

Standard Operating Procedures (SOP) Rehabilitation Service Delivery Accuracy (RSDA) Review Quality Assurance (QA) Reviews

Purpose

The purpose of this document is to provide a guide for completing an RSDA QA review.

Responsibilities

Cases are randomly selected for review by the Office of Performance Analysis and Integrity (PA&I) based on business rules provided by Vocational Rehabilitation and Employment (VR&E) Service each Fiscal Year. The VR&E Service Systematic Technical Accuracy Review (STAR) Team conducts national QA reviews, and the VR&E Officer (VREO) or designee conducts the Local QA reviews for the VR&E Division. A Qualified QA Reviewer is defined as a Vocational Rehabilitation Counselor (VRC) at the journeyman level, who has a supervisory role, or whose performance level is outstanding or excellent. A designated Reviewer cannot review any of his/her assigned cases.

The review is based on the United States Code (USC), Code of Federal Regulations (CFR), VR&E Procedural Manual (M28R), and other guidance (Policy Advisories, Circulars, Letters, and emails). Due to the nature of the services provided by VR&E, professional judgement must be used in some instances.

Prerequisites

The Reviewer must complete the QAWeb training before being designated as a QA Reviewer and obtaining access to the QA Web system.

Selection Criteria

To be selected for an RSDA review, the case must currently (at the end of the month prior to selection) be in Extended Evaluation (EE), Independent Living (IL), Rehabilitation to the Point of Employability (RTE), or Job Ready (JR) status, or be in Interrupted (INT) status after having been in one of those statuses. The case must have been in one or more of those statuses for at least 10 months.

Scope

The RSDA review includes all case management and service delivery (except for fiscal authorization and payment) for the 6-month period prior to selection for review.

Responses

When reviewing a VR&E record for quality, a question has three possible responses: Yes, No, or Not Applicable (NA). Scores are calculated by dividing the number of Yes responses by the total number of Yes + No responses. NA responses are not included in the score calculation. Some questions (1, 2, 3, etc.) have reasons (1.A, 1.B, 1.C, etc.) listed to provide more specific detail on errors cited. This will help improve tracking and identify need for clarification or training.

Accuracy Scores

The RSDA reviews contribute to the Evaluation, Planning, Rehabilitation Services Accuracy (EPRSA) and Overall Accuracy scores.

EPRSA measures the accuracy of Chapter 31 services. All applicable questions from all Chapter 31 reviews will be used to calculate the EPRSA score.

Overall Accuracy measures the accuracy of Chapter 31 and Chapter 36 cases. All applicable questions from all Chapter 31 and Chapter 36 reviews will be used to calculate the Overall Accuracy score.

SOP Guidance

The guidance below lists the policy and procedures examined for each question. The SOP document may serve as a guide for reviewing the quality of VR&E service provision. Please note the following definitions:

- **Must:** An unconditional requirement. VR&E staff must comply with the policy or procedure when it is relevant to the case.
- **Should:** Presumptively mandatory requirement. VR&E staff must comply with the policy or procedure when relevant to the case except in rare circumstances when the policy or procedure cannot be met. Reasons for not following the guidance must be documented.

Please note, where appropriate, the term Veteran refers to Servicemembers and Veterans (SM/V).

General		
1.	Was data entered correctly and consistently in the VR&E record?	
	Considerations	Citations
	All data must be entered accurately into the VA systems and must be consistent with the data contained in the VR&E record.	M28R.III.A.2
1.A	Case status dates were not consistent with documentation in the record.	
	An individual's rehabilitation program is assigned to appropriate statuses in order to determine progress in his/her program. To reflect the individual's actual progress or status in the program, VR&E staff must update the case status no later than two workdays after the program status change. Employees on travel must enter their work activity within 10 workdays of their return to the RO. This delay in entering the case status movement must be documented in a case note on the date the status is changed. The VREO must ensure strict adherence to implementing these procedures for consistency of data entry, accuracy in generated reports and safeguarding data integrity.	M28R.III.A.1 M28R.III.A.2
1.B	SEH indicator was not consistent	
	Entry in this field is required to indicate whether or not a serious employment handicap exists. If the VRC determines that the individual has a SEH, enter "Y" in this field. Conversely, if the individual does not have a	M28R.III.A.2

	SEH, enter "N." Should the individual's employment handicap status change during the course of his or her program, the case manager must update this field accordingly. Care should be taken that the SEH status is correct.	
1.C	Pre-CH31 salary was not consistent	
	<p>This field requires a four-digit entry. The case manager must enter the monthly salary or equivalent (at the time the entitlement decision is made) in this field upon completion of the initial evaluation. Enter only whole dollar figures of the individual's monthly wage, with no dollar sign (\$). If needed, enter leading zeros to fill the field (e.g., a salary of \$950.00 a month would be entered as 0950).</p> <p><i>Tip: If the Veteran reports yearly salary, divide by 12 to determine the monthly salary. If the Veteran reports bi-weekly salary, multiply by 2.2 to determine the monthly salary. If the Veteran reports weekly salary, multiply by 4.3 to determine the monthly salary.</i></p>	M28R.III.A.2
1.D	Selected track was not consistent.	
	<p>Select the appropriate track:</p> <ul style="list-style-type: none"> • Reemployment • Rapid access to employment • Employment through long-term services • Self-employment • Independent Living 	M28R.III.A.1 M28R.IV.C.4
2.	Were required documents signed, dated, and filed correctly?	
	Considerations	Citations
2.A	VAF 28-1902b, Certification of Entitlement and Counseling Narrative, was missing or unsigned.	
	<p>Before a Veteran or Servicemember can receive services from VR&E, a VRC must make a determination as to whether or not he/she is entitled to services based on a comprehensive initial evaluation. There must be an official entitlement determination on all claims for VR&E services.</p> <p>The VAF 28-1902b, Counseling Record-Narrative Report, documents information developed during the initial evaluation to explain the entitlement determination and rehabilitation needs. This form is mandatory and must be signed and filed in the VR&E record.</p> <p>The signature on the 28-1902b must be an acceptable signature, as outlined in PA 19-03</p>	38 USC 3102 38 CFR 21.40 M28R.IV.B.2 PA 19-03
2.B	VAF 28-0957, VR Guidelines and Debt Prevention, was missing or unsigned.	
	The VRC must provide an orientation to ensure the Veteran understands both the VRC's role and his/her role, as well as answer any questions the Veteran may have regarding the rehabilitation process. The rehabilitation plan and VAF 28-0957 are used to guide this orientation. Following orientation to the rehabilitation process, the VRC and the Veteran must sign the VAF 28-0957. The originals are placed in the VR&E record, and copies are provided to the Veteran.	M28R.IV.C.3 M28R.IV.C.5 M28R.IV.C.6 M28R.IV.C.7 M28R.IV.C.8 M28R.IV.C.9
2.C	Rehabilitation Plan was missing or unsigned	

	<p>The foundation of a successful rehabilitation program is a well-developed plan of action. The development of a rehabilitation plan is required for any individual who is entitled to and receiving Chapter 31 services.</p> <p>The rehabilitation services proposed in a Veteran's rehabilitation plan must be approved by the case manager, or the VR&E Officer as required, prior to authorization of services. The VRC and the Veteran must sign the rehabilitation plan.</p> <p>The signatures on the rehabilitation plan must be an acceptable signature, as outlined in PA 19-03</p>	<p>38 CFR 21.92 M28R.IV.C.1 M28R.IV.C.3 M28R.IV.C.5 M28R.IV.C.6 M28R.IV.C.7 M28R.IV.C.8 M28R.IV.C.9 M28R.V.A.1 PA 19-03</p>
2.D	Rehabilitation Plan had expired.	
	<p>An anticipated completion date helps track progress toward the goal and keeps the plan moving forward. It also informs the VRC and the Veteran of the time frame in which services will be provided.</p> <p>Duration of services specifies a start and end date for each intermediate objective.</p> <p>The anticipated completion date and duration of services dates are required elements of the rehabilitation plan, and must be updated as changes occur.</p>	<p>M28R.IV.C.1 M28R.IV.C.3 M28R.IV.C.5 M28R.IV.C.6 M28R.IV.C.7 M28R.IV.C.8 M28R.IV.C.9</p>
2.E	28-1905, Authorization and Certification of Entrance or Reentrance into Rehabilitation and Certification Status, was missing or unsigned.	
	<p>VAF 28-1905 must be used as authorization to facilities for services provided to Veterans participating in the VR&E Program. It also notifies the facility of the approved program of study for the Veteran. This form must not be sent unless the training program has been approved and the facility has been assigned a valid facility code.</p> <p>When authorizing and documenting enrollment of Veterans participating in a rehabilitation program, VR&E must:</p> <ul style="list-style-type: none"> a) Complete and sign VAF 28-1905 for authorization of training. b) File the signed VAF 28-1905 in the VR&E record. c) Record authorization of training in the electronic case management system. <p>Case managers must ensure that Parts A and B of VAF 28-1905 are completed, including the case manager's signature in box 11A. Completion of Parts A and B of VAF 28-1905 provides the essential VA authorization for the facility to provide requested services. A copy of VAF 28-1905 with Parts A and B completed and an authorized signature (in accordance with PA 19-03) in box 11A should be filed in the VRE record.</p>	<p>M28R.V.A.3 PA 19-03</p>
3.	Did the case comply with regulatory time limits?	
	Considerations	Citations
3.A	Duration of employment services exceeded 18 months.	
	<p>The periods during which a Veteran may receive employment assistance are not subject to the required eligibility period, as described in 38 CFR 21.41 through 21.45. However, entitlement to employment assistance is</p>	<p>38 CFR 21.73 M28R.IV.A.3 M28R.VI.A.2</p>

	<p>limited to a total of 18 months of employment services, as described in 38 CFR 21.73. This means that although a Veteran has exhausted 48 months of his/her entitlement, he/she may continue to receive employment services. However, the period of employment services must not exceed a total of 18 months.</p> <p>During the 18-month period, the VRC will tailor and may modify the type, duration, and phasing of employment services to accommodate the Veteran's needs. The Veteran will concentrate his/her efforts on the activities specified in the IEAP.</p> <p>A Veteran who has received 18 months of employment services may not receive additional employment services. If a Veteran is unable to achieve suitable employment by the end of the 18-month period, then VR&E must discontinue the case. A Veteran in either Rehabilitated (REH) or Discontinued (DIS) case status may do the following:</p> <ul style="list-style-type: none"> • Request additional employment assistance • Formally reapply to the VA VR&E Program <p>The Veteran must be determined eligible and entitled to Chapter 31 services. Upon this determination, VR&E will offer the Veteran vocational rehabilitation services, including an additional 18 months of employment services.</p> <p>NOTE: If a Veteran obtains suitable employment before exhausting 18 months of entitlement to employment services, the case manager may keep the case open and declare the Veteran "rehabilitated" after the 60-day follow-up period has been completed, even if that follow-up period extends past the 18 months. The VRC must document that all services leading to suitable employment were provided during the 18-month eligibility period.</p>	
3.B	Duration of IL services exceeded 24 months (or 30/36 months with concurrence).	
	<p>Per 38 U.S.C. 3105 and 38 CFR 21.76, a program of independent living services cannot exceed 24 months unless one the following criteria are met:</p> <ol style="list-style-type: none"> 1. The VRC determines that a longer period is necessary and likely to result in a substantial increase in the individual's level of independence in daily living. In this situation, an extension of up to six months is possible. 2. If the individual served on active duty during the Post 9/11 Global Operations period and has a severe disability incurred or aggravated in such service, the VRC may request an extension of up to two six-month periods if the additional period(s) will result in a substantial increase in the individual's level of independence in daily living. <p>Extension Beyond 24 Months:</p>	<p>38 USC 3105 38 CFR 21.76 M28R.IV.C.9</p>

	<ol style="list-style-type: none"> 1. VR&E Concurrence VR&E Officer concurrence is required for any request for an extension of IL services beyond 24 months. The VRC must document the extension request on FL 28-521, Request for IL Extension. See Appendix O, VA Forms, for information on how to access this form. 2. Vocational Rehabilitation Panel Review The Vocational Rehabilitation Panel (VRP) must review requests for extensions of IL services beyond 24 months and make recommendations on whether this action is consistent with the needs of the individual. The request for an extension beyond 24 months is a required referral to the VRP. See M28R.IV.C.2 for additional information on the VRP. 3. Director, VR&E Service Concurrence The Director of VR&E Service must approve all extensions of IL services beyond 36 months. 	
3.C	Duration of EE services exceeded 12 months (or 18/24 months with proper documentation and concurrence).	
	<p>Extended evaluations must be at least two weeks long, but may not exceed 12 months unless a longer period is necessary to determine whether achievement of a vocational goal is reasonably feasible. The VRC can approve the initial 12-month extended evaluation period, but the VR&E Officer must approve any extensions of that period.</p> <p>Up to two additional six-month periods of extended evaluation may be approved if there is reasonable certainty that the feasibility of achieving a vocational goal can be determined during this period. Any request for an extension beyond the basic period of 12 months must be justified by a discussion of the Veteran's circumstances and the issues related to the feasibility of achieving a vocational goal. This justification must be documented in narrative form on VAF 28-1902b, Counseling Record - Narrative Report, or VAF 28-1902n, Counseling Record - Narrative Report (Supplemental Sheet) and placed in the VR&E record.</p> <p>Note that Veterans who served during Operation Iraqi Freedom (OIF) and/or Operation Enduring Freedom (OEF) can be provided with an initial extended evaluation plan of 18 months if the severity of the Veteran's disabilities warrants additional time to make the determination of feasibility. VR&E Officer concurrence is required.</p>	<p>38 USC 3105 38 CFR 21.74 M28R.IV.C.3</p>
4.	Was required concurrence documented?	
	Considerations	Citations
4.A	Appropriate level of concurrence for program cost was not documented.	
	<p>Vocational Rehabilitation Counselor</p> <ul style="list-style-type: none"> • The VRC can approve rehabilitation plans with an annual cost of up to \$25,000, with the exception of self-employment plans and construction costs associated with IL plans. 	M28R.V.B.1

	<p>VR&E Officer</p> <ul style="list-style-type: none"> • Self-employment plans with a total cost up to \$25,000. • Rehabilitation plans with an annual cost of \$25,000 to \$75,000. • IL plans that do not contain construction with annual costs up to \$75,000. • IL plans that contain construction costs up to \$2,000. <p>It is important to note that VR&E Officers may not delegate their responsibility to review program costs associated with extended evaluation, independent living, or establishing a small business.</p> <p>Regional Office Director</p> <ul style="list-style-type: none"> • Rehabilitation plans with an annual cost of \$75,000 to \$100,000. • IL plans that do not contain construction with an annual cost of \$75,000-\$100,000. • IL plans that contain construction costs between \$2,000 and \$15,000. <p>VR&E Service Director</p> <ul style="list-style-type: none"> • Rehabilitation plans when the annual cost of services exceeds \$100,000. • IL plans that do not contain construction when the annual cost of services exceeds \$100,000. • IL plans that contain construction costs that exceed \$15,000. • Self-employment plans when the total cost of the program exceeds \$25,000. 	
4.B	Entitlement extension concurrence was not documented.	
	<p>Per 38 CFR 21.70, vocational rehabilitation programs cannot exceed 48 months, or the part-time equivalent, except as indicated in 38 CFR 21.78. Extensions are based on the Veteran's employment handicap classification and require VR&E Officer concurrence. 38.</p>	<p>38 CFR 21.70 38 CFR 21.78 M28R.IV.B.2 M28R.IV.B.4 M28R.IV.C.1</p>
4.C	IEEP extension beyond 12 months was not documented.	
	<p>Extended evaluations must be at least two weeks long, but may not exceed 12 months unless a longer period is necessary to determine whether achievement of a vocational goal is reasonably feasible. The VRC can approve the initial 12-month extended evaluation period, but the VR&E Officer must approve any extensions of that period.</p> <p>Up to two additional six-month periods of extended evaluation may be approved if there is reasonable certainty that the feasibility of achieving a vocational goal can be determined during this period. Any request for an extension beyond the basic period of 12 months must be justified by a discussion of the Veteran's circumstances and the issues related to the feasibility of achieving a vocational goal. This justification must be documented in narrative form on VAF 28-1902b, Counseling Record -</p>	<p>38 USC 3105 38 CFR 21.74 M28R.IV.C.3</p>

	<p>Narrative Report, or VAF 28-1902n, Counseling Record - Narrative Report (Supplemental Sheet) and placed in the VR&E record.</p> <p>Note that Veterans who served during Operation Iraqi Freedom (OIF) and/or Operation Enduring Freedom (OEF) can be provided with an initial extended evaluation plan of 18 months if the severity of the Veteran's disabilities warrants additional time to make the determination of feasibility. VR&E Officer concurrence is required.</p>	
4.D	Approval of more than one term of academic training in an IEEP was not documented.	
	<p>In general, the IEEP should consist of no more than one term of academic coursework. However, one additional academic term may be approved if the reason for the additional term is not solely for the purpose of determining academic potential. When considering if an additional academic term is appropriate, the VRC must:</p> <ul style="list-style-type: none"> • Determine that additional diagnostic and/or evaluative services are needed • Ensure that the second academic term is authorized in conjunction with these additional diagnostic and/or evaluative services • Address all feasibility concerns during the second academic term • Submit written documentation regarding the need for additional services that specifies how the additional services will assist in the determination of feasibility • Obtain concurrence from the VR&E Officer 	M28R.IV.C.3
4.E	IILP concurrence was not documented prior to implementing the plan.	
	<p>All IILPs, including the analysis of the home modification plan and professional drawings of the proposed modification if modifications are part of the proposed plan, must be approved before the VRC and individual sign the plan. There are various levels of approval based on the type of service included in the IILP.</p> <p>1. VR&E Officer Concurrence The VRC must submit the IILP; VAF 28-0814, Checklist for Independent Living Plan Approval; and any additional relevant information, to include professional drawings if proposed modifications are part of the IILP, to the VREO for approval. Per 38 CFR 21.162, the VREO must approve all IILPs. The VREO may approve:</p> <ul style="list-style-type: none"> • IILPs with annual cost up to \$75,000 that do not contain construction • IILPs that contain construction costs up to \$2,000 <p>2. Director, Regional Office Concurrence The Director of the regional office must approve the following:</p> <ul style="list-style-type: none"> • IILPs with an annual cost of \$75,000-\$100,000 that do not contain construction • IILPs that contain construction costs between \$2,000 and \$15,000 	M28R.IV.C.9

	<p>The VREO must submit the Director's Checklist for Independent Living (IL) Cost Approval, VAF 28-0953, all required documentation noted on the checklist, and professional drawings if proposed modifications are part of the IILP, to the Director for approval when the IILP contains construction costs between \$2,000 and \$15,000.</p> <p>3. Director, VR&E Service Concurrence The Director of VR&E Service must approve the following:</p> <ul style="list-style-type: none"> • IILPs with an annual cost that exceeds \$100,000 that do not contain construction • IILPs with construction costs that exceed \$15,000 <p>The VREO must submit the Director's Checklist for Independent Living (IL) Cost Approval, VAF 28-0953, all required documentation noted on the checklist, and professional drawings, if proposed modifications are part of the IILP, to the Director for approval when the IILP contains construction costs that exceed \$15,000. The VR&E Service Director will review the information and provide a written response concerning concurrence to the RO Director, with a copy to the VREO.</p>	
4.F	IL extension beyond 24 months: concurrence was not documented.	
	<p>Per 38 U.S.C. 3105 and 38 CFR 21.76, a program of independent living services cannot exceed 24 months unless one the following criteria are met:</p> <ol style="list-style-type: none"> 3. The VRC determines that a longer period is necessary and likely to result in a substantial increase in the individual's level of independence in daily living. In this situation, an extension of up to six months is possible. 4. If the individual served on active duty during the Post 9/11 Global Operations period and has a severe disability incurred or aggravated in such service, the VRC may request an extension of up to two six-month periods if the additional period(s) will result in a substantial increase in the individual's level of independence in daily living. <p>Extension Beyond 24 Months:</p> <ol style="list-style-type: none"> 4. VR&E Concurrence VR&E Officer concurrence is required for any request for an extension of IL services beyond 24 months. The VRC must document the extension request on FL 28-521, Request for IL Extension. See Appendix O, VA Forms, for information on how to access this form. 5. Vocational Rehabilitation Panel Review 	<p>38 USC 3105 38 CFR 21.76 M28R.IV.C.9</p>

	The Vocational Rehabilitation Panel (VRP) must review requests for extensions of IL services beyond 24 months and make recommendations on whether this action is consistent with the needs of the individual. The request for an extension beyond 24 months is a required referral to the VRP. See M28R.IV.C.2 for additional information on the VRP.	
4.G	IL extension beyond 36 months: concurrence of Director of VR&E Service was not documented.	
	The Director of VR&E Service must approve all extensions of IL services beyond 36 months.	38 USC 3105 38 CFR 21.76 M28R.IV.C.9
4.H	Reimbursement for a firearm occurred with no documented concurrence.	
	<p>A memorandum to the RO Director through the VREO must be prepared for review and concurrence prior to authorizing the purchase of a firearm. The VREO is responsible for reviewing the entire individual's VR&E record, the current VA service-connected and non-service-connected disability ratings, and any pending claims for disability. The VREO must use the checklist found in Appendix AZ, Review Prior to Purchase of Firearms, to identify and address any issues that could warrant disapproval of the purchase. Examples of disability conditions which warrant sufficient documentation to resolve any doubt of the appropriateness of the handling of firearms includes neuropsychiatric conditions, such as schizophrenia, major depression, and bipolar disorder; other mental health conditions, such as post-traumatic stress disorder and anxiety disorder, and substance abuse.</p> <p>VR&E Officer's Concurrence</p> <ol style="list-style-type: none"> 1) If the VREO does not concur, the VRC must provide the individual with written notification of the decision, the right to administrative review by the Director of VR&E Service and VAF 20-0998 2) If the VREO concurs, the memorandum and individual's VR&E record will be forwarded to the RO Director for review and concurrence. <p>RO Director's Concurrence</p> <ol style="list-style-type: none"> (1) If the RO Director does not concur, the VRC must provide the individual with written notification of the decision, the right to administrative review by the Director of VR&E Service and VAF 20-0998. (2) If the RO Director concurs, a copy of the memo and the concurrence must be filed in the individual's VR&E record. Subsequently, the VRC will meet with the individual to review and sign Appendix BA, Conditions of Reimbursement for Purchase of Firearms. <p>Refer to M28R.V.A.4 for guidance on procedures on reimbursement of purchase of a firearm.</p>	M28R.IV.C.2

4.I	Retroactive induction concurrence was not documented.	
	<p>The VREO must concur with the retroactive induction prior to the processing of payment. This concurrence must be documented in the corresponding VR&E record.</p> <p>The VRC must prepare a memorandum for review and an approval by the VREO that includes the following information:</p> <ul style="list-style-type: none"> • Specific dates of retroactive training. • Requested date of induction. • Number of months of remaining entitlement. • Entitlement Termination Date (ETD). • Disability rating information. • Vocational goal. • Documentation of other VA educational benefits used during the retroactive period. • Information about the individual's cooperation during the counseling process. 	<p>38 CFR 21.282 M28R.IV.C.2 M28R.V.A.1 M28R.V.B.8 M28R.IV.C.8</p>
4.J	Retroactive reimbursement concurrence was not documented.	
	<p>The VREO or designee must concur with the retroactive reimbursement prior to the signing of a new or amended IWRP that includes retroactive reimbursement. The VRC must submit the following items when requesting VREO concurrence:</p> <ol style="list-style-type: none"> a) A written justification for retroactive reimbursement in the VR&E record or a case note that clearly indicates the following: <ul style="list-style-type: none"> • How the criteria for retroactive approval under 38 CFR 21.282, except 21.282(c)(5), have been met. • The period to be approved. • The specific services to be approved, e.g., difference of tuition. b) A copy of the signed Appendix AB, Election of Retroactive VR&E Chapter 31 Benefits. c) A copy of the Long Term Solution (LTS) screens showing Chapter 33 benefits paid to the individual for the period that is requested for retroactive reimbursement. d) A copy of the IWRP or amended IWRP that clearly lists all retroactive services that are being authorized. e) Appendix AV, VREO Concurrence – Ch33 Retroactive Reimbursement, that documents the VREO or designee's concurrence. 	<p>M28R.IV.C.2</p>
4.K	Self-employment plan/category concurrence was not documented.	
	<p>The initial IWRP may be developed after determination of a suitable vocational goal.</p> <ul style="list-style-type: none"> • For Category I cases, this will occur after the IEEP is completed and approval for the Category I assignment is received from VR&E Service. 	<p>M28R.IV.C.8</p>

	<ul style="list-style-type: none"> • For Category II cases, this will occur after the category assignment. The IWRP does not require the approval of the VREO or other signature levels unless the annual cost of the plan is over \$25,000. Refer to M28R.V.B.1 for more information on cost approval/concurrence levels. <p>Per 38 CFR 21.258, the VREO must approve all self-employment plans with an estimated or actual cost of up to \$25,000 for the total cost of the plan. The Director of VR&E Service must approve a self-employment plan with an estimated or actual cost of \$25,000 or more for the total cost of the plan. The VRC must submit the self-employment plan and VAF 28-0794, Self-Employment Plan Approval Request, to the VREO for approval before obtaining the Veteran's signature or authorizing any service. In addition, the VRC must prepare a memorandum describing the program costs, as needed, based on approval levels for program costs that includes appropriate signature lines.</p>	
5.	Were case management appointments and contacts documented at the required frequency?	
	Considerations	Citations
	<p>The Veteran's progress in reaching the goals of the plan will be reviewed and evaluated as scheduled in the plan by the Case Manager and the Veteran.</p> <p>The individual's rehabilitation plan must include an identified case management level and a schedule for frequency of case management visits. The level must also be documented on VAF 28-1902n or in a case note.</p> <p>Case management appointments are defined as face-to-face meetings with the Chapter 31 participant that cover vocational, medical, financial, academic and any other issues impacting progress.</p> <p>Contacts are defined as follow-up on issues identified through the case management appointment or other case management activities. These contacts may be made by face-to-face interaction or other methods, such as telephone, fax, email, or letter.</p> <p>Due to limitations with travel and distance, the general requirements for face-to-face contact do not apply to Veterans training outside the U.S., including U.S. Territories. However, the frequency of case management and contact remains the same as for other cases.</p>	<p>38 CFR 21.96 M28R.IV.C.2 M28R.V.A.2 M28R.V.C.3</p>
5.A	Initial case management appointment was not documented within the required 30/60 days of plan development.	
	<p>All programs, with the exception of those receiving training in an institution of higher learning or a non-college degree program, require an initial case management appointment within 30 days of plan development. For those Veterans receiving training in an institution of higher learning or a non-college degree program, the initial case management appointment is required within 60 days.</p>	<p>M28R.V.A.2</p>
5.B	Contact was not consistent with documented Level 1 contact.	

	Level 1: One annual face-to-face case management visit is required. Additionally, one case management follow-up by telephone or in-person is required during each of the other terms or three times per year if non-standard terms or training is non-academic.	M28R.IV.C.2 M28R.V.A.2
5.C	Contact was not consistent with documented Level 2 contact.	
	Level 2: Face-to-face case management meetings are required once per term attended or at least three times per year for non-standard terms. For non-academic programs, required face-to-face meetings are conducted once per month for the first three months, then quarterly.	M28R.IV.C.2 M28R.V.A.2
5.D	Contact was not consistent with documented Level 3 contact.	
	Level 3: Face-to-face case management visits are required once per month, with the exception of those Veterans participating in an IEAP or IILP. For IEAP: allows for monthly contacts in place of face-to-face visits if no special needs or barriers are identified. Contacts may be made by DVOPs/LVERs. For IILP: allows for monthly contacts in place of face-to-face visits for periods of up to three months while waiting for cost approvals, coordination of construction or other administrative delays in active service provision.	M28R.IV.C.2 M28R.V.A.2
5.E	Interrupted – Unplanned: Interval between contact exceeded 90 days.	
	The case manager must continue to provide follow-up activities during a period of interruption. These activities can be conducted via telephone, email, letter, in person, or via telecounseling. They are designed to provide motivation and identify resources that may increase the Veteran’s ability to resume his/her rehabilitation program. For unplanned interruptions, follow up activities must be conducted in intervals of no more than 90 days. The case manager must document the follow up activities in a case note.	M28R.V.A.6 PA 19-02
5.F	Interrupted – Planned: Contact schedule was not documented or contact exceeded the 120-day mark.	
	For planned interruptions, the VR&E staff member and Veteran must work together to develop an individualized contact schedule that fits the individual’s circumstances and preferences. This contact schedule must be documented in a case note. The contact should not exceed the 120-day mark to determine if the Veteran is ready to enter into an active status so the case does not become inactive and have a potential negative impact on the VR&E staff member’s performance standards.	M28R.V.A.6 PA 19-02
6.	Were case management appointments, contacts, and follow-up appropriately documented?	
	Considerations	Citations
6.A	Case management appointments: Documentation did not address progress in the rehabilitation plan, and did not cover vocational, medical, financial, academic, or other issues impacting progress.	
	Case management appointments are defined as face-to-face meetings with the Chapter 31 participant that cover vocational, medical, financial, academic and any other issues impacting progress. A contact is defined as a communication between the case manager and the Veteran to assist the Veteran in completing his/her rehabilitation goal. Contacts are made to follow-up on issues identified through the scheduled case management appointments or other case management activities.	M28R.V.A.2 M28R.VI.A.3

	<p>Substantive case documentation of specific, observable behaviors is required to identify problems that impact the rehabilitation process. The observations and outcomes of these contacts will be fully documented in the VR&E record or in a case note. Any consequent change to the planned program will be entered in the Progress Notes sections of the VAF 28-8872, Rehabilitation Plan. These documents should express not only the professional observations of the VRC, but also the Veteran's perceptions of his/her progress toward the rehabilitation goal.</p> <p>The results of case management appointments and contacts will be documented in the VR&E record or a case note. This documentation details the chronological progress of services provided to the Veteran and should include the following:</p> <ul style="list-style-type: none"> • Progress in the specific elements of the plan. • Evaluation of needed special services, such as reader service or tutoring, to assist the Veteran to overcome a problem in his/her program and the results of the steps taken to resolve the problem. • All arrangements to initiate planned services or follow-up of Veterans in Interrupted or Discontinued case status, except for Veterans placed directly in Discontinued case status from Applicant case status. • The outcomes of employment assistance and follow-up action. • Findings after reviewing the plan, such as the need for an amendment or recommendation that no substantive changes are needed. • Date of the next case management appointment and future planned actions. <p>During employment services, all contacts or meetings with the Veteran must be clearly documented in the VR&E record or case notes and should include the following topics for discussion:</p> <ul style="list-style-type: none"> • Is the Veteran following the employment-seeking actions outlined in the IEAP? • Is the Veteran receiving the appropriate level of assistance or is more assistance needed? • Do circumstances require modification of the IEAP, including changes in services or service providers? If the plan requires modification, the case manager must redevelop the IEAP with the Veteran using a comprehensive evaluation. • Is the Veteran employed? If so, does the job meet his/her needs? <p>Note: The documentation of contact should include the information discussed; show that the Veteran is making progress; and note any needs or problems, and actions taken to address the needs or problems.</p>	
6.B	Contacts: Documentation did not address the Veteran's progress in the rehabilitation plan or provide follow-up on identified issues.	
	Contacts are defined as follow-up on issues identified through the case management appointment or other case management activities. These	M28R.V.A.2 M28R.VI.A.3

	<p>contacts may be made by face-to-face interaction or other methods, such as:</p> <ul style="list-style-type: none"> • Telephone • FAX • Email • Letter • Telecounseling • Text <p>Note: The documentation of contact should include the information discussed; show that the Veteran is making progress; and note any needs or problems, and actions taken to address the needs or problems.</p>	
6.C	IL: All issues identified on the Case Support Checklist were not addressed.	
	The VRC or contracted counselor must utilize VAF 28-0852, Case Support Checklist, as a guide during case management meetings that occur on a monthly basis. The VRC must address all issues identified on the checklist and document either on the checklist or in a case note. This checklist must be filed in the VR&E record.	M28R.IV.C.9
7.	Did the record contain the documentation required in support of regular progress reviews as appropriate?	
	Considerations	Citations
7.A	Grades or transcripts were not documented to show progress in the rehabilitation plan.	
	<p>Substantive case documentation of specific, observable behaviors is required to identify problems that impact the rehabilitation process. Grades or transcripts from training should be documented to show a Veteran's progress toward the objectives and goal of the rehabilitation plan.</p> <p>Grades/transcripts may be obtained from the Veteran, or the training facility.</p> <p>Each facility approved to provide training or other rehabilitation services must, as part of its approval, agree to cooperate with the VA and to provide in a manner prescribed by the VA accurate and timely information concerning the Veteran's attendance, performance and progress (38 CFR 21.294(a)(4)). The VRC will arrange with the training facility for timely submission of information on the Veteran's attendance and progress in training that is needed to determine that training is proceeding in accordance with the plan. Securing this information is part of the collaborative relationship between VA and the training facility.</p> <p>The training facility's published catalog should contain the school's policies and regulations concerning standards of progress required of all students. The policies must define the grading system, minimum grades considered satisfactory, conditions for interruption for unsatisfactory grades or progress, a description of the probationary period, if any, and conditions for reentrance of students dismissed for unsatisfactory progress. They should include a statement about progress records kept by the school and furnished to the student.</p>	<p>M28R.V.A.2 M28R.V.B.2</p>
7.B	Job logs or other evidence was not documented to show progress in employment services.	

	The VRC/EC is responsible for the provision of employment services to ensure that the Veteran's progress is monitored regularly and that services are provided appropriately and in a timely manner. If the rehabilitation plan requires the submission of job logs, these must be documented in the VR&E record.	M28R.VI.A.3
7.C	VAF 28-0852, Case Support Checklist: IL Case Support Checklist, was not documented when required.	
	The VRC or contracted counselor must utilize VAF 28-0852, Case Support Checklist, as a guide during case management meetings that occur on a monthly basis. The VRC must address all issues identified on the checklist and document either on the checklist or in a case note. This checklist must be filed in the VR&E record.	M28R.IV.C.9
7.D	VAF 28-1905c, Monthly Report of Training and Wages, was not documented when required.	
	<p>Unless information equivalent to that provided for Veterans in regular institutional programs is available, VAF 28-1905c, Monthly Report of Training and Wages, will be used to record attendance and progress for on-job programs and NPWE, homebound, independent instructor, special rehabilitation programs and schools where courses are conducted almost wholly on a job operations basis. Information on VAF 28-1905c will be used to determine whether overall progress in completing the program is within the established program scope and duration.</p> <p>VAF 28-1905c, Monthly Report of Training and Wages:</p> <ul style="list-style-type: none"> • At the end of each training month, the trainee and the trainer will enter on VAF 28-1905c the total hours the trainee devoted to major instructional and work activities. The trainer will certify the Veteran's progress and the rate of pay in on-job training cases and then forward the completed form to the VRC. • When equivalent information is available from the training facility, VAF 28-1905c will not be used. For information to be equivalent, it must enable the VA to adequately document the trainee's progress. For on-job training, equivalent information is generally available in well-established apprenticeship programs and structured training programs conducted by large companies. The content of these programs is well known and can be relied upon for consistent presentation of knowledge and skills needed in a trade or craft. For these programs, VAF 28-1917, Monthly Statement of Wages Paid to Trainee, is used in lieu of VAF 28-1905c. 	M28R.V.A.2
8.	Was an annual review of the plan documented and was the plan amended as needed?	
	Considerations	Citations
	The VRC and the Veteran will periodically review and evaluate the IWRP. A comprehensive review will be conducted at least once every 12 months and will be annotated on the IWRP. Review may result in no change to the plan, an amendment, or redevelopment of the plan.	38 CFR 21.96(b) M28R.V.A.2
9.	Was the plan amended when required?	
	Considerations	Citations
9.A	Plan was not amended as needed.	

	<p>The Veteran or the VRC may request a change in the plan at any time (38 U.S.C. 3107(b)). A change in the Veteran's long-range goal may only be made following a reevaluation of the Veteran's rehabilitation program by the VRC. A change may be made when:</p> <ul style="list-style-type: none"> • Achievement of the current goal(s) is no longer reasonably feasible, or • The Veteran's circumstances have changed or new information has been developed which makes rehabilitation more likely if a different long-range goal is established, and • The Veteran fully participates and concurs in the change. <p>A change in intermediate objectives or services provided under the plan may be made by the VRC when such change is necessary to carry out the statement of long-range goals.</p> <p>The VRC may modify the rate of pursuit, the frequency of case management appointments, and the schedule of plan review.</p> <p>If the individual is not progressing through the plan as expected, or it becomes clear that the goals of the plan need to be reassessed, the VRC must redevelop the rehabilitation plan.</p>	M28R.V.A.2
9.B	The plan was not amended when additional services were required.	
	The services provided must be outlined on the rehabilitation plan in observable, measurable objectives designed to meet the overall goal of the rehabilitation plan.	M28R.IV.C.1
9.C	The plan was not amended when the Veteran attended training at a different facility.	
	<p>A Veteran may be authorized to attend training in two facilities. This may occur in a combination course of on-job and institutional training, or when the Veteran is attending two universities in a consortium arrangement. Prior to preparing the authorization for school attendance, the case manager must ensure that the primary training facility will accept the courses to be taken by the Veteran at the secondary training facility.</p> <p>In addition, the case manager must ensure that the Veteran's concurrent attendance in two training facilities is outlined in the Veteran's rehabilitation plan. The plan must clearly identify the primary training facility or the school that will be conferring the degree or certificate of completion.</p> <p>The case manager must authorize the Veteran's training attendance in a separate VAF 28-1905 for each facility. The case manager must ensure that the two forms are clearly annotated with "Concurrent Enrollment" in red at the top of the form and the primary training facility identified. Both forms must be submitted at the same time to the training facilities. Additionally, the case manager must annotate in the electronic case management system Remarks section that the Veteran is authorized to attend training in two facilities. The annotation must cite the period(s) that the Veteran is attending training in two facilities.</p>	M28R.V.1
9.D	The plan was not amended when the goal changed.	

	<p>The Veteran or the VRC may request a change in the plan at any time (38 U.S.C. 3107(b)). A change in the Veteran's long-range goal may only be made following a reevaluation of the Veteran's rehabilitation program by the VRC. A change may be made when:</p> <ul style="list-style-type: none"> • Achievement of the current goal(s) is no longer reasonably feasible, or • The Veteran's circumstances have changed or new information has been developed which makes rehabilitation more likely if a different long-range goal is established, and • The Veteran fully participates and concurs in the change. 	M28R.V.A.2
10.	Were referrals made when needed?	
	Considerations	Citations
	<p>Early problem identification provides the best opportunity to avoid unnecessary interruptions in a Veteran's rehabilitation program. The case manager must develop cooperative arrangements with the Veteran, facilities, community resources, the Veterans Administration Medical Center (VAMC) and other service providers to ensure that reasonable effort is made to resolve problems and take preventive measures as needed.</p>	M28R.III.C.6
10.A	The Veteran was not referred to VHA as needed.	
	<p>The electronic request for medical and dental services is the primary referral source for VHA services for VR&E participants and replaces the use of VAF 28-8861, Request for Medical Services. However, if a VR&E Office is unable to use the electronic submission, the use of VAF 28-8861 is required.</p> <p>VRCs may submit referrals for VHA medical and dental services electronically through the Compensation and Pension Records Interchange (CAPRI). Each VHA facility has designated a single point of contact (POC) to receive and process referrals for Veterans participating in the VR&E program.</p> <p>Note: Submission of electronic requests for medical and dental/vision services is not required. Rather, it is an option to expedite the delivery of services to VR&E participants. It also enhances the ability to track the status of referrals using reporting tools in CAPRI.</p> <p>The case manager is required to document in a case note when an electronic request is completed in CAPRI.</p> <p>It is VHA policy to provide timely access to VHA health care services for Veterans participating in a vocational rehabilitation program under title 38 U.S.C., Chapter 31. The health care services authorized by title 38 U.S.C., Chapter 31 are limited to those provided in title 38 U.S.C. Chapter 17. See VHA Directive 1182 for additional information.</p>	M28R.V.A.5
10.B	The Veteran was not referred to other VA resources as needed.	
	<p>VR&E works cooperatively with other VA departments to meet Veterans' health needs, obtain information that may impact rehabilitation planning or</p>	M28R.VI.A.3

	<p>program participation and provide services to facilitate successful program completion.</p> <p>Referrals to supports outside the realm of VR&E Service, such as VAMC, Vet Centers, State vocational rehabilitation offices, independent living centers, and other community supports may assist the Veteran in reaching the goals of the rehabilitation plan. VR&E staff should refer the Veteran to these resources as needed.</p>	
10.C	The case was not referred to the VRP as needed.	
	<p>The VRP plays a vital role in the development of some rehabilitation plans by providing expert opinions and guidance on complex issues. The following information outlines the process for referral to the VRP, the responsibility of the parties involved, identifies the required elements of the case review summary and discusses integrating the VRP's recommendations into the rehabilitation plan.</p> <p>Referral for Rehabilitation Plans</p> <p>The VRC must prepare a written referral when seeking the assistance of the VRP. The referral must contain the following information:</p> <ul style="list-style-type: none"> • Reason for the referral, to include a precise statement of what action or information is requested. • Summary of the individual's medical history, to include a clear description of his/her present functional abilities and limitations. • Copies of pertinent medical records from private physicians as members of the panel will have access to the individual's VA medical records. • Additional facts, observations or information deemed useful. <p>Referral for an IL Plan</p> <p>If the VRC is seeking guidance for an IL plan, then the referral must contain the following information:</p> <ul style="list-style-type: none"> • Statement describing the basis for the VRC's determination that the pursuit of a vocational goal is not feasible at this time. • Statement describing the individual's IL needs. • Specific IL objectives to be achieved by participation in the plan. • Selected services that will assist the individual in achieving the objectives. • Brief assessment of the individual's motivation to achieve the objectives. 	M28R.IV.C.2
10.D	The Veteran was not provided referrals to campus or community resources as needed.	
	<p>Community resources may include placement services at the Veteran's technical school, college or university, state vocational rehabilitation agencies and other locally based not-for-profit facilities.</p>	M28R.VI.A.3
10.E	The Veteran was not referred to DOL as needed/required.	

	Veterans in the VR&E program will be referred to State Agencies for employment services. As the Federal government's lead agency on employment, DOL-funded services provide critical expertise, access to networks, employers, and other resources that make their role an important component to the employment success of Ch31 Veterans and positively influences rehabilitations.	VA/DOL Memorandum of Agreement Technical Assistance Guide
11.	Was case status movement consistent with documentation?	
	Considerations	Citations
	<p>An individual's rehabilitation program is assigned to appropriate statuses in order to determine progress in his/her program.</p> <p>To reflect the individual's actual progress or status in the program, VR&E staff must update the case status no later than two workdays after the program status change. Employees on travel must enter their work activity within 10 workdays of their return to the RO. This delay in entering the case status movement must be documented in a case note on the date the status is changed.</p> <p>The VREO must ensure strict adherence to implementing these procedures for consistency of data entry, accuracy in generated reports and safeguarding data integrity.</p>	M28R.III.A.1 M28R.III.A.2
12.	Was the case moved to Interrupted status when appropriate and is required documentation in the file?	
	Considerations	Citations
12.A	Reasons for interruption, expected outcome, actions to be completed during interruption, and expected date of return were not documented.	
	The case manager must document the reason(s) for the interruption, the expected outcome, actions to be completed during the interruption, and the expected date of the Veteran's return to active status in the VR&E record.	M28R.V.A.6
12.B	Extensive efforts were not made to contact the Veteran prior to Interruption when contact was lost.	
	A case must not be placed in INT status without first documenting attempts to reach the Veteran. Attempts to reach the Veteran should be documented in a case note and include phone calls, emails, and mailed letters showing the case manager's efforts to reach the Veteran by all available means. Extensive efforts must be made to contact the Veteran prior to placement of the case into INT status. Attempted contacts must be documented clearly in the VR&E record or electronic case management system.	M28R.V.A.6
12.C	The Veteran was not informed of interruption in writing.	
	<p>The case manager must also inform the Veteran in writing of the following information:</p> <ul style="list-style-type: none"> • Explanation or reason(s) for the interruption • Steps to be taken by the Veteran and VA to continue the rehabilitation program • Explanation of the consequences if the Veteran does not follow the steps as outlined in the notification letter 	M28R.V.A.6

<input type="checkbox"/> Extended Evaluation Status		
13.	Were the services provided in EE status designed to resolve the question of feasibility?	
	Considerations	Citations
13.A	Services outlined on the IEEP would not resolve the question of feasibility to achieve a vocational goal.	
	The purpose of an extended evaluation is to determine whether it is currently reasonably feasible for a Veteran with an SEH to achieve a vocational goal. The VRC makes the determination that a period of extended evaluation is necessary when feasibility cannot readily be determined based on the information obtained in the initial evaluation.	38 CFR 21.57 M28R.IV.C.3
13.B	Services consist solely of academic training.	
	Academic coursework may be an appropriate part of an extended evaluation plan, but services cannot consist solely of academic programs.	M28R.IV.C.3
14.	Was the feasibility determination documented after the provision of Extended Evaluation services?	
	Considerations	Citations
	<p>There are three possible outcomes of an IEEP.</p> <p>a. The Achievement of a Vocational Goal is Reasonably Feasible</p> <p>When the outcome of the IEEP indicates that the achievement of a vocational goal is reasonably feasible, the VRC and Veteran will work together to develop an appropriate rehabilitation plan with a goal of employment.</p> <p>b. The Achievement of a Vocational Goal is Not Currently Reasonably Feasible</p> <p>When the outcome of the IEEP indicates that the achievement of a vocational goal is not currently reasonably feasible, the VRC must consider the need for IL services and develop a program of IL services if appropriate.</p> <p>It is important to note that finding that the achievement of a vocational goal is infeasible without a period of extended evaluation requires compelling evidence which establishes infeasibility beyond any reasonable doubt.</p> <p>c. It is Not Clear if the Achievement of a Vocational Goal is Currently Reasonably Feasible</p> <p>In rare instances, the services provided during the period of extended evaluation do not lead to a definitive determination of feasibility. In this situation, 38 U.S.C. 3106 states that VR&E must resolve any reasonable doubt in the Veteran's favor by determining that achievement is currently reasonably feasible.</p>	M28R.IV.C.3
<input type="checkbox"/> Independent Living Status		
15.	Was collaboration with the appropriate VA entities completed, as needed?	
	Considerations	Citations

	<p>The VRC must coordinate medical and mental health services as needed with the Veterans Health Administration (VHA) to ensure the individual's health conditions are treated and stabilized to the maximum extent possible. This includes services designed to address personal adjustment issues the individual or family may be experiencing as a result of the effects of the disability (ies).</p> <p>VR&E must work closely with other entities within VA to identify appropriate housing accommodations when indicated to ensure that the accommodations are necessary, feasible, and provided in an appropriate manner.</p> <p>VA prosthetics and/or Home Improvements and Structural Alterations (HISA) grant programs are the primary providers for equipment to increase independence in daily living. However, the VRC may provide equipment needed to increase activities of daily living as indicated on the Preliminary Independent Living Assessment if such equipment is not provided by prosthetics and/or HISA.</p>	M28R.IV.C.9
16.	When the comprehensive IL assessment indicated a need for home adaptations, was a referral made to SAH?	
	Considerations	Citations
	<p>If the in-home comprehensive evaluation indicates that home adaptations are needed, the VRC will send an email to the Regional Loan Center (RLC) of jurisdiction referring the completion of the home adaptation to SAH.</p> <p>Home adaptation is defined as a project to adapt a housing unit, for which the Secretary determines any component of construction for which any of the following requirements apply and/or are needed for completion to ensure the housing unit is suitable to, or fit for, the residential living needs of an eligible individual:</p> <ul style="list-style-type: none"> • A technical drawing. • A permit, if required by local or State laws or building codes. • The use of a licensed contractor to complete the home adaptation. • A required compliance inspection under current SAH policy. The SAH agent assigned to the home adaptation will certify if a compliance inspection is required. 	PA 19-01
<input type="checkbox"/> Job Ready Status		
17.	Was the IEAP developed at least 60 days prior to the completion of training?	
	Considerations	Citations
	<p>Sixty days prior to a Veteran completing the training component under his/her IWRP, the VRC must complete the Veteran's IEAP. If a combined IWRP/IEAP was initially developed, then the IEAP portion of the plan should be reviewed and revised if necessary at least 60 days prior to completion of training.</p> <p>Note: When developing a combined IWRP/IEAP, the Add Plan function on the Employment Tab must also be completed to ensure the occupational code of the Chapter 31 program is included in data reports.</p>	M28R.VI.A.2

18. Was the Job Ready Declaration documented and complete?		
	Considerations	Citations
18.A	There was no documented Job Ready Declaration.	
	It is the VRC's responsibility to assess the Veteran's job readiness and make a formal declaration of job readiness upon completion of the IWRP. The VRC must accurately and clearly justify and document the declaration of the Veteran's job readiness in a case note. The narrative must clearly explain that there are no impediments in the Veteran's ability to obtain or maintain suitable employment. This documentation must be filed in the VR&E record.	M28R.VI.A.4
18.B	The Job Ready Declaration did not clearly explain that there were no impediments in the Veteran's ability to obtain or maintain employment.	
	The determination must include the following verification: <ul style="list-style-type: none"> No barriers, such as disability conditions, family situations, etc., exist that may prevent the Veteran from obtaining or maintaining suitable employment. 	M28R.VI.A.4
18.C	There was no evidence of contact with the Veteran while the case manager was making the job ready determination.	
	The case manager must ensure that the Veteran's VR&E record contains a documented contact with the Veteran that clearly demonstrates that the case manager has established communication with the Veteran while making the job ready determination.	M28R.VI.A.4
18.D	Documentation did not support the Job Ready Declaration.	
	It is the VRC's responsibility to make a determination for declaring a Veteran job ready before he/she is provided employment services. The determination must include the following verifications: <ol style="list-style-type: none"> Documentation such as a diploma, certification from a training facility or transcript of records that demonstrate the Veteran has completed the education or other training outlined in his/her Individualized Written Rehabilitation Plan (IWRP). Completion of any required certification or license. No barriers, such as disability conditions, family situations, etc., exist that may prevent the Veteran from obtaining or maintaining suitable employment. Possession of job-seeking skills. 	M28R.VI.A.4

☐ Reviews (For tracking only. Not included in score. Answering No does not result in a fiscal error.)		
19. Was the requested Higher-Level Review completed in an accurate and timely manner?		
	Considerations	Citations
19.A	The requested review was not completed accurately.	
	The QA review will assess the accuracy of the decision and compliance with procedures outlined in M28R.III.C.3, including: <ul style="list-style-type: none"> Only information in the record at the time of the decision is reviewed during the higher-level review (HLR). No new evidence is reviewed. The SM/V submitted VAF 20-0996 to the RO of jurisdiction within one year of the date listed on the decision letter. 	38 CFR 21.416 M28R.III.C.3

	<ul style="list-style-type: none"> • If more than one year has elapsed, the VR&E staff member must inform the SM/V in writing that he/she is outside the time limit to request an HLR, but may submit new evidence, if available, for a supplemental claim review (SCR). • VAF 20-0996 is date stamped as soon as it is received, and information is entered into Caseflow. • If an informal conference is requested, the higher-level reviewer must document the completion of the informal conference in case note. • If the SM/V requests the HLR be completed at another RO, the HLR was complete at the alternate RO, as identified in M28R.Appendix T. • Three possible outcomes: uphold the decision, overturn the decision, or identify a duty to assist error. 	
19.B	The review was not completed in a timely manner (90 days or less from date of request).	
	<p>All HLRs must be completed; a decision rendered; and the SM/V informed of the decision in writing within 90 days from the receipt of VAF 20-0996.</p> <p>It is important to note that even if the SM/V requests the HLR be completed at an alternate RO, the timeliness requirements to complete the HLR within 90 days from receipt of the request for a HLR remain in place. The requirement to complete the HLR within the required timeframe will transfer to the RO completing the HLR. Therefore, it is imperative that the coordination between the two ROs occur as soon as possible to ensure the alternate RO has appropriate time to complete the HLR.</p>	38 CFR 21.416 M28R.III.C.3
19.C	The review was not completed by a more experienced VRC than the individual who made the decision.	
	An HLR is a review of a decision that is completed by a more experienced VRC than the individual who made the decision. For VR&E, this duty may be assigned to lead or Supervisory VRC; the Assistant VR&E Officer; or the VR&E Officer. The higher-level reviewer must be someone that was not involved in the original decision-making process.	38 CFR 21.416 M28R.III.C.3
19.D	The review indicated a Duty to Assist error, but a Supplemental Claim Review was not initiated.	
	<p>If during a HLR, the reviewer identifies a duty to assist error, meaning that the reviewer determined by a review of the case that additional information is available that may likely impact the decision that was not considered in the original decision, he/she will return the case to the assigned VRC. The VRC must immediately contact the SM/V to initiate the process to obtain the new evidence. The VRC has 30 days from the time the reviewer returns the case to obtain the new information and readjudicate the claim.</p> <p>It is important to note that the identification of a duty to assist error automatically triggers a SCR. Therefore, as soon as the duty to assist error is identified, Caseflow must be updated.</p>	38 CFR 21.416 M28R.III.C.3
19.E	The requested informal conference was not provided.	
	Considerations	Citations

	The SM/V has the right to one informal conference per issue during the HLR. Due to the timeliness requirements for completing the HLR, rescheduling the informal conference may not be an option if the request to reschedule is not made in a timely manner. Therefore, if the SM/V does not attend the informal conference and/or requests to reschedule the conference, it must be made in a timely manner that allows sufficient time to complete the HLR. Best practice is to reschedule the conference one time to ensure that VR&E provides every opportunity for the SM/V to be heard. If the request to reschedule the informal conference is not timely and will impede the reviewer's ability to complete the HLR within the 90/125-day period, then the reviewer is not required to reschedule the conference.	38 CFR 21.416 M28R.III.C.3
20.	Was the requested Supplemental Claim Review completed in an accurate and timely manner?	
	Considerations	Citations
20.A	The requested review was not completed accurately.	
	The QA review will assess the accuracy of the decision and compliance with procedures outlined in M28R.III.C.3, including: <ul style="list-style-type: none"> • The review includes new and relevant evidence that was not considered when the original decision was made. • The SM/V submitted VAF 20-0995 to the RO of jurisdiction • VAF 20-0995 is date stamped as soon as it is received, and information is entered into Caseflow. • Two possible outcomes: uphold the decision or overturn the decision. 	38 CFR 21.416 M28R.III.C.3
20.B	The review was not completed in a timely manner (125 days or less from date of request or identification of a Duty to Assist error).	
	All SCRs must be completed; a decision rendered; and the SM/V informed of the decision in writing within 125 days from the receipt of VAF 20-0995.	38 CFR 21.416 M28R.III.C.3

General Comments

This section is used to note any other issues in the case that are not addressed above. This section does not count as an error, but analysis of noted issues may lead to additional items being added to the review instrument.