

Department of Veterans Affairs



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From: Dr. Michael Harris-Love, P/TBI Fellowship Deputy Program Director, and Health Science/Exercise Internship Site Director, DC VAMC

Subject: Response to VA Secretary call for recommendations: the 2017 VA National Academic Affiliations Council meeting

To: Dr. Karen M. Sanders, Deputy Chief Academic Affiliations Officer, Veterans Health Administration

The VA Secretary, Dr. David J. Shulkin, issued a call for recommendations to address barriers to academic affiliations and training at the VA per his memorandum released on March 24, 2017. The following comments are provided in response to this memorandum and may be incorporated into the planned discussion at the VA National Academic Affiliations Council meeting held on July 12-13, 2017 in Washington, D.C.

The recommendations and comments herein were compiled by the leadership of the training programs at the DC VAMC involving OAA Interprofessional Polytrauma and Traumatic Brain Injury Rehabilitation Fellows, and Health Science/Exercise Interns from local academic affiliates. Please note that some comments were obtained from representatives of our academic affiliate partners and may not represent the views of the DC VAMC or our fellowship program staff:

- I. ACADEMIC AFFILIATION AGREEMENTS (VA FORM 10-0094g)
 - a. Frequently requested changes to the contractual language in the VA academic affiliation agreement by the legal staff at candidate academic institutions:
 - i. Provisions of the Federal Employees Liability Reform and Tort Compensation Act, 28 U.S.C. 2679 (b)-(d) (10-0094g, pg. 1)
 1. Some institutions request that the inclusion of “faculty” is deleted from the agreement, and that only “trainees” are listed under the provision.
 2. *Recommendation:* consider revising 10-0094g and allow academic facilities to select if “faculty” and/or “trainees” are covered by the provision.
 - ii. Enable faculty appointments for VA staff (10-0094g, pg. 1, Section 1.B)
 1. Most institutions request the deletion of this clause from the agreement.
 2. *Recommendation:* allow for an “opt in/opt out” choice for this clause.
 - iii. Appoint VA staff and appropriate school program faculty to the VA Partnership Council and its subcommittees... (10-0094g, pg. 2, Section 2.K)
 1. Most institutions request the deletion of this clause from the agreement.
 2. *Recommendation:* allow for an “opt in/opt out” choice for this clause.

- iv. Academic partners frequently request additional student protections during a training period in the event that an academic affiliation is ended:
 - 1. The requested addition: "If this affiliation agreement is terminated during a student's training experience, then the student will be allowed to continue and complete the training experience except if the termination is associated with the student's behavior or competency."
 - 2. *Recommendation*: the requested provision to protect the students' interests during a training rotation or internship is reasonable. Add this clause to the revised 10-0094g form.
- b. Allow for pre-approved institutional flexibility in the academic agreement without the need for additional review by the VA Office of the General Counsel
 - i. Provide "opt in/opt out" clauses as identified in Section 1 of this document.
 - ii. If the VA Office of the General Counsel must approve the aforementioned revised or added clauses, then provide a modifiable version of the 10-0094g form.

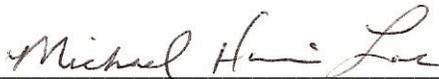
II. THE LOCAL VA APPOINTMENT OF OAA ADVANCED FELLOWS

- a. Streamline the candidate approval and appointment process
 - i. The process of appointing an OAA Advanced Fellow features no less than 25 steps (not including the recruitment efforts or writing the application; see our attached internal checklist)
 - 1. OAA Advanced Fellows do not constitute a full-time, permanent FTE or require a salary line derived from medical center funds. Moreover, the direct supervision of an OAA Advanced Fellow requires Service Chief-level management regarding the allocation of supervisory time by staff, and the provision of space and resources for the fellow. Why does this process require Medical Center Director (MCD) level approval?
 - 2. *Recommendation*: OAA Advanced Fellow appointments currently require the signatures of the Clinical Service Chief, the Department of Education Official, and the Fellowship Program Director; eliminate the requirement for the MCD signature (a 2 to 4 week process) and provide only an informational memorandum to the medical center leadership.
- b. ****Clinical privileges for licensed fellows on research traineeships**
 - i. There is confusion between the credentials and qualifications of clinical trainees and research trainees that have completed their clinical education and have obtained the licensure/certification required for independent clinical practice.
 - 1. Associated Health Professionals appointed via an OAA research traineeship are allowed to maintain clinical privileges and see a limited number of patients (per VHA HANDBOOK 1400.07). However, Service Chiefs have been informed that a supervising clinician has to sign the CPRS notes of these fellows (despite the fact that they could be hired immediately within the VA and practice independently). We suspect that this rule may be in place for the large majority of OAA Advanced Fellows that have clinical trainee positions.

2. *Recommendation:* All qualified OAA Advanced Fellowship research appointees should be allowed to engage in independent clinical practice if the Vetpro credentialing process confirms that all licensure/certification requirements have been fulfilled.
- c. Allowing the VA to compete for the best post-doctoral fellows
 - i. Applications for OAA Advanced Fellowship research appointments cannot be submitted until after candidates have an earned doctoral degree that is confirmed through the Vetpro credentialing process. In comparison, most students in pursuit of a post-doctoral position secure a contingent appointment at least one semester prior to the graduation date (which allows for their smooth transition following graduation and a host of other advantages). As a result, the VA OAA Advanced Fellowship research appointment pathway does not allow for us to compete for the best post-doctoral students.
 - ii. *Recommendation:* Allow for the early (e.g., up to 6 months) OAA application submission, review, and approval of research traineeships that are contingent on the final Vetpro confirmation of the earned doctoral degree. The early review option would apply ONLY to research appointments.
 - d. The *OAA Support Center* website has been a great help to the application process; we encourage continued support and further development of this important resource.

Thank you for your longstanding support of the academic affiliations between VA medical centers and their university partners. In addition, the OAA Advanced Fellowship program has provided invaluable support to the clinical and research initiatives that enhance the care of Veterans at the DC VAMC. We appreciate the opportunity to contribute to the pending dialogue at the 2017 VA National Academic Affiliations Council meeting.

Sincerely,



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