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

OAA sends $ to VAMC → VAMC manages educational funds → Affiliates receive reimbursement from VA → Affiliate pays Health Profession Trainees
Disbursement Oversight History

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

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

On site educational activities
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
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
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
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
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
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
Federal Holidays

• Reimbursed
  • Trainee scheduled to rotate at the VA the same day
• Cannot work elsewhere in lieu of the holiday
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
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
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
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
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 1400.05: Disbursement agreement procedures for physician and dentist residents
• VHA Handbook 1400.10: 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
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
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