

PAID ADVERTISING PROCEDURES

- 1. REASON FOR ISSUE:** To update the Department of Veterans Affairs (VA) policy on paid advertising.
- 2. SUMMARY OF MAJOR CHANGES OR SUMMARY OF CONTENT:** This handbook rescinds VA Interim Advertising Policy, July 23, 2019. It formalizes roles, and responsibilities relating to requesting permission, purchasing, and monitoring the execution of paid advertising through VA controlled expenditures. It provides updated departmental guidance for the activities of the VA Advertising Oversight Board (VAAOB), or those with delegated authority, and staffing of paid advertising requests requiring VA Secretary-level approval.
- 3. RESPONSIBLE OFFICE:** Strategic Planning and National Veterans Outreach, Office of Public and Intergovernmental Affairs.
- 4. RELATED DIRECTIVE:** VA Handbook 8500.
- 5. RESCISSIONS:** VA Interim Advertising Policy, July 23, 2019.

CERTIFIED BY:

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

/s/

Karen Brazell
Principal Executive Director, Office of
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/s/

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PAID ADVERTISING PROCEDURES

1. **PURPOSE.** This handbook establishes policy for VA's use of appropriated funding or monetary and in-kind gifts and donations within an Agency-defined role of national advertising. The objective is to ensure advertisements paid for or controlled by the Department possess quality, are cost effective, are tracked, meet the needs of Veterans, their families, their survivors and their caregivers (VFSC). Advertising proposals must include performance metrics and goals and are within VA's statutory authority to advertise policies or programs. This handbook also ensures consistency in branding and 'look and feel' across the Department. Title 38 USC §532, Authority to advertise in national media and VetStar Award Program, defines the advertising portion of the outreach mission for VA. It authorizes the purchase of national advertising and permits VA's use or direction of funds, regardless of venue, method, or scope, when those funds promote awareness of benefits, services, or assistance, provided by VA for the benefit of VFSC. This includes funds spent to promote VA's human resource (HR) recruitment efforts or encourage participation in VA medical research studies.

2. **PAID ADVERTISING GUIDELINES.**

General. Advertising serves to inform the public about a product, service, or business and may be a valuable tool in providing information about VA's mission to provide timely benefits and services to our nation's Veterans, servicemembers, family members, and caregivers (VSFC). When used appropriately, advertising can improve access to VA and its services; assist in the recruitment of personnel; assist in the recruitment of Veterans to participate in VA medical research studies; and empower Veterans by providing them with timely and accurate information. This handbook does not apply to the Veterans Canteen Service (VCS) or VA Voluntary Services, (VAVS) which have independent authority to advertise and are exempt from this advertising handbook. Note that no other VA entity may purchase advertising in support of VCS or VAVS.

a. **Approvals.** All advertising must be approved by the appropriate authority, as identified within this handbook, before any funding for the advertising shall be obligated. Specific items required in each advertising proposal are identified within this handbook, as are required actions and prohibitions. Any items not specifically directed or prohibited are left to the discretion of the approving authority. All proposed advertising requires that a proposal first be submitted to the appropriate approving authority. In addition to the required information in each proposal, every proposal shall contain all information required for the authority to make an educated decision as to whether they should approve the advertising proposal or not.

- b. **Advertising Methods.** Advertising may consist of the following methods: market research; non-traditional advertising; online display; out of home(OOH); print; promotional items and mementos; public service announcements (PSAs); radio; search engine promotion/optimization (SEO); social media; special events; and television (cable, broadcast, or digital). Additional information related to each of these methods is found in the Definition section of this handbook.
- c. **Advertising Proposal: Required Content.** Advertising proposals will only be approved if they:
- (1) Help improve awareness of VA's benefits, services, assistance, employment opportunities, or research studies, of which VFSC, others eligible to receive VA benefits, or those seeking employment, may benefit;
 - (2) Contain a description of and provide the purpose for the campaign;
 - (3) Contain information related to the strategy of the campaign and provide a reasonable justification and relationship between the expense and the benefit;
 - (4) Identify the advertisement is only informational in nature;
 - (5) Identify the Fiscal Year funds to be utilized, cost, and duration;
 - (6) Identify the proposed timeline for the advertising;
 - (7) Identify the target audience for the advertisement;
 - (8) Indicate an effort to be good stewards of taxpayer dollars;
 - (9) Affirm all current VA branding requirements are in accordance with the Tier 1 VA Graphics Standard Guide;
 - (10) Affirm that the focus of the advertising can manage any increase in demand that may result from the advertisement;
 - (11) Affirm that the advertisement contains a call to action, method to contact VA, or reference to how VFSC may obtain additional information;
 - (12) Contain advertising examples, or a description(s) thereof;
 - (13) Contain a statement of goals, measures, and metrics to determine success;

- (14) Adhere to other requirements or prohibitions identified from OPIA or OGC that have been issued since the date this handbook was published (consult your Under or Assistant Secretary's appointed advertising subject matter expert); AND,
 - (15) Are approved by a member of the Senior Executive Service designated as being responsible for the proposed advertising, or their superiors as required by the advertising cost thresholds described in this handbook.
- d. **Advertising Requirements.** The advertising proposal must abide by the following:
- (1) Expenditure thresholds. Whether developing a single advertisement for a specific location or a sustained, nationwide, regional, or local campaign, all advertising must undergo an approval process based upon the amount of the proposed expenditure. See the Process Section 1(f) of this handbook for specific expenditure thresholds and related approving authorities.
 - (2) Accuracy in Advertising. All VA advertising, regardless of format, must clearly identify that the U.S. Department of Veterans Affairs is the source of that advertising. Inappropriate or inaccurate advertising, including advertising that could reasonably be viewed as partisan or misleading, is not permitted.
 - (3) VA Directive 0023 (Tier 1 Graphic Standards), and VA Leadership Directed Messaging, Imagery, or Advertising Campaigns. VA Graphic Standards should always be utilized when advertising. The Tier 1 VA parent or an approved subordinate seal / graphic should be utilized in all visible advertising. Only if size of the advertising does not permit compliance with Tier 1, then the VA seal alone may be utilized. If size of advertising does not permit use of the VA seal, then text identifying "U.S. Department of Veterans Affairs" must be utilized. Social media advertising, if from a VA account, requires a referring URL; at a minimum. Audio only advertising should mention the "U.S. Department of Veterans Affairs" or refer to the appropriate VA website once per advertisement.
 - (4) Recruitment for Participants in a Medical Research Study. Any paid recruitment efforts, to include purchase of promotional items, meant to assist in procuring medical research candidates or participants must follow this advertising handbook. Proof of Research and Development Committee approval as well as Institutional Review Board authorization is required. VHA will provide additional guidelines for this kind of advertising.

- (5) HR Recruitment. Any paid recruitment efforts, to include promotional items, meant to assist in procuring candidates for VA employment must follow this advertising handbook.
- (6) Advertising Through Contracts Valued at One Million Dollars or More. This applies to either a single year contract or one with option years. If the proposed advertising will be through a contract award that includes base plus option years, where the total value of the base plus option years exceed one million dollars, the proposing entity may submit a single request for approval of the entire contract and option years. When requesting approval, the requesting entity will follow the same process required for any other advertising submission. Once the request is approved by the applicable Under or Assistant Secretary, OPIA will host a formal VA Advertising Oversight Board (VAAOB). The requesting entity will provide subject matter expert(s) to present the proposal and answer questions in-person, or telephonically if otherwise unavailable. This will ensure all facets required for preparing the campaign are met e.g., costs, measurements, reporting, etc. It is strongly recommended that the Under Secretaries and Assistant Secretaries maintain appropriate records as to dollars obligated, measurements, and metrics information for response to Department or Congressional queries.
- (7) Advertising Through Contracts Valued at Less than One Million Dollars that Contain Option Years. If the proposed advertising will be through a contract award and includes a base plus option years, the proposing entity may submit a single request for approval of the entire contract. Once approved, the entity may proceed with the approved base year, but prior to the exercising of each option year, the entity must submit supplemental information, through the requestor's Administration or Staff Office, for OPIA review and data collection. These option year submissions will consist of a memorandum, signed by a member of the senior executive service (SES) who oversees the budget funding the effort, and the memo will contain the following information: the option year, amount, FY funds utilized, and in text and through attachments will include the metrics collected that evidence the level of success in attaining the requestor's advertising goals as well as the justification for exercising the option year. Any changes in the option year's advertising should be noted and be based on reasonable conclusions following the analysis of collected metrics. Monetary expenditures should not be repeated without variation, once evidence exists showing the previous year was unsuccessful.

- (8) Origination of Submission. The organization submitting the advertising proposal will be the organization whose budget will fund the advertising.
 - (a) In situations where there is a transfer of funds from one organization to another, the transferring organization shall not mandate what or how the receiving organization advertises, unless the transferring organization is the one submitting the proposal. Requiring the receiving entity to submit the proposal in such a circumstance would circumvent the purpose of the advertising threshold approval requirements. However, if the receiving entity has some authority over what and how they will advertise, then the receiving entity will be responsible for the advertising proposal submission.
 - (b) If the transfer of funds is dependent on an open call for advertising proposals where only selected organizations receive the transfers based on the content of their proposals, then the receiving organization, having determined the purpose and method of the advertising will be responsible for the advertising proposal.
 - (c) Advertising where funding may originate from outside VA, but VA has authority to direct where and how the money will be spent for the advertising will still require an advertising proposal submission.
 - (9) Donated Advertising. Advertising paid for with non-VA funds or provided pro bono still requires notification to the approval authority identified in this handbook. Notification shall include name of the advertising campaign; purpose of campaign; source of non-VA funds; value of the advertising, dates of the advertising campaign run; and target markets for the campaign.
 - (10) Hybrid Donated/Paid Advertising. In instances where the final advertising campaign, including paid media costs, creative, or other preparatory work, are funded through a mixture of VA funds and external entities' funding (including in-kind donations), such as with Ad Council campaigns or PSAs, an advertising proposal must be submitted through the designated approval authority; as identified in this handbook. Use the total of VA funds and non-VA funds to determine the appropriate approval authority.
- e. **Prohibitions and Limitations.** The intent of all advertising can only be informational in nature. Advertising SHALL NOT include:

- (1) Prohibited Sources. VA directed advertising cannot be paid for by a publicity expert (i.e., contractor or consultant) or any other prohibited source. However, VA may enter into a federal contract with a contractor where the contractor will purchase advertising, so long as VA maintains final approval over all advertising, exercises all inherently governmental functions, and the contract is overseen by VA personnel.
- (2) Promotion. Advertising shall not be created for the purpose of publicity, propaganda, or lobbying. Advertising by VA shall also not appear to support or endorse private entities offering commercial benefits (such as special promotions on Veterans Day, discounts, etc.) for Veterans or VA employees.
 - (a) Self-aggrandizement. Advertising shall not occur that is for the purpose of being self-congratulatory. Advertising cannot overpromise or position VA as incomparable to other agencies. This includes unduly emphasizing the importance of the agency, some part of the agency, or VA officials. Additionally, inaccurate portrayal of consumer usage, opinion, or experience, or advertising used to generate false impressions of services, benefits, resources, commodities, etc. is prohibited. However, it is permissible to utilize purely factual information in advertising.
 - (b) For example, it is permissible to identify that specific services have improved or attained a particular standard, as awarded by VACO or a third-party audit. If such information is utilized, the awarding entity must be identified.
- (3) Propaganda. Advocating a particular viewpoint or advertising that is partisan in nature is prohibited.
- (4) Splitting. Breaking advertising into smaller pieces in order to evade approval thresholds is prohibited.
- (5) Endorsement. Unless permitted by a VA-legally reviewed signed agreement, VA may not imply partnership or show favoritism for a non-VA entity. Advertising shall not contain information from an individual, firm, or corporation that implies favoritism for commercial products, commodities, or services. VA may advertise a joint research study, of which VA is a part, a hiring effort or event of which VA is a part, or a third-party event where VA is a participant. However, VA must make clear in such instances that VA is merely “participating” or “in attendance,” to avoid any possible misperception of endorsement (e.g., community runs, local sports teams, non-federal events, or sponsored job fairs).

- (6) Underwriting. Advertising shall not be conducted through underwriting (i.e. a direct payment for advertising to organizations such as Public Broadcasting, NPR, etc.). The exception to this prohibition is that VA may contract for advertising with such entities so long as all federal contracting rules are followed.
- (7) VA Seal. Advertising products shall not contain both the VA seal and a non-VA entity trademark or logo, unless permitted by a VA-legally reviewed signed agreement that permits the combination. Individual exceptions to this policy may only be granted by the Office of the Secretary.
- (8) Personal Viewpoints. Advertising shall not include or promote personal views of VA leaders or employees. Use of Veterans' personal experiences and opinions regarding VA benefits and services is permitted. All advertising must correlate with VA's agency-wide position, values, and messaging.
- (9) Vulgarity or Derogatory Advertising. Advertising shall not include vulgar or derogatory language, images, or connotations.
- (10) Personally Identifiable Information (PII) collection. Advertising shall not possess the capability to collect information that locates or identifies a specific individual or exposes PII. Electronic tracking (i.e. cookies or tags) may be used as a part of advertising, but only for the purpose of collecting metrics or tracking where individuals explore online resources. Such information may only be used in aggregate to allow for refinement of advertising efforts and information resources.
- (11) Images and Likeness. Whenever possible, use real Veterans and VA employees in VA Advertising. Advertising shall not utilize the image or likeness of any individual unless the individual has agreed to such usage. A signed waiver indicating that such permission has been given (e.g. VHA Form 10-3203 – Consent for Production and use of Verbal or Written Statements, Photographs, Digital Images, and/or Video or Audio Recordings by VA) is required. Paid actors or individuals in commercially available images need not provide such waivers.
- (12) Unlawful copyrights and trademarks. Advertising shall not infringe on copyrights and trademarks. All inclusion of copyrighted or trademarked materials must be documented as being authorized by the owner and properly cited.

- f. **Process.** Regardless of the type of advertising, all advertising must be submitted for approval and will adhere to the following procedure in order to obtain such approval:
- (1) Every submission must be accompanied with the information required by each Administration or Staff Office. Each submission must include a description of the campaign, its estimated cost, the purpose and aims of the campaign, the proposed source of funding and the tools that will be used in accomplishing the campaign's goals. See section 2(c) of this handbook, above, for the complete list.
 - (2) It is recommended that the VA Regional OPIA office be provided a final copy of the proposed advertising for their awareness.
 - (3) Depending on an advertisement's expenditure amount, follow the process below, based upon the corresponding threshold, to obtain approval: Threshold amounts are determined by the cumulative amount proposed from a facility or program office budget, utilizing the same FY funds, for the same purpose-driven advertising. When making this determination, the total amount resets to \$0 when new fiscal year funding is utilized. For example, all a facility's advertising conducted around the topic of homelessness, regardless of when the advertising occurs, shall be considered in the aggregate if using the same FY funds.
 - (a) **\$1- \$100,000 (if reach and content is not national in scope – association or medical publications are permitted):** The Under Secretaries or Assistant Secretaries will approve or deny requests. This authority to approve up to \$100,000 may not be delegated below the Under or Assistant Secretaries' Chief of Staff (or equivalent). The Under Secretaries or Assistant Secretaries may delegate approval authority of amounts not to exceed \$50,000 to the member of the Senior Executive Service (SES) from whose budget the advertising will be funded, an individual serving above that SES and within their supervisory chain, or an SES-led office established within each Administration or Staff Office which maintains responsibility to provide advertising policy SMEs and will oversee the administration's advertising efforts. The administration's identified approving authority shall be responsible for maintaining awareness of, and certifying compliance with, all advertising related legal and policy requirements. Further, the identified approving authority is responsible for integrating into their reviews, any future changes, additions, guidance, or legal/policy opinions, as they occur.

- (b) **Proposal Amounts exceeding \$100,000 and up to \$500,000 or under \$100,000 if reach or content is national in scope (excluding association or medical publications):** The Under Secretaries or Assistant Secretaries will approve and then submit to OPIA for presentation to the VA Advertising Oversight Board (VAAOB) for technical review. The VAAOB will recommend approval or will return proposals for clarification. If the proposal is approved, the VAAOB will provide to the Assistant Secretary OPIA for final approval. Following submission to OPIA, this portion of the review and approval process has a target completion of 14 days.
 - (c) **Proposal Amounts exceeding \$500,000:** The Under Secretary or Assistant Secretaries will endorse and then submit to OPIA for presentation to the VAAOB for technical review. The VAAOB will review and if they recommend endorsement, submit to the A/S-OPIA, who will review. If the A/S-OPIA endorses the proposal, OPIA National Veterans Outreach office will return the endorsed advertising request package to the requesting Administration or Staff Office for their entry into VIEWS and submission to the VA Chief of Staff, who will either approve or disapprove/return the proposal.
- g. **Tracking/Data Capture.** Almost all VA advertising costs are paid for using tax dollars. In accordance with the 2018 House Appropriations Committee Report, page 84, VA is responsible to report advertising expenditures to Congress. It is important to serve as good stewards of taxpayer money and track the impact of advertising to justify the expenditure in resources, both financial and human. Every advertising method – be it print, electronic (TV and radio), or online – should be tracked to capture relevant metrics; such metrics could include the number of times an ad was seen and the demographics of the viewers. This data does not rely on or need to capture PII. Capturing this data is part of the advertising process and shall be reported, based on content and form approved by OPIA.
 - (1) Quarterly FY Amounts Spent - High-Dollar Advertising Reporting: Administrations and Department staff offices shall capture all advertising campaigns that exceeds \$2M in actual spending during an FY Quarter and then report such expenditures, each quarter, to OPIA's Veterans National Outreach Office for their required reporting to the Committees on Appropriations of both Houses of Congress.

- (2) Quarterly FY Amounts Approved for Spending - Advertising Reporting: Administrations and Department staff offices shall capture amounts of all approved advertising packages originating from within organizations, regardless of amount, but approved during a specified FY Quarter, and then report such approved expenditures, each quarter, to OPIA's Veterans National Outreach Office.
- (3) Annual Reporting – Amounts Approved for Spending: Following the start of a new FY, administrations and staff offices shall consolidate into a single report all advertising dollars that had been approved for spending during the previous FY and will report this data to OPIA's Veterans National Outreach Office, in a format that OPIA has previously approved.

3. RESPONSIBILITIES.

- a. **Office of the Secretary of Veterans Affairs (OSVA):** OSVA will review and determine whether to approve or return advertising packages that exceed approval threshold amounts for the Assistant Secretary for Public and Intergovernmental Affairs.
- b. **Under Secretaries, Assistant Secretaries, and Other Key Officials** shall:
 - (1) Ensure that requirements identified within this handbook are followed within their organizations.
 - (2) Purchase, or approve subordinates' proposals to purchase, advertising for amounts up to the assigned expenditure thresholds.
 - (3) Ensure that campaigns for areas under their jurisdiction will not be split into smaller pieces in order to evade existing thresholds.
 - (4) Request, through OPIA, the permission to purchase advertising for amounts in excess of their own expenditure thresholds.
 - (5) Maintain copies of approved advertising packages and will track, archive, and provide data as identified in this handbook, or as requested by OPIA, in a timely manner.
 - (6) Collect and consolidate, on an annual basis, amounts approved for advertising spending from the previous FY. This information will be submitted within a single report to OPIA's Veterans National Outreach Office, in a format that OPIA has previously approved.

- (7) Monitor and collect, quarterly FY advertising spending that exceeds \$1M per campaign in actual spending during an FY Quarter and then report such expenditures, each quarter, to OPIA's Veterans National Outreach Office for their required reporting to the Committees on Appropriations of both Houses of Congress.
 - (8) Delegate in writing or through a subordinate policy, any of the above responsibilities under their authority.
- c. **Assistant Secretary for Human Resources and Administration/ Operations, Security, and Preparedness** in addition to responsibilities in Para 3 b above may purchase advertising for VA Central Office and Special Staff personnel recruiting and will provide data to OPIA for reporting and approval.
- d. **Assistant Secretary for Public and Intergovernmental Affairs (A/S-OPIA), in addition to responsibilities in Para 3 b above:**
- (1) May purchase advertising to inform and promote the awareness of VA benefits and services provided under laws administered by VA.
 - (2) Is responsible for this advertising handbook, technical standards, policy updates, and adjudicating any advertising policy related questions.
 - (3) Is responsible for compiling reports related to VA paid advertising, which will include the objectives of each advertising campaign, the costs of the campaign, and any other data the A/S-OPIA believes necessary. Copies will be provided to all members of the VAAOB.
 - (4) Will serve as the as the Chair and proponent for the VA Advertising Oversight Board (VAAOB).
 - (5) Will decide on the appropriateness of proposals from other administrations and VACO staff offices. The A/S-OPIA will use criteria that include but are not limited to: appropriateness of the campaign, compliance with applicable VA graphic standards, other campaigns that are underway, effective use of VA resources, and the likelihood that the campaign will have its intended effect. This responsibility can be delegated, in writing, to the Deputy Assistant Secretaries for Public Affairs or to the Director of the National Veterans Outreach Office.
 - (6) For advertising packages that do not exceed the A/S-OPIA approval threshold, A/S-OPIA will either approve the submitted

advertising campaign request or return it to the requesting entity for clarification or modification.

- (7) For advertising packages that exceed the A/S-OPIA approval threshold, OPIA will determine whether to endorse the proposal. OPIA endorsed proposals will be transmitted by the OPIA National Veterans Outreach office back to the requesting Administration or Staff Office. The requesting office is responsible for entering into and tracking through, VA Integrated Enterprise Workflow Solution (VIEWS) and submitting to OSVA for their review and approval.

e. **VA Advertising Oversight Board (VAAOB):**

- (1) The Secretary directed establishment of a VAAOB to review the Department's paid media advertising activity and to approve major campaigns (those advertising efforts that involve national media outlets - excluding association or medical publications) or expenditures exceeding \$100,000.
- (2) The A/S-OPIA will serve as Chair and proponent for the meetings.
- (3) The VAAOB is comprised of Subject Matter Experts (SMEs), appointed by each Administration's Public Affairs Office and is chaired by the Executive Director for Strategic Plans and National Veterans Outreach, OPIA.
- (4) The role of the VAAOB is to review and make recommendations to OPIA leadership for all advertising proposals that exceed administration or departmental staff office threshold amounts. The board's focus is to ensure that all required information identified in this handbook is addressed.

- f. **The General Counsel** in addition to responsibilities in Para 3 b above, shall review OPIA, administration, or departmental staff office submitted advertising actions for legal sufficiency and advise the Office of the Secretary as to whether there are any legal impediments to proceeding with the advertising as proposed. The General Counsel shall also provide guidance to any administration or departmental staff office request to review an advertising issue or pending question that is not otherwise addressed in this handbook.

4. DEFINITIONS.

- a. **Advertising.** For the purpose of this handbook, advertising and related terms are defined by OPIA as:

- (1) All externally produced outreach activities procured through purchases by, or directed by, VA for the development, production, and distribution of messaging meant to connect eligible individuals to available VA benefits or services, promote efforts to hire VA employees, or promote efforts to recruit participants for VA medical research studies;
- (2) Any purchased, non-VA produced, collateral materials;
- (3) The hiring of firms (any external company or group) conducting any creative work, market research, or ad buys themselves.
- (4) Advertising includes, but is not limited to:
 - (a) Market research. If in preparation for advertising, this includes any payments made for investigation to determine where Veterans are located, optimal modalities to reach the cohorts desired, and the best methods of messaging to achieve the desired effect.
 - (b) Non-Traditional Advertising – Efforts to utilize advertising not otherwise described within this directive. Receiving approval to advertise through a non-traditional source will require additional justification that supports its use. Justifications may include market research, target audience capture, or metrics from other entities who have utilized this type of advertising.
 - (c) Online / Digital. Any advertisement that appears in online media or the electronic version of newspapers and magazines, such as *The New York Times* online. Online advertising is different than print advertising, even if the ad is also in the print version of the publication; often the media outlet (e.g., *The New York Times*) will allow an advertiser to purchase an ad for print and online display.
 - (d) Out of Home (OOH). Any advertisement that is viewed outside the house, which includes billboards, bus backs, bus stops, inside buses, subway stops/stations, inside subways, spaces at sports venues, and any other advertisement that is viewed outside the home.
 - (e) Print Advertising. Any advertising that appears in traditional newspapers, magazines, journals, and other hard-copy publications.
 - (f) Public Service Announcement (PSA). A message designed to inform, affect attitudes, or spur action from the target

audience. PSAs receive free airtime or print placement, sometimes referred to as “donated media,” and therefore proves to be an efficient, effective, and economical way to reach a broader audience. (NOTE: It is important to remember that, while the media time is free, the production costs may not be).

- (g) Search Engine Promotion. This includes purchases to promote results on internet search engines results.
- (h) Social Media Advertising. Any advertisement on social networks and sites such as Facebook. This includes purchases to promote posts on social media sites. Examples include highlighting, featuring, or raising search result rankings.
- (i) Special Events. Special events take many forms and include, but are not limited to:
 - (5) Conferences/Exhibits – generally large in scale and structured as forums for providing information about important or timely topics.
 - (6) Service Events – deliver services or benefits to Veterans or other stakeholders during the event, such as health fairs, Stand Downs, health screenings, and career fairs.
 - (7) Community Events – raise awareness of Veterans, or other VA beneficiaries, within a community. These may include events such as Welcome Home and Yellow Ribbon events.
 - (8) Other Events – includes events such as VA’s Winter Sports Clinic and National Veterans Creative Arts Festival.
 - (9) Outreach. Outreach is defined in 38 USC § 6301. “Outreach” means the act or process of reaching out in a systematic manner to proactively provide information, services, and benefits counselling to Veterans, and to the spouses, children, and parents of Veterans who may be eligible to receive benefits under the laws administered by the Secretary, to ensure that such individuals are fully informed about, and receive assistance in applying for, such benefits. Outreach covers a variety of activities. For more information, see the OPIA Outreach Directive. Note that although advertising is part of outreach, not all outreach is advertising.
 - (10) Personally Identifiable Information (PII). PII is defined by Office of Information and Technology and refers to information that can be used to distinguish or trace an individual's identity, such as his/her

name, social security number, biometric records, etc. Whether accessed alone or combined with other PII, this information can be used to identify and track a specific individual, such as date and place of birth, mother's maiden name, etc.(g) Remarketing. In email and online marketing, this refers to the process of reengaging a user based on a recent interaction. Remarketing uses cookies.

- (11) **Promotional Items – Including Coins.** Promotional item purchases are permitted as a subset of advertising, and governed by this handbook, so long as they are inexpensive items that are acquired to support advertising efforts, as such terms are defined within this handbook (to increase awareness of VA benefits, services, hiring efforts, or research study recruitment). Permission to purchase will be granted only if the request follows the process and requirements identified in this handbook, the VA Financial Policy Volume II. Ch.4, and addresses any other requirements that OPIA may identify and convey to the Administrations and Staff Offices following OPIA's consultation, if necessary, with OGC. Further, the designated approving authority may impose additional, but not fewer requirements.
- (a) All items must identify VA as the source of the item, provide a method of contact, and the items must contain a call to action, space permitting.
 - (b) Distribution of promotional items to VA or Federal employees for their personal use is prohibited. General giveaways, swag, and 'thank you' items to external stakeholders are not permitted. Items meant as gestures of goodwill are only authorized for purchase by the VA Secretary.

5. REFERENCES.

- a. 38 U.S. Code § 532. Authority to advertise in national media; VetStar Award Program.
- b. 5 U.S. Code § 3107 - Employment of publicity experts; restrictions.
- c. 18 U.S. Code § 1903 – Lobbying with appropriated monies.
- d. 31 U.S. Code § 1352 - Limitation on use of appropriated funds to influence certain Federal contracting and financial transaction.
- e. 38 U.S. Code § 703 (d) – Miscellaneous authorities respecting employees.

- f. 38 USC § 6301 – Purpose; definitions
- g. VA Office of Financial Policy Volume II, Chapter 4 – Appropriations, Funds, and Related Information.
- h. VA Handbook 8500 -VA Public Affairs Program2018 House Appropriations Committee Report, page 84