

Timeline for VHA Action Plan for NPC Oversight

July 31, 2008	DUSHOM	<ul style="list-style-type: none"> ○ Identify which NPC employees did not comply with federal laws, regulations, and VA policies applicable to conflicts of interest ○ Take necessary steps to ensure complete compliance
July 31, 2008 then annually	Senior Level Administrator	<ul style="list-style-type: none"> ○ Consult with NPC directors on a regular basis to ensure their understanding of VA policies, particularly with regard to conflict of interest rules and regulations ○ Require financial controls ○ Visit NPCs on a regular basis to discuss these policies and any difficulties the NPC director may be having implementing policies
July 31, 2008	NPPO	<ul style="list-style-type: none"> ○ Annually collect the require signed statements of the executive director of each corporation, which verify that each corporation director and employee has certified awareness of the conflict of interest laws and regulations referred to in paragraph 7366 (c)(1) ○ Monitor a sample of the corporations each year to determine whether the underlying verifications of the directors and employees of the corporation indeed exist and were collected by the corporation and support the executive director's annual statement
July 31, 2008	NPPO OGC	Identify, develop and implement any additional administrative controls to enforce NPC compliance on issues related to conflict of interest, which are found to be advisable
September 30, 2008.	ORD	<ul style="list-style-type: none"> ○ Hire NPPO senior level administrator and ○ Hire NPPO staff
September 30, 2008.	Senior Level administrator and staff	<ul style="list-style-type: none"> ○ Provide policy guidance to NPCs ○ Provide overall oversight to <ul style="list-style-type: none"> ○ NPPO ○ Steering Committee ○ Expert Working Committee ○ Support the NPOB
September 30, 2008	Steering Committee	<ul style="list-style-type: none"> ○ Develop and agree on specific policy that clearly defines the oversight authorities of the VA Nonprofit Corporation Oversight Board (NPOB), VHA Chief Financial Officer (CFO), and VA Non-Profit Research and Education Corporation Program Office (NPPO) and ○ Develop policy that will enable the NPOB, CFO, and NPPO to effectively provide programmatic direction and clarification to the NPCs

September 30, 2008	VHA Chief Financial Officer Deputy Under Secretary for Health for Operations and Management (DUSHOM)	Exercise financial oversight of all VA NPCs through a tiered structure using the current VISN and medical center administrative structures to ensure compliance with financial policies and guidance by all VA NPCs
September 30, 2008.	Multi-Disciplinary Expert Working Committee	<ul style="list-style-type: none"> ○ Focus on immediate, short-term recommendations for improving NPC oversight and controls ○ Report to VA Nonprofit Research and Education Corporation Program Office (NPPO) ○ Present analyses and recommendations to the Steering Committee ○ If approved by Steering Committee, present final recommendations to the NPOB for implementation through the medical centers and VISN
September 30, 2008.	Steering Committee	Develop and agree upon specific policy that will enable the NPOB, CFO, and NPPO to effectively provide programmatic direction and clarification to the NPCs
September 30, 2008.	VISN Committees	<ul style="list-style-type: none"> ○ Conduct semi-annual independent management and financial reviews are conducted for each NPC located within the VISN. These reviews will include: <ul style="list-style-type: none"> • An assessment of compliance with financial policy guidance • An assessment of requirements related to internal control and conflicts of interest • Findings and recommendations in annual independent audit reports for each NPC • Submissions for the annual report to Congress • Management of funds • Safeguarding of Equipment ○ Report results of review through the DUSHOM, the VHA Chief Financial Officer, the steering committee, and an expert working committee formed by the VHA Office of Research and Development (ORD) to the VA Nonprofit Corporation Oversight Board (NPOB)
December 31, 2008	ORD	<ul style="list-style-type: none"> ○ Develop a charter to convene a steering committee in order to address underlying structural issues related to governance and finance and ○ Formulate specific policy that clearly defines the oversight authorities of the VA Nonprofit Corporation Oversight Board (NPOB), VHA Chief Financial Officer (CFO), and VA Non-Profit Research and Education Corporation Program Office (NPPO)
December 31, 2008	Steering Committee	Address underlying structural issues related to governance, including conflicts of interest, and finance
December 31, 2008	Under Secretary for Health	After policy development – <ul style="list-style-type: none"> ○ will make the necessary recommendations to the Secretary, VA and ○ direct ORD to update VHA Handbook 1200.17 to incorporate these new authorities by December 31, 2008

December 31, 2008	ORD VHA Office of Finance Office of General Counsel	Revise and update VHA Handbook 1200.17 to clearly define minimum control requirements for all NPCs
December 31, 2008	VHA	<ul style="list-style-type: none"> • Issue guidance to the field defining minimum control requirements through ORD conference calls, the VHA Intranet, and via written communications as necessary
December 31, 2008	ORD VA Employee Education System	<ul style="list-style-type: none"> • Deploy a web-based education program entitled “ Internal Controls for Nonprofit Research and Education Corporations • Develop a directive to announce training for VA NPC statutory board members and other participants as appropriate • Under Secretary for Health with formally release program, emphasizing its importance and outlining the necessary requirements to complete the training