

REMINDER: EVERYONE “ENGAGED IN RESEARCH” AT THE VAMHCS MUST BE A VA-PAID EMPLOYEE OR HAVE A WOC APPOINTMENT

Definitions:

WOC = “Without compensation” appointment. Individual is not paid by the VA but has undergone a process to be appointed to the VA as an unpaid individual who is qualified to perform duties described in the WOC process.

IPA = “Intergovernmental Personnel Act”. Individual is paid by another institution but is working at the VA (for example). The IPA employee must also have a WOC appointment in order to work at VAMHCS.

Engaged in research = A person or institution is engaged in research when:

- The person intervenes with living individuals by performing invasive or noninvasive procedures for research purposes (e.g., drawing blood; collecting other biological samples; dispensing drugs; administering other treatments; employing medical technologies; utilizing physical sensors; utilizing other measurement procedures).
- The person intervenes with living individuals by manipulating the environment for research purposes (e.g., controlling environmental light, sound, or temperature; presenting sensory stimuli; orchestrating environmental events or social interactions; making voice, digital, or image recordings).
- The person interacts with living individuals for research purposes (e.g., engaging in protocol-dictated communication or interpersonal contact; conducting research interviews; obtaining informed consent).
- The person releases, obtains, receives, or possesses private information that is individually identifiable (either directly or indirectly through coding systems) for research purposes (e.g., obtaining private information from medical records and/or research records in an individually identifiable form).

If you do not have VA “eighths”, or do not receive a VA paycheck, or do not have a WOC appointment, then you MAY NOT be a VA principal investigator or be a team member engaged in research activities at the VAMHCS. Principal Investigators and members of the research team who are engaged in research at the VAMHCS must either be employed by the VA (receive a VA paycheck), or have a “without compensation” (WOC) appointment.

- Your WOC appointment is obtained through VAMHCS Human Resources Management Service (HRMS).
 - Apply for your WOC appointment through the VAMHCS Service or Center most applicable to your team (e.g. Medical Service, Surgical Service, Research Service, GRECC, MIRECC, etc.).

- The Service then submits the WOC application package to VAMHCS HHRMS in a process that is similar to an application for employment. This includes items such as a background check, fingerprinting, and security check.
- Once HRMS receives all your paperwork (including your completed credentialing [if applicable to you] and your background check has cleared), you will receive an appointment letter from HRMS. This letter needs to be signed by you and a copy returned to the VAMHCS Service or Center that has processed your WOC appointment. The letter shows that you have been appointed for the time period stated in the letter.
- IPA employees must also have a WOC appointment in order to work at VAMHCS.
- Processing of a WOC appointment through HRMS can take 90 days on average, so plan ahead when considering a plan to assign a non-WOC to your VA research team.
- WOC appointments obtained through Research Service are currently processed by Tina McGinley (410-605-7000 x6568, tina.mcginley@va.gov).
- See VAMHCS Policy 512-05/HR-021 for additional information.

■ WOC appointments expire!!!!

- A WOC appointment can be active for up to three years. The Service/Center through whom the individual is appointed decides whether the appointment will be for 1, 2 or 3 years.
- **If your WOC appointment expires, you must halt VA research activities until your status can be reinstated.**
- Keep track of the expiration date of your WOC appointment. You will not necessarily receive a reminder, so plan ahead. **A renewal on average can take 45 days to process through HRMS.**
- When the VAMHCS Office of Research Compliance conducts audits on VAMHCS studies, the auditor will obtain information on which members of the research team engage in VA activities. It is potential serious noncompliance if VA team members (engaged in research activities at or through the VAMHCS) are not VA employees or do not have a WOC appointment.

■ Other requirements for WOC's:

- Some WOCs who have a license or certification, and perform duties with human participants under that license or certification, may also need to have VA credentials and privileges in order to perform research duties.
- All WOC's must also have a Research Scope of Practice signed by their PI and the ACOS/R&D.
- WOC's must complete all applicable VA trainings.

■ Remember, **if you are a Principal Investigator, YOU are responsible to ensure that you and your staff have appropriate, current employment/WOC status at the VAMHCS, have Research Scopes of Practice, and are credentialed at the VAMHCS (as applicable).**

For questions concerning this or other Research Service Hot Topics OR for adding staff or colleagues to the Hot Topics mailing list, contact:

Jessica Mendoza,
Human & Animal Research Protections Officer
Room 3D158
410-605-7000 x6512
jessica.mendoza@va.gov

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For comments, complaints or suggestions regarding the Research Service or Office of Research Compliance, contact:

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