Quality Reviews - Post-Determination

Instructor Lesson Plan

Time Required: 2 Hours

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| Lesson Description | |
| The information below provides the instructor with an overview of the lesson and the materials that are required to effectively present this instruction. | |
| TMS # | 4176415 |
| Prerequisites | Prior to this lesson, the Veteran Service Representatives (VSRs) or Rating Veteran Service Representatives (RVSRs) should have completed Internet web-based training (IWT). Trainees should also have completed all prerequisites and Pre-Determination residency challenge. |
| target audience | The target audience for Quality Reviews Post-Determination is **Entry level VSR’s**.  Although this lesson is targeted to teach the **VSR**, Entry Level employee, it may be taught to other VA personnel as mandatory or refresher type training. |
| Time Required | 1 hour |
| Materials/ TRAINING AIDS | Lesson materials:   * **Quality Reviews Post-Determination** PowerPoint Presentation * **Quality Reviews Post-Determination** Trainee Handouts * **Quality Reviews Post-Determination** Job Aid * **Quality Reviews Post-Determination Level II Assessment** |
| Training Area/Tools | The following are required to ensure the trainees are able to meet the lesson objectives:   * Classroom or private area suitable for participatory discussions * Seating, writing materials, and writing surfaces for trainee note taking and participation * Handouts, which include a practical exercise * Large writing surface (easel pad, chalkboard, dry erase board, overhead projector, etc.) with appropriate writing materials * Computer with PowerPoint software to present the lesson material   Trainees require access to the following tools:   * VA TMS to complete the assessment |
| Pre-Planning | * Become familiar with all training materials by reading the Instructor Lesson Plan while simultaneously reviewing the corresponding PowerPoint slides. This will provide you the opportunity to see the connection between the Lesson Plan and the slides, which will allow for a more structured presentation during the training session. * Become familiar with the content of the trainee handouts and their association to the Lesson Plan. * Practice is the best guarantee of providing a quality presentation. At a minimum, do a complete walkthrough of the presentation to practice coordination between this Lesson Plan, the trainee handouts, and the PowerPoint slides and ensure your timing is on track with the length of the lesson. * Ensure that there are copies of all handouts before the training session. * When required, reserve the training room. * Arrange for equipment such as flip charts, an overhead projector, and any other equipment (as needed). * Talk to people in your office who are most familiar with this topic to collect experiences that you can include as examples in the lesson. * This lesson plan belongs to you. Feel free to highlight headings, key phrases, or other information to help the instruction flow smoothly. Feel free to add any notes or information that you need in the margins. |
| Training Day | * Arrive as early as possible to ensure access to the facility and computers. * Become familiar with the location of restrooms and other facilities that the trainees will require. * Test the computer and projector to ensure they are working properly. * Before class begins, open the PowerPoint presentation to the first slide. This will help to ensure the presentation is functioning properly. * Make sure that a whiteboard or flip chart and the associated markers are available. * The instructor completes a roll call attendance sheet or provides a sign-in sheet to the students. The attendance records are forwarded to the Regional Office Training Managers. |

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| Introduction to Quality Reviews- Post Determination | | |
| INSTRUCTOR INTRODUCTION | | Complete the following:   * Introduce yourself * Orient learners to the facilities * Ensure that all learners have the required handouts |
| time required | | 5 minutes |
| Purpose of Lesson  Explain the following: | | This lesson is intended to explain the quality review process for post determination cases. This lesson will contain discussions and exercises that will allow you to gain a better understanding of:   * National Quality Reviews * Local Quality Reviews * In-process reviews (IPRs) vs Individual quality reviews (IQRs) * STAR Checklist * Systems Compliance * Appeal Process |
| Lesson Objectives  Discuss the following:  Slide 2  Handout pg.2 | In order to accomplish the purpose of this lesson, the VSR will be required to accomplish the following lesson objectives.  TheVSR will be able to:   * Understand the purpose of a Quality Review * Differentiate between national and local quality review * Recognize the duties of the Quality Review Team * Differentiate between IQRs and IPRs * Understand the categories of errors that can be cited | |
| Explain the following: | Each learning objective is covered in the associated topic. At the conclusion of the lesson, the learning objectives will be reviewed. | |
| Motivation | **Explain to the trainees that quality reviews are conducted in order to determine an improve Regional Office (RO) and employee accuracy, monitor and improve the level of service to claimants and beneficiaries and; eliminate errors at the earliest possible stage in the claims process whenever possible.** | |
| STAR Error code(s) | TBD | |
| References  Slide 3  Handout pg.3 | Explain where these references are located in the workplace.   * **M21-4, Chapter 3-National Quality Reviews** * **Fast Letter (FL) 13-18- Overview of Quality Review Teams** * **October 2014 Compensation Service Bulletin (CSB)** | |

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| Topic 1: Levels of Review | |
| Introduction | This topic will allow the trainee to understand the difference between the national and local levels of quality reviews. |
| Time Required | 15 minutes |
| OBJECTIVES/ Teaching Points | Topic objectives:   * Understand the purpose of a Quality Review * Differentiate between national and local quality review * Recognize the duties of the Quality Review Team   The following topic teaching points support the topic objectives:   * National Quality Review * Local Quality Review * Duties of the QRT |
| Levels of Review-National  Slide 5  Handout pg.4 | Explain what STAR stands for and briefly describe the process. Systematic Technical Accuracy Review (STAR) is the Veterans Benefits Administration’s (VBA) national program for measuring compensation claims processing accuracy. STAR includes review of work in two areas:   * + Claims that usually require a rating decision, and   + Claims that generally do not require a rating decision.   STAR results are generated for all of VBA’s regional offices (ROs) and are included in both the station’s and the RO Director’s Performance Dashboards. |
| Levels of Review-Local  Slide 6  Handout pg. 4 | At the local office level, the Quality Review Team (QRT) is comprised of dedicated Quality Review Specialists (QRS) whose sole purpose is to improve the quality of claims processing by:   * + Evaluating station quality;   + Identifying error trends; and   + Ensuring individual employee reviews are performed monthly. |
| Duties of the quality Review Team (QRT)  Slide 7  Handout pg.5 | The Veterans Benefits Administration (VBA) is committed to increasing rating accuracy to 98 percent by 2015. To help achieve this goal, the Quality Management Transformation Initiative workgroup conducted a study to determine the need for specific quality review personnel at each regional office (RO). The workgroup suggested VBA would achieve a number of gains by dedicating quality review specialists to perform all quality reviews. Implementing QRTs through a standardized quality review specialist position would allow focused emphasis on station quality. |
| Duties of the QRT  Slide 7  Handout pg.5 | Appropriate duties are:   * + Monthly IQRs   + IPRs   + Feedback and training on error trends   + Peer reviews   + Preparation of cases for shipment/return from STAR, to include corrective actions and quarterly STAR report   + Extended reviews (10 cases versus 5 cases per month) for employees on Performance Improvement Plans   + Special reviews identified by Compensation Service   + Second signature for cases with traumatic brain injury and special monthly compensation issues when the QRT is current on all required IPRs and IQRs |
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| note(s) | Take note of any questions the trainees may have and decide if they should be addressed at this point or at the end of the training. |

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| Topic 2: Types of Local Quality Reviews | |
| Introduction | Understand the difference between IPRs and IQRs |
| Time Required | 10 minutes |
| OBJECTIVES/ Teaching Points | Topic objectives:   * Types of quality reviews * Differentiate between IQRs and IPRs * Additional duties of QRT   The following topic teaching points support the topic objectives:   * The definition of an Individual Quality Review (IQR) * The definition of an In-Process Review (IPR) * Understanding the types of quality reviews |
| QRT Reviews  Slide 8  Handout pg.6 | The QRT is responsible for two types of quality reviews:   * Individual Quality Reviews (IQRs) - A review of 5 randomly selected cases each month for those employees with a quality element in their performance standards. This will determine the employee’s quality level for his/her individual performance evaluation. * In-Process Reviews (IPRs) - Non-punitive IPRs conducted at strategic points in the claims process with immediate feedback provided to employees. Employees will take appropriate corrective action on identified deficiencies. These reviews are not part of the individual performance data, but may be used for training purposes. The number of IPRs completed per RO should be no less than 10% of the expected monthly production as identified on the RO’s fiscal year dashboards. |
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| note(s) | Takes notes of any questions that may need to be addressed at this time. |

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| Topic 3: Checklist for Quality Reviews | |
| Introduction | Have a better understanding of the STAR checklist |
| Time Required | 10 minutes |
| OBJECTIVES/ Teaching Points | Topic objectives:   * Understand the purpose of the STAR checklist * Understand the general guidelines for quality reviews * Know what the STAR checklist consists of   The following topic teaching points support the topic objectives:   * Discuss why STAR uses a checklist * Describe the general guidelines for quality reviews * Discuss the sections of the STAR checklist categories |
| STAR checklist  Slide 10  Handout pg.7 | The STAR process requires a comprehensive review and analysis of all elements of processing associated with a specific claim or issue. STAR checklists are designed to facilitate consistent structured reviews.  The Rating and Authorization checklists classify errors into three categories   * Benefit Entitlement * Decision Documentation/Notification, and * Administrative. |
| General Guidelines for Quality Reviews  Slide 11  Handout pg.7 | The general guideline is to record an error when an action taken violates current regulations or other directives and affects outcome, or has the potential to affect outcome.  Examples of outcome-related deficiencies include, but are not limited to   * errors that result in an overpayment or underpayment to a claimant * procedural deficiencies that violate the claimant’s due process rights, and * Deficiencies which would result in a remand from the Board of Veterans Appeals (BVA) if not corrected.   ***Note***: The deficiencies include all items listed under Benefit Entitlement on the STAR Checklist for rating and authorization. |
| STAR checklist categories  Slide 12  Handout pg. 7 | (A)Address All Issues  (B) Proper Development or Procedural Issues  (C) Income Issues **(Pension)**  (D) Dependency Issues  (F) Accrued Benefits Issues **(Survivor)**  (G) Adjustments  (H) Payment and Effective Dates  (I) Due Process Issues  (J) Administrative Decisions  (K) Notification  (L) Appropriate Signature  ***Emphasize*** that, at the post-determination level of the claims adjudication process, the propriety of all authorization activity undertaken during the claim’s pendency, to include development, is subject to review. Remind trainees of their earlier lesson on pre-determination quality reviews and inform them that competencies discussed in that lesson will be supplemented with a discussion of error checklist categories native to post-level claims processing. |
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| note(s) | Takes notes of any questions that may need to be addressed at this time. |
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Topic 4: Applicability to Post-Determination

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| Introduction | This topic will allow the trainee to gain exposure to specific STAR error categories and types considered in claims at the level of post-determination and promulgation. |
| Time Required | 15 minutes |
| OBJECTIVES/ Teaching Points | Topic objectives:   * Examine checklist categories that are particularly significant to post-determination case processing.   The following topic teaching points support the topic objectives:   * Identify STAR checklist categories that are particularly significant to post-determination case processing * Describe the types of infractions and deficiencies that would constitute errors in each category. |
| Applicability to Post-Determination  Slide 13  Handout pg. 8 | The D category of the Checklist considers any and all matters dependency related. Establishment of qualifying dependents can affect the benefit rate payable. Two issues must be resolved: relationship and dependency. Dependency may be assumed or may require development. Dependency is secondary to the primary resolution of relationship.  Error category D1 determines whether a dependent spouse was correctly established or removed, and 38 CFR 3.50 provides the basic framework for this determination. Further definitions and development requirements are contained in 38 CFR 3.50 through 3.60 and 3.200 through 3.216. The scope of this and other dependency questions includes preparation of a justifiable Administrative Decision when required.  Error category D2 determines whether dependent children were correctly established or removed. The basic rules governing the propriety of such a determination are published under 38 CFR 3.57 and 3.667. The issues of date of birth, relationship, and occasionally custody must be resolved.  Error categories D3, D4, and D5 concern the accurate establishment or removal of dependent parents, a surviving spouse, and surviving children, respectively. |
| Applicability to Post-Determination (Cont’d)  Slide 14  Handout pg. 8 | A clear error in the H, or payment and effective date, element ultimately results in an overpayment or underpayment of benefits.  This category contains only one error option for selection in any instance in which payment dates and rates are improperly assigned, so its implications are many and far-reaching. It may be applied for failure to intuit entitlement to earlier effective dates for issues affected by liberalizing legislation, or for rating or nonrating violation of effective date rules published under 38 CFR 3.400-404 and 3.500-504.  The I category addresses concerns related to due process and its proper observation. The basic rule concerning notice is contained in 38 CFR 3.103. Within that regulation, at 3.103(b)(2), are provisions for due process associated with adverse actions. Additional instructions for implementation are found in M21-1, Part I, Chapter 2. Strict adherence to these procedures is necessary both from the stakeholder’s perspective and the Government’s.  Error category I1 ensures that a predetermination notice was successfully sent. This notice is based upon a proposed, rather than final, action. Contemporaneous notice is not included.  Error category I2 ensures that the predetermination notice was fully informative. In order to satisfy this element, all components specified under M21-1 I.2.B2 must be included in the letter.  Error category I3 ensures that the claimant was afforded 60 days to respond before the due process period was considered expired. Control is maintained under end product 600. A 60-day waiting period is required unless the claimant agrees to the proposed action, states that all evidence has been provided, or the reduction is deemed unnecessary prior to expiration of due process. |
| Applicability to Post-Determination (Cont’d)  Slide 15  Handout pg. 8  Applicability to Post-Determination (Cont’d)  Slide 15  Handout pg. 8 | The K element of the STAR Authorization Checklist evaluates the accuracy of correspondence and decisional notices. 38 CFR 3.103 contains the basic standards. Claimants and their representatives are entitled to timely notice of any decision made by VA. This rule applies to both awards and disallowances.  Error category K1 determines whether notification were sent and documented in the file. Notification may be placed in claims folder or in the electronic record(s), but ***must*** be present to one location or the other. If neither form of media shows a decisional notice, then for all intents and purposes, one was never sent. The appeal period does not begin until the claimant and representative are notified of the decision.  Error category K2 determines whether the notification sent was technically accurate. Correspondence is VA’s primary communication medium. Information must be complete and accurate. The Automated Decision Letter (ADL) process will require that VSRs carefully review the letter generated in VBMS-A, the accuracy and acceptability of which must not be automatically presumed. Any deficiencies in information must be supplemented with free text or corrected via alternative correspondence preparation with Personal Computer General Letters (PCGL).  The K3 error category questions whether appeal rights were included in the decisional letter, as such is mandatory following every decision, be it rating related, administrative, or both.  The K4 error category determines whether the power of attorney was identified, and if so, whether the elected agency was correctly identified and copied on correspondence. The Corporate record should be updated to include designation of the claimant’s representative so computer-generated notices are furnished to both. |
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| Note(s) | Takes notes of any questions that may need to be addressed at this time. |

Topic 5: System Compliance Considerations

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| Introduction | This topic introduces the trainee to categories of system compliance that will be subject to quality review at the local level. |
| Time Required | 15 minutes |
| OBJECTIVES/ Teaching Points | Topic objectives:   * Define a system compliance error. * Identify processes subject to system compliance reviews.   The following topic teaching points support the topic objectives:   * Exploration of Quality Assurance’s formulated list of system compliance inquiries. * Emphasis on close attention to detail to ensure that all applicable systems are updated at each stage of development. |
| System Compliance (S1) Considerations (For Local Use Only)  Slides 16 & 17  Handout pg. 9 | System compliance considerations (subject to local, not national quality review) gauge the extent to which employees have, throughout the term of the open claim’s pendency, fully utilized application functionalities to accurately update/activate claim type and status indicators and populate claimant data.  Compensation Service Quality Assurance has developed the following list of questions to serve as a framework for system compliance assessment:   * Is the date of claim and end product correct? * Are all the payees' addresses (including direct deposit information) correct? * Are all periods of service for the Veteran verified and updated in all systems? * Was the Power of Attorney (POA) information/access updated in all systems and correspondence? * Were special issues and flashes entered and correct? * Were contentions and classifications entered correctly? * Were tracked items entered and updated as necessary? * Was the claim status (Ready for Decision (RFD), Rating Decision Complete (RDC), OPEN) updated appropriately? * Were the suspense dates (tracked item or claim level) updated and correct?   System compliance errors are only those errors that fall under one of the nine questions. Under the current list, uploading documents (including notification letters) and VBMS indexing is not a system compliance error. If an action or non-action by a VSR cannot be categorized under one of the nine questions, it is a comment, not a system compliance error. Regional offices (ROs) are required to utilize the October 2014 list when calling system compliance errors; local guidance or policy will not be used. |
| Note(s) | Takes notes of any questions that may need to be addressed at this time. |
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| Topic 6: Addressing Disagreements | |
| Introduction | This topic will allow the trainees to understand the process by which local and national errors may be contested. |
| Time Required | 10 minutes |
| OBJECTIVES/ Teaching Points | Topic objectives:   * Explore options for expressing disagreement with findings of error.   The following topic teaching points support the topic objectives:   * Discussion of requests for reconsideration of national STAR errors * Discussion of the process by which local quality errors may be rebutted. |
| Request for Reconsideration-National  Slide 18  Handout pg. 10 | It is anticipated that occasionally ROs may receive a review result with which they disagree or believe the explanation offered is unclear or inadequate. Any basic disagreement over the correctness of a call must be formally addressed.  If an RO believes an erroneous error call has been made, the case may be returned for a formal reconsideration by the QA Staff under the direction of the Quality Assurance Officer (QAO). To request reconsideration of an error, prepare a memorandum to the QA Office stating the basis for the request for reconsideration.  Requests for reconsiderations must be submitted within ***10 business days***. The 10-day period for rating and authorization will begin with the date the RO receives the file or is notified that an electronic review has been completed. QA Staff maintains an official grace period of 10 days for paper cases after the prescribed 10-day period, which begins when the station receives the paper folder from the QA Office.  ***Notes***:  The 10-day grace period takes into account mailing. This will be moot once all files are electronic.  Exceptions to the 10-day period may be requested by contacting the QA Staff at [VAVBAWAS/CO/214B](mailto:214B.VBACO@va.gov). |
| Appeals Process-Local  Slides 19 & 20  Handout pg. 10 | Some stations have worked with their local union to devise an appeal process for disagreements on error calls that impact an individual’s performance. For stations where this is the case, the error’s verification will be resolved based on the locally determined procedures. If there is no locally bargained agreement in place, the following procedures apply if an employee disagrees with an error call involving his/her IQR:  The employee has 5 business days after being notified of an error to express disagreement in writing. Employee must provide manual and/or regulation citation or other appropriate reference to support rebuttal of error call, in his/her written disagreement.  Disagreements with error calls more than 5 business days after notification will not be entertained except in rare circumstances as determined by the QRT coach or designee.  Employee and QRS will discuss the error in an attempt to resolve differences of opinion.  Employee must provide manual and/or regulation citation or other appropriate reference to support rebuttal of error call, in writing  If QRS and employee do not reach agreement on the error, the error will be resolved by locally determined procedures.  The employee will be notified of the final decision in writing; the only basis for overturning an error is because the QRT’s manual and/or regulation citation or other reference used to support the error call was incorrect. |
| Regional Office Specific Topics | **This row should be included ONLY in the last topic before the Practical Exercise.**  At this time add any information pertaining to:   * Station quality issues with this lesson * Additional State specific programs/guidance on this lesson |

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| Practical Exercise | |
| Time Required | 20 minutes |
| EXERCISE | Request that students complete the Practical Exercise located on page 20 in the lesson handout. Use of any and all available reference material is permitted and encouraged.  Ask if there are any questions about the information presented in the exercise, and then proceed to the Review. |
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| Lesson Review, Assessment, and Wrap-up | |
| Introduction  Discuss the following: | The Quality Reviews – Post-Determination lesson is complete.  Review each lesson objective and ask the trainees for any questions or comments. |
| Time Required | 10 minutes |
| Lesson Objectives | You have completed the Quality Reviews – Post-Determination lesson.  The trainee should be able to:   * Understand the purpose of a Quality Review * Differentiate between national and local quality review * Recognize the duties of the Quality Review Team * Differentiate between IQRs and IPRs * Understand the categories of errors that can be cited |
| Assessment | Remind the trainees to complete the on-line assessment in TMS to receive credit for completion of the course.  The assessment will allow the participants to demonstrate their understanding of the information presented in this lesson. |