110- 252, Stat. 2325. Second Reference: Post-9/11 Veterans Educational Assistance Act of 2007.
Public Laws	Access to threat and vulnerability information is governed by law	First Reference: Homeland Security Act of 2002, Pub. L. No. 107-296, § 202, 116 Stat. 2135 (2012). Second Reference: Homeland Security Act of 2002 § 202.
Federal Register	This final rule establishes policy, assigns responsibilities, and prescribes procedures for carrying out the <i>Post-9/11 GI Bill</i> .	Post-9/11 GI Bill, 78 Fed. Reg. 34250 (June 7, 2013).
United States Code (U.S.C.)	Pursuant to federal law regarding	38 U.S.C. § 3301.

Executive (presidential orders, codes, and regulations)

Reference	Narrative (cue phrases)	Footnote/Endnote
Executive Order (EO)	This year, President John Doe signed an executive order (EO) to decrease seismic risks in VA's buildings. The EO updates the federal requirements that	Executive Order: Establishing a Federal Earthquake Risk Management Standard, Exec. Order No. 13717 (Feb. 2, 2016).
Code of Federal Regulations (CFR)	The Code of Federal Regulations (CFR) provides that	38 CFR § 21.9675. 38 CFR §§ 21.9675-9685. If two sections are cited: 38 CFR §§ 21.9675-9685, 45.9705.
Federal Acquisition Regulation (FAR)	The FAR states that	FAR § 2.101-2(f)(4)
Office of Management and Budget (OMB)	In a related 2004 circular, the Office of Management and Budget (OMB) defines an improper payment as	Office of Management and Budget (OMB), Management's Responsibility for Internal Control, OMB Circular A-123, App. C, Pt. I-A, Risk Assessing, Estimating, and Reporting Improper Payments, (December 21, 2004).

 ${\bf Administrative}\ (Departmental\ policies,\ procedures,\ guidance,\ etc.)$

Reference	Narrative (cue phrases)	Footnote/Endnote
VA Handbook	The agency has revised and updated its Directive 6330 and Handbook 6330.01 to reflect a more structured approach to policy development and publication.	VA Handbook 6330, Directives Management Procedures, October 21, 1993.
	Procedures for implementing this directive can be found in the VA Handbook that establishes how management should handle employee relations	VA Handbook 5021, Employee Management Relations, Part I, Appendix A, May 3, 2013.
VA Directive	VA's Energy and Water Management Program policy requires, as set up in an April 2014 Directive	VA Directive 0055, VA Energy and Water Management Program, December 10, 2014.
		Second Reference: VA Directive 0055.
VA Form	As required by a VA Form titled, The Department of Veterans Affairs Veterans Health Administration (VHA) Veterans Choice Program Provider Agreement	VA Form 10-10145, Department of Veterans Affairs Veterans Health Administration (VHA) Veterans Choice Program Provider Agreement, February 2016.
		Second Reference: VA Form 10-10145.
VA Financial Policies and Procedures	As specified in VA policies related to financial procedures governing the Government Purchase Card Program	VA Financial Policies and Procedures, <i>Government Purchase Card</i> , vol. 16, January 26, 2017.
VBA Handbook	Guidelines for reimbursement from third-party health insurers for medical care provided by VA to insured veterans are outlined in a VBA handbook dating back to 2012.	VBA Handbook 1601C.02, Revenue Utilization Review, May 10, 2012.

Reference	Narrative (cue phrases)	Footnote/Endnote
VHA Handbook	Procedures for implementing this guideline can be found in the VHA Handbook	VHA Handbook 0710.2, Fire Department Services at VA Medical Centers and Domiciliaries, Appendix A, Paragraph 1(a – c).
VHA Directive	A VHA directive outlines the procedures for managing outpatient consults	VHA Directive 1232(1), Consult Processes and Procedures, September 16, 2008.
VHA Standard Operating Procedure	As for the related VHA SOP on the matter, it must be noted that	VHA Procurement and Logistics Standard Operating Procedure 160- 10-01, <i>Procurement</i> <i>Process</i> , June 25, 2010.
VA/VHA/VBA Notices, Bulletins & Pamphlets, and Memorandum	VA/VHA/VBA guidance can be found in a notice on Directive 6600 was rescinded on	VA Notice 17-09, Rescission of VA Directive 6600, Responsibility of Employees and Others Supporting VA in Protecting Personally Identifiable Information (PII), February 1, 2018.

Judicial Branch (court cases, et al.)

Reference	Narrative (cue phrases)	Footnote/Endnote
Court Case (CMOS 14.276)	In United States v. MacDonald, the court found that	U.S. v. MacDonald, 531 F.2d 196, 199-200 (4th Cir. 1976). Second Reference: MacDonald, 531 F.2d at 197.
	The Board of Veterans Appeals found the logic of <i>Landicho</i> was applicable when the veteran dies with an appeal pending before the Board per the <i>Smith</i> ruling.	Landicho v. Brown, 7 Vet. App. 42, 47 (1994). Smith v. Brown, 10 Vet. App. 330, 333–34 (1997).
Legal Opinion	In a legal precedent opinion, VA Office of General Counsel explains that	VAOPGCPREC 4-2015 (December 3, 2015).

Other

Reference	Narrative (cue phrases)	Footnote/Endnote
Book (<u>CMOS 14.100</u>)	A traumatic brain injury (TBI) can have a profound effect on a veteran's personality	Mark J. Ashley and David A. Hovda, <i>Traumatic Brain</i> <i>Injury: Rehabilitation</i> , <i>Treatment</i> , and Case <i>Management</i> , 4th ed. (Boca Raton: CRC Press, 2017), 152–177.
Journal (CMOS 14.167)	The incidence of penetrating brain injury increases during war	Deborah Warden, "Military TBI During the Iraq and Afghanistan Wars," <i>The Journal of Head Trauma Rehabilitation</i> 21, no. 5 (September/October 2006): 398–402.

Reference	Narrative (cue phrases)	Footnote/Endnote
News Article (CMOS 14.191)	The New York Times featured Dr. David X. Cifu's medical opinion	Barry Meier and Danielle Ivory, "Effective Concussion Treatment Remains Frustratingly Elusive, Despite a Booming Industry," <i>New York Times</i> , July 3, 2015.
News Release (CMOS 14.200)	Injured veterans participate in the Invictus Games	VA Office of Public Affairs, "Hundreds of injured military Veterans from around the globe to compete in the 2016 Invictus Games: VA to provide onsite medical and mental health support to international athletes in Orlando," news release, May 6, 2016, https://www.va.gov/opa/pressrel/includes/viewPDF.cfm?id=2786.
OIG Report (<u>CMOS 8.2</u> and <u>14.86</u>)	In the recent audit of VBA's Post-9/11 G.I. Bill, the OIG recommended that	VA Office of Inspector General, Audit of VBA's Post-9/11 G.I. Bill Monthly Housing Allowance and Book Stipend Payments, Report No. 13-01452-214, July 11, 2014.
	Since March 2012, the OIG has issued annual reports on VA's compliance with IPERA.	VA Office of Inspector General, FY 2014 Review of VA's Compliance With the Improper Payments Elimination and Recovery Act, Report No. 14-03380- 356, May 14, 2015.

Reference	Narrative (cue phrases)	Footnote/Endnote
Website	The table is based on a VA consolidation plan	VA Office of Data Governance and Analytics, "Department of Veterans Affairs Statistics at a Glance," fact sheet, December 31, 2017. https://www.va.gov/opa/pressrel/includes/viewPDF.cfm ?id=2786. (The website was accessed on January 11, 2018.)