



Office of the Dean

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Effective: Immediately

VCU School of Medicine Policy Statement for:

Assigning Personnel to Federal Agencies under an Intergovernmental Personnel Agreement (IPA)

Purpose: Outline eligibility and other requirements for VCU School of Medicine (SOM) personnel to be approved to work under an IPA agreement with the Central Virginia VA Health Care System (CVVHCS) or any other Federal Agency.

Background: In January 2023, CVVHCS notified SOM of changes in Department of Veterans Affairs policy for non-federal employee placement on IPAs. The majority of active IPAs in SOM are with CVVHCS. The updated Department of Veterans Affairs policy requires additional documentation and an attestation that any employee on an IPA is in a non-temporary position and has been employed by VCU for at least 90 days prior to IPA assignment. VA Guidance doc: Recruitment and Placement Job Aid 05-RP-038

VCU SOM Requirements for IPA Assignments:

- For consistency, VCU SOM requirements apply to all federal agencies to which VCU personnel may be assigned under an IPA agreement.
- VCU SOM Employees eligible to be placed on IPA assignment include employees who have held full-time or part-time positions for at least 90 days of the following types:
 - Faculty
 - Staff (Classified or University & Academic Professional)
 - Postdoctoral Fellows
- Students and hourly/wage positions are not eligible to be placed on IPAs.
- Any requests for new positions (faculty or staff) that will subsequently be funded on an IPA must follow the normal approval process through School of Medicine Dean's Office HR or Office of Faculty Affairs.
 - Note: Departments will be responsible to support the first 90 days of a new hire salary/fringe costs prior to the employee being eligible to go on IPA assignment.
- VCU SOM Department Administrators or their Human Resource designees are required to work with the employee and IPA granting federal agency to meet all documentation and attestation requirements.
 - VCU SOM has approved the following attestation statement:
 - "I attest that [First Last Name] has been employed for greater than 90 days at VCU as a [part time/full time] regular employee."

- If a federal agency does not find this attestation sufficient, please consult with the SOM Dean's office prior to agreeing to a modified statement.
- Once attestation is complete – provide confirmation it is complete to Research Administration or other staff preparing the IPA request via RAMS-SPOT as applicable.
- VCU SOM Department Administrators or their Research Administration designee must identify a VCU Principal Investigator for the IPA and submit the IPA in VCU's RAMS-SPOT system as a funding proposal.
 - The IPA document is the only document required to be uploaded in SPOT.
 - VCU DSP requires SOM to "Log Comment" in SPOT confirming employment attestation is complete:
 - Comment language: "Department completed attestation that employee on IPA has been employed for greater than 90 days at VCU as a regular employee".
 - Those preparing RAMS-SPOT applications should confirm with Department Administrator/HR designee the above is accurate prior to logging the comment.
 - Please note: No employee verification documentation should be uploaded to SPOT.
 - SOM Office Of Research Administration approves all SOM proposal submissions in SPOT on behalf of the Dean and will notify SOM Faculty Affairs on all IPA requests for VCU Faculty.
- For consistency, VCU SOM requires all IPA assignments be documented using the current U.S. Office of Personnel Management's "Assignment Agreement - Title IV, Intergovernmental Personnel Act" form version OF 69 # (REV. 2-89) available for download from the OPM's website.
- VCU SOM requires the following text be included in the corresponding sections of the IPA document:
 - In Part 7, field #22, include text "VCU supervisors will elicit feedback from [*Insert name of Federal agency*] staff overseeing work under this IPA for VCU annual performance evaluations."
 - In Part 8, field #25, include text "Virginia Commonwealth University (VCU) will maintain records for the participant, including official time and attendance logged and approved within RealTime by the individual [*insert participating employee name here*]. The employee will coordinate their leave with the Federal agency supervisor and the VCU supervisor to provide approved time and attendance to VCU for recording."
 - In Part 9, field #26, include text "This is [X]% of a 1.0 FTE. Should the individual receive an increase in rate of pay at VCU, this agreement will be evaluated for rebudgeting."

CVVHCS/Department of Veterans Affairs Requirements:

Effective immediately VCU SOM will be required to meet the documentation and attestation requirements under the updated policy for all employees intended to be put on new IPA assignments

At the point of renewal, VCU SOM will be required to meet the documentation and attestation requirement under the updated policy for all IPA renewals/continuations.

Listed below is new information that will be required for each person that will be and is currently on an IPA.

- Current Resume or CV
- 2 Forms of Identification (See acceptable forms of ID on I-9 Form)
- I-9 Form
- Form 306 / Background Check (required if access to the VA and VA system)
- How they will spend their time to reflect 100% of their time. A project breakdown is preferred (Project number & Title).
- Pay source for their time
- Documentation that the individual that is being considered for an IPA is in a non-temporary appointment (in a position without a time limit) and have been in the non-temporary appointment for at least 90 days.

Questions related to this Policy Statement:

Email: SOM Office of Research Administration somresadmin@vcuhealth.org

VA specific questions: Angela Davis, Administrative Officer, Research Service, CVVHCS (angela.davis@va.gov)

For Reference:

Federal Office of Personnel Management (OPM) Guidance:

<https://www.opm.gov/policy-data-oversight/hiring-information/intergovernment-personnel-act/#url=Overview>

Federal Office of Personnel Management (OPM), Assignment Agreement - Title IV, Intergovernmental Personnel Act form version OF 69 # (REV. 2-89):

https://www.opm.gov/forms/pdf_fill/of69.pdf