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Requirement for credentialing of all research staff

This requirement applies to all research staff including those that are compensated by the VA, those that are appointed as Without Compensation (WOC), and those appointed by the Intergovernmental Personnel Act Mobility Program (IPA). The staff may be full time, part time, or fee basis.

Credentialing

Credentialing is the systematic process of screening and evaluating qualifications and other credentials, including licensure, registration, certification, required education, relevant training and experience, and current competence.

Unlicensed staff

All staff that by virtue of their education and training is eligible to obtain licensure, registration, or certification is required to be credentialed through Vetpro even if they do not hold an active license, registration, or certification at the time they are appointed.

Unlicensed nurses, physicians, pharmacists, clinical psychologists, and others requiring licenses, registration, or certifications for clinical practice cannot be hired into those occupations unless they obtain an active license, registration, or certification for the occupation and qualify under VA qualification standards. If they do not obtain the license, registration, or certification they must be hired under some other occupational category for which they qualify. If this other occupational category allows a scope of practice to perform procedures AND there is no requirement for licensure or certification, then with a duly exercised scope of practice after the appropriate credentialing could be processed. *Note: See VHA Directive 2006-067 for a list of all effected occupations.*

VetPro: Staff that must be credentialed in VetPro

- All health care professionals who claim licensure, certification or registration as applicable to their position within VHA.
- All research staff that holds a degree that may make them eligible for licensure, registration, or certification. Such persons would include but is not limited to: nurses, physicians, Foreign Medical Graduates, Clinical Psychologists, and pharmacists that do not have a current active license. *Note: See VHA Directive 2006-067 for a more complete list.*
- All research staff including research administrative personnel, who by the nature of their position have the potential to assume patient care-related duties, or oversee the quality or safety of the patient care delivered, e.g. Research Assistants, Project Officers, etc..

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Scope of Practice or Functional Statement

A Scope of Practice or Functional Statement outlines all the duties of employees. These duties must: 1) be consistent with the occupational category under which they are hired, 2) allowed by the license, registration, or certification they hold, 3) consistent with their qualifications (education & training), and 4) be agreed upon by the person's immediate supervisor and the ACOS. *Note: When working on specific research protocols, the Principal Investigator for each protocol must also agree.*

Clinical Privileges

If the person's license allows for independent practice and the facility chooses to allow independent practice, privileges must be granted in accordance with VHA Handbook 1100.19 and the facility's Medical Staff Bylaws, Rules and Regulation prior to performing the interventions covered under the privileges they have been granted.

Points to consider

Individuals must not practice beyond the occupation they are hired/appointed into and their Scope of Practice or Functional Statement.

Principal Investigators are responsible for the overall conduct of their research protocols including ensuring that all research staff for the protocol are working within their Scope of Work or Functional Statement.

The appropriate background check as defined in VA Directive and Handbook 0710 must also be completed. *Note: For those employees working with Select Agents or Toxins, additional background investigations must be completed. See VHA Handbook 1200.06 for more information.*

Trainees from our academic affiliates must have a Resident/Trainee Credentials Verification Letter (RCVL) prior to any interactions with research subjects. VHA Handbook 1400.1 contains further information regarding residents and trainees.

Human Resource Management (HRM) responsibilities

HRM has the primary responsibility for verifications of a candidate's qualifications including education, relevant training and experience, and current competence to hold the position. HRM is also responsible for checking US citizenship or visa status.

ACOS/R&D and/or AO/R&D responsibilities

Either the ACOS/R&D and/or the AO/R&D must ensure that all research staff:

- Have been credentialed prior to appointment. If not, they must be credentialed ASAP. *Note: Credentialing for those who are covered by Directive 2006-067*

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and VHA Handbook 1100.19 must be credentialed through VetPro. Staff that hold a degree that may make them eligible for licensure, registration, or certification related to in health care must also be credentialed through VetPro.

- Have a Scope of Practice or Functional Statement that is consistent with their education, licensure, or certification, and
- Have been granted the appropriate privileges, if applicable under the facility's Bylaws,

In addition, the following must be done:

- Annually ascertain compliance with these requirements.
- Maintain records that will adequately show these responsibilities have been fulfilled.

VHA Policies regarding credentialing

- VHA Directive 2006-067 December 22, 2006 "Credentialing of Health Care Professionals"
- VHA Handbook 1100.19 March 6, 2001 "Credentialing and Privileging"
- VHA Handbook 1400.1 July 27, 2005 "Resident Supervisions"
- VA handbook and Directive 0710, September 10, 2004 "Personnel Suitability and Security"
- VA Handbook 5005 April 15, 2002 "Staffing"