



VHA Office of Academic Affiliations (10X1)

Guide to Completing the Trainee Qualifications and Credentials Verification Letter (TQCVL)

For Both Affiliate and VA Program Directors

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Overview:

VHA appoints and trains over 120,000 health professions trainees (HPTs) every year. The Office of Academic Affiliations (OAA) oversees all health care training programs and trainees. VHA plays a leadership role in defining the education of future health care professionals that helps meet the changing needs of the Nation's health care delivery system.

HPT is a general term used to describe individuals appointed to temporary positions in one or more VHA medical facilities performing clinical or research training experiences to satisfy program or degree requirements. HPTs can be either VA-paid or Without Compensation (WOC). Trainee academic levels include undergraduate, graduate, and post-graduate students, interns, residents, fellows, and VA advanced fellows; and pre- and post-doctoral fellows.

Background:

To qualify for VA training, each HPT must first be listed on a Trainee Qualifications and Credentials Verification Letter (TQCVL). A TQCVL from the director of the sponsoring (VA or non-VA) program must be submitted to the VA Facility Director through the VA Designated Education Officer (DEO) prior to appointment.

The TQCVL confirms that specific information has been verified by the sponsoring entity for each trainee listed. And that the HPT is eligible for Federal appointment. All trainees who will receive training at a VA facility must be listed on a TQCVL. Multi-year programs must submit a TQCVL every year listing all trainees in the program. For example, an Internal Medicine resident would be listed on the TQCVL for 3 consecutive years, or until they complete the program.

The TQCVL confirms that an HPT is:

- enrolled in or accepted into the accredited or VA sponsored training program and has had primary source verification of appropriate qualifications and credentials as required by the admission criteria of the training program;
- qualified, and has the required credentials, to participate in the accredited training program as agreed to by the sponsoring institution, affiliated participating institutions, and the VA;
- eligible for appointment to a Federal Government position;
- physically and mentally fit to perform the essential functions of the training program; and
- immunized following current CDC guidelines and VHA policy for healthcare workers to protect themselves, other employees and patients while working in a healthcare facility.

A TQCVL is required for all HPTs. Stipend-paid HPTs must be US citizens, therefore non-US citizen documentation only pertains to WOC HPTs.

A TQCVL is required for all HPTs. All VA appointed stipend-paid and WOC trainees are protected from personal liability while participating in training at a VA healthcare facility. Protection is provided under the Federal Employees Liability Reform and Tort Compensation Act 28 U.S.C.2679 (b)-(d). The liability, if any, of the United States for injury or loss of property, or personal injury or death shall be governed exclusively by the provisions of the Federal Tort Claims Act.

A TQCVL confirms that the trainees listed are physically and mentally fit to meet the requirements of their training program. The letter attests to the HPT's health status and ensures that the trainee has appropriate tuberculosis and immunization screenings recommended for healthcare workers, as per

State and/or CDC requirements and VHA policy. A fully executed TQCVL serves as documentation of these requirements and is accepted in lieu of the pre-placement examination and evaluation.

(Based on: OHRM Bulletin - HR Professionals Webinar: Policy Updates to VA Handbook 5019, Employee Occupational Health Service (Thursday, November 9, 2017) and HR Questions and Answers, Pre-placement Physical Exams 11.9.17)

Trainees listed on the TQCVL must meet all criteria stated in the document as is appropriate to each individual. If a trainee does not meet these criteria they should not be listed on the TCQVL. Trainees are not permitted to participate in a clinical rotation until they meet the criteria on the TQCVL and, as applicable, until reasonable accommodations are made to meet these requirements. Only after a trainee meets all criteria may a new TQCVL be submitted with their name added to the HPT list. Program directors should inform the VA DEO of any pending issues for a specific HPT. Unqualified trainees MUST NOT be listed on the final TQCVL.

Once a TQCVL has been submitted to the DEO, a program director has up to 72 hours to inform the VA DEO of any changes in the academic status of individual trainees, adverse actions that affect the trainee appointment, or changes in the trainee health status that pose a risk to the safety of trainees, other employees, or patients.

The TQCVL verifies the following items for all listed trainees:

Non-US Citizens:

VA appointment of all non-US citizen HPTs must be approved by the Medical Center Director or Designee. The Medical Center Director's acceptance signature on the TQCVL denotes approval. Non-US citizens are not authorized to receive a stipend and must not be appointed in a VA paid status. Non-US citizen trainees must meet all program enrollment criteria. Programs must ensure that a US citizen trainee will not be displaced by appointing a non-US citizen at the VA. Non-US citizens who are not legally entitled to reside, or work, in this country are not eligible for Federal appointment.

Prior to appointment of a non-US citizen the following must be confirmed:

- Documented proof of immigrant, non-immigrant, or exchange visitor status:
 - Appropriate visa (J-1, J-2, H-1B, H-4, E-3) status; (other visas require discussion between DIO and DEO and may need decision of VA General Council); or
 - Permanent Resident Card (formerly "Green Card"); or
 - Deferred Action for Childhood Arrivals (DACA) trainee, Employment Authorization Document (Form I-766).

HPTs must have a US social security number (SSN) prior to beginning the VA pre-employment, onboarding process. HPTs not eligible to apply for an SSN are not eligible for a VA appointment and must perform their clinical training at a non-VA facility.

Appointment of non-US citizen trainees must be approved by the Medical Center Director or Designee. Acceptance and signature on the TQCVL denotes approval. Otherwise a or separate approval letter must be obtained and filed in the onboarding case file.

Selective Service System:

Federal law requires that most males living in the US between the ages of 18 and 26 register with the Selective Service System. This includes individuals who are US citizens, non-US citizens and dual

nationals, regardless of their immigration status. Male for this purpose is defined as those individuals born male on their birth certificate regardless of current gender. *Only male, non-US citizens on a student or visitor visa are exempt from registration.* Males required to register, but who fail to do so by their 26th birthday, are **barred from any position in any Executive Agency**. Program Directors can ask trainees to visit <https://www.sss.gov> to register, print proof of registration or, if not registered, apply for a status information letter (SIL). The SIL denotes one’s requirement for registration, and, if applicable, exemption from the registration requirement.

<p>Male Under Age 26</p>	<p>https://www.sss.gov Print proof of registration letter OR Register and print proof of registration letter</p>
<p>Male Over Age 26</p>	<p>https://www.sss.gov Print proof of registration letter OR Apply for Status information letter (SIL)</p>

Males who are required to register but who failed to do so by their 26th birthday are **barred from any position in any Executive Agency**.

Personal Identity and Credentials Verification:

- All trainees will be issued a Personnel Identify Verification (PIV) credential. Trainees must possess and provide two, official pieces of government ID. The trainee’s full, legal name, as it appears on the IDs, will be the name submitted to VA on the TQCVL. A list of acceptable IDs may be found on the following VA website. <https://www.oit.va.gov/programs/piv/media/docs/IDMatrix.pdf>
 - States have begun issuing Secure Driver’s Licenses (Real ID <https://www.dhs.gov/real-id>). Be sure trainees have sufficient IDs to receive a PIV.
- All trainees must have had primary source verification of educational credentials as required by the admission criteria of the training program. Requirements vary based on type of health professional and the training program and may include:
 - Reference letters, primary source verification of current and past license(s), registration(s) in any field, or certification(s) through the state licensing board(s) and/or national and state certification bodies. As well as Drug Enforcement Administration (DEA) registration as required by the training program;
 - International medical school graduates have had primary source verification of the Educational Council for Foreign Medical Graduates (ECFMG) certificates as appropriate;
- All **licensed trainees** must be screened against the National Practitioner Data Bank (NPDB). This may apply to some post-degree associated health trainees who have obtained licensure. Queries can be done at or through your credentialing or graduate medical education office. <https://www.npdb.hrsa.gov/>

- As a rule, ***students are not listed*** in the national practitioner database unless they were previously licensed, for example a dental student with a degree as a Registered Nurse (RN).
- All trainees must be screened against the Health and Human Services' List of Excluded Individuals and Entities (LEIE) <https://exclusions.oig.hhs.gov/>. The LEIE is an OIG compiled list of individuals who are currently excluded from participation in Medicare, Medicaid and all other Federal healthcare programs. Trainees found on in the LEIE are NOT eligible for VA appointment.

For paid trainees receiving a stipend in VA sponsored programs, the program director of must ensure that the local VA facility has documentation of screening against the NPDB, as appropriate, and that the LEIE has been reviewed.

Health Requirements:

See Appendix A: Healthcare Guidelines for TQCVL document

Physically and Mentally Fit to Perform Essential Functions: Trainees must be physically and mentally able to perform essential functions required by their training program.

- If the trainee is in a **VA sponsored program (accredited in VA's name)**, the VA program director must review documentation that there has been a physical examination performed in the last year. Trainees should be apprised of the VA's conditions of employment and provide required physical examination information.
- Trainees covered by a TQCVL are considered to meet the essential requirements of their training program with or without accommodations.

Free from Communicable Disease: Trainees must be free of communicable disease and conform with the following requirements.

- The affiliate, or VA program director, must ensure that the trainee has obtained TB screening. Trainees should be apprised of the VA's conditions of employment and provide required TB screening information per CDC guidelines or State requirements. In cases where the trainee has not completed their TB screening by the first day of their rotation, the VA facility will refuse the trainee appointment until the required health screenings have been performed.
 - Annual TB screening may be required for trainees and would consist of:
 1. Initial baseline testing upon hire: either Tuberculin Skin Test (TST) or Interferon–Gamma Release Assays (IGRAs) following current CDC recommendations
 2. Annual or serial screening: Determined by state regulations and/or VHA facility annual risk assessment outcomes.

Trainees in multi-year programs who require annual TB screening may receive annual TB screening at the VA facility.

- The affiliate, or VA program director, must ensure that the trainee has completed the hepatitis B vaccination series or has signed a declination waiver. Trainees should be apprised of the VA's conditions of employment and provide required hepatitis B vaccination information. In cases where

the trainee has not started or completed their hepatitis B vaccination series by the first day of their rotation, the VA facility will refuse the trainee appointment until the required health screenings/vaccinations have been performed or a declination waiver has been signed.

- The affiliate, or VA program director, must ensure that the trainee has met VHA policy on influenza vaccinations. Currently, that means the trainee has obtained annual influenza vaccination not later than November 30th of each year. Trainees that decline vaccination must wear a face mask while at the VA healthcare facility throughout the influenza season.
- When requested, the affiliate must be able to provide the VA with individual trainee health examination (physical) and evaluation (vaccination) documentation.

***NEW* Checklist for HPTs Training at VA Facilities: Am I Eligible?**

To assist Affiliates and program directors with verifying and collecting certain information for the TQCVL, a new *Checklist* has been created. Give the checklist to the trainees and enlist their help in determining that they are eligible for VA appointment. <https://www.va.gov/oa/app-forms.asp> If a trainee cannot comply with any of the items on the checklist, then they are not eligible for VA appointment, cannot perform training at the VA, and should not be listed on the TQCVL HPT List of Trainees.

NOTE: Eligibility does not confirm HPT suitability. All trainees also undergo either a special agreement check screening or background investigation.

Sample TQCVL:

The next few pages show a sample TQCVL and the attached List of HPTs. Please note that:

- The letter is to be placed on Program/University letterhead or include the institution's seal
- The letter must be addressed **To** the VAMC Facility Director
- The letter must be signed by the individual responsible for the program and trainees. For example:
 - Program Director
 - Designated Institutional Officer (DIO)
 - Educational Dean
 - Dean for Academic Affairs, etc.
- Signature blocks for the VAMC Facility Chief of Staff and Director to accept the document. However, if your facility has granted specific signature authority to allow others to accept the TQCVL (e.g. the DEO), then this information can be adjusted.
- The wording in the body of the **TQCVL must not be modified**
- A document can be created (.docx or .pdf) to accept electronic signatures
- **ATTACHED to the TQCVL will be the list of HPTs** covered by this TQCVL
- **TQCVL's without Lists or Lists without a cover TQCVL will NOT be accepted**
- HPTs must be listed using their full, legal names, correctly spelled and the name must match two government issued identification documents



University of Education
Audiology Joint Doctoral Program
VA Anywhere Healthcare System

November 19, 2018

Dear Mr. Joseph Smith:

I certify that all appropriate information for the health professions trainees listed on the attached TQCVL List of Trainees has been verified. At the time of verification, all trainees listed are fully qualified and have the necessary credentials to complete their scheduled clinical training at a Department of Veterans Affairs (VA) healthcare facility.

ALL trainees:

- Are enrolled in the designated training program and have met criteria for their specified level of training;
- Meet the physical requirements of the training program;
- Have had tuberculosis screening as required by the Center for Disease Control (CDC) or VA standards;
- Have had hepatitis B vaccination or have signed declination waivers;
- Have been vaccinated for influenza per VHA policy; currently by November 30th each year or, if declining vaccination, trainees are aware of the requirement to wear a face mask throughout the influenza season while at the VA healthcare facility;
- Have been screened against the Health and Human Services' List of Excluded Individuals and Entities (LEIE).
<https://exclusions.oig.hhs.gov/> (all paid and WOC trainees)

As applicable:

- International medical school graduates have had primary source verification of the Educational Council for Foreign Medical Graduates (ECFMG) certificates.
- Licensed trainees have been screened against the National Practitioner Data Bank (NPDB) <https://www.npdb.hrsa.gov/>
- Trainees born male, both U.S. citizens and immigrants, who are between 18 and 25 years old, have registered with the Selective Service or provided a Status Information Letter.
- If required by the admission criteria of the training program, all trainees have had primary source verification of education and other credentials.

NOTE: List may not be all inclusive. Please mark which items below are required and have been verified.

- Reference letters
- Primary source verification of current and past license(s) or registration(s) in any field

- Certification(s) through the state licensing board(s) and/or national and state certification bodies
- Drug Enforcement Administration (DEA) registrations
- National Provider Identifier (NPI) registration
- Other: _____

As applicable, for non-U.S. citizen trainees:

- Documented proof of current immigrant or non-immigrant status has been reviewed and attached to include:
 - o Appropriate visa (J-1, J-2, H-1B, H-4, E-3) status; or
 - o Permanent Resident Card (formerly "Green Card"); or
 - o Deferred Action for Childhood Arrivals (DACA) trainee, Employment Authorization Document (Form I-766).
 - o Other visas require discussion with the VA Designated Education Officer (DEO) and may need decision of VA General Council.
- Appointment of non-US citizens must be approved by the Medical Center Director.

I will notify the VA DEO, as soon as possible but no later than 72 hours, of changes in the academic status of individual trainees, adverse actions that affect the trainee appointment, or changes in health status that pose a risk to the safety of trainees, other employees, or patients.

I certify that all documents pertaining to the listed trainees are maintained on file and available for review by VA officials by contacting the following Office: Kathy Jones, Kathy.jones@uni.edu



 Joseph Jones, Au.D., Ph.D.
 Program Directory Audiology
 University of Education

11/19/2018

 Date

Dr. Susan Smythe, VAMC Chief of Staff
Accept/Do Not Accept (circle one)

Signature

Date

Mr. Joseph Smith, VAMC Director
Accept/Do Not Accept (circle one)

Signature

Date

Enclosure: TQCVL List of Trainee(s)
cc: Dr. James Johnson, Designated Educational Officer

Questions?

Contact the Designated Education Officer (DEO) at your affiliated VA facility.

Contact Dr. Monic Lypson monica.lypson@va.gov about TQCVL subject material.

Contact Sandra Bee sandra.bee@va.gov for information about this guide and how to use the templates.

Links to Approved Templates:

The DEO at each facility is authorized to make modifications to the letter addressee, salutation, and signature blocks. However, the body text of the TQCVL must not be modified. Copy and paste into a new document.

Trainee Qualifications and Credentials Verification Letter – MS Word Format – Copy and Paste		https://www.va.gov/OAA/TQCVL/TQCVL_TemplateFINAL.docx
TQCVL List of Trainees – Excel Format		https://www.va.gov/OAA/TQCVL/TQCVL_HPT_ListFINAL.xlsx
TQCVL List of Trainees – MS Word Table Format		https://www.va.gov/OAA/TQCVL/TQCVL_HPT_ListFINAL.docx
NEW Eligibility Checklist for VA HPTs		https://www.va.gov/OAA/TQCVL/TQCVL_HPTInstructions_V1.pdf

Appendix A: TQCVL Healthcare Guidelines

The Trainee Qualifications and Credentials Verification letter (TQCVL) is confirmation that the HPT is fit to perform the essential functions, physical and mental, of the training program, immunized following current Center for Disease Control (CDC) guidelines and eligible for VA appointment.

Items to Review for Health Screen:

- Evidence of physical examination and evaluation in the past 12 months
- Evidence that the HPT meets the physical requirements of the training program
- Evidence of Tuberculosis screening
- Evidence of Hepatitis B vaccine, natural infection/recovery, or appropriate declination waiver
- Assurance that the HPT will be immunized for seasonal influenza by November 30th of every year OR wear a mask when at a VA healthcare facility

Interpreting Physical Examination:

Trainees covered by a TQCVL are verified to be in satisfactory physical condition to meet the requirements of their training program. HPTs should provide to the signer of the TQCVL evidence of a physical examination performed in the past 12-months stating they are able to meet the physical demands of the position. The US Office of Personnel Management (OPM) specifies three levels of “Physical Demand” factors:

Level 8-1 – The work is sedentary with no special physical demands

Level 8-2 – The work requires some physical exertion above average agility and dexterity

Level 8-3 – The work requires considerable and strenuous physical exertion

Interpreting Tuberculosis TB Screening Testing:

If a trainee has received TB screening outside of VA the following guidance on how to interpret this screening will assist in reviewing the results. Additional details may also be found on the CDC website.

<https://www.cdc.gov/tb/topic/testing/healthcareworkers.htm>

1. The two-step Mantoux tuberculin skin test (TST) should be used for baseline or initial testing.

- Potential results:
 - Positive — consider the HPT as TB infected
 - A second TST is not indicated
 - HPT should be evaluated for TB disease
 - Seek assistance from EMPLOYEE /OCCUPATIONAL HEALTH
 - Negative — consider the HPT as not TB infected
 - Document result

2. TB blood testing performed for baseline or initial screening does not require two-step testing and is not affected by BCG vaccination.

- Potential results:
 - Positive — consider the HPT as TB infected
 - HPT should be evaluated for TB disease
 - Seek assistance from EMPLOYEE /OCCUPATIONAL HEALTH
 - Negative — consider the HPT as not TB infected
 - Document result

Interpreting Hepatitis B Testing Results:

Hepatitis B serologic testing involves measurement of several hepatitis B virus (HBV)-specific antigens and antibodies. Different serologic markers or combinations of markers are used to identify different phases of HBV infection and to determine whether a patient has acute or chronic HBV infection, is immune to HBV because of prior infection or vaccination, or is susceptible to infection. Additional details may also be found on the CDC website. <https://www.cdc.gov/hepatitis/hbv/hbvfaq.htm>

How Do I Interpret Hepatitis B Serologic Test Results?

Serologic Marker	Results	Clinical State
HBsAG anti-HBc anti-HBs	Negative Negative Negative	Susceptible
HBsAG anti-HBc anti-HBs	Negative Positive Positive	Immune due to natural infection
HBsAG anti-HBc anti-HBs	Negative Negative Positive	Immune due to hepatitis B vaccination

If you have additional questions, consider contacting your Employee/Occupational Health for further guidance.

Created in collaboration by the VHA Office of Academic Affiliations, VHA Office of Workforce Management & Consulting, VHA Office of Occupational Health Services and VA Office of Human Resources & Administration
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