



## **VHA Office of Academic Affiliations (14AA)**

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

*For Affiliate and VA Program Directors*

**Version 6, February 2024**

## Overview:

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

Health Professions Trainee (HPT) is a general term used to describe individuals appointed to temporary positions in one or more VHA medical facilities performing clinical, research or quality improvement training experiences under supervision to satisfy program or degree requirements. HPTs can be appointed as either direct VA-paid or Without Compensation (WOC). HPTs paid via a disbursement agreement are WOC. Trainee academic levels include undergraduate, graduate, and post-graduate students, interns, residents, fellows, and VA advanced fellows.

## Background:

To qualify to train at the VA, each HPT must meet all requirements of the training program and the Federal Government to legally work. OAA requires that each program verify HPTs' compliance with these requirements using the Trainee Qualifications and Credentials Verification Letter (TQCVL). A TQCVL from the affiliated or VA-sponsored program director must be submitted to the VA Facility Director through the VA Designated Education Officer (DEO) before an HPT is appointed.

The TQCVL confirms that the sponsoring entity has verified specific information for each HPT listed in the accompanying attachment. All HPTs 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, Internal Medicine residents would be listed on the TQCVL for three consecutive years or until they complete the program.

The TQCVL confirms that an HPT:

- is enrolled in the training program that completed the TQCVL and has met all admission criteria of that training program;
- has the required credentials to participate in the training program as agreed to by the sponsoring institution, affiliated participating institutions, and the VA;
- is eligible for appointment to a Federal Government position;
- is able to perform the essential functions of the training program, with a reasonable accommodation if practicable; and
- is immunized following current CDC guidelines for healthcare workers to protect themselves, other employees, and patients while working in a healthcare facility.

A TQCVL is required for all HPTs and annually for HPTs in multi-year programs. Direct VA-paid HPTs must be US citizens; therefore, non-US citizen documentation only pertains to WOC HPTs.

All HPTs who receive an appointment to VA (whether direct VA-paid or WOC) are protected from personal liability while 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 HPTs listed are physically and mentally fit to perform the essential functions of the training program, with a reasonable accommodation if practicable, and immunized following current Center for

Disease Control guidelines and VHA policy on reasonable accommodations or medical exemption. A fully executed TQCVL serves as documentation of all VA eligibility requirements and, therefore, no further eligibility checks need to be made by HR. For details, refer to VA HR Management Letter No. [5-19-06](#) dated June 19, 2019, which supersedes all references to HPT credentials and qualifications stated in VA Handbook 5005.

HPTs listed on the TQCVL must meet all requirements stated in the document. If an HPT does not meet all these requirements, they should not be listed on a TCQVL. HPTs are not permitted to participate in training at the VA until they meet the requirements of the TQCVL or, as applicable, until reasonable accommodations are made or arranged with VA for them to meet these requirements. Only after an HPT meets all requirements may a new or addended TQCVL be submitted with their name added to the HPT list. HPTs may also be removed from a TQCVL via addendum. Program directors should inform the VA DEO of any pending issues for a specific HPT. Unqualified HPTs MUST NOT be listed on any TQCVL.

Once a TQCVL has been submitted and accepted by VA facility leadership, the program director at the sponsoring institution has up to 72 hours to inform the VA DEO of any changes in an HPT's academic status, adverse actions that affect the trainee's 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 HPTs:**

#### **Non-US Citizens:**

Non-US citizens HPTs who are not legally authorized to reside and work in the US are not eligible for VA appointments. Non-US citizens are not authorized to receive direct VA pay and must not be appointed in a VA-paid status. Non-US citizen HPTs must meet all program enrollment criteria. Programs must ensure that US citizen HPT will not be displaced by appointing a non-US citizen at the VA.

HPTs must have a US social security number (SSN) before beginning the VA pre-employment onboarding process. HPTs without an SSN are not eligible to train at the VA.

Prior to the 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-4, E-3, H-1B) status; (other visas require discussion between DIO and DEO and may need a decision from VA General Council); or
  - Permanent Resident Card (formerly "Green Card"); or
  - Deferred Action for Childhood Arrivals (DACA) trainee, Employment Authorization Document (Form I-766).

#### **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 requirement 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 irrespective of current gender. *Only male, non-US citizens on a non-immigrant 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 per Federal law even if they have served in the armed forces.** Program Directors should have male-born HPTs 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.

<b>Males Under Age 26</b>	<a href="https://www.sss.gov">https://www.sss.gov</a> Print proof of registration letter <b>OR</b>
	Register and print proof of registration letter
<b>Males Over Age 26</b>	<a href="https://www.sss.gov">https://www.sss.gov</a> Print proof of registration letter <b>OR</b> Apply for Status information letter (SIL)

**Personal Identity and Credentials Verification:**

- All HPTs will be issued a Personal Identify Verification (PIV) credential. Trainees must possess and provide two official government IDs. The HPT's full legal name, as it appears on the IDs, will be the name submitted to VA on the TQCVL list. A list of acceptable IDs may be found on the following VA website: [PIV Credential Identity Verification Matrix \(va.gov\)](#)
  - States have begun issuing Secure Driver's Licenses (Real ID <https://www.dhs.gov/real-id>). Be sure HPTs have acceptable IDs to receive a PIV.

**Program and Admission Criteria:**

- All HPTs must have had primary source verification of educational credentials as required by the admission criteria of the sponsoring training program. Requirements vary based on the 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 sponsoring training program;
- International medical school graduates have had primary source verification of the Educational Council for Foreign Medical Graduates (ECFMG) certificates as appropriate.

**National Practitioner Data Bank (NPDB):**

- All HPTs who currently have or previously had a full unrestricted **license(s)** in any health profession must be screened against the National Practitioner Data Bank (NPDB). This status may apply to some post-degree associated health HPTs 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, such as a dental student with a Registered Nurse (RN) degree.
  - HPTs can self-query the NPDB and show proof.

**List of Excluded Individuals and Entities (LEIE):**

- All HPTs 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 currently excluded from participating in Medicare, Medicaid, and all other Federal healthcare programs. HPTs found on the LEIE are NOT eligible for VA appointments.
- For direct VA-paid HPTs in VA-sponsored programs, the program director must ensure that the local VA facility has documentation of screening against the NPDB, as appropriate, and documentation that the LEIE has been

reviewed.

### **Health Requirements:**

- HPTs must be physically and mentally fit to perform the essential functions of the training program. HPTs must also be immunized following current CDC guidelines and VHA policy for healthcare workers to protect themselves, other employees, and patients while working in a healthcare facility.
- If the HPT is in a **VA-sponsored program (meaning accredited in VA's name)** and is requesting an accommodation, the VA program director should request documentation from the HPT that there has been a physical examination or other evaluation that documents the need for accommodation. HPTs should be apprised of the VA's conditions of employment and provide required physical examination information. The VA program Director and HPT should coordinate with their facility and/or VISN leadership on the accommodation process.
- HPTs must have "preplacement" baseline tuberculosis (TB) screening and ongoing TB evaluation and training per CDC health care personnel guidelines <https://www.cdc.gov/tb/topic/testing/healthcareworkers.htm>. For most HPTs, this means screening before beginning a training program and continuous monitoring and education. However, for HPTs directly paid by VA, the screening must have been performed within 90 days of the VA employment offer and acceptance. HPTs should be apprised of the VA's conditions of employment and provide proof of TB screening information. 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.
- The affiliate, or VA program director, must verify that the trainee has up-to-date vaccinations for healthcare workers as recommended by CDC and VA <https://www.cdc.gov/vaccines/adults/rec-vac/hcw.html> This may include but is not limited to:
  - **COVID-19**
  - **Hepatitis B**
  - **Seasonal Influenza, before November 30 of the influenza season**
  - **Measles, Mumps, & Rubella**
  - **Varicella**
  - **Tetanus, Diphtheria, Pertussis**
  - **Meningococcal:** *Applicable only to HPTs who work as microbiologists and routinely exposed to Neisseria meningitidis should get meningococcal conjugate vaccine and serogroup B meningococcal vaccine.*
- Immunizations protect our Veterans, employees, and the HPTs. Requests for vaccination reasonable accommodations or medical exemption will be considered at each local facility on a case-by-case basis after consultation with the site's Employee Occupational Health unit. Accommodations or medical exemptions must be approved by the local facility's Medical Center Director with the concurrence of the Chief of Staff.
- VA facilities have the right to determine who is appointed to their sites. You must have a Medical Center Director-approved accommodation or medical exemption if an HPT does not meet CDC vaccination recommendations.
- Until the accommodation or medical exemption process is complete, the Medical Center Director has the right to determine if an HPT can work while the process is being completed.

- Approved accommodations or medical exemptions will be attached to the TQCVL.
- If requested, the signer of the TQCVL must provide the VA with individual HPT health attestation and/or health documentation.

### **"Am I Eligible?" Checklist**

A checklist has been created to assist Affiliates and program directors with verifying and collecting certain information for the TQCVL: "Am I Eligible?" This checklist is on the OAA internet forms site [Am I Eligible? Checklist for VA HPTs](#). Provide each HPT with the checklist and enlist their help in verifying that they are eligible for VA appointment. If an HPT 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 a TQCVL.

*NOTE: Eligibility does not confirm HPT suitability. All HPTs also undergo a special agency check (SAC/fingerprint) screening, and some HPTs also require a Tier 1 background investigation.*

### Sample TQCVL:

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

- The letter is to be placed on Program/Affiliate, VA, or Consortium letterhead or includes the institution's seal
- The letter must be addressed **to** the VAMC Facility Director
- The letter must be authored and signed by an educational official from the sponsoring institution, who is the individual responsible for the training program and the health professions trainees (HPTs) who are in the training program.
  - For VA-sponsored programs, this is the Program Director.
  - For psychology internship programs, the responsible educational official must be from the academic institution.
- Signature blocks are provided for the VA Facility Chief of Staff and Director to accept the document. However, this information can be adjusted if your facility leadership has granted specific signature authority to allow the DEO to accept the TQCVL.

The certification language in the body of the TQCVL must not be modified.

A document (.docx or .pdf) can be created to accept electronic signatures. OAA supports the following signature types: Wet signature on document, Scanned copy of wet signature on document, Scanned signature of document with wet signature, PIV signature, and/or DocuSign signature\* (\*22.x of DocuSign is approved for VA use with constraints. [DocuSign Public Key Infrastructure \(PKI\) \(va.gov\)](#))

ATTACHED to the TQCVL will be the list of HPTs covered by this TQCVL who meet all requirements of the program and VA.

- **A TQCVL without a list of HPTs or a list of HPTs 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.



June 15, 2024

Dear Dr. Smith,

As program director for the Internal Medicine program at Academic Excellence University, I, John M. Jones, MD have verified all information for the trainees listed in this document.

My signature on this Trainee Qualifications and Credentials Verification letter (TQCVL) certifies that verification has been made and that each health professions trainee (HPT) on the attached list is fully qualified to participate in the subject training program and meets the conditions of employment as outlined below.

Additionally, should any HPT on the attached list experience a change in their academic or health status, I will notify the facility's Designated Education Officer (DEO) no later than 72 hours after the discovery. Though it is unnecessary to disclose specifics of the change, HPTs who become unqualified (e.g., are no longer enrolled or active in a program, pose a risk to the health and safety of others) will not be permitted to continue training at the VA and must be offboarded per VA policy.

**I certify** that each HPT on the attached list has:

- Met all requirements for enrollment and continued participation in the specified training program;
- Met all criteria for their level of training;
- Evidence or self-certification that they are physically and mentally fit to perform the essential functions of the training program;
- Evidence or self-certification of up-to-date vaccinations for healthcare workers as required by Centers for Disease Control (CDC) and VA <https://www.cdc.gov/vaccines/adults/rec-vac/hcw.html>. VA-approved accommodations or medical exemptions must be submitted with this TQCVL. Evidence of tuberculosis screening or testing as recommended by CDC health care personnel guidelines <https://www.cdc.gov/tb/topic/testing/healthcareworkers.htm>;
- Identification documents to meet VA security requirements; [PIV Credential Identity Verification Matrix \(va.gov\)](#); and
- Results of screening against the Health and Human Services List of Excluded Individuals and Entities (LEIE). <https://exclusions.oig.hhs.gov/>.



I certify that EVERY HPT on the attached list has met ALL admission criteria of the training program, including, but not limited to: (check all that apply):

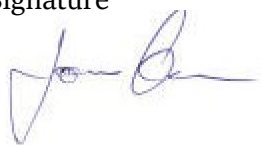
- Primary source verification of current and past license(s) or registration(s) in any field
- Certification(s) through the state licensing board(s) and/or national and state certification bodies
- Drug Enforcement Administration (DEA) registration
- National Provider Identifier (NPI) registration
- Other qualifications and certifications: \_\_\_\_\_

I certify that HPTs on the attached list who meet any of the following criteria have had their information verified as stated and therefore meet Federal appointment eligibility requirements:

- **HPTs who were born male** and who are US citizens, immigrants to the US, or are otherwise required by law to register, have registered with the Selective Service System. <https://www.sss.gov>
- **HPTs who are international medical school graduates** have had primary source verification of the Educational Council for Foreign Medical Graduates (ECFMG) certificates.
- **HPTs who currently have or previously had full unrestricted license(s)**, including licenses in other professions, have been screened against the National Practitioner Data Bank (NPDB). <https://www.npdb.hrsa.gov/>
- **HPTs who are non-US citizens:**
  - Have current immigrant, non-immigrant, exchange visitor, or other documentation stating that they are eligible to live and work in the US;
    - Appropriate documents can be provided and could include a permanent resident card, employment authorization document Form I-766, visas: J-1, J-2, H-4, E-3, H-1B or DS-2019;
  - Have been issued a US social security number

Finally, I certify that all documents and information pertaining to HPTs on the attached list can be reviewed by contacting Shirley Jakes at 555-123-4567.

Signature



Date: June 15, 2024

John Jones, MD, Academic Excellence University

Attachment: TQCVL List of HPTs

VA Medical Facility Chief of Staff Accept/Do Not Accept (circle one)



VA Medical Facility Designated Education Officer

Date: June 30, 2024

Accepted on behalf of the Medical Center Director and Chief of Staff per Delegation of Authority granted via memo on March 1, 2024



## TQCVL List of Health Professions Trainees (HPTs) Meeting All Program and VA Requirements

Date TQCVL Signed: June 15, 2024

VA Facility where HPTs are Training: Metropolitan VA Medical Center

Sponsoring Institution: Academic Excellence University

Training Program (profession, etc.): Internal Medicine

All applicable Fields must be Complete and Accurate. \*\*Name must match two pieces of [identification](#).

Last Name**	First Name**	Middle Name or Initial	Generation Suffix (II, Jr.)	Degree held (e.g., MD, DO, DDS, NP)	Personal Email Address	Country of Citizenship if not USA	Year/Level of Training (e.g., PGY3, student, extern)	Expected Program or VA Start Date (MM/DD/YYYY)	Expected Program or VA End Date (MM/DD/YYYY)
Bay	Taylor	Nicole		MD	taylor.bay@gmail.com		PGY1	07/01/2024	6/30/2027
Browning	Jamie	Ashton		DO	jamie.browning@yahoo.com		PGY1	07/01/2024	6/30/2027
Coltrane	Molly	Elizabeth Amici		MD, PhD	mollycoltrane@apple.com		PGY1	07/01/2024	6/30/2027
Hawkins	Jacob	Boyce	III	MD	jacob.hawkinsIII@gmail.com		PGY2	07/01/2024	6/30/2026
Hinton	Lacey	Michelle		MD	lacey.hinton@yahoo.com		PGY2	07/01/2024	6/30/2026
Lin	Kwan	Yu		MD	kwanyu.lin@gmail.com	Taiwan	PGY2	07/01/2024	6/30/2026
Lowe	Kristen	Bryanna		MD	kristen.lowe@gmail.com		PGY2	07/01/2024	6/30/2026
Nguyen	Jade	Thao		MD	jadethaonguyen@yahoo.com		PGY3	07/01/2024	6/30/2025
Wilder	Angelica	Marie		MD	marie.wilder@yahoo.com		PGY3	07/01/2024	6/30/2025
Williams	Erin	Elizabeth		MD	elizabeth.williams@gmail.com		PGY3	07/01/2024	6/30/2025

## Next Steps

Contact the DEO at your affiliated facility to get the correct TQCVL template.

## Questions

Contact the Medical Informatics Unit at the [OAA Help Desk](#) or [oaahelp@va.gov](mailto:oaahelp@va.gov) with questions about this guide. Please include the DEO in your communication. Thank you.