

**REIMBURSEMENT OF CONTINUING PROFESSIONAL EDUCATION EXPENSES  
FOR FULL-TIME, BOARD CERTIFIED PHYSICIANS AND DENTISTS**

**1. REASON FOR ISSUE:** This Veterans Health Administration (VHA) directive provides the requirements for reimbursing Continuing Professional Education (CPE) expenses for full-time, board certified physicians and dentists.

**2. SUMMARY OF CONTENT:** This new directive sets forth mandatory VHA procedures, including authorities, required approvals, and necessary documentation for the reimbursement of CPE expenses for full-time, board certified physicians and dentists.

**3. RELATED ISSUES:** VA Directive 5015-1, Employee Training and Development.

**4. RESPONSIBLE OFFICE:** The VHA Chief Learning Officer, Employee Education System (10A2B) is responsible for the content in this directive. Questions may be referred to the Employee Education System at [VHA10A2BAction@va.gov](mailto:VHA10A2BAction@va.gov).

**5. RESCISSIONS:** None.

**6. RECERTIFICATION:** This VHA directive is due for recertification on or before the last working day of August 2023. This VHA directive will continue to serve as national VHA policy until it is recertified or rescinded.

Richard A. Stone, M.D.  
Executive in Charge

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## REIMBURSEMENT OF CONTINUING PROFESSIONAL EDUCATION EXPENSES FOR FULL-TIME, BOARD CERTIFIED PHYSICIANS AND DENTISTS

### 1. PURPOSE

This Veterans Health Administration (VHA) directive establishes policy for Continuing Professional Education (CPE) reimbursement to full-time, board certified physicians and dentists. **AUTHORITY:** Title 38 United States Code (U.S.C.) 7411.

### 2. BACKGROUND

Under 38 U.S.C. 7411, full-time, board certified physicians and dentists appointed under 38 U.S.C. 7401(1) are reimbursed for expenses incurred, up to \$1,000 per year, for continuing professional education. VA has determined that “reimbursable continuing professional education expenses” include course fees, course supplies, transportation, meals and incidental expenses (meaning fees and tips given to porters, baggage carriers, hotel staff, and staff on ships), and lodging expenses incurred by a covered physician or dentist to attend required or optional training. Tuition or course fees paid directly to a vendor by VA, and travel costs paid directly by VA, are considered reimbursable expenses and will be deducted from the \$1,000.

### 3. POLICY

It is VHA policy that full-time, board certified physicians and dentists appointed under 38 U.S.C. 7401(1) shall be reimbursed for CPE expenses incurred, up to \$1,000 per fiscal year, upon the employee’s submission for CPE. **NOTE:** *The term Continuing Medical Education (CME) and/or Maintenance of Certification (MOC) is often used to refer to CPE for physicians.*

### 4. RESPONSIBILITIES

a. **Under Secretary for Health.** The Under Secretary for Health is responsible for ensuring overall VHA compliance with this directive.

b. **Deputy Under Secretary for Health for Operations and Management.** The Deputy Under Secretary for Health for Operations and Management is responsible for:

(1) Communicating the contents of this directive to each of the Veterans Integrated Services Networks (VISN);

(2) Providing oversight of VISNs to ensure compliance with this directive.

c. **Veterans Integrated Service Network Director.** The Veterans Integrated Service Network (VISN) Director is responsible for ensuring that all full-time, board certified physicians and dentists within their area of responsibility are provided opportunities to complete their CPE.

d. **VA Medical Facility Director.** The VA medical facility Director is responsible for:

(1) Approving requests to participate in CPE events for reimbursement that are properly submitted in advance of the event in accordance with facility education and training policies and procedures.

(2) Maintaining records related to documentation of training and development of employees in compliance with VA Handbook 5015-1, Employee Learning and Professional Development, dated June 25, 2010, or subsequent policy.

**e. Full-Time, Board Certified Physicians and Dentists.** Full-time, board certified physicians and dentists must ensure that CPE events must be properly approved in accordance with their facility education and training policies and procedures prior to their participation in the event to qualify for reimbursement under 38 U.S.C. 7411. Requests for CPE event attendance and reimbursement should meet basic requirements of enhancing the full-time, board certified physician and dentist competencies, job performance or organization mission and goals. The full-time, board certified physician or dentist must include a copy of the event program brochure and schedule including a program description, goals and learning objectives when requesting approval to participate in the CPE event. Full-time, board certified physicians and dentists must submit, at a minimum, the following documentation to the VA medical facility's designated department or service line, when requesting reimbursement after participation in a pre-approved event:

(1) Copies of payment receipts or comparable documentation of expenses and a travel voucher (if applicable);

(2) Evidence of attendance at the approved CPE program or activity, e.g., certificate of attendance or course completion. **NOTE:** See Appendix B of this directive for examples of acceptable forms of documentation of CPE expenditures.

(3) Full-time, board certified physicians and dentists, and relevant Agency officials, are advised that:

(a) Reimbursement for expenses incurred while pursuing CPE, including meals and incidental expenses, lodging expenses, and other related requirements, will be consistent with federal travel regulations and limits. See Title 41 Code of Federal Regulations (CFR) 300-304.

(b) Reimbursement may exclude continuing education expenses for off-site education and training that is substantially similar to on-site facility education and training offered at no cost to the employee.

(c) Board certified physicians and dentists may submit requests for reimbursement following the completion of the CPE event and up until September 30 (the last day of the fiscal year) in which the CPE event was completed.

(d) As required by 38 U.S.C. 7411, reimbursable expenses for all CPE expenses incurred by a full-time, board-certified physician or dentist, whether mandatory or non-mandatory, may not exceed \$1,000 per year.

**5. REFERENCES**

- a. Title 38 U.S.C. 7401(1), Appointments in Veterans Health Administration.
- b. Title 38 U.S.C. 7411, Full-time board-certified physicians and dentists: reimbursement of continuing professional education expenses.
- c. Title 41 CFR 300, The Federal Travel Regulation (FTR).
- d. VA Handbook 5015-1, Employee Learning and Professional Development, dated June 25, 2010, or subsequent policy.

## APPENDIX A

**EXAMPLES OF REIMBURSEMENT OF CONTINUING PROFESSIONAL EDUCATION EXPENSES FOR FULL-TIME, BOARD CERTIFIED PHYSICIANS AND DENTISTS**

1. Physicians and dentists must have evidence of attendance at an approved Continuing Professional Education (CPE) program and/or a course completion certificate. These examples illustrate which expenses may be reimbursed in a variety of situations.

2. All examples presuppose that the covered physician or dentist has been pre-approved by their organization to attend a conference or training that will result in CPE credits.

3. As defined in 5 CFR 351.203, local commuting area is “the geographic area that usually constitutes one area for employment purposes. It includes any population center (or two or more neighboring ones) and the surrounding localities in which people live and can reasonably be expected to travel back and forth daily to their usual employment.”

a. **Example 1.** An optional training course that an employee wants to attend is within the local commuting area of the employee’s duty location, and course or conference fees are paid for by the Department of Veterans Affairs (VA).

In this example the reimbursable expense, the course fees, was paid for by VA. As per VA Financial Policies and Procedures Manual on Local Travel, Volume XIV, Chapter 7, 070501, Part B “Approval for Local Travel,” VA determines the local travel area in consideration of the normal commuting area of the conference. Because the training is within the commuting area of the employee’s duty location, lodging, meals, and incidental expenses do not apply.

b. **Example 2.** An optional training course that an employee wants to attend is within the local commuting area of the employee’s duty location, and course or conference fees are paid for by the employee.

In this example, reimbursable expenses are course fees, applied up to the annual limit. As per VA Financial Policies and Procedures Manual on Local Travel, Volume XIV, Chapter 7, 070501, part B “Approval for Local Travel,” VA will determine the local travel area in consideration of the normal commuting area of the conference. Because the training is within the commuting area of the employee’s duty location, lodging, meals, and incidental expenses do not apply.

c. **Example 3.** An optional training course that an employee wants to attend requires the employee to utilize air travel and hotel lodging, and course or conference fees are paid for by VA.

In this example, reimbursable expenses include course fees, transportation (airline ticket), lodging, meals, and incidental expenses (taxi or shuttle, parking fees, etc.).

Reimbursement will occur through VA's travel management system and be subject to the limitations and documentation requirements therein. See VA's current travel management system website: <https://cge.concursolutions.com/default.asp>. **NOTE:** *This linked document is outside of VA control and may or may not be conformant with Section 508 of the Americans with Disabilities Act.*

d. **Example 4.** Some specialty and subspecialty boards have a Maintenance of Certification (MOC) program. Fees for such programs are normally bundled to include administrative expenses and fees to award CPE credits.

(1) These boards endorse and provide high-quality continuing medical education; therefore, VA allows board certified physicians and dentists to claim some portion of these expenses for reimbursement up to \$1,000 per fiscal year.

(2) In the absence of information from the particular specialty board itself about the breakdown of fees, VA will allow reimbursement of 50 percent of these expenses when CPE is provided for MOC activities such as self-assessment modules in a particular specialty. Proof of completion of these activities is required for reimbursement to occur. Reimbursement to the physician or dentist will be the lower of the two amounts: 50 percent of the total cost of the MOC activity or the CPE fee itself specified by the board, provided that the reimbursable CPE fee, whether included in the total cost of the MOC activity or specified separately by the specialty board, does not result in the employee receiving more than \$1,000 in CPE expense reimbursement for the year.

e. **Example 5.** An employee is directed by VA to attend a training course for which CPE credits are awarded, and VA pays for the course fees and travel costs but not lodging and per diem expenses. The lodging and per diem expenses are paid by the employee.

If the expenses paid directly by VA do not reach the \$1,000 annual limit, then the other amounts paid by the employee, such as lodging, meals, and incidental expenses, will apply to the \$1,000 annual reimbursement maximum.

APPENDIX B

**FREQUENTLY ASKED QUESTIONS: REIMBURSEMENT OF CONTINUING PROFESSIONAL EDUCATION EXPENSES FOR FULL-TIME, BOARD CERTIFIED PHYSICIANS AND DENTISTS**

**1. I am a full-time physician on a temporary appointment. Am I eligible for reimbursement of Continuing Professional Education (CPE) expenses?**

No. The law provides for payment only to full-time, board certified physicians and dentists appointed under 38 U.S.C. 7401(1). Temporary and part-time appointments are authorized under section 7405; and, therefore are not included for reimbursement in section 7411.

**2. Do dentists appointed under 38 U.S.C. 7401(1) have to be board certified to receive reimbursement for CPE expenses under 38 U.S.C. 7411?**

Yes. VA has interpreted the statute to allow CPE reimbursement only for board certified physicians and board certified dentists.

**3. I have a Ph.D. in a related medical occupation, but am not a board certified physician or dentist. Am I eligible for reimbursement?**

No. The law in 38 U.S.C. 7411 provides for reimbursement to full-time, board certified physicians and dentists only.

**4. I am a health care provider hired under the authority of 38 USC 7401(1), but I am not a physician or a dentist. Am I eligible for reimbursement of CPE expenses?**

No. 38 U.S.C 7401 (1) lists physicians, dentists, podiatrists, chiropractors, optometrists, registered nurses, physician assistants, and expanded-function dental auxiliaries. However, in 38 U.S.C. 7411 Congress authorized CPE reimbursement for only full-time, board certified physicians and dentists.

**5. I am a full-time, board certified physician. I pay for a subscription to a professional journal which provides for continuing education credit at an additional cost. May I claim this expense?**

The additional costs related to CPE credits may be claimed but not the basic cost of the subscription.

**6. Are fees for licensure and/or initial certification required for my occupation reimbursable?**

No. Licensure, certification, and degree costs for any minimum credential required in the qualification standard for your occupation are not eligible for reimbursement.

While fees for the original certification are not reimbursable, the fees for CPE to maintain certification are reimbursable.

**7. What are considered acceptable forms of proof and documentation for my CPE expenditures to be reimbursed?**

Copies (hard [physical] and electronic) of payment receipts or comparable documentation of expenses (e.g., e-ticket for airline ticket, hotel receipt, copy of credit card statement); a travel voucher (if applicable); or expense receipt for enrollment in Maintenance of Certification (MOC) activities; and evidence of attendance at approved CPE program or activity (e.g., certificate of attendance and/ or course completion and/or proof of enrollment in MOC activities).

**8. I attended a national conference (for example, Patient Safety, Mental Health, Telemedicine, etc.) that was needed for my assignment, which cost more than \$1,000, and I received CPE credits. May I still receive reimbursement for other approved CPE expenses for that fiscal year?**

No. The CPEs from the attendance at a national conference, needed for your assignment, must be unrelated to those necessary for maintenance of certification in their primary specialty. However, that does not preclude a physician or dentist attending a national conference for a reason such as presenting on behalf of VA from receiving reimbursement for other travel expenses he or she may be eligible for under Federal Travel Regulations, such as lodging, per diem payments, mileage reimbursement, parking fees, taxi, or other miscellaneous expenses.

**9. Registration and travel expenses are routinely funded from different cost centers and through different processes at my medical center. Is the \$1,000 for any combination of registration and travel expenses?**

Yes. The total required reimbursement for all CPE expenses is limited to the \$1,000 for the respective year. The \$1,000 includes both tuition and travel reimbursement together.

**10. In the example of a Nephrology Maintenance of Certification (MOC) training with the following fees, what is the appropriate use of CPE reimbursement for these types of activities?**

**a. \$1,650 = if Board Certified in Internal Medicine**

**b. \$1,810 = if physician holds a subspecialty certification**

Specialty and subspecialty recertification activities are authorized for reimbursement of CPE. The amount will vary based on each specialty or subspecialty. Often the Certifying Board will provide an itemized schedule that breaks out charges for CPE costs. If the Certifying Board does not provide a breakdown of fees that includes the CPE component, up to 50 percent of the total cost of the MOC activities may be reimbursed as authorized CPE expenses, up to a limit of \$1,000 per fiscal year.

**11. I am a board certified internist, and I regularly purchase the Medical Knowledge Self-Assessment Program (MKSAP) from the American College of Physicians (ACP) which is published every 3 years. Are these self-study CPE materials reimbursable?**

Yes. Self-study CPE materials are authorized for reimbursement. For some courses the CPE is completed over a 2 or 3 year period. This CPE is reimbursable subject to the \$1,000 per fiscal year upon submission of proof of purchase of the self-study material/course (online, DVDs, books).