



VHA Office of Academic Affiliations (10A2D)

Guide to Completing the Trainee Qualifications and Credentials Verification Letter

For Both Affiliate and VA Program Directors

March 2018

Overview:

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

HPT is a general term used to describe both Paid and Without Compensation (WOC), Title 38, undergraduate, graduate, and post-graduate students, interns, residents, fellows, and VA advanced fellows; and pre- and post-doctoral fellows whose time at a VA medical facility is spent in clinical or research training experiences to satisfy program or degree requirements.

Background:

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

The TQCVL, which must be completed annually for multi-year programs, confirms that specific information has been verified by the sponsoring entity for each trainee listed. All trainees who will receive training at a VA facility must be listed on a TQCVL.

The TQCVL confirms that an HPT is:

- Enrolled in or accepted into the accredited training program and has had primary source verification of appropriate qualifications and credentials as required by the admission criteria of the training program;
- Qualified, and has the required credentials, to participate in the accredited training program as agreed to by the sponsoring institution, affiliated participating institutions, and the VA;
- Compliant with all US citizenship or immigration and naturalization laws and therefore suitable to be appointed to a Federal Government position; and
- Meets the essential functions (physical and mental) of the training program and immunized following current CDC guidelines and VHA policy for healthcare workers to protect themselves, other employees and patients while working in a healthcare facility.

A TQCVL is required for all HPTs. For those stipend-paid directly by the VA, many of the items listed below apply. Items that are only applicable to without compensation (WOC) HPTs, notably Citizenship criteria as well as documentation related to immigration and naturalization, are noted.

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

A TQCVL confirms that trainees are in satisfactory physical condition to meet the requirements of their training program. The letter is also an attestation that the appropriate tuberculosis screening, as per State and/or CDC requirements and VHA policy, as well as immunization screenings, have taken place;

and, per current VHA policy and CDC recommendations for healthcare workers, it may be relied on as documentation to that effect. The TQCVL serves as a pre-placement evaluation.

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

Trainees listed on the TQCVL must meet all criteria stated in the document. If a trainee does not meet these criteria they should not be listed on the TCQVL. Trainees are not eligible for a clinical rotation until they meet the criteria on the TQCVL and, as applicable, until reasonable accommodations are made to meet these requirements. Only once a trainee meets all criteria may a new TQCVL be submitted. Program directors should inform the VA DEO of pending issues, but should NOT list unqualified trainees on the TQCVL.

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

The TQCVL covers the following items for the listed trainees:

Health Status (see Appendix A: Healthcare Guidelines for TQCVL document):

Trainees must be able to perform essential functions of their training program (e.g., lifting, bending, physical stamina of patient care etc.)

- If the trainee is in a **VA sponsored program (accredited in VA's name)**, the VA program director must review documentation that there has been a physical examination/ evaluation performed in the last year. If a physical examination/ evaluation has not been completed, VA may complete the physical examination/ evaluation for VA paid trainees.
- Trainees covered by a TQCVL are considered to meet the essential requirements of their training program with or without accommodations.

Communicable Disease:

Trainees must be free of communicable disease and meet the following:

- All trainees are expected to provide documentation of a Hepatitis B vaccine. In cases where the trainee has not started or completed their hepatitis B vaccination series by the first day of their rotation, the VA facility will refuse the trainee appointment until the required health screenings/vaccinations have been performed or a declination waiver has been signed. The affiliate must ensure that the trainee has initiated the hepatitis B vaccination series or has signed a declination waiver. The hepatitis B vaccination may be administered by the VA facility for training programs sponsored by VA. For programs accredited in the affiliate's name, hepatitis B vaccine must be completed outside of VA (affiliate's student health clinic, etc.).
- All trainees are expected to provide documentation of tuberculosis (TB) screening per CDC guidelines or State requirements. In cases where the trainee has not completed their TB screening by the first day of their rotation, the VA facility will refuse the trainee appointment until the required health screenings have been performed. The affiliate must ensure that the trainee has obtained TB screening. TB screening may be done by the VA facility for training programs sponsored

by VA. For programs accredited in the affiliate's name, TB screening must be completed outside of VA (affiliate's student health clinic, etc.).

- Annual TB screening maybe required for healthcare workers and would consists of:
 1. Initial baseline testing upon hire: either Tuberculin Skin Test (TST) or Interferon–Gamma Release Assays (IGRAs) following current CDC recommendations
 2. Annual or serial screening: Determined by state regulations and/or VHA facility annual risk assessment outcomes.
- All trainees are expected to provide documentation of an annual influenza vaccination. The affiliate must ensure that the trainee has met VHA policy on influenza vaccinations. Currently, that means the trainee has obtained annual influenza vaccination not later than November 30th of each year. Trainees that decline vaccination must wear a face mask while at the VA healthcare facility throughout the influenza season.
- When requested, the affiliate must be able to provide the VA with individual trainee health examination and evaluation (vaccination) status.

Non-US Citizens:

Appointment of all non-US citizen HPTs must be approved by the Medical Center Director or Designee. Non-US citizens are not authorized to receive a stipend and must not be appointed in a VA paid status. Non-US citizen trainees must meet all program enrollment criteria. Programs must ensure that a US citizen trainee will not be displaced by sending the non-US citizen to the VA.

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

- Approval by the Medical Center Director or Designee
- Documented proof of immigrant or non-immigrant status:
 - Appropriate visa (J-1, J-2, H-1B, H-4, E-3) status; (other visas require discussion between DIO, DEO and may need decision of 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:

All male US citizens, regardless of where they live, and male immigrants, residing in the United States, who are 18 through 25, are required to register with Selective Service. Males for these purposes are those individuals born male on their birth certificate regardless of current gender. If not registered, a Status Information Letter must be provided. Trainee gender and indication of Selective Service registration must be provided on the TCQVL and, if applicable, a copy of the Status Information Letter must be provided. Additional information may be found on the Selective Service website.

<https://www.sss.gov>

Personal Identity and Credentials Verification:

- All trainees will be issued a Personnel Identify Verification (PIV) credential. Trainees must possess two, official pieces of government ID. The trainee's full, legal name, as it appears on the IDs, will be the name submitted to VA on the TQCVL. A list of acceptable IDs may be found on the following VA website. https://www.oit.va.gov/programs/piv/_media/docs/IDMatrix.pdf
- All trainees must have had primary source verification of educational credentials as required by the admission criteria of the training program, the requirements vary based on type of health professional and the training program requirements and may include:
 - Reference letters, primary source verification of current and past license(s), registration(s) in any field, or certification(s) through the state licensing board(s) and/or national and state certification bodies. As well as Drug Enforcement Administration (DEA) registration as required by the training program;
 - International medical school graduates have had primary source verification of the Educational Council for Foreign Medical Graduates (ECFMG) certificates as appropriate;
 - The affiliate is responsible for screening **licensed trainees** against the National Practitioner Data Bank (NPDB). This may apply to some post-degree associated health trainees who have obtained licensure. Queries can be done at or through your credentialing or graduate medical education office.
<https://www.npdb.hrsa.gov/>
 - As a rule, ***students are not listed*** in the national practitioner database unless they were licensed previously, for example a dental student with a degree as a Registered Nurse (RN).
 - The affiliate is responsible for screening all WOC trainees against the Health and Human Services' List of Excluded Individuals and Entities (LEIE). The LEIE is an OIG compiled list of individuals who are currently excluded from participation in Medicare, Medicaid and all other Federal healthcare programs. The VA Office of Academic Affiliations requires that sponsors (academic affiliates or VA program director for WOC trainees) review this list as part of the trainee qualification process. <https://exclusions.oig.hhs.gov/>

For paid trainees receiving a stipend in VA sponsored programs the program director of must ensure that the local VA facility has documentation of screening against the National Practitioner Data Bank (NPDB), as appropriate, and that the Health and Human Services' List of Excluded Individuals and Entities (LEIE) has been reviewed.

Sample TQCVL:

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

- The letter is to be placed on Program/University letterhead or include the institution's seal
- The letter must be addressed **To** the VAMC Facility Director
- The letter must be signed by the individual responsible for the program and trainees:
 - Program Director
 - Designated Institutional Officer (DIO)
 - Educational Dean
 - Dean for Academic Affairs, etc.
- Space needs to be included for the VAMC Facility Chief of Staff and Director to accept the document. However, if your facility has granted specific signature authority to allow others to accept the TQCVL (e.g. the DEO), then this information can be adjusted.
- The wording in the body of the **TQCVL must not be modified**
- **ATTACHED will be the list of HPTs** covered by this TQCVL



University of Education

University of Education
Audiology Joint Doctoral Program
3330 Main Street
Anywhere, CA 92929

March 4, 2018

Dear Medical Center Director:

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

ALL trainees:

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

As applicable:

- Trainees covered by a TQVL are considered to be in satisfactory physical condition and meet the essential requirements of their training program.
- International medical school graduates have had primary source verification of the Educational Council for Foreign Medical Graduates (ECFMG) certificates.
- Licensed trainees have been screened against the National Practitioner Data Bank (NPDB) <https://www.npdb.hrsa.gov/>
- Trainees born male, both U.S. citizens and immigrants, who are between 18 and 25 years old, have registered with the Selective Service or provided a Status Information Letter.

- Drug Enforcement Administration (DEA) registrations
- National Provider Identifier (NPI) registration
- Other: _____

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

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

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

I certify that all documents pertaining to the listed trainees are maintained on file and available for review by VA officials by contacting the following Office: Admissions Director, Janet Jackson, (555) 555-1234, janet.jackson@UofED.edu.



 Joseph Jones, Au.D., Ph.D.
 Program Director Audiology
 Joint Doctoral Program
 University of Education

3/4/2018

 Date

VAMC Chief of Staff
Accept/Do Not Accept (circle one)

Signature
Date _____

Printed Name

VAMC Director
Accept/Do Not Accept (circle one)

Signature
Date _____

Printed Name

Enclosure: TQCVL List of Trainee(s)
cc: VA Facility, Designated Educational Officer

TQCVL List of Trainees

Date TQCVL Signed: March 4, 2018
 Sponsoring Institution: University of Education
 Training Program: Audiology Joint Doctoral Program
 VA Facility: VAMC Anywhere

Trainee Full, Legal Name (Last, First, Middle)	Email Address (personal address preferred)	Specialty/Training Program or Educational Field	Degree (e.g. MD, DO, DDS, NP)	Gender Assigned at Birth	Country of Citizenship if not USA	Post Graduate Year (PGY) Or Year/Level in Training Program	Expected Program End Date (MM/YYYY)
Smith, Laura, Marie	Lmsmith27@gmail.com	See above		Female		3	June 2019
Shah, John, Kenneth	JohnKenShah@yahoo.com	See above	Ph.D.	Male		1	June 2021

Questions?

Visit the OAA Help Desk: <https://www.va.gov/oaa/apps/lpssurveys/helpdesk.aspx>

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

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

Links to Approved Templates:

Trainee Qualifications and Credentials Verification Letter – PDF Format – Fill-in		https://www.va.gov/OAA/TQCVL/TQCVL_TemplateFINAL.pdf
Trainee Qualifications and Credentials Verification Letter – MS Word Format – Copy and Paste		https://www.va.gov/OAA/TQCVL/TQCVL_TemplateFINAL.docx
TQCVL List of Trainees – Excel Format		https://www.va.gov/OAA/TQCVL/TQCVL_HPT_ListFINAL.xlsx
TQCVL List of Trainees – MS Word Table Format		https://www.va.gov/OAA/TQCVL/TQCVL_HPT_ListFINAL.docx

Appendix A: Healthcare Guidelines for TQCVL

If you have further questions, consider contacting your Employee/Occupational Health

Items to Review for Health Screen:

- Evidence of physical evaluation in the past 12 months
- Noting the following:
 - Evidence that the HPT meets the physical requirements of the training program
 - Evidence of Hepatitis B vaccine, natural infection/recovery, or appropriate declination waiver
 - Evidence of Tuberculosis screening

The Trainee Qualifications and Credentials Verification letter (TQCVL) is a confirmation that the appropriate Tuberculosis and immunization screenings have taken place (or that waivers have been secured) and may be relied on as documentation to that effect.

Interpreting Hepatitis B Testing Results:

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

How Do I Interpret Hepatitis B Serologic Test Results?

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

Interpreting Tuberculosis TB Screening Testing:

If a trainee has received TB screening outside of VA the following guidance on how to interpret this screening will assist in reviewing the results. Additional details may also be found on the CDC website. <https://www.cdc.gov/tb/topic/testing/healthcareworkers.htm>

1. The two-step Mantoux tuberculin skin test (TST) should be used for baseline or initial testing.
 - Potential results:
 - Positive — consider the HPT as TB infected
 - A second TST is not indicated
 - HPT should be evaluated for TB disease
 - Seek assistance from EMPLOYEE /OCCUPATIONAL HEALTH
 - Negative — consider the HPT as not TB infected
 - Document result

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

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

Interpreting Physical Examination/Evaluation:

Trainees covered by a TQCVL are in satisfactory physical condition to meet the requirements of their training program and are not required to undergo a pre-placement physical exam or pre-placement physical evaluation; the TQCVL is the pre-placement evaluation.

If you have further questions, consider contacting your Employee/Occupational Health

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

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