System Compliance Training

Trainee Handout

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Objectives

* Review the history of System Compliance errors
* Identify the different System Compliance errors
* List different ways to prevent System Compliance errors
* Summarize the importance of proper systems compliance
* Properly identify if an System Compliance error exists

References

* [**M21-1, Part I, Chapter 3 - Power of Attorney**](https://vaww.compensation.pension.km.va.gov/system/templates/selfservice/va_ka/portal.html?encodedHash=%23!agent%2Fportal%2F554400000001034%2Farticle%2F554400000014079%2FM21-1-Part-I-Chapter-3-Section-C-Payment-of-Attorney-or-Agent-Fees)
* [**M21-1, Part III, Subpart ii, Chapter 2, D through F - Reopen, Claims for Increase, Reconsideration**](https://vaww.compensation.pension.km.va.gov/system/templates/selfservice/va_ka/portal.html?encodedHash=%23!agent%2Fportal%2F554400000001034%2Ftopic%2F554400000003077%2FChapter-02-Benefit-Programs-and-Types-of-Claims)
* [**M21-1, Part III, Subpart ii, Chapter 3, Section C - Systems Updates**](https://vaww.compensation.pension.km.va.gov/system/templates/selfservice/va_ka/portal.html?encodedHash=%23!agent%2Fportal%2F554400000001034%2Farticle%2F554400000014125%2FM21-1-Part-III-Subpart-ii-Chapter-3-Section-C-System-Updates)
* [**M21-1, Part III, Subpart iii, Chapter 1, Section F - Record Maintenance During the Development Process**](https://vaww.compensation.pension.km.va.gov/system/templates/selfservice/va_ka/portal.html?encodedHash=%23!agent%2Fportal%2F554400000001034%2Farticle%2F554400000036530%2FM21-1-Part-III-Subpart-iii-Chapter-1-Section-D-Record-Maintenance-During-the-Development-Process%3FfromQuery%3Dtracked%20item%20)
* [**M21-4, Appendix A - Regional Office Station Numbers and Payee Codes**](https://vaww.compensation.pension.km.va.gov/system/templates/selfservice/va_ka/portal.html?encodedHash=%23!agent%2Fportal%2F554400000001034%2Farticle%2F554400000019718%2FAppendix-A-Regional-Office-Station-Numbers-and-Payee-Codes)
* [**M21-4, Appendix B - End Product Codes and Work-Rate Standards for Quantitative Measurements**](https://vaww.compensation.pension.km.va.gov/system/templates/selfservice/va_ka/portal.html?encodedHash=%23!agent%2Fportal%2F554400000001034%2Farticle%2F554400000011474%2FAppendix-B-End-Product-Codes-and-Work-Rate-Standards-for-Quantitative-Measurements%20)
* [**M21-4, Appendix C - Index of Claim Attributes**](https://vaww.compensation.pension.km.va.gov/system/templates/selfservice/va_ka/portal.html?encodedHash=%23!agent%2Fportal%2F554400000001034%2Farticle%2F554400000036570%2FAppendix-C-Index-of-Claim-Attributes%20%20%20)
* [**M21-4, Appendix D - Index of Claim Stage Indicators**](https://vaww.compensation.pension.km.va.gov/system/templates/selfservice/va_ka/portal.html?encodedHash=%23!agent%2Fportal%2F554400000001034%2Farticle%2F554400000036576%2FAppendix-D-Index-of-Claim-Stage-Indicators%20)
* [**M21-4, Chapter 6, Appendix A, B, and C - Task Based Quality Review Checklist**](https://vaww.compensation.pension.km.va.gov/system/templates/selfservice/va_ka/portal.html?encodedHash=%23!agent%2Fportal%2F554400000001034%2Farticle%2F554400000037939%2FChapter-6-Quality-Review-Team-QRT)**s**

All M21-1 references are found in the [Live Manual Website](https://vaww.compensation.pension.km.va.gov/). Explain how to access these references.

Topic 1: History of System Compliance Errors

**Development of VETSNET Business Rules**

VETSNET Business Rules were originally developed April 3, 2003 under Fast Letter (FL) 03-10. FL 03-10, Distribution of standardized data input rules for Modern Award Processing – Development (MAP-D) clearly defined MAP-D functions and functionality.

Rollout of the MAP-D application began in November 2002 to field stations. Data was able to be collected through Inventory Management System and was designed to replace the BDN WIPP reports.

Fast Letter 03-10 defined eight general segments of a claim cycle. The rules for each segment explain the actual data being input or the action being accomplished, who has responsibility for the input and when, and where it is input into MAP-D.

April 2003 was when VA defined eight categories of cycles throughout the claims process which are around today. This was the start of gaining uniformed business processes throughout the nation.

|  |  |  |  |
| --- | --- | --- | --- |
| **Process Segment** | **Action** | **Specifications** | **Typical****Responsibility** |
| Claims control | Use SHARE to establish claims control | Actual date claim received | Triage |
| Development Initiated | First development action taken | Actual date evidence is requested | Pre-DPost-D |
| Development-Interim actions | Some requested evidence is received or additional evidence is developed | Evidence is recorded using the actual date received or date additional evidence is requested | TriagePre-DPost-D |
| All evidence received | All requested items received or controls expired | Date last requested evidence is received or date assessed for non-response | TriagePre-DPost-D |
| Claim determined ready for decision | Assessed as ready for decision | Date assessed as ready for decision | Pre-DPost-D |
| Decision complete | Claim decided - ready to move on to award/ notification or POA review | Date decision action is complete, after any second signature approval | RatingPost-D (non-rating issues) |
| Decision Processed - pending authorization | Claim has been GAP’d | Date of GAP | Post-D |
| Award action authorized - decision notification released | Claim has been authorized or finalized and notification has been released | Date of CAUT or PCLR with release of decision notification letter | Post-D |

**VETSNET Business Rules**

FL 06-11, VETSNET Business Rules, was issued July 17, 2006. It defined standardized rules and claims cycles. Updates completed to MAP-D enhanced functionality and defined status options as the following:

* Use of MAP-D notes
* Explanation of MAP-D status indicators
* Clarification of “received” versus “closed” tracked items
* All open tracked items must be closed (if there are no other pending issues and response time has expired) prior to “ready-for-decision” status

**VETSNET Business Rules Progression**

FL 12-03, Revised VETSNET Business Rules, was issued February 13, 2012. It defined standardized rules and stressed MAP-D compliance. Enhanced business requirements included the following:

* Entering contentions
* Entering unsolicited evidenced received with the claim
* Tracking all development actions via tracked items
* Tracking all development letters
* Entering notes

***Explain*** that MAP-D was designed because there was variation in claims and needed to standardize VA’s business practices.

**February 2014 Compensation Service Bulletin**

February 2014 Compensation Bulletin stated Quality Review Specialists (QRSs) are required to cite System Compliance errors on an individual quality review for the following:

* Is the payee’s addresses (to include direct deposit) updated, correct, and verified?
* Is the date of claim correct?
* Were the contentions and classifications entered into VBMS or MAP-D? Were they entered correctly?
* Were special issues and flashes entered and correct?
* 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?
* Was the Power of Attorney (POA) information/access updated in all systems and correspondence?
* Are the documents in VBMS indexed correctly? Are the dates of receipt for each document correct?
* Is service information in SHARE verified and complete?
* Was Control of Veterans Records System (COVERS) updated to reflect the correct and current location?

**M21-4 Chapter 6**

M21-4 Chapter 6 was created in December 2015 to assist QRSs improve quality and timeliness of claims processing. QRSs must call System Compliance errors for oversights such as the following:

1. Is the date of claim and end product correct?
2. Are all the payees’ address (including direct deposit) correct?
3. Are all periods of service for the Veteran verified and updated in all systems?
4. Was the Power of Attorney (POA) information/access updated in all systems and correspondence?
5. Were special issues and flashes entered correctly?
6. Were contentions and classifications entered correctly?
7. Were tracked items entered and updated as necessary?
8. Was the claim cycle (Ready for Decision (RFD), Rating Decision Complete (RDC), Open) updated appropriately?
9. Were the suspense dates (tracked item or claim level) updated and correct?

Topic 2: What is Considered a System Compliance Error

System Compliance Checklist

[M21-4 Chapter 6](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001034/content/554400000037939/Chapter%206.%20%20Quality%20Review%20Team%20%28QRT%29), Appendices A and B provide the VSR and RVSR Task Based Quality Review Checklists, respectively. Section 11 of each checklist covers System Compliance Specific Questions. Questions on the Qualtiy Review Checklists include:

* Date of claim incorrect
* End product correct
* Payees’ address (including direct deposit information) incorrect
* All periods of active duty or other service related to claimed issues not verified and updated in all systems (BIRLs/Participant Profile) (EOD, RAD, Branch, Char SVC, Sep Reason VADS and/or VERIFIED)

**Date of Claim (DOC)**

The date of claim (DOC) is the earliest date any Department of Veterans Affairs (VA) facility received the claim ([M21-1 III.ii.2.B.3.c](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001034/content/554400000014119/M21-1-Part-III-Subpart-ii-Chapter-2-Section-B-Claims-for-Disability-Compensation-and-or-Pension-and-Claims-for-Survivors-Benefits#3)). The only exception is that the DOC for a pre-discharge claim is the first day following the anticipated date of release from active duty (RAD), regardless of the date VA received the claim ([M21-1 III.i.2.A.2.b](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001034/content/554400000014099/M21-1-Part-III-Subpart-i-Chapter-2-Section-A-General-Information-on-Pre-Discharge-Claims)).

***Example Scenario***:

* A VA medical center (VAMC) receives *VA Form 21-526*EZ on October 14, 2017.
* The VAMC forwards the application to the regional office (RO) on November 1, 2017.
* The RO does ***not*** receive the application in its mailroom until November 5, 2017.

***Result***:  When the RO places the claim under EP control, it must use October 14, 2017, as the DOC.

**End Product**

The end product (EP) is the primary workload monitoring and management tool for the Veterans Service Center (VSC)/Pension Management Center (PMC). It is imperative that the correct EP is associated with the claim.

* Correct use of the EP system facilitates proper control of pending workloads and appropriate work measurement credit.
* Correct work measurement is essential to substantiate proper staffing requirements and determine productive capacity.

M21-4, Appendix B

**Period of Service**

RO personnel are responsible for ensuring service is updated in both BIRLS (Beneficiary Identification and Records Locator Subsystem) and the Veteran’s corporate record through Participant Profile ([M21-1 III.ii.3.C.7.a](https://vaww.compensation.pension.km.va.gov/system/templates/selfservice/va_ka/portal.html?encodedHash=%23!agent%2Fportal%2F554400000001034%2Farticle%2F554400000014125%2FM21-1%2C%20Part%20III%2C%20Subpart%20ii%2C%20Chapter%203%2C%20Section%20C%20-%20System%20Updates)). All periods of **ACTIVE** service must be verified and updated in VA systems.

Verified service is shown by

* a *Y* or *D* in the VADS (Veterans Assistance Discharge System) field of the BIRLS VET’S IDENTIFICATION DATA tab in Share, or
* the claims processor
	+ entering *Y* in the VERIFIED field, if using BIRLS, and
	+ checking the SERVICE VERIFIED box in Participant Profile.





In some situations, service connection (SC) is awarded for a death, disease, or injury incurred or aggravated during a period of duty other than full-time active duty in the Armed Forces. In these situations, the period of duty during which the death, disease, or injury occurred is considered active military service for VA compensation purposes. These instances warrant ADT and.or IADT be entered into systems.

***Example***:  SC may be awarded for an injury incurred in the line of duty (LOD) during inactive duty for training (IADT). Once it is determined that SC is in order for that injury, the period of IADT is considered active military service for VA compensation purposes.

Clarify when SC for disability or death has been established based on a single day of ADT or IADT, the authorization activity will update BIRLS and Participant Profile to reflect that the period of service identified by the RVSR is active service. The RVSR will utilize the day following as the end date of service but clearly annotate [*VA Form 21-6789, Deferred Rating Decision*](http://vbaw.vba.va.gov/bl/20/cio/20s5/forms/VBA-21-6789-ARE.pdf), (as directed in [M21-1, Part III, Subpart ii, 6.A.2.k](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001034/content/554400000014143/M21-1%2C-Part-III%2C-Subpart-ii%2C-Chapter-6%2C-Section-A---Establishing-Veteran-Status)) to reflect that the service was actually only one single day of service.

**REMINDER:** ADT and IADT should not be inputted to BIRLS and Participant Profile unless the SC disability was incurred during such a period.

**Payee(s) Address(es)**

It is very important to maintain the correct and most current contact information in the system. This includes the mailing address and direct deposit information. Addresses and other contact information can be updated using VBMS or SHARE. It is highly encouraged that all contact information must be updated through the EDIT VETERAN function under the claimant’s PROFILE in VBMS. [M21-1 III.ii.3.C.1.b](https://vaww.compensation.pension.km.va.gov/system/templates/selfservice/va_ka/portal.html?encodedHash=%23!agent%2Fportal%2F554400000001034%2Farticle%2F554400000014125%2FM21-1%2C%20Part%20III%2C%20Subpart%20ii%2C%20Chapter%203%2C%20Section%20C%20-%20System%20Updates) provides the step-by-step instructions on how to update the contact information in VBMS.

Direct deposit information can only be updated in SHARE or VBMS-A (at awards promulgation). To change the address and/or direct deposit information in SHARE you will use the Change of Address function. [M21-1 III.ii.3.C.1.c](https://vaww.compensation.pension.km.va.gov/system/templates/selfservice/va_ka/portal.html?encodedHash=%23!agent%2Fportal%2F554400000001034%2Farticle%2F554400000014125%2FM21-1%2C%20Part%20III%2C%20Subpart%20ii%2C%20Chapter%203%2C%20Section%20C%20-%20System%20Updates). provides the step-by-step instructions for updating in SHARE.

Proper business mail delivery address format is provided by the [United States Postal Service Business Mail 101 webpage](https://pe.usps.com/BusinessMail101?ViewName=DeliveryAddress).

Important items to keep in mind for Mailing Addresses are:

* No punctuation
* If you can't fit the suite or apartment number on the same line as the delivery address, **put it on the line ABOVE the delivery address, NOT on the line below**

**Power of Attorney (POA)**

The Department of Veterans Affairs’ (VA’s) policy is that all claimants have the right to representation before the department in claims affecting the payment of benefits or relief. VA representation means broadly that an individual has completed legal formalities to authorize a VSO, attorney, agent, or individual to perform functions on his or her behalf in business before VA.

[VA Form 21-22, Appointment of Veterans Service Organization as Claimant’s Representative](http://www.vba.va.gov/pubs/forms/VBA-21-22-ARE.pdf), or [VA Form 21-22a, Appointment of Individual as Claimant’s Representative](http://www.vba.va.gov/pubs/forms/VBA-21-22a-ARE.pdf), are declarations of represetation by the claimant.

Make sure the form is complete – signatures and dates. Follow directions in [M21-1 III.ii.3.C.4.g](https://vaww.compensation.pension.km.va.gov/system/templates/selfservice/va_ka/portal.html?encodedHash=%23!agent%2Fportal%2F554400000001034%2Farticle%2F554400000014125%2FM21-1-Part-III-Subpart-ii-Chapter-3-Section-C-System-Updates) when an outdated VA Form 21-22 or VA Form 21-22a is received. For information on acceptable versions of VA Form 21-22, please see M21-1 III.ii.1.C.8.a. Be cognitive the VA can accept older versions of VA Form 21-22 until depletion of existing stock.

You must check the form for compliance with [M21-1 I.3.B.2.d](https://vaww.compensation.pension.km.va.gov/system/templates/selfservice/va_ka/%23%21agent/portal/554400000001034/article/554400000014077/M21-1%2C%20Part%20I%2C%20Chapter%203%2C%20Section%20B%20-%20Power%20of%20Attorney%20%28POA%29%20Rights%20to%20Notification%20and%20Review%20of%20Records). This is extremely important as VA must comply with [38 U.S.C 7332](https://www.law.cornell.edu/uscode/text/38/7332). To prevent inadvertent disclosure of records protected by [38 U.S.C 7332](https://www.law.cornell.edu/uscode/text/38/7332), a claimant’s representative may only access VA electronic systems pertaining to the claimant where there is a valid claimant authorization in effect permitting disclosure to all protected records ([M21-1 I.3.B.2.g](https://vaww.compensation.pension.km.va.gov/system/templates/selfservice/va_ka/portal.html?encodedHash=%23!agent%2Fportal%2F554400000001034%2Farticle%2F554400000014077%2FM21-1%2C%20Part%20I%2C%20Chapter%203%2C%20Section%20B%20-%20Power%20of%20Attorney%20(POA)%20Rights%20to%20Notification%20and%20Review%20of%20Records)).

If VA Form 21-22 does not permit release of [38 U.S.C 7332](https://www.law.cornell.edu/uscode/text/38/7332), then send the claimant the *Failure to Elect 38 U.S.C. 7332* letter through [Letter Creator](http://vbacodmoint1.vba.va.gov/bl/21/LetterGenerator/LG.asp).

***Also,*** very important that you update systems to revoke or change POA per III.ii.3.C.4.f, when such evidence is received.

**Verify POA Access**

[M21-1 III.ii.3.C.5.b](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001034/content/554400000014125/M21-1-Part-III-Subpart-ii-Chapter-3-Section-C-System-Updates) provides the steps on how to update SHARE for the appointment of a representative. Box 12 of the VA Form 21-22 correlates to Auth’d POA Access in the Corporate record. If Box 12 is checked, then the Auth’d POA Access box should state “Yes.”

Box 14 of the VA Form 21-22 correlates with the CADD Auth’d box. If Box 14 of the VA Form 21-22 is checked, then the box should state “Yes”.



**Special Issues and Corporate Flashes**

[M21-4, Appendix C](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001034/content/554400000036570/Appendix%20C.%20Index%20of%20Claim%20Attributes) provides the list of Corporate Flashes and Special Issues, respectively,

Special Issues and Corporate Flashes help track pending work and resolve claims as quickly and efficiently as possible.

**Contentions**

Use of contentions for each claim is mandatory and should be entered as soon as they are identified ([M21-1 III.iii.1.F.2.a](https://vaww.compensation.pension.km.va.gov/system/templates/selfservice/va_ka/portal.html?encodedHash=%23!agent%2Fportal%2F554400000001034%2Farticle%2F554400000036530%2FM21-1-Part-III-Subpart-iii-Chapter-1-Section-D-Record-Maintenance-During-the-Development-Process%20%20)). Make sure you express the required language for dependency contentions.

***Reminder*** that each contention must be entered separately, easy to understand, and in the claimant’s own words, as appropriate. If the Veteran misspells a condition, you can input the correct spelling. If the condition claimed is “Diabetes due to Agent Orange Exposure,” you only need to input “diabetes,” not “due to Agent Orange Exposure.” Agent Orange exposure will be identified using a special issue and/or corporate flash.

**Tracked Items**

The purpose of tracked item is to control receipt or non-receipt of information requested from the claimant, beneficiary, or other information provider. Status of individual tracked items will be visible through eBenefits ([M21-1 III.iii.1.F](https://vaww.compensation.pension.km.va.gov/system/templates/selfservice/va_ka/portal.html?encodedHash=%23!agent%2Fportal%2F554400000001034%2Farticle%2F554400000036530%2FM21-1-Part-III-Subpart-iii-Chapter-1-Section-D-Record-Maintenance-During-the-Development-Process)).

It is the responsibility of the claims processor reviewing or taking action on a claim to ensure that

* the necessary tracked item(s) have been generated
* all suspense dates are accurate, and
* the dispositions of all tracked items have been accurately managed, to include any automated tracked item actions. [M21-1 III.iii.1.F.3.e](https://vaww.compensation.pension.km.va.gov/system/templates/selfservice/va_ka/portal.html?encodedHash=%23!agent%2Fportal%2F554400000001034%2Farticle%2F554400000036530%2FM21-1-Part-III-Subpart-iii-Chapter-1-Section-D-Record-Maintenance-During-the-Development-Process)

***Reminder*** custom tracked items can be manually established by the claims processor; however, custom tracked items should not be used if a standard tracked item for the claim action already exists.

Topic 3: Importance of System Compliance

**Importance of System Compliance**

The Department of Veterans Affairs has worked tirelessly over the past few years to reduce the number of pending compensation claims. VA has also adopted creating transparency with the public. Your individual actions influence data which is given to the public through this web site: [Veterans Benefits Administration Reports](http://www.benefits.va.gov/reports/detailed_claims_data.asp)

Every claim you work impacts a Veteran and their family!

**Creating a Better Veteran’s Experience**

The President’s Commission on Care for America’s Returning Wounded Warriors established by [Executive Order 13426](http://www.gpo.gov/fdsys/pkg/FR-2007-03-08/pdf/07-1137.pdf) in March 2007, recommended the creation of a web portal to provide wounded, ill, and injured service members, Veterans, their family members, and care providers a single transparent access point to online benefits, as well as related contact and services.

On April 5, 2010, eBenefits launched version 2.3 which allowed service members and Veterans to check the status of C&P claims, review payment history, obtain home loan certificates of eligibility, and access [My Health*e*Vet](https://www.myhealth.va.gov/index.html) through a single sign on.

Various data points are exchanged with eBenefits and directly impact the information the Veteran is able to view through eBenefits. Every employee who enters data possesses the ability to influence updates which are given to the Veteran.

**Creating a Better Work Experience**

***Question:*** Have you ever received a claim where development already occurred yet the systems were not properly updated? How did receiving this type of workload make you feel?

Various feelings probably occurred when it was identified you received a less than 100% accurate piece of workload within your work queue.

Proper systems compliance eliminates extra workload. Here are some examples:

* Manually reassigning claims occurs because proper flashes or special issues are not initially added correctly.
* Prevents missed Development.
* Eliminates misrouting of claims.

**National Impacts Throughout VA**

Systems Compliance impacts the National Work Queue’s (NWQ) ability to properly disseminate workload to employees for processing based on special issues and flashes.

Incorrect tracked items added to a claim or not closing out track items could cause delays in claims processing timeliness.

Wrong date of claim could lead to a wrong effective date applied.

Incorrect address could implicate a Personally Identifiable Information (PII) violation.

Incorrect contentions entered could confuse the Veteran and the next employee who processes the claim.

Department of Veterans of Office of Inspector General has published various reports which are related to VA’s compliance and non-compliance with established system procedures.

Topic 4: How to Avoid System Compliance Errors

**Recommendations to Avoid System Compliance Errors**

Create a routine of verifying accuracy of system compliance while working a claim.

Performing steps in the same order will likely reduce the chance to miss one of the system compliance categories. Creating a habit of going in the same order will become routine after the same process is implemented.

Post the systems compliance checklist in a visible sight within your work area.

Double check your work. Triple check your work! Especially Periods of Sevices and POA information are updated, verified, and entered.

Learn from errors or recommendations provided to you from the QRT, whether it would be an in-process review or a quality review.

Keep in mind you are influencing a Clamaint’s eBenefits record and think about if you were a claimant how you would like your claim to be processed. Keep in mind your co-workers - the better system compliance each individual satisfies, the higher the quality and lower average days pending for each claim. Tracked items are designed for employees to quickly identify which life cycle the claim currently meets and assists in determining what next action is required.

The Code of Federal Regulations and Manual are your best resources to avoiding system compliance oversights. Additional resources are the [VBA Learning Catalog](https://vba-tpi.vbatraining.org/lc/?AspxAutoDetectCookieSupport=1) and [VSR/RVSR Assistant](http://cptraining.vba.va.gov/c%26p_training/Job_Aids/VSR_RVSR_Asst.htm)