

Charleston Research Institute Policy Memorandum

Title: Intergovernmental Personnel Act (IPA) Policy

Reviewed by: Board of Directors

Implementation Date: 6/28/2011

Reviewed Date: 6/27/2014, 5/01/2017

Next Scheduled Review Date: 5/01/2020

Approval: R. Amanda C. LaRue, Ph.D., Chairperson

Policy Statement:

The purpose of the IPA is temporary staffing authority to allow the government and private sector to share expertise. A statutory prohibition in the IPA authority is that VA cannot be charged an administrative fee.

Charleston Research Institute will comply with all federal regulations pertaining to Intergovernmental Personnel Act (IPA) per 5 U.S.C. §§ 3371 – 3376; 5 C.F.R. Part 334; and VA Handbook 5005, Part I, Chapter 3, Section C. Further guidance is provided at <http://www.opm.gov/programs/ipa/index.asp>.

CRI will limit the number of IPA personnel to one per investigator and will assess investigators' CRI residual accounts 10% for the cost of administrative overhead for each IPA appointee requested by the investigator. Any exceptions to this policy require board approval.

Background:

The purpose of IPA is to authorize the temporary assignment of employees between the Federal Government and State, local, and Indian tribal governments, institutions of higher learning and other eligible organizations (5 C.F.R. § 334.101). Agencies may not provide reimbursement for indirect or administrative costs associated with an IPA assignment. As a result, CRI must cover the administrative costs of payroll, reporting, etc., from another source.

Guidelines:

Under no circumstances should IPA agreements be used as a mechanism for hiring clinical staff or as a substitute for scarce medical specialist, sharing, commercial item or other clinical services contracts. Nor is it appropriate to use IPA agreements for administrative and support positions. (VA Handbook 5005, Part I, Chapter 3, Section C(2)(c))

IPA agreements should not be used to circumvent restrictions on hiring due to budget constraints, reductions-in-force, or ceiling allocations. Assignments must be filled by highly-qualified employees; assignments cannot impair VA services (VA Handbook 5005, Part I, Chapter 3, Section C(2)(a)).