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VHA Updates: Disbursement Policy and Education Cost Contracts

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Disbursement Policy Changes

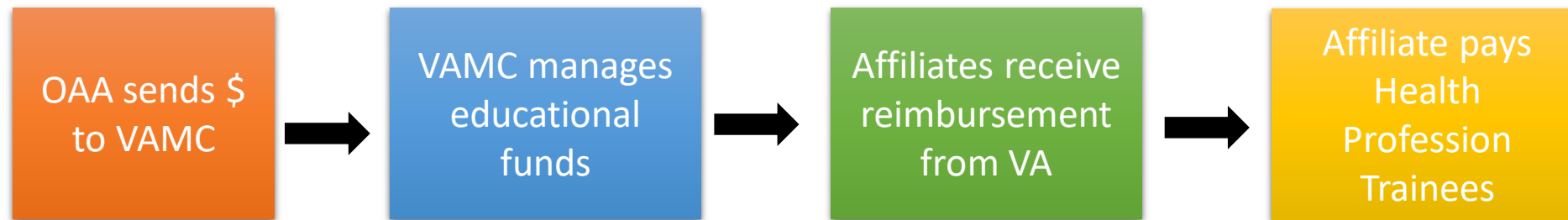
- Rationale for Policy Change
- Office of Academic Affiliations Action Plan
- Disbursement Policy





Disbursement/Oversight

- \$1B OAA budget for health professions trainee salaries and benefits
- Second largest funder of GME
- Disbursement Agreement (DA)
- Statute 7406 authorizes DA with affiliates



Disbursement Oversight History

- 2015: OGC: Mt. Home VAMC and East Tennessee State University (\$1 M)
- 2016: Congressional Hearing
- 2017: OIG: Oklahoma City VAMC
- 2020: GAO: ReDPro Checklist Review



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Operational Plan

- Communication with stakeholders
 - AAMC GRA
 - VA Chiefs of Staff
 - VA Chief Medical Officers
 - VA facilities and affiliates
- Educational Activity Records (EARs) deadline extended to 1 Jan 2022
- OAA EARs Operational Workgroup
- OAA EARs Automation Workgroup
- National Academic Affiliations Council (NAAC) Academic Partnership Committee (APC) Disbursement Workgroup
- OAA Health Professions Education Office Workforce Transformation



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EARs Operational Workgroup

- Identify up to 5 operational issues 1400.05 implementation
- Reduce burden on DEOs & their staff
- Create practical solutions for field implementation
- 8 Designated Education Officers (DEOs)
- Weekly meetings since July 9, 2021



EARs Automation Workgroup

- Final phase of market research
- Web-based
- Accessible by HPTs and staff outside the VA
- User friendly
- Program, Facility, VISN, and National level reporting
- Automated reconciliation feature
- Automated cross reference with notes (when applicable)



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Reimbursable Activity

Care for Veterans,
on VA ground,
with VA funds!

On site educational activities



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Off-Site Didactics - Update

- Off-site didactic sessions, reimbursable if
 - Specified in advance in the residents' schedule
 - Necessary for residents to perform VA duties
 - Required of all residents in the program



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Didactics - Update

- Virtual transmission to VA facility
 - Technically feasible
 - Didactic session is conducive to virtual transmission (e.g., a lecture as opposed to hands-on training or interactive workshops).
- Travel time greater than 1-hour roundtrip
 - Teleconferencing OR
 - Provide didactics at VA or OR
 - Deduct the travel time from VA reimbursement.
- Assigning residents to VA solely for didactic time is not permissible



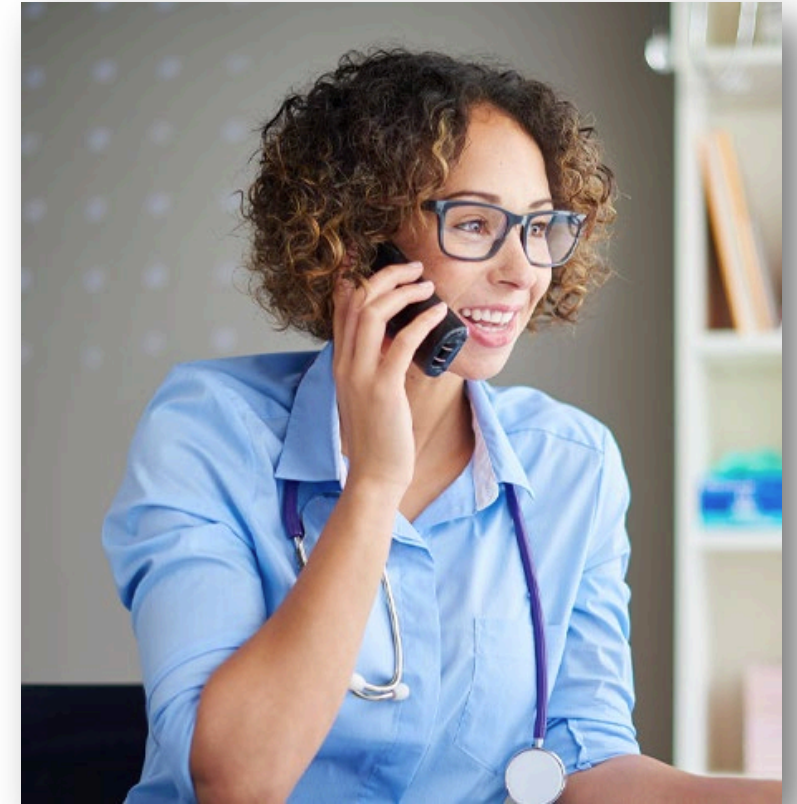
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Call- Update, Shared Call, Key Concepts

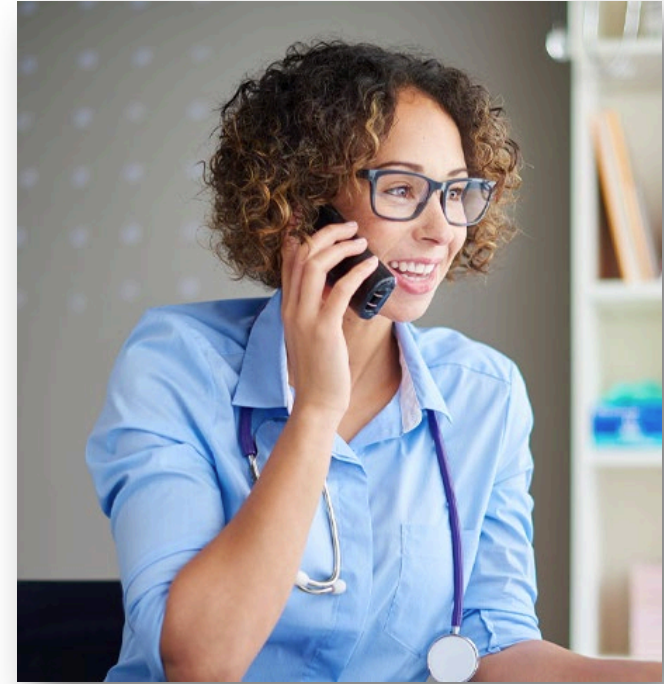
- Scheduled clinical and educational work in a primary clinical rotation
 - Inclusive of all in-house clinical and educational activities
 - Includes overnight call that is part of a rotation (e.g., every fourth night call on an internal medicine inpatient rotation)
- Primary clinical rotations funded by CMS or VA
- Resident assignment by FTE rather than individual residents



Call- Update, Shared Call, Key Concepts

- **Shared call is**

- Time spent after and beyond scheduled primary clinical rotations
- Residents assigned to both a primary clinical rotation and shared call
- Clinical duties for more than one facility
- Not predictable
- Immediate resident availability
- Dependent on adequate clinical coverage for facility



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Call- Update, Shared Call, Policy Update

- Shared responsibility between VA and affiliate
- Not billed separately by either VA or affiliate
- VA will not deduct payment for VA-assigned residents covering shared call at the affiliate
- Ensures VA and CMS not billing for the same period
- VA and affiliate work to ensure equitable coverage plan
 - Upfront agreement, use PLA



Orientation

- All trainees must be on-boarded with VA
- VA reimburses proportional share



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Reimbursable Activity



Local, Regional, National Meetings/Conferences

- 6-week advance approval
- VA reimburses proportional share
 - VA's share of FTE & resident time
- Enhances care to veterans
- Not to exceed 5 days



Post Call Day

- Call the day before must be for the VA
- Trainee must physically come into the VA for call
- Trainee must be available to come into the VA anytime for emergency coverage
- Trainee cannot work elsewhere in lieu of their Post Call day



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Educational Detail



- Approved by the Chief Academic Affiliations Officer at the national level
- Experience not possible at the affiliate or participating site
- VA Mission-related requirement
- Accreditation requirement
- Proportionate share
- Affiliation Agreement/Program Letter of Agreement



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Federal Holidays

- Reimbursed
 - Trainee scheduled to rotate at the VA the same day
- Cannot work elsewhere in lieu of the holiday



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Research (on-site/off-site)

- Project approved by the VA IRB
- Accreditation requirement
- VA reimburses proportional share
- Supervised by a practitioner with a VA appointment



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In-Service Exams and Specialty Board Exams



- Time to travel to and from exam
- Time to take the exam
- Exam fees are **NOT** reimbursable
- VA proportional share



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Sick Leave

- Maximum of fifteen days per FTE
- Sick Leave pool is required
- Sick leave pool managed at the program level for each affiliate



Telework

- Temporary during pandemic
- Reimbursed
 - Trainee completes VA work



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Annual Leave

- Included in daily rate
 - No additional funding required
- Number of vacation days set by affiliate
- OAA cap - 28 days per trainee per year
- Proportional share
- VA requires copy of affiliate leave policy



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A wooden gavel with a yellow handle and a dark wooden head rests on a dark wooden surface. In the foreground, a rectangular sign with a green background and a wooden border contains the words "JURY DUTY" in a serif font. The background is a blurred wooden surface.

Non- Reimbursable Activity

- Off-site continuity clinic
- Licensing Exams
- Military Leave
- Jury Duty
- Interviews

Educational Cost Contracts

Purpose: to reimburse a pro-rated portion of educational costs related to education of accredited trainees

Contract mechanism

- VHA Handbook 1 400.05: Disbursement agreement procedures for physician and dentist residents
- VHA Handbook 1 400.10: Health Care Resources Contracting: Educational Costs of Physician and Dentist Resident Training
- Veterans Equitable Resource Allocation (VERA) funding



Educational Cost Contracts

Specific healthcare resources

- Required to maintain accreditation
 - Physician Residency
 - Dental Residency
- Support function of residency program
- No overlap with Disbursement agreements



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Educational Cost Contracts



ECC: Allowable expenses



- Accreditation fees
- National Residency Match Program (NRMP) Subscription fees
- In-service examination fees
- Residency program management software fees
- User fees for simulation centers
- Required training (ACLS, BLS, Intern OSCE)
- Mobile communication devices
- Recruitment costs, exclusive of travel, meals and entertainment
- Orientation expenses, exclusive of travel, meals and entertainment



ECC: Expenses NOT Covered

- Anything provided by VA
- Anything NOT used during experience at VA
- Licensing fees
- Licensing examination
- Board certification examination fees
- Malpractice insurance
- Administrative expenses
- Meals, travel, entertainment (recruitment)
- Faculty salaries or benefits

MEDICAL
MALPRACTICE



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Questions?

Please email gmehelp@va.gov or
vhaoaacompliance@va.gov

Please include your local DEO!





OCU Fraud, Waste and Abuse Uncovered

- Affiliate rotations billed to VA
- VA billed for care to non-Veterans at non-VA site
- Non-reimbursable activities
- Whistleblower Complaints - Fraudulent VA Rotations
- Significant overpayment to several affiliates
- Self Referral of Patients by Affiliate Faculty and Residents

