



DEPARTMENT OF VETERANS AFFAIRS

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In Reply Refer To

Dear Research Community

Supporting our research mission is one of our highest priorities. Over the years we have become lax in our compliance with the use of IPA's in support of that research mission. This memo serves to outline the use of IPA's as a mechanism to support research and also to be in compliance with federal law. Any questions about this process should be addressed to appropriate leadership.

Purpose of IPA's: The IPA mechanism was not designed for supporting research, but has been a convenient hiring tool for time limited projects such as research projects. For Research the ideal use of an IPA is to bring specific subject matter expertise to a research project such as biostatisticians or other positions which are difficult to hire in a limited manner. The IPA mechanism is not meant to be used to circumvent the Federal (VA) hiring process. Regulations DO NOT allow and the CMCVAMC does not support the use of the IPA mechanism to support administrative functions or direct clinical care.

Although the Federal law on IPA's is not crystal clear, we have clarified the use of this mechanism with other VA facilities such as Boston, Ann Arbor, and Baltimore. The following local rules will be in place until new guidance is received by the Office of Management and Budget or VACO. We believe that tightening our use of IPAs is necessary to bring us into compliance with the Federal Standards.

General principles

- IPA's should not be used to hire clinical staff – MD's, clinical PhD's etc. These positions can be hired part time or full time as direct hires in the VA. If the staff member is a Penn faculty member, they would also need to be hired as a joint appointment with an MOU in place. Joint appointment requires both organizations to work through their respective HR departments.
- IPA's cannot be used for administrative and support positions.
- Students employed in research, graduate, or teaching assistant positions are not eligible to participate in the IPA Mobility Program.
- IPA's are meant to be time limited (see below).
- IPA's in general should not be used for full time staff as these can likely be hired as VA employees, possibly even as a direct hire under a Medical Support Authority (MSA) hiring authority.
- IPA's forms must be fully completed and include adequate justification for the position. Improperly completed forms will be returned and will delay the start of the IPA. IPA assignments CANNOT begin until after the Medical Center Director signature is acquired.

CMCVAMC rules for using IPA's

- Prior to initiating an IPA, the employee must be employed for more than 90 days by the institution of record (i.e. Penn).
- The IPA must be fully executed (signed by all parties) prior to the start date of the IPA.
- An individual can only be paid continuously via an IPA(s) for a maximum of 4 years in duration. After 4 years there needs to be a 12 month break in service before a new IPA can start. Please note that the individual can accumulate time on multiple IPA's that counts towards the four (4) years. For example a statistician who works on project X from 1/2012 – 12/2013 then starts on project Y on 1/2014 with no break between the projects will have been on an IPA for 48 months around 12/2015 and thus require a 12 month break in service after that even if the project is not complete.
- To avoid a 12 month break in service, an individual must have a 61 day or greater break during the 4 year period and the 4 year clock will start over. For example if the statistician above worked on project X from 1/2012 – 12/2013 then took a 61 day break before starting a new IPA in 3/2014, then he/she can stay funded on an IPA for an additional 4 years starting from 3/2014. Ideally the break in service must occur no later than the 2 year and 10 month mark. Planning is critical.
- During the 61 day break the investigator is responsible for finding alternative funding for the employee. The employee continues to be employed by Penn or the institution of record.

JPA's

To reduce confusion, you should be aware that the Philadelphia Research and Education Foundation (PREF) has the capacity to conduct a similar mechanism of pay for salaries at other institutions. This mechanism is called a JPA and doesn't have the same limitations on time. The JPA doesn't contribute to the time clock of an IPA. The PREF is able to manage grants from the DOD, foundations, NIH, etc. but not VA research funds.

Sent on behalf of:

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