

Policy and Administrative Records of the Veterans Administration

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IN contemporary Federal agencies documentation of policy is coming to consist more and more of printed or nearprint issuances, each reproduced in hundreds—even thousands—of copies. A discriminating article by Paul Lewinson in this journal has already dealt in part with such issuances and the desirability of preserving record sets of them in an agency's archives.¹ It is to be hoped that the Veterans Administration will keep and that the National Archives in the future will preserve a master set of the Administration's issuances as part of its records, for the archivist (or the historian) will save an immense amount of time and gain important perspectives if he begins with these in general research before he plunges into the records *per se*.

Administration of veterans' affairs is an immense operation. Over 32 million men and women have served in the U. S. armed forces during wars since 1776. Some 22½ million of these veterans are living today and, together with their families, they constitute more than 40 percent of the nation's population. Serving these veterans, their widows, and their orphans is a force of 175,000 men and women—the VA employees who staff its Central Office and approximately 500 field stations. The benefits administered include medical and hospital care, insurance, compensation, pensions, education, training, vocational rehabilitation, guardianship, and home loans. The direction and control of this variety of activities and of the farflung network of field stations could not be accomplished effectively without a comprehensive system of policy and general administrative issuances. This system, mandatory throughout VA,

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¹ "The Preservation of Government Publications," in *American Archivist*, 22: 181-188 (Apr. 1959). See especially p. 182-185.

is both old and new—some issues were originated by predecessor agencies, and others have come into being only within recent years.

The VA records of policy and general administration, unlike the ephemeral material that is generated in daily communication processes, are of continuing value. They are the overall guidelines—the framework within which VA operates. In some instances they are based directly on law; in others they flow from the powers, both specific and implied, granted the Administrator under law. For these reasons and because large quantities are usually required, the published records of policy and general administration are issued as permanent printed series. An official file copy is kept in all instances. Such copies, together with background material and supporting papers, form the major permanent staff records of VA.

The documents thus kept can be grouped as regulatory documents, interpretative documents, intelligence documents, promotional documents, and informational documents. Most of them are in series issued by VA; a few series, however, consist of laws, opinions, and the like emanating outside the agency but binding upon VA. The different types of documentation are described in detail below.

REGULATORY DOCUMENTS

The term “regulatory documents” as used here means any document that is regulative in effect. Thus it would include the law itself, those documents that have legal effect, and internal directives or procedures that are mandatory. Depending upon the particular documents involved, they may be binding on VA employees, veterans, or third parties, including veterans’ representatives and the general public.

Legislation

The background information—including correspondence with the Bureau of the Budget, Members of Congress, and others; committee reports; various versions of the bills and so forth; and VA’s comments on all legislation—is carefully documented and safeguarded. This activity is carried on by the Legislative Reference and Research Service staff of the General Counsel. In addition, printed copies of laws, hearings, and the like are maintained in binders. Complete, prompt reference service is assured through indexes and cross-references. Executive orders are maintained in a similar manner, also by the Legislative Reference and Research Service.

VA Instructions

VA instructions are issued by the Administrator and are both regulatory and procedural in nature. An instruction is essentially a temporary medium, used for expediency in putting new law into effect. All regulatory material of permanent value in a VA instruction is eventually issued in VA regulations, described below. Procedural matter is later included in a manual. Like VA regulations, any regulatory VA instruction is published in the *Federal Register*. A record copy of each VA instruction, with its supporting documents, is maintained by the Office of the Assistant Administrator for Management Services.

VA Regulations

VA regulations implement laws and executive orders in matters governing relations with claimants, beneficiaries, and third parties. Based on the authority vested in the Administrator, they confer a right, privilege, authority, or immunity; impose an obligation; or prescribe a penalty or a course of conduct. These regulations are published in the *Federal Register*. As in the case of other documents signed by the Administrator, record copies and supporting documents are maintained by the Office of the Assistant Administrator for Management Services.

Administrator's Decisions

Administrator's decisions are those precedent opinions of the General Counsel that for various reasons have been referred to and approved by the Administrator. Those selected for VA-wide distribution are published in a numbered series and are periodically bound in volumes. The record copy and drafts of published Administrator's decisions are maintained by the Office of the Assistant Administrator for Management Services; the background material is retained by the General Counsel's Office.

VA Circulars

VA circulars are used for instructions and announcements that are generally applicable throughout the agency. They are frequently used to disseminate instructions that involve several manuals (see below), and they are subsequently incorporated in these permanent manuals. Circulars are also used for rescission of other issuances. The history files and record copies of VA circulars are maintained by the Office of the Assistant Administrator for Management Services.

Numbered Memoranda

Numbered memoranda are used by the Administrator, the top staff offices, and the three VA departments (Medicine and Surgery, Veterans Benefits, and Insurance) for making announcements, requesting reports, issuing instructions to staff members, and dealing with other internal administrative matters. The memoranda are systematically rescinded or combined and reissued. The history files and record copies of those published by the Administrator's Office are maintained by the Office of the Assistant Administrator for Management Services. Those issued by the heads of departments and top staff offices are maintained by their respective publications control officers.

Numbered memoranda (called "operating memoranda") are also used by the Department of Insurance field stations to implement manuals issued by the Central Office. Under VA's decentralized management, the details of many operating procedures are decided by station managers. Field stations are also authorized to deviate from published procedure, with certain exceptions, if the deviation will improve service or reduce operating costs. The Department of Insurance, Central Office, reviews all field operating memoranda and requests rescissions or changes whenever they conflict with policy or are incompatible with overall operations. Each field station maintains the history files and record copies of its operating memoranda in the office of its publications control officer.

Technical Bulletins

Technical bulletins are used by the Department of Medicine and Surgery and the Department of Veterans Benefits, and occasionally by other offices, for the issuance of detailed technical instructions and information. Technical bulletins are often used for one-time instructions only and hence are not incorporated in a manual. The history files and record copies are kept by the publications control officers for their respective departments.

Interim Issues

These are directives used by the departments and top staff offices to implement, change, or delete instructions contained in manuals. They are issued when immediate revisions of the manuals are impracticable or when the issuances need further refinement before their incorporation in a permanent manual. Interim issues, reproduced through offset printing and teletypes, in effect serve as temporary manual changes. They have a standard format and numbering

system and are periodically incorporated in regularly printed manual changes. The history files and record copies of interim issues are maintained by the publications control officers of the various offices. The Office of the Assistant Administrator for Management Services maintains those signed by the Administrator, the Deputy Administrator, or the Associate Deputy Administrator.

VA Policy Manuals

VA policy manuals are used as permanent series for stating policy and procedures generally applicable throughout the agency. Most of the policy manuals were at first developed by task groups consisting of representatives of the various departments and top staff offices of VA. Today the manual changes are developed by the staff office having overall responsibility in the particular area concerned and are then coordinated with other interested offices. All policy manuals are published and the history files are maintained by the Office of the Assistant Administrator for Management Services.

The departments are authorized to issue such supplements to these policy manuals as they find necessary and desirable. These supplements are arranged in the same manner as the basic policy manual and are keyed directly to it. History files and record copies of the supplements are maintained by the publications control officers of the various offices. The VA policy manuals consist of the following:

MP-I, Part I. General Administrative.

- Chapter 1. System of Administrative Issues.
- Chapter 2. VA Investigation Policy.
- Chapter 3. Systematic Review of Programs and Operations.
- Chapter 4. VA Information Policy.
- Chapter 5. Safeguarding Classified Defense and Other Information or Material.
- Chapter 6. Procedure for Recognition of Attorneys, Agents, and Accredited Representatives of Recognized Service Organizations.
- Chapter 7. Nondiscriminatory Employment Policy.

MP-I, Part II. General Administrative.

- Chapter 1. Paperwork Management.
- Chapter 2. Employee and Beneficiary Travel.
- Chapter 3. Tabulating Operations.
- Chapter 4. Form and Form Letter Control.
- Chapter 5. Mail and Records Control Operations.
- Chapter 6. Telecommunications.
- Chapter 7. Microphotography.
- Chapter 8. Protection of VA Indispensable Records.

- Chapter 9. Publications.
- Chapter 10. Correspondence.
- Chapter 11. Visual Aids.
- Chapter 12. Procurement and Loan of Other Government Agency Records.

MP-2, Supply.

- Part I. Utilization of Government-Owned Personal Property.
- Part II. Procurement and Sales.
- Part III. Inventory and Supply Management.
- Part IV. Warehousing and Traffic Management.
- Part V. Specifications, Standards, and Cataloging.

MP-3, VA Engineering.

- Part I. Construction, Preservation, and Alterations of Structures, Grounds, and Utilities.
- Part II. Acquisition, Management, and Disposal of Real Property.
- Part III. Safety, Fire Protection, and Disaster Relief.
- Part IV. Advertisement, Award, and Administration of Formal Contracts at Field Stations.

MP-4, VA Budget and Finance Policy Manual.

- Part I. General.
- Part II. Payment of Salaries.
- Part III. Voucher Auditing.
- Part IV. Benefit Payments.
- Part V. Administrative Accounting.
- Part VI. Reports and Statistics.
- Part VII. Budgetary Policy and Administration.
- Part VIII. Performance Measurement and Standards.
- Part IX. Financial Audit Policy.

MP-5, VA Personnel Policy Manual.

- Chapter 1. Personnel Administration in the VA.
- Chapter 2. Position Classification and Pay Administration.
- Chapter 3. Recruitment and Examining.
- Chapter 4. Training and Development.
- Chapter 5. Selection and Placement.
- Chapter 6. Performance Evaluation.
- Chapter 7. Conduct of Employees.
- Chapter 8. Hours of Duty and Leave.
- Chapter 9. Benefits and Services.
- Chapter 10. Incentive Awards.
- Chapter 11. Employee Groups.
- Chapter 12. Discipline, Grievances, Hearings, and Appeals.
- Chapter 13. Separations.
- Chapter 14. Reduction in Force.

- Chapter 15. Personnel Records, Files, and Reports.
- Chapter 16. Employment of Physicians, Dentists, and Nurses and Other Excepted Personnel under Title 38 USC.
- Chapter 17. Qualification Standard.
- Chapter 18. Personnel Program Evaluation Standards for Field Stations.
- Chapter 19. Employee Relations.

Operating Manuals

Each of the three VA departments issues basic manuals containing the operating policies and methods for the particular benefit programs it administers. As manuals are revised and new ones are issued, they are being numbered in accordance with the assigned correspondence symbols of the departments: 10, for Department of Medicine and Surgery; 20, for Department of Veterans Benefits; and 90, for Department of Insurance. Changes in operating manuals are normally made by the issuance of new pages; as previously explained, however, interim issues are often used to make temporary changes. It is a longstanding policy of VA *not* to use letters as a means of issuing policy and procedural matter because of the problems of effective controls, coordination, and proper distribution in an agency so large and complex.

The basic operating manuals of the three VA departments are the following:

Department of Medicine and Surgery.

- M-1. Operations
- M-2. Professional Services.
- M-3. Research and Education.
- M-4. Dentistry.
- M-5. Controller Procedures.
- VSC-1. Veterans Canteen Service Operating Procedures.
- M10-3. Medical Division Administrative Operations.
- M10-4. Instruction and Guide for Meat Utilization and Fat Conservation.
- M10-6. Standard Medical Administration Procedures.
- M10-8. On-the-Job Training Manual.
- M10-11. Standard Administrative Procedures for Psychiatric Services.
- M10-20. Maintenance and Operation, Policies and Procedures.
- M10-21. Mortuary Operations.

Department of Veterans Benefits.

- M29-1. Contact Operations.
- M23-7. Tabulating Machine Operations.
- M4A-8. Loan Guaranty Operations for Regional Offices.
- M4B-16. Direct Loan Activities.

- M7-1. Vocational Rehabilitation and Education Procedures.
- M8-1. Adjudication Procedure—Miscellaneous Compensation and Pension.
- M8-2. Coding Operations—Death Claims.
- M8-3. Rating Procedure and Codes.
- M8-5. Adjudication Procedure—Regional Offices and Veterans Benefits Office.
- M8-6. Adjudication Procedure—Insurance.
- M8-8. Adjudication Procedure—Burial Allowance.
- M8-10. Disability Coding Operations.
- M23-1. Administrative Operations.
- M26A-1. Loan Guaranty—Coding Instructions.
- M27-1. Office of Chief Attorney.
- M28-1. Survey Standards.

Department of Insurance.

- M90-1. Central Office Operating Procedures.
- M90-2. Operating Procedures—National Service Life Insurance Dividend Schedules.
- M90-3. Operating Procedures—National Service Life Insurance.
- M90-4. Operating Procedures—United States Government Life Insurance.
- M90-5. Surveys and Evaluations.
- M90-6. Miscellaneous Tables.
- M90-7. Management Reporting System.
- M90-8. Operating Procedures—Veterans Special Life Insurance.

INTERPRETATIVE DOCUMENTS

"Interpretative documents" are those developed to interpret regulatory documents of legal effect as they apply to individual cases, groups, or situations. In general they are legal opinions, and they often have the effect of the law or regulation interpreted.

Opinions of General Counsel

The General Counsel is frequently asked by the three VA departments to interpret laws and regulations as they apply to individual veterans and claimants. The case folder, with any background material, is sent to him. In developing the case, his office establishes its own precedent file, which is confidential and is made available only to members of that Office and other authorized persons. When the opinion is rendered, the original typewritten copy is returned to the department involved, with the case folder attached. The file copies are always placed in the precedent folders, which are filed alphabetically by name. If the opinion is of general

interest it is numbered, published, and distributed within the VA in accordance with a standard distribution list. If the opinion is not published a copy is filed in the current binder for "unnumbered decisions." The responsibility for these functions rests with the precedent and research staff, a part of the law library of the General Counsel's Office. The library keeps a complete set of published and "unnumbered" opinions, a set of digests of opinions, and related indexes.

Decisions of the Board on Waivers and Forfeitures

The function of the Board on Waivers and Forfeitures is to determine questions of forfeiture of veterans' rights and benefits in cases involving fraud and/or misrepresentation, mutiny, treason, sabotage, or rendering assistance to the enemy. The Board also reviews certain decisions involving overpayment and assumes jurisdiction in some others. The decisions of the Board are filed in the case folders of individual veterans. Since the folders in such cases are automatically sent to the Veterans Benefits Office—the field station for the Washington area—and therefore are readily accessible, files are not maintained by the Board. However, the Board does keep a punched card for each case it considers, and individual Board members keep copies of some of the decisions for their own use.

Decisions of the Board of Veterans Appeals

The function of the Board of Veterans Appeals is to decide appeals to the Administrator on claims for benefits under laws administered by the Veterans Administration. The Board receives the veteran's case folder from the field office. When the decision is made the original is filed in the folder. A copy, together with the brief face (worksheet) and occasionally some other pertinent material, is filed numerically by case number in the Board's record room. Copies more than a year old are microfilmed annually and are then destroyed. To the extent indicated, digests of decisions are prepared for the Board's internal use.

Court Decisions

The Litigation Service, Office of General Counsel, represents the Veterans Administration in various types of lawsuits, including cases both for and against VA. In lawsuits involving individual veterans, the folders are often called in from the appropriate field station until the cases are closed. The Litigation Service establishes its own folder for each case it handles. The folder contains such material as correspondence with the Department of Justice, attorneys, and

others; and copies of pleadings, decisions, and other court records. The folders are filed alphabetically under suit name, except for insurance cases, which are filed under the veteran's name.

Attorney General Opinions and Comptroller General Decisions

Bound volumes of these decisions are maintained by the VA library, by the law library of the General Counsel's Office, and by various other offices throughout VA. In addition, copies of individual decisions involving VA are maintained by the particular offices concerned, as part of their general administrative and policy records.

INTELLIGENCE DOCUMENTS

The term "intelligence documents" as used here means those documents developed to give management the information it needs to evaluate policy and performance, make decisions, and formulate future plans. There is a wide range of intelligence documents within VA—from the Administrator's formal *Annual Report* and the various statistical and other periodic reports to the numerous *ad hoc* reports, such as surveys and special studies. These range from one-page memoranda to bound and illustrated volumes.

For several years VA has had a comprehensive, integrated reporting system known as top management reports. The system is so designed that each level of management has in condensed form the information it needs at that particular level. There are a standard format for each of the reports and an updating schedule. The information is in chart form wherever possible. The reports include such information as budget and expenditures, workload status, performance effectiveness, number of veterans receiving benefits, and machine utilization.

The top management reporting system has some unique features. One is a weekly "critical problem and significant happening report," which starts at the lowest level of management and is then selectively channeled upward to the Administrator. The department head publishes the consolidated report for the benefit of his staff; and in addition the weekly departmental staff meetings often discuss items in the reports. The Administrator also selects some of the items for discussion at his weekly staff conferences. Another unique feature of the top management reports is a public opinion digest—uniform project reports with related progress reports and a "pocket notebook." The latter is a pocket-size looseleaf notebook containing highly condensed selected data from the various top management reports. It is used by the Administrator and the department

heads at budget and other congressional hearings, conferences, conventions, and the like.

Extensive use is also made of wall charts; in fact, the Administrator has a chart room that is attracting considerable attention in and out of Government. Published intelligence documents issued by the Administrator are processed by the Office of the Assistant Administrator for Management Services, who retains the history file. The files relating to the intelligence documents issued by the departments are maintained as part of their record systems. If the document is printed, the record copy is kept by the publications control officer.

PROMOTIONAL DOCUMENTS

Promotional documents are prepared for the purpose of trying to encourage or influence someone to do something. In form and manner of presentation they employ many of the techniques used in advertising. And, as in advertising, their effectiveness largely depends upon the creative imagination that goes into their preparation. In a large agency like VA, there is a constant flow of promotional documents, both internal and external. Internal promotional documents are issued for such purposes as increasing employee suggestions, stimulating self-improvement, raising money for the United Givers' Fund and other groups, getting blood donations, making employees more conscious of safety, improving letter-writing, and encouraging the application of work simplification techniques. External promotional documents pertain to such matters as encouraging veterans to convert their insurance and bring their beneficiary records up to date or to notify VA of changes in address. Promotional documents include posters, letters, mail stuffers, overprints on envelopes and applications, and leaflets. Since promotional activities are carried on simultaneously at decentralized points by the departments and staff offices, it is not practical to centralize documentation for them. Therefore, each department and top staff office maintains files of these various promotional documents as part of its record activity. In the case of published matter, the documentation is maintained by the publications control officer.

INFORMATIONAL DOCUMENTS

Informational documents are those issued for the sole purpose of conveying information—a public service of a sort. The extent of their use is largely dependent upon the agency's initiative, the need for them, and the costs of their preparation and dissemination. It

is unfortunate that we still find some Government publications that amount to gobbledygook. As in the case of procedural and all other types of official documents, the 4-S principles of GSA's "Plain Letters" program need to be more generally applied. (These principles, vigorously supported by the Administrator of Veterans Affairs, are strength, shortness, simplicity, and sincerity.)

Like promotional documents, informational documents have wide range and variety. Internally, there are documents informing employees of their rights under the VA promotion program and the Fair Employment Practices Act; announcements of awards and other types of recognition, changes to be made, or research being conducted; and reports of conventions, meetings, and other events of interest. The VA also issues a series of information bulletins containing technical information, suggestions, and reminders. External informational documents—including radio and television releases—involve information on Government life insurance, education and training benefits, veterans' home loans and matters that should be considered when buying a home, and general benefits for veterans and their dependents. The physical characteristics and media used are about the same as for promotional documents.

The above analysis may seem tedious to some readers and appalling to future custodians of the records of the Veterans Administration. It represents, however, the documentation of procedure and policy of a large—and efficient—Federal agency. No doubt the future archivist may preserve only a sampling of some of the documentation discussed toward the end of the paper (the promotional and informational documents, for instance). Only at his peril, however, and at the inconvenience of the 21st-century researcher, will he discard the regulatory, interpretative, and intelligence documents. These will give the user, long after the centennial of World War II, an idea of the machinery of the Veterans Administration in the quaint beginnings of the electronic age.

Paper Work

The terminology of archives administration and records management is ever changing, and the terms understood so well yesterday are differently defined today. The Spring & Summer 1962 issue of *New Jersey Messenger*, for instance, carries a laudatory notice about Lucile Kane's *Guide to the Care and Administration of Manuscripts*—but under the center head PAPER WORK.