1. REASON FOR ISSUE. This Veterans Health Administration (VHA) Handbook provides specific direction and procedures related to the operation of the educational assistance program at Department of Veterans Affairs (VA) health care facilities; specifically the Education Debt Reduction Program (EDRP). EDRP assists VHA in meeting its needs for qualified health care staff in certain occupations for which recruitment or retention is difficult.

2. SUMMARY OF CONTENTS. This VHA Handbook:

a. Provides comprehensive information about EDRP,

b. Specifies program responsibilities at the employee, facility, Veterans Integrated Service Network (VISN), and VHA Central Office level.

c. Describes eligibility requirements for VA employees to receive educational assistance under EDRP, the application, and the funding allocation processes for facilities and VISNs.


4. RESPONSIBLE OFFICE. The Healthcare Retention and Recruitment Office (10A2A7) is responsible for the contents of this Handbook. Inquiries should be directed to (504) 565-4900.

5. RESCISSIONS. VHA Handbook 1021.1, dated April 25, 2008, is rescinded.

6. RECERTIFICATION. This VHA Handbook is scheduled for recertification on or before the last working day of May 2017.

Robert A. Petzel, M.D.
Under Secretary for Health

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EDUCATION DEBT REDUCTION PROGRAM PROCEDURES

1. PURPOSE

This Veterans Health Administration (VHA) Handbook provides specific direction and guidance for administration of the Education Debt Reduction Program (EDRP) at VHA field facilities. EDRP enhances recruitment and retention of health professionals that are required to meet VHA staffing.

2. AUTHORITY

   a. The Department of Veterans Affairs (VA) EDRP is codified in title 38, United States Code (U.S.C.), §§ 7681 to 7683.

   b. This authority permits VA to provide EDRP payments to permanent, full-time employees appointed under 38 U.S.C. 7401 and part-time employees appointed under 38 U.S.C. 7405 (excluding individuals serving in positions without compensation (WOC) and other time-limited appointments), with qualifying loans, who occupy selected positions providing direct-patient care services, or services incident to direct-patient care services, for which recruitment and retention of qualified personnel is difficult.

   c. EDRP payments may cover tuition costs and other reasonable educational expenses, including the cost of books, general fees and laboratory fees, and other reasonable living expenses.

   NOTE: Though the scope of the authority contained in EDRP is substantial, it does have limitations. Details of this authority are described and exemplified in the following paragraphs.

3. BACKGROUND

   a. VA engages in strong competition with private sector organizations and other governmental agencies for scarce health care staff. Some of these difficulties affect the system at large, while the impact from others is at regional or community levels. VA’s health care system has undertaken the most significant transformation in its history, i.e., the transition from a hospital, bed-based system to an ambulatory care-based system, with primary care as the focus of patient treatment in both outpatient and inpatient settings. The key goal that underlies VA’s transformation, and continues to drive its strategies for the future, is a quest for health care value. The success of this transition depends, in part, on achieving an appropriate level and mix of quality health care staff. Educational assistance, such as that afforded under EDRP, is an excellent incentive that can help VA achieve its staffing goals and enhance the value of the health care that it provides to the Nation’s Veterans.

   b. EDRP is not an appropriate incentive for program, or policy-level positions determining policy, making policy, or policy-advocating character, unaffiliated with direct patient care responsibilities (e.g., VA Central Office, Veterans Integrated Service Network (VISN) positions...
or research positions). For the purposes of EDRP, positions are limited to the following occupations:

1. Physician,
2. Dentist,
3. Podiatrist,
4. Pharmacist,
5. Licensed practical or vocational nurse,
6. Expanded-function dental auxiliary,
7. Registered Nurse (RN),
8. Certified Registered Nurse Anesthetist (CRNA),
9. Physician Assistant (PA),
10. Optometrist,
11. Physical therapist,
12. Occupational therapist,
13. Certified respiratory therapy technician,
14. Registered respiratory therapist,
15. Psychologist,
16. Social worker,
17. Nuclear medicine technologist,
18. Dietitian,
19. Occupational therapy assistant or aide,
20. Physical therapy assistant or aide,
21. Medical technologist,
22. Diagnostic radiologic technologist or technician,
(23) Therapeutic radiologic technologist or technician,
(24) Medical instrument technician,
(25) Pharmacy technician or aide,
(26) Audiologist,
(27) Speech pathologist,
(28) Orthotist or prosthetist,
(29) Medical records administrator and specialist,
(30) Prosthetic representative,
(31) Medical records technician,
(32) Biomedical engineer,
(33) Chiropractor,
(34) Dental technologist (dental hygienist and dental assistant or aide)
(35) Kinesiotherapist (Corrective Therapist), and
(36) Blind Rehabilitation Specialist or Outpatient Specialist.

**NOTE:** It is not the intent that all of these occupations be routinely funded. Occupations are only considered for funding if they are identified by the approving VISN and facility as positions for which it is difficult to recruit and retain qualified personnel.

### 4. DEFINITIONS

#### a. Acceptable Level of Performance

An annual performance rating of “fully successful” or higher, or a proficiency rating or report of “satisfactory,” “fully successful,” or higher constitutes an acceptable level of performance for an EDRP participant. A participant who receives an annual performance rating of less than “fully successful,” or a proficiency rating or report of less than “satisfactory” or “fully successful” during an EDRP service period is not eligible to receive an EDRP award.

#### b. VA Form 10-0394B, Education Debt Reduction Program (EDRP) Acceptance of Conditions

VA Form 10-0394B, specifies the terms and conditions of an EDRP award. An EDRP award is completed after it is first signed by the EDRP candidate and then by the Under Secretary for Health, or designee (see App. C).
c. **Commercial Loan.** A commercial loan is a loan made by a bank, credit union, savings and loan association, insurance company, school, or other financial or credit institution that is subject to examination and supervision in its capacity as a lender by an agency of the United States and/or of the state in which the lender has its principal place of business.

d. **Eligible Employee.** An employee must meet specific eligibility requirements to participate in EDRP. To be eligible for participation, an employee must:

1. Be appointed under one of the following authorities:
   
   a. Title 38 U.S.C. 7401, as a permanent, full-time VHA employee; or
   
   b. Title 38 U.S.C. 7405, as a permanent, part-time VHA employee without a time limitation (excludes individuals serving in positions with WOC and other time-limited appointments) serving in one of the positions listed in subparagraph 3b for which recruitment and retention is difficult.

2. Owe any amount of principal and interest on a qualifying loan, the proceeds for which were used by, or on behalf of, that individual to pay costs relating to a course of education or training which led to a degree that was required, used, and qualified the individual for the position to which appointed.

e. **Qualifying Loan.** A qualifying loan is a loan, government or commercial, made for educational purposes by institutions which are subject to examination and supervision in their capacity as lending institutions by an agency of the United States or of the state in which the lender has its principal place of business. Loans must be for actual costs paid for tuition, and other reasonable educational expenses such as living expenses (see subpar. 4f and par. 14), fees, books, supplies, educational equipment and materials, and laboratory expenses.

f. **Reasonable Living Expenses.** Reasonable living expenses means the reasonable cost of room and board, transportation and commuting costs, and other reasonable costs incurred during an individual’s attendance at an educational institution that are part of the educational loan. Living expenses should be equal to or less than the sum of the school’s estimated standard student budget for living expenses for the degree program and for the year(s) during which the participant was enrolled in school. If there is no standard budget available from the school or if the participant requests repayment for educational and living expenses which exceed the standard student budget, reasonableness of educational and living expenses incurred must be substantiated by additional documentation. **NOTE:** Luxury items such as motorized vehicles, etc., do not qualify under this definition.

g. **Service Period.** A service period is the period of time that an EDRP participant must serve in a paid duty status in order to receive an EDRP payment. A service period is typically 12 months. Payments are made at the conclusion of a service period. A participant in the program may not receive debt reduction payments for more than five consecutive 12-month periods of service in a paid duty status. The first, and in some cases the only, service period begins on the calendar day after a VA Form 10-0349B is completed. Participants are ineligible to receive debt reduction payments any time that they are in a non-pay status. A service period is
extended by the length of time that a participant spends in a non-pay status since that time must be made up with paid service before an EDRP payment is made to the participant. The participant’s service period will be extended by 1 calendar day for each increment of 8 hours of leave without pay (LWOP).

h. **Federal Perkins Loan.** A Federal Perkins Loan is a low-interest loan for both undergraduate and graduate students with exceptional financial need. Federal Perkins Loans are made through a school’s financial aid office. The school is the lender and the loan is made with government funds. Up to 100 percent of the outstanding loan principal balance may be cancelled for full-time employees in certain occupations. Employees with Federal Perkins Loans and appointed to full-time positions in VHA are not eligible for the EDRP if appointed to one of the following occupations: Licensed Practical or Vocational Nurse, RN, a medical technician working in health care services, dental hygiene, medical technology, or nutrition who is certified, registered or licensed by the appropriate state agency. **NOTE:** Questions concerning Federal Perkins Loans should be directed to the educational institution that provided the loan.

5. RESPONSIBILITIES OF THE HEALTHCARE RETENTION AND RECRUITMENT OFFICE (HRRO)

The Director, HRRO, is responsible for national implementation and management of EDRP; this includes:

a. Developing and implementing policy, funding allocation, and program oversight and evaluation.


c. Coordinating efforts with VISNs or facilities, so that if failures in the administration of EDRP exist, (e.g., budget overruns, failure to include EDRP award offer in vacancy announcement, commitment letter, etc.), arrangements are made to enter into a Memorandum of Understanding (MOU) with HRRO that provide for the VISN or facility, to be held financially responsible for payment of any EDRP award that would exceed HRRO’s budget.

(1) In making a determination that such a failure occurred, HRRO has the authority to obtain and review all relevant documents and information.

(2) If it is determined that the facility is financially responsible, VISNs or facilities must enter into an MOU with HRRO (see App. E), which must be prepared by the VISN or facility EDRP Liaison.

d. Executing VA Form 10-0349B for participants. To accomplish this, applicants must submit VA Form 10-0394, Education Debt Reduction Program (EDRP) Application, to the facility Human Resources EDRP coordinator within 4 months of the date they were notified of their eligibility to apply for EDRP.
e. Monitoring facility and VISN compliance with VHA Directive 1021 and VHA Handbook 1021.01.

f. Evaluating program progress and effectiveness to be used in the preparation of annual reports for the Under Secretary for Health.

g. Providing program guidance to local facilities and VISN coordinators.

h. Determining EDRP service period dates and amounts of awards, based on availability of funds.

i. Executing an MOU between HRRO and any VISN or facility that notifies HRRO of its intent to provide supplemental funding for EDRP as a recruitment or retention incentive.

6. RESPONSIBILITIES OF THE FACILITY DIRECTOR

The Facility Director is responsible for local-level EDRP implementation and management consistent with VHA policy. More specifically, the Facility Director is responsible for:

a. Assigning EDRP oversight to the Human Resources Management Officer.

b. Ensuring that local policies and procedures related to EDRP are developed and implemented with involvement and/or negotiation with the exclusive Labor Representatives, as appropriate, in accordance with policy governing labor-management agreements, and applicable law and regulations.

c. Ensuring that the facility managers do not reappoint or reassign employees for the sole purpose of qualifying them for EDRP awards.

d. Ensuring that funds, centralized or local, are available to support offers of EDRP to employees.

7. RESPONSIBILITIES OF THE HUMAN RESOURCES MANAGEMENT OFFICER

The Human Resources Management Officer is responsible for:

a. Linking EDRP program management to the local recruitment, selection, and retention process.

b. Ensuring the program is managed according to established regulations and policy, and that case files contain appropriate documentation (see par.10).

c. Identifying a Primary Program Coordinator and Alternate Program Coordinator.

(1) The Primary Program Coordinator assigned to this position must be a journeyman-level Human Resources Specialist responsible for managing the complex duties associated with the program.
(2) The Alternate Program Coordinator must also be knowledgeable about EDRP, and be able to perform the full scope of EDRP responsibilities in the absence of the primary coordinator.

d. Identifying and prioritizing a list of locally difficult to recruit and retain occupations, or specialties within occupations, which will be eligible for consideration of EDRP awards. This list must coincide with the facility and/or VISN Workforce Succession Strategic Plan and be updated periodically as needs change. In advance of recruitment, the decision to include EDRP is made at the facility level in conjunction with (if appropriate) VISN involvement and HRRO funding authorization. The recruitment process and job announcement or commitment letter must then include EDRP as part of the recruitment package for the individual selected. In cases where EDRP is offered as a retention incentive, a memorandum signed by the medical facility Director must accompany each individual EDRP application package justifying why this retention incentive was considered necessary for the particular employee.

e. Notifying HRRO of EDRP Primary and Alternate Coordinator changes within 10 calendar days.

f. Inputting a copy of the executed VAF 10-0394B, in the employee’s electronic official personnel file (eOPF).

g. Ensuring that all Human Resources (HR) Staff are aware of employees who are active EDRP participants.

h. Ensuring that HR staff notify the Primary and Alternate EDRP Coordinators of any changes on a EDRP participant’s status, tour of duty, reduction in hours, reassignments, resignations, terminations or other actions that will affect EDRP eligibility.

i. Maintaining an official EDRP folder on each participant in HR.

8. RESPONSIBILITY OF THE MEDICAL CENTER PRIMARY AND ALTERNATE PROGRAM COORDINATOR

The medical center Primary and Alternate EDRP Coordinators are responsible for:

a. Implementing and managing EDRP locally by compiling all required information in a timely manner.

b. Ensuring applicants for EDRP meet all requirements for EDRP.

c. Maintaining and providing EDRP application packages.

d. Ensuring educational programs completed by applicants meet required qualification and accreditation standards.

e. Providing timely and accurate assistance and guidance to employees during the application process.
f. Obtaining a copy of the loan instrument(s) from the employee to validate the applicant’s indebtedness.

g. Forwarding complete and accurate application packages to the VISN EDRP Coordinator. Documents must be sent to the VISN EDRP Coordinator to ensure HRRO receives the application package within established timeframes, as determined by HRRO. The complete application package includes:

(1) VA Form 10-0394;

(2) VA Form 10-0394A, Education Debt Reduction Program (EDRP) Loan Verification Form;

(3) VA Form 10-0394B;

(4) A copy of the vacancy announcement;

(5) The commitment letter with the EDRP offer or the retention justification memorandum signed by the medical facility Director;

(6) Transcripts; and

(7) The most recent Standard Form (SF) 50, Notification of Personnel Action (other than award or general adjustment).

h. Notifying candidates, who have been approved for funding after HRRO approves the award, and providing candidates a copy of their completed VA Form 10-0349B.

i. Scanning a copy of VA Form 10-0349B into the employee’s eOPF.

j. Having the approved candidate sign and return the Notice of Award Approval to HRRO. **NOTE:** This is not a VA Form; it is on a blank sheet of paper in the EDRP Coordinator’s Guide and on the EDRP Share Point site provided to the Coordinator with a hard copy maintained in the employee’s EDRP folder.

k. Verifying that program participants have maintained an acceptable level of performance prior to authorizing annual debt reduction payments.

l. Verifying that the program participant(s) maintained an acceptable level of conduct, with no sustained formal disciplinary or adverse actions, prior to authorizing annual debt reduction payments.

m. Obtaining copies of acceptable documentation from employees to substantiate that EDRP participants made payments of principal and interest on qualifying loans during each service period for which an award is authorized, and that such payments were credited during the service period.
n. Notifying HRRO of any excess or unused funds for those participants who fail to meet all program requirements.

o. Coordinating with other appropriate services, such as Financial Management.

p. Establishing a process to communicate with all EDRP award recipients on a quarterly basis to identify any participant changes that impacted EDRP funding (e.g., resignations, transfers, retirements, reassigned or position or occupation changes for which the EDRP award was made, change in work schedules, any period of LWOP or Absent Without Leave (AWOL), name changes, etc.).

q. Reporting any participant changes to HRRO within 10 calendar days.

r. Submitting complete and accurate EDRP application packages to the VISN EDRP Coordinator for review.

s. Functioning as communication liaison between facility applicants, awardees, and HRRO concerning all EDRP matters.

t. Processing all eligible EDRP transfers in accordance with the EDRP Award Participant Facility Transfer Procedures (see App. D).

9. RESPONSIBILITY OF THE VISN EDRP COORDINATOR

The VISN EDRP Coordinator is responsible for:

a. Communicating with HRRO concerning all EDRP matters.

b. Verifying accuracy of EDRP application packages and funding availability, then submitting application packages to HRRO for final review and approval.

c. Providing timely and accurate assistance and guidance to VISN, and medical facility staff and employees regarding eligibility and management of the EDRP Program.

d. Functioning as a medical facility EDRP Coordinator in the absence of the medical facility primary or alternate EDRP Coordinators.

e. Establishing a process to communicate with VISN and medical facility staff on a regular basis, identifying changes that impact EDRP processes, eligibility, and funding.

f. Reviewing all applications packages for eligibility, accuracy, and completeness.

g. Forwarding reviewed application packages to HRRO within the established time frame, as determined by HRRO.

h. Maintaining a tracking system that includes applications submitted, approved, denied, award amount, and current running balance of VISN and facility funds available.
i. Notifying HRRO, in writing, of any excess or unused funds by July 1 of each year.

**10. RESPONSIBILITIES OF THE APPLICANT OR PARTICIPANT**

Each applicant and participant is responsible for:

a. Carefully reviewing the material contained in this Handbook and VHA Directive 1021 to ensure that they fully understand the nature of the program, its benefits and limitations, and participant responsibilities.

b. Completing a legible and accurate VA Form 10-0394.

c. Submitting a complete and accurate EDRP application package (VA Form 10-0394, VA Form 10-0394A, and VA Form 10-0394B) to the facility EDRP Program Coordinator within 4 months of the date they were permanently appointed or notified of their eligibility to apply for EDRP.

d. Signing a VA Form 10-0394B.

e. Satisfying all requirements specified in VA Form 10-0394B.

f. Maintaining an acceptable level of performance in the position to which appointed and held during the EDRP service period.

g. Maintaining an acceptable level of conduct, defined as having no sustained formal disciplinary or adverse action, in the position appointed to and held during the service period. A participant whose conduct results in a sustained formal disciplinary or adverse action is not eligible to receive an EDRP award and must be terminated from the EDRP. **NOTE: EDRP funding is held in escrow until any appeal is finally resolved.**

h. Providing a current document within 30 calendar days of the end date of each service period reflecting the total amount of payments made and credited during each service period covered under VA Form 10-0394B. If proofs of payments are not received by the local EDRP Coordinator within 30 calendar days of completing a service period the participant’s payments will be delayed. The following are considered acceptable forms of proof of payment:

   (1) A signed letter from the lending institution, on its letterhead, indicating the exact amount of payments received and credited or posted toward the loans specified in the EDRP Application Package, during the specific service period. The EDRP participant’s name and specific account numbers must appear on that letter.

   (2) Copies of cancelled checks, front and back, payable to the lending institution(s), and noting specific account numbers.

   (3) Copies of the face of the appropriate check(s), payable to the lending institution(s) plus copies of bank statements showing that those checks cleared the account.
(4) A printout from the lender’s Web site. In addition to showing specific dates that payments were credited and amount of payments made on those dates, this printout must reflect the employee’s name, social security number, and/or loan account number(s), as specified on VA Form 10-0394A.

(5) A completed Lender Payment Verification Form (available from the local EDRP Coordinator).

i. Notifying the local EDRP Coordinator, in writing, of any of the following changes within 10 working days of their occurrence: name, address, telephone number, and any employment status change that would impact EDRP funding, i.e., change in work schedule, all periods of LWOP or AWOL, resignation, reassignment, transfer, vacating, changing, detailing from the position or occupation for which an EDRP award was made, etc.

j. Initiating and forwarding a request for EDRP award transfer to another VA facility to the local EDRP coordinator at least 1 month in advance of the transfer date and in accordance with EDRP Participant Facility Transfer Procedures (see App. D) to allow sufficient time for processing and coordinating with the gaining facility. Failure to follow these procedures may result in termination from the EDRP.

k. Making loan payments on those loan(s) approved under EDRP, at the level approved for reimbursement. Total payments made by a participant of less than 75 percent of the approved service period award amount will result in a 25 percent reduction of award amounts for all remaining service periods of the EDRP award. A participant who makes no loan payments during a service period must be terminated from the EDRP. Payments must be posted or credited to the participant’s loan account during the specific service period dates.

11. RESPONSIBILITIES OF THE FACILITY FINANCIAL MANAGEMENT SERVICE OFFICE

The facility Financial Management Service is responsible for:

a. Maintaining a copy of the executed VA Form 10-0394B in the appropriate file.

b. Verifying and validating loan documentation and employee payment records prior to reimbursement. Only those loans approved under the EDRP are authorized for reimbursement. Loans approved for EDRP reimbursement are those that are reflected on VA Form 10-0394A. The following are considered acceptable forms of proof of payment:

(1) A signed letter from the lending institution, on its letterhead, indicating the exact amount of payments received and credited and/or posted toward the loans specified in the EDRP Application Package, during the specific service period. The EDRP participant’s name and specific account numbers must appear on that letter;

(2) Copies of cancelled checks, front and back, payable to the lending institution(s), and noting specific account numbers;
(3) Copies of the face of the appropriate check(s), payable to the lending institution(s) plus copies of bank statements showing that those checks cleared the account;

(4) A printout from the lender’s Web site. In addition to showing specific dates that payments were credited, and amount of payments made on those dates, this printout must show the employee’s name, social security number, and loan account number as specified in VA Form 10-0394A;

(5) A completed Lender Payment Verification Form (available from the local EDRP Coordinator).

c. Making reimbursement payments to program participants in accordance with applicable policy and guidance.

12. ELIGIBILITY

a. An employee must meet specific eligibility requirements to participate in EDRP. To be an EDRP award recipient, the individual:

(1) Must be appointed under one of the following authorities:

(a) Title 38 U.S.C. 7401, as a permanent, full-time VHA employee; or

(b) Title 38 U.S.C. 7405, as a part-time VHA employee without a time limitation (excludes individuals serving in positions with WOC and other time-limited appointments) serving in one of the positions listed in paragraph 2 for which facility management has determined that recruitment and retention is difficult.

(2) Must owe any amount of principal and interest under a loan, the proceeds of which were used by, or on behalf of, that individual to pay costs relating to a course of education or training which led to a degree that was required, used, and qualified the individual for the position to which appointed.

(3) The educational debt for the degree that qualified the applicant for an EDRP award must have been for education obtained from an accredited school or institution.

13. FUNDING

a. Centralized EDRP funding is managed by HRRO. The HRRO Program Manager is responsible for managing the funding process consistent with available funds, overall VHA goals and identified health care staffing needs. EDRP awards are based on the availability of funds and Department need. Debt reduction awards are prioritized to allow as many employees (who have outstanding loans for education or training in specified health care disciplines for which recruitment or retention is difficult) as possible to receive them.
b. VHA facilities and VISNs are required to submit complete applications of candidates whom they wish to recommend for EDRP awards to HRRO based on current or anticipated difficulties in filling health care positions covered by EDRP.

c. HRRO completes VA Form 10-0394B throughout the fiscal year. Accordingly, each period of service for a participant usually includes time that involves 2 fiscal years. HRRO allocates funds to a facility to cover the full amount of an approved debt reduction payment to a participant during the fiscal year in which the participant completes a specific period of service covered under VA Form 10-0394B.

d. Payments are made to approved EDRP participants at the conclusion of each 12-month service period covered by an EDRP award for the total amount of payments made by the participant during the service period, not to exceed the total amount approved for each service period by HRRO. HRRO disburses the funds to the facility and the facility is responsible for ensuring the EDRP participants receive the reimbursement within 2 pay periods of the medical center receiving the Transfer of Disbursing Authority (TDA).

e. Local and national staffing issues (VHA Workforce Succession Strategic Plan) must be considered in making effective EDRP funding decisions. Factors affecting funding include, but are not limited to, the following:

(1) **VISN and/or Facility Issues.** VISN and/or facility issues include:

(a) VISN and/or facility health care staffing needs (current and anticipated) by priority;

(b) Workload;

(c) Length of time it takes to fill vacant positions;

(d) Current and projected staffing levels;

(e) Turnover;

(f) Nature and extent of VISN and/or facility recruitment efforts;

(g) Academic levels and interest of eligible employees; and

(h) VISN Workforce Succession Strategic Plan.

(2) **National Issues.** National issues include:

(a) Current and anticipated national VHA occupational shortages;

(b) Health care industry staffing trends;

(c) VHA and VA workforce demographics;
(d) Top management direction (e.g., program and mission changes);

(e) Significant changes in standards and requirements affecting employment; and

(f) Priorities established in the VHA Workforce Succession Strategic Plan.

f. VISN Directors and medical facility Directors are authorized to use local funds to support EDRP offers when centralized funds are not available or in situations discussed in subparagraph 5c(2) of this Handbook. Use of VISN or medical centers funds requires a MOU.

**NOTE:** HRRO periodically reviews and refines funding criteria consistent with local and VISN needs and overall VHA goals.

### 14. ALLOWABLE DEBT REDUCTION EXPENSES

a. An EDRP award may cover certain amounts paid to reduce the balance on qualifying educational loans for the approved individual employee, meaning those educational and living expenses which are equal to or less than the sum of the school’s estimated standard student budget for educational and living expenses for the degree program and for the year(s) during which the participant was enrolled in school. If there is no standard budget available from the school or if the participant requests repayment for educational and living expenses which exceed the standard student budget, reasonableness of educational and living expenses incurred must be substantiated by additional documentation. **NOTE:** Luxury items such as motorized vehicles, etc., do not qualify under this definition

b. An EDRP payment may not exceed the actual amount of principal and interest that a participant paid to reduce the balance on a qualifying educational loan or loans during a specific period-of-service covered by VA Form 10-0394B. The amount of an EDRP payment cannot exceed the award limit established by HRRO. Participants must provide appropriate and acceptable documentation to substantiate any amounts that they paid and were credited or posted by the lender during a service period to reduce the principal and interest on their loans. These amounts may not include payments that have been reimbursed, or can be reasonably expected to be reimbursed, by any other party or payer. **NOTE:** Further delineation of the funding limits on EDRP awards is included in paragraph 15.

c. Educational loans that qualify for coverage under EDRP are limited to Government (Federal, state, local) and commercial loans for health professional education and must be in the name of the individual who applies for an EDRP award. Additionally, the health professional education covered by such a loan must have been specific education that was required, used and qualified the participant for appointment to a specific position in one of the occupations listed in subparagraphs 3b(1) through 3b(36). The degree must be from an accredited school or program.

d. The following loans do not qualify for coverage under the EDRP:

(1) Loans obtained from family members, relatives, and friends.

(2) Loans made prior to, or after, the candidate’s EDRP qualifying education.
(3) Any portion of a consolidated loan that is not specifically identified with the education and purposes for which an EDRP award may be authorized (i.e., home or auto loans merged with educational loans).

(4) Loans for which an individual incurred a service obligation for repayment or agreed to service for future cancellation (e.g., Federal Perkins Loan).

(5) Credit card debt.

(6) Parent Plus Loans.

(7) Federal Perkins Loans (unless the occupation is not subject to cancellation). **NOTE:** Refer to paragraph 4h for more definitive information regarding this loan.

(8) Loans that have been paid in full.

(9) Loans that are in default and assumed by a collection agency.

(10) Loans not obtained from a bank, credit union, savings and loan association, not-for-profit organization, insurance company, school, and other financial or credit institution which is subject to examination and supervision in its capacity as a lending institution by an agency of the United States or of the state in which the lender has its principal place of business.

(11) Loans for which supporting documentation is not available.

(12) Loans that have been consolidated with loans of other individuals, such as spouses, children, friends, or other family members.

(13) Loans or portions of loans obtained for educational or living expenses which exceed the standard of reasonableness as determined by the participant's standard school budget for the year in which the loan was made, and are not determined by the National Institutes of Health (NIH), to be reasonable based on additional documentation provided by the individual.

(14) Loans, financial debts, or service obligations incurred under the following programs, or similar programs, which provide loans, scholarships, loan repayments, or other awards in exchange for a future service obligation:

(a) Armed Forces (Army, Navy, or Air Force) Professions Scholarship Program;

(b) Exceptional Financial Need (EFN) Scholarship Program;

(c) Financial Assistance for Disadvantaged Health Professions Students (FADHPS);

(d) Indian Health Service Scholarship Program;

(e) National Health Service Corps Scholarship Program;
(f) NIH Undergraduate Scholarship Program (UGSP);

(g) National Research Service Award (NRSA) Program;

(h) Physicians Shortage Area Scholarship Program;

(i) Primary Care Loans (PCL);

(j) Public Health Service Scholarship Program; and

(k) Privately and publicly held corporations (national or local pharmacies, private hospitals, local and state run medical facilities, etc.).

(15) Any loan in default, delinquent, or not in a current payment status.

(16) Any Federal educational loan debt, including debt arising from the conversion of a service obligation to a loan, that has been in default or written off as uncollectible is ineligible for repayment under the Program, even if currently considered to be in good standing.

(17) Parents PLUS loans; (except the Graduate PLUS loans for students).

(18) Home equity loans or other non-educational loans.

e. If an individual has consolidated two or more educational loans under a single loan, EDRP will only cover loans for education that qualified the participant for appointment to specified health positions. Accordingly, applicants who have consolidated their outstanding educational loans must provide documentation to verify the portion of the balances on their consolidated loans that may be covered under EDRP. It is the participant’s sole responsibility to ensure that payments on a consolidated loan are broken out by the lender that consolidated the loans, e.g., four loans qualified for EDRP, participant consolidates those four loans with three other non EDRP loans, the lender must document how much of the payment(s) went towards the four qualifying EDRP loans in each payment. If this is not available, the participant is subject to being terminated from the EDRP.

15. EDUCATION DEBT REDUCTION PAYMENTS

a. The total amount of debt reduction payments that may be awarded to an employee is limited as determined by HRRO. A program participant may not receive more than five EDRP payments. Each EDRP payment is made at the conclusion of a 12-month service period in a paid status. The first, and in some cases the only, service period begins on the day after a VA Form 10-0394B is completed by the Under Secretary for Health, or designee. The annual amount of debt reduction award that a full-time employee may receive is limited and determined annually by HRRO, based on the availability of funds.

b. Although the statutory maximum EDRP award amount is currently $60,000, HRRO, VISN and medical center managers are not required to award this amount to a participant, but
may award any amount up to this limit or cap on the basis of availability of funds and recruitment and retention needs.

c. EDRP payments to part-time employees are pro-rated based on the proportion of their regular part-time schedules to full-time employment. A part-time or full-time participant’s work schedule is not to be adjusted during a period covered under VA Form 10-0394B without prior notification to HRRO.

d. Participants are ineligible to receive debt reduction payments for time that they are in a non-pay status. The time that a participant spends in a non-pay status during a 12-month service period covered under VA Form 10-0394B must be made up with paid service, before a payment can be made to the participant. Once again, a participant may not receive an EDRP payment for a service period covered under VA Form 10-0394B until they have completed 12-months of paid service in the specified duty status for that particular period. For the purposes of EDRP, the service period will be extended by 1 calendar day for each 8 hours of LWOP.

e. If an EDRP award covers two or more service periods, the participant must continuously serve in the position for which the award was authorized until all of the periods of service have been completed. The second service period begins on the day after the first service period ends. Each subsequent service period begins the day after the prior one ends.

f. Participants who do not maintain acceptable levels of performance in the positions covered by their VA Form 10-0394B are not eligible to receive EDRP payments. Annual performance or proficiency ratings are used to determine if participants’ performance levels are acceptable. A performance rating of “fully successful” or a proficiency rating of “satisfactory” constitutes an acceptable level of performance for an EDRP participant. A participant who receives a performance rating of less than “fully successful” or a proficiency rating of less than “satisfactory” during an EDRP service period is not eligible to receive an EDRP award and is terminated from the program. Since the annual rating period and the EDRP service period may not coincide, EDRP Program Coordinators must verify the employee’s performance with the appropriate supervisor or rating official for the time period between the last performance appraisal and the end of the service period.

g. Maintaining an acceptable level of conduct, defined as having no sustained formal disciplinary or adverse action. A participant whose conduct results in a sustained formal disciplinary or adverse action is terminated from EDRP, and is not eligible to receive an EDRP payment for the service period in which the personnel action occurred or for any subsequent service periods covered by the EDRP award. **NOTE:** EDRP funding is held in escrow until any appeal is finally resolved.

h. EDRP payments are exempt from taxation.

i. An EDRP payment must be paid directly to the participant and not to the lending institution or other third party.
16. WAIVERS TO MAXIMUM AMOUNTS OF EDRP

The Secretary of Veterans Affairs, or designee, may waive limitations in the case of an individual who is determined by the Secretary of Veterans Affairs, or designee, as serving in a position for which there is a shortage of qualified employees, by reason of either location or requirements of the position. In the case of such a waiver, the total amount of education debt repayment payable to that individual may be up to the total eligible amount of the principal and the interest on the participant’s loan.

a. A request for waiver will be submitted to Secretary of Veterans Affairs, or designee, through HRRO;

b. The concurrence of the VISN, and medical facility Director or National CMOP Director for that individual must be submitted to HRRO for review. Evidence that the following factors were considered must be fully documented in the written justification to pay an EDRP incentive and must be retained as part of the record:

(1) The medical center manager determines that the unique qualifications of the employee or a special need of the medical center for the incumbent’s services make it essential to offer an EDRP recruitment or retention incentive in excess of the cap if the individual would more than likely not accept the VHA employment offer, or to remain with VHA in the absence of this recruitment or retention incentive.

(2) Employment trends and labor market factors, such as the availability and quality of candidates in the labor market possessing the clinical competencies required for the position could perform the full range of duties and responsibilities of the individual position at the level to be performed by the individual.

(3) The success of efforts within the previous 6 months to recruit candidates and/or retain employees with competencies similar to those possessed by the individual for positions similar to the position to be held by the individual.

(4) The basis for determining the special need for the individual’s services that makes it essential (or critical) to hire or retain the individual based on VHA’s and medical center’s mission needs, and the special and clinical competencies required for the position.

(5) The desirability of the duties, call schedules, work or organizational environment, or geographic location of the position in rural or highly rural facilities.

(6) The salary being offered and the salaries typically paid outside the VHA.

c. Upon approval of the waiver the funding for the waiver beyond the $60,000 statutory cap is the responsibility of the VISN and/or medical center requesting the waiver.
17. PROGRAM ACCOUNTABILITY

a. EDRP requires significant accountability on the part of each participant. While some key participant responsibilities are specified in paragraph 10, other important terms and conditions of program participation are described in other paragraphs of this Handbook and in VA Form 10-0394B. All participants need to carefully review this material to ensure that they fully understand the nature of the program, its benefits and limitations, and participant responsibilities.

b. Facilities and VISNs are accountable for ensuring that EDRP is implemented and administered at local VHA health care facilities in accordance with applicable law, VHA Directive 1021, this Handbook, and guidance from HRRO.

c. HRRO is accountable for ensuring that EDRP is administered at the national level consistent with the law, provisions of the VHA Directive 1021, this Handbook, and senior management direction.

d. HRRO is also responsible for:

(1) Providing program guidance to facility and VISN officials.

(2) Conducting random and periodic EDRP audits to ensure EDRP is administered at the VHA health care facility level consistent with the law, provisions of VHA Directive 1021, this Handbook, and top management and HRRO direction.

e. Facility officials are required to provide HRRO with all requested information, documents, and/or reports by the established deadline.

18. ACADEMIC REQUIREMENT

EDRP payments are limited to the VHA qualification standards used, which qualified the individual for the position and grade level to which appointed (see subpar. 2b). The degree must be from an accredited school or program.

19. PROGRAM LENGTH

A participant in the program may not receive EDRP payments for more than five consecutive 12-month periods of paid service.

20. RELATIONSHIP OF OTHER EDUCATIONAL ASSISTANCE PROGRAMS

Awards authorized to EDRP participants may be in addition to assistance available to participants under other components of the Educational Assistance Program covered in 38 U.S.C. Chapter 76, i.e., the NNEI and Employee Incentive Scholarship Program (EISP). However, if an employee is in a service obligation period associated with one of these programs, they are not eligible for EDRP as a retention incentive until the service obligation has been fulfilled. Individuals receiving a Student Loan Repayment Program (SLRP) incentive under
title 5 authorities should not receive an EDRP award during the period of their service obligation under SLRP.

21. PROGRAM COMMENCEMENT DATE

The program commences on the day after the date that a participant’s VA Form 10-0394B is signed by the Under Secretary for Health, or designee.

22. EARLY TERMINATION OF EDRP PARTICIPATION

a. EDRP will be terminated if a program participant vacates the health care professional position for which an EDRP award is authorized. This includes changes on a permanent basis (e.g., resigns; converts to a title 5 appointment, converts or accepts another non-covered title 38 or Hybrid title 38 position different from the one that initially qualified the participant for EDRP. Acceptance into a training program (such as the Graduate Healthcare Administration Training Program (GHATP), Army-Baylor Master of Public Health (MPH) program, VA Pharmacy Residency) or if the employee leaves the occupational series to which they were appointed will result in termination of EDRP. If the participant did not complete a 12-month period of paid service under VA Form 10-0394B, the payment for that service period is pro-rated to the amount of time served during the period in the position for which the EDRP was originally authorized. No payments are authorized for subsequent periods covered under VA Form 10-0394B, even if the candidate returns to the position for which the award was authorized.

NOTE: One exception is if a program participant transfers to the same position at another facility, the participant may be eligible to continue to receive EDRP payments, provided that the gaining facility concurs and the participant follows the EDRP Award Participant Facility Transfer Procedures (see App. D). Failure to follow the transfer procedures may result in termination from EDRP participation.

b. A participant who is separated due to a staffing adjustment or a reduction-in-force before completing a service period covered under VA Form 10-0394B, must receive a pro-rated payment based on the proportion of time served in a paid duty status to the total time in the service period. No payments are to be authorized for subsequent periods covered under the program.

c. In cases when it is considered to be in the best interest of VA to reassign an employee to a position that is not covered by EDRP, the participant is entitled to reimbursement as specified in preceding subparagraph 22a.

d. A participant who receives, or is subject to, a sustained formal disciplinary or adverse action, or who receives a performance rating of less than “fully successful” or a proficiency rating of less than “satisfactory” during an EDRP service period is terminated from the program. The participant is not eligible to receive an EDRP payment for the service period in which the discipline or action or rating occurred, or for any subsequent service periods covered by the EDRP award.
e. A participant who makes no loan payments during a service period must be terminated from the EDRP.

f. A participant who transfers to another facility and fails to follow the specific EDRP transfer procedures (see App. D), is to be terminated from the EDRP.

23. RECRUITMENT

EDRP may be authorized upon determination that, in the absence of loan repayment benefits, VHA would have difficulty filling a specific position with a highly-qualified, permanently-appointed candidate. The decision to offer EDRP must be in writing and made as part of the recruitment process. When EDRP is used as a recruitment tool, it must be documented in either the vacancy recruitment announcement(s) or commitment letter executed during the recruitment process. \textit{Note}: Pre-approval of an EDRP offer by HRRO is required for selected occupations that have been identified at the national level as not difficult to recruit and/or retain. It is understood that there may be a justifiable need at some facilities for one or more of these occupations. Facility EDRP Coordinators are provided a list of these occupations by HRRO as the selected occupations change. Local recruitment plans for EDRP must be established that include:

a. The specific difficult to recruit and retain health profession occupation, or specialties within an occupation, that are being supported or recommended by the facility under EDRP. Evidence of need may be based on some or all of the following:

1) Success of recent efforts to recruit suitable candidates, including such indicators as offer acceptance rates, proportion of positions filled, length of time required to fill positions, and use of locally authorized incentives;

2) Recent turnover in the same or similar position(s);

3) Labor market factors that affect the ability to recruit for similar positions; and

4) Any special qualifications needed.

b. The name, routing symbol, location, and telephone number of the local EDRP Coordinator, or alternate EDRP Coordinator, must be included in the recruitment announcement.

c. A statement emphasizing that the final decision on an EDRP award amount is contingent on the availability of EDRP funds, since the overall program funding process is centralized.

24. RETENTION ELIGIBILITY REQUIREMENT

a. EDRP may be authorized as a retention incentive for current eligible employees serving in full-time or part-time appointments without time limit that have no unfilled recruitment, retention, relocation or scholarship incentive service obligation(s). The employee must possess and maintain an annual performance rating of “fully successful” or higher, or a proficiency rating or report of “satisfactory,” “fully successful,” or higher, which constitutes an acceptable level of
performance for an EDRP participant. A participant who receives an annual performance rating of less than “fully successful,” or a proficiency rating or report of less than “satisfactory” or “fully successful” during an EDRP service period is not eligible to receive an EDRP award.

b. EDRP, as a retention incentive, is to be paid on an annual basis at the end of the period of obligated service.

c. An employee who is in a service obligation period associated with one of the Educational Assistance Programs covered in 38 U.S.C. Chapter 76 (i.e., NNEI and EISP) is not eligible for EDRP as a retention incentive until the service obligation has been fulfilled. Individuals on a SLRP incentive under title 5 authorities should not receive an EDRP award during the period of their service obligation under SLRP.

25. CRITERIA FOR THE AUTHORIZATION OF RETENTION

a. An EDRP retention incentive may be authorized if, without one, VHA would likely lose, for any reason, an employee whose retention is essential because of usually high or unique qualification (i.e., competencies) or a special VHA need.

b. The medical center manager determines that the unique qualifications of the employee or a special need of the medical center for the employee’s services make it essential to retain the employee, since the employee would be likely to leave VHA employment in the absence of this retention incentive.

c. Prior to offering EDRP as a retention incentive additional justification, with the concurrence of the VISN, medical center Director or National CMOP Director, that individual must be submitted to HRRO for review and approval. Evidence that the following factors were considered must be fully documented in the written justification to pay an EDRP retention incentive, and must be retained as part of the record:

(1) Employment trends and labor market factors, such as the availability and quality of candidates in the labor market possessing the clinical competencies required for the position, who could perform the full range of duties and responsibilities of the employee’s position at the level performed by the employee;

(2) The success of efforts within the previous 6 months to recruit and retain candidates and retain employees with competencies similar to those possessed by the employee for positions similar to the position held by the employee;

(3) The basis for determining the medical center’s special need for the employee’s services that makes it essential (or critical) to retain the employee, based on VHA’s and the medical center’s mission needs, and the special and clinical competencies required for the position;

(4) The desirability of the duties, work or organizational environment, on-call schedules, or geographic location of the position;

(5) The salaries typically paid outside VHA;
(6) Certification of the employee’s annual performance rating of “fully successful” or higher, or a proficiency rating or report of “satisfactory,” “fully successful,” or higher which constitutes an acceptable level of performance for an EDRP participant;

(7) Other retention incentives being offered to the employee at this time;

(8) Evidence of high-demand, competing health care and commercial settings for the knowledge and skills possessed by the employee, and significant pay disparities between VHA and non-VHA salaries;

(9) A discussion with the employee of the employee’s career plans; and

(10) Other supporting factors.

26. APPLICATION PROCESS

Following appointment to the position for which EDRP was authorized as part of the recruitment process or a retention determination and to ensure timely processing, the candidate is to complete a VA Form 10-0394 and submit it to the local Program Coordinator within 4 months of the date the candidate was permanently appointed or notified of the candidate’s eligibility to apply for EDRP. The applications of candidates that are recommended for awards by facilities and VISNs are to be received by HRRO in sufficient time to allow for timely review and approval.

27. ACCEPTANCE OF CONDITIONS

A decision to provide an EDRP award is finalized when an official VA Form 10-0394B is signed by the Under Secretary for Health, or HRRO designee.

28. REPORTING REQUIREMENTS

a. HRRO evaluates program effectiveness and prepares ad hoc reports for the Under Secretary for Health. These reports include the number of new and continuing EDRP participants by occupation, per fiscal year, at the national, VISN, and local facility levels, as well as other pertinent information necessary to assess the impact of EDRP on recruitment and retention. Additionally, HRRO prepares an annual report on VA’s Educational Assistance Programs at the conclusion of each fiscal year.

b. Initial and annual reports on local utilization of EDRP, as required, must be filed electronically over the Intranet to the VHA EDRP Program Manager, HRRO.

29. APPEALS

EDRP decisions must be consistent with applicable law and VA policy. An applicant or participant may not appeal, seek a waiver, an exception, or reconsideration of any administrative decision made regarding the administration of EDRP.
30. REFERENCES


b. Public Law 105-368.

c. Public Law 107-135.

d. Public Law 111-163.

e. VA Handbook 5007/20, Part VI, Chapter 3, Retention Incentives.

f. VHA Directive 1020, Employee Incentive Scholarship Program.

g. VHA Handbook 1020, Employee Incentive Scholarship Program.
VA FORM 10-0394, EDUCATION DEBT REDUCTION PROGRAM (EDRP) APPLICATION

Department of Veterans Affairs (VA) Form 10-0394, Education Debt Reduction Program (EDRP) Application, can be found on the Veterans Health Administration (VHA) Forms Intranet page at: http://vaww.va.gov/vaforms/medical/pdf/vha-10-0394-fill.pdf. NOTE: This is an internal Web site and is not available to the public.

This form is not to be used for local reproduction, but is a fill-able form to be completed electronically.
VA FORM 10-0394A, EDUCATION DEBT REDUCTION PROGRAM (EDRP) LOAN VERIFICATION FORM

Department of Veterans Affairs (VA) Form 10-0394A, Education Debt Reduction Program (EDRP) Loan Verification Form, can be found on the Veterans Health Administration (VHA) Forms Intranet page at: http://vaww.va.gov/vaforms/medical/pdf/vha-10-0394A-fill.pdf. 

NOTE: This is an internal Web site and is not available to the public.

This form is not to be used for local reproduction, but is a fill-able form to be completed electronically.
VA FORM 10-0394B, EDUCATION DEBT REDUCTION PROGRAM (EDRP)  
ACCEPTANCE OF CONDITIONS

Department of Veterans Affairs (VA) Form 10-0394B, Education Debt Reduction Program (EDRP) Acceptance of Conditions, can be found on the Veterans Health Administration (VHA) Forms Intranet page at:  http://vaww.va.gov/vaforms/medical/pdf/vha-10-0394B-fill.pdf.

NOTE: This is an internal Web site and is not available to the public.

This form is not to be used for local reproduction, but is a fill-able form to be completed electronically.
EDRP AWARD PARTICIPANT FACILITY TRANSFER PROCEDURES

The Education Debt Reduction Program (EDRP) enhances recruitment and retention of health professionals required to meet the staffing needs of the Veterans Health Administration (VHA). NOTE: Failure to follow the EDRP Award Participant Facility Transfer Procedures will result in termination from the EDRP.

1. THE AUTHORITY FOR THE EDRP (Title 38 United States Code (U.S.C.) Sections 7681 to 7683) permits the Department of Veterans Affairs (VA) to provide EDRP payments to employees with qualifying loans, who occupy positions at VHA facilities providing direct-patient care services or services incident to direct-patient care services, for which recruitment and retention of qualified personnel is difficult. Each EDRP award is considered for approval by the Healthcare Retention and Recruitment Office (HRRO) based on a facility’s difficulty to recruit and retain qualified personnel for a specific position at the particular VHA facility where the EDRP applicant was permanently appointed. Technically, an EDRP participant who leaves the position at the facility for which the award was made may forfeit the eligibility to continue to receive debt reduction payments.

2. CONSISTENT WITH THE PRECEDING AUTHORITY, THE FOLLOWING PROCEDURES ARE ESTABLISHED FOR EDRP PARTICIPANTS WHO ANTICIPATE TRANSFERRING FROM ONE VHA FIELD FACILITY TO ANOTHER VHA FIELD FACILITY.

The following steps must be taken at least 1 month prior to the transfer:

a. The participant must initiate an electronic request, using Outlook, to the local EDRP Program Coordinator (at the losing facility), requesting that the EDRP participant’s eligibility be transferred to another facility. Assuming the employee was accepted for transfer, this request must contain the requested and confirmed date of transfer, a point of contact, and any other pertinent information.

b. Prior to forwarding the participant’s request for transfer, the losing facility EDRP Coordinator must review the request for appropriateness and inform the gaining facility EDRP Coordinator as to the position to which the recipient was appointed and awarded EDRP funding.

c. The gaining facility’s EDRP Program Coordinator must provide the following information, along with the participant’s request and the losing facility’s information, and forward all requests to HRRO for final review and approval:

(1) Verify with the local Human Resources office that the transfer is approved and provide the effective date of the transfer.

(2) Certify that the position to which the EDRP recipient is transferring is specifically identified on the gaining facility’s local EDRP announcement and is the same position for which the EDRP participant was awarded EDRP funding at the losing facility.
(3) Indicate if the participant will be full-time or part-time, and if part-time, what percentage.

(4) Indicate the facility’s approval or disapproval of the recommendation to transfer the recipient's EDRP eligibility to them.

(5) Forward the completed electronic request, using email, to HRRO for final review and approval.

3. HRRO WILL PROCESS THE REQUEST AND NOTIFY THE GAINING AND LOSING EDRP PROGRAM COORDINATORS OF THE DECISION AS SOON AS POSSIBLE.

NOTE: Participants are required by VA Form 10-0394B, Education Debt Reduction Program (EDRP) Acceptance of Condition, Section C3, to notify their local program coordinator in writing, of any change of name, address, telephone number, and employment status within 10 working days of the occurrence. Further, participants are required to report any other change that will impact EDRP funding.
SAMPLE MEMORANDUM OF UNDERSTANDING (MOU)
SAMPLE SUPERVISORY CERTIFICATION FOR EDRP RETENTION INCENTIVE