



# Pension and Fiduciary (P&F) Service

## Fiduciary Quality Call

Date: December 23, 2019

TMS: # VA 4540060

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### *AGENDA TOPICS*

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[ITEM 1: Reconsideration Requests](#)

[ITEM 2: September 2019 Quality Analysis](#)

[ITEM 3: FPM 2.F.2.a and National STAR Checklist](#)

[ITEM 4: ASPEN Questions](#)

[ITEM 5: Training Requests](#)

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### *AGENDA ITEMS*

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**Agenda item:** Reconsideration Requests

**Presenter:** Kelly Wante, Chief

**Target Audience:**

Quality Review Specialists (QRS) and Quality Review Team (QRT) Coaches/Assistant Coaches

**Discussion:**

- Per M21-4 8.7.d requests for reconsideration must be accompanied by appropriate:
  - FPM procedures
  - supporting statutes and regulations
  - CAVC opinions
  - General Counsel Opinions
  - General Counsel precedent decision, or
  - policy letters.

**References/Contacts**

- ✓ [M21-4 8.7.d](#) Requests for Reconsideration

**Target Audience:**

Quality Review Specialists (QRS) and Quality Review Team (QRT) Coaches/Assistant Coaches

**Discussion:**

- The reporting month of September 2019 was the first month the Fiduciary Hubs saw the effect of the substantive error category updates (M21-4 8.3.b). Only six total substantive errors were cited. The standalone 2019 quality performance for the nation was 93.34%. As the FY progresses, this change should hopefully improve quality and reflect a more fair and accurate measure of Fiduciary quality
- Of the six errors cited, no discernable trend could be identified.
- P&F Service will continue to analyze quality trends to ensure clear guidance and appropriate training is provided.

**References/Contacts**

- ✓ [M21-4 8.3.b](#) General Guidelines for Quality Reviews

**Target Audience:**

Quality Review Specialists (QRS) and Quality Review Team (QRT) Coaches/Assistant Coaches

**Discussion:**

- **Question from Salt Lake City:** The FPM, for 2.F.2.a, in accordance with 38 CFR 13.100(g), the FHM will not conduct a face to face visit, for minors regarding an IA case. How will this be evaluated in the National STAR checklist?
- **Response:** Under the current checklist, it will not be an error if the hub follows guidance under FPM 2.F.2, for expedited initial appointments for minors.

If the case qualifies for expedited initial appointment process for minors and the hub does not utilize this process, we may cite a substantive (F1) error using the current checklist per FPM 2.F.2.a.

We may cite a substantive (K1) error on the current checklist in expedited initial appointment cases for minors, if the hub does not obtain a signed and dated VA Form 21P-4703 prior to certification of the fiduciary per 2.F.2.m.

For all administrative errors that require correction, we will cite Q2 and the applicable reference.

**References/Contacts**

- ✓ [FPM 2.F.2 Conducting Expedited Initial Appointments for Minor Beneficiaries](#)
- ✓ [M21-4, Chapter 8, Appendix B Field Examination Quality Checklist](#)

**Target Audience:**

Quality Review Specialists (QRS) and Quality Review Team (QRT) Coaches/Assistant Coaches

**Discussion:**

- **Question 1:** Is there a report that the employee can run that will list all quality reviews conducted and the error comment narrative? From what we can see, the quality reports employees can pull either list the quality numbers (numbers of yes, no, NA) and the quality percentage. The other reports allow the employees to pull a list of the individual quality questions from the checklist but does not show them the comment narrative input by QRT.
- **Response 1:** Currently, there is no functionality in ASPEN to generate a report which will provide a list of all quality reviews conducted and the error comment narrative. Pension and Fiduciary (P&F) is working with the Office of Field Operations (OFO) to determine the feasibility of creating a report which will generate this information. We are expediting this action; however, we are unable to provide a specific time-frame for completion.
- **Question 2:** Is there a report the coaches can pull that will show all the employee's quality exceptions with the QRT error comment narrative?
- **Response 2:** Currently, there is no functionality in ASPEN to generate a report which will show the employee quality exceptions with the QRT error comment narratives. Pension and Fiduciary Service (P&F) is working with Office of Field Operations (OFO) to provide this capability. We are expediting this action; however, we are unable to provide a specific time-frame for completion.
- **Question 3:** While we do not believe that there is a process in place we are checking to see if there a way in ASPEN for employees to respond to error citations? Meaning, can an employee send something back to QRT correcting or rebutting error citations? Or do we need to come up with a local process?
- **Response 3:** The reconsideration process is done outside of ASPEN and is developed as a local process. During the training, the following scenario was presented as a possible option:
  - Employee requests formal reconsideration through QRT Coach within 5 business days of cited error
  - QRT coach assigns reconsideration review to 2 Coaches
    - If agree, ASPEN is updated accordingly
    - If disagree, third (final) reviewer makes decision (Fid Hub Manager or designee)
  - Formal notification sent to employee

- Please note, an additional Q&A document is forthcoming pending clarifications on available reports.

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**Agenda item:** Training Requests

**Presenter:** Kelly Wante, Chief

**Target Audience:**

Quality Review Specialists (QRS) and Quality Review Team (QRT) Coaches/Assistant Coaches

**Discussion:**

- **Question from Columbia:** Requesting training for QRT personnel on the forthcoming FPM changes for FY20 in advance and updates and training from P&F Training Staff nationally to ensure consistency across hubs.
- **Response:** The P&F Service Quality and Oversight, Training, and Procedures Teams are working to improve our communication to the field. Major changes will be accompanied by appropriate training and subsequent quality guidance. Minor changes may not always be accompanied by training, but can be requested via our Training, Quality, and Oversight mailbox. Quality clarifications can also be submitted via this mailbox.

**References/Contacts**

- ✓ [PFTNGQUALOVRST.VBACO@va.gov](mailto:PFTNGQUALOVRST.VBACO@va.gov)

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*Closing Comments*

**P&F Quality Mailbox:**

If you have a specific topic suggestion, please feel free to email it to the Pension and Fiduciary (P&F) Quality mailbox at [PFTNGQUALOVRST.VBACO@va.gov](mailto:PFTNGQUALOVRST.VBACO@va.gov)

**Quality Call Bulletins**

Quality Call Bulletins can be found in the following location:

[https://vbaw.vba.va.gov/PENSIONANDFIDUCIARY/Quality\\_Call\\_Bulletins.asp](https://vbaw.vba.va.gov/PENSIONANDFIDUCIARY/Quality_Call_Bulletins.asp)

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*Post-Call Follow Up*

**Quality Call Recording:**

A recording of the November 21, 2019 Fiduciary Quality Call can be found here:

<https://vbatraining.adobeconnect.com/p7ft4rdcb78g/>. This link works best when using the Google Chrome web browser.

## **Q&A:**

### Question 1: Lincoln and Milwaukee Fiduciary Hubs

Can we please obtain a list of errors that are substantive and non-substantive?

#### P&F Response:

This list was sent out to Hub Station Directors via email dated November 26, 2019. The substantive error categories are outlined in [M21-4 8.3.b, General Guidelines for Quality Reviews](#) as follows:

- Prevention of VA negligence
- Protection of beneficiaries, or
- Correct payment

### Question 2: Milwaukee Fiduciary Hub

Are we able to utilize our established reconsideration process?

#### P&F Response:

Yes. The reconsideration process is determined at the local level.

### Question 3: Indianapolis Fiduciary Hub

Are we able to obtain a TMS course number associated with the quality call meetings?

#### P&F Response:

The TMS course numbers will be provided in the heading on page 1 of this Quality Call Bulletin each month following the call. The TMS number for the November call is 4540060.

### Question 4: Louisville Fiduciary Hub

Are we able to utilize the August 2016 version of the 21P-4718a which expired on July 31, 2019 to verify account information?

#### P&F Response:

Yes, please continue to utilize the August 2016 version of the [21P-4718a](#). The [M21-1 III.ii.1.C.8.e](#) classifies a form as outdated if a new form is being issued or the form is being discontinued. The [21P-4718a](#) is pending review by OMB as VA wishes to continue use of this form. One approved by OMB, VA will obtain an additional three-year grant for use of this form and an updated version date will be noted on the form.

### Question 5: Louisville Fiduciary Hub

Are we able to utilize the 21P-4718a to establish direct deposit?

#### P&F Response:

The guidance for establishing direct deposit is located in [FPM 4.C.12.b](#). This guidance provides that direct deposit account changes require verification that the account is properly titled prior to updating, with limited exceptions as noted in this manual section. Verification of the account is done by viewing a copy of a voided check, or the [VA Form 24-0296, Direct Deposit Enrollment](#) with one of the following:

- a copy of a voided check
- a bank statement showing the account is properly titled, or

- a complete [VA Form 21P-4718a, Certificate of Balance on Deposit and Authorization to Disclose Financial Records](#).

Upon determination that the account is properly titled, the payment account must be updated in Share and in BFFS.

Question 6: Indianapolis Fiduciary Hub

The Indianapolis Fiduciary Hub has seen emails from other hubs indicating these hubs have received P&F clarification and guidance on KM updates. Is it possible to issue these emails to all the hubs for consistency purposes?

P&F Response:

The P&F Policy and Procedures staff issues a monthly email to the Hub Station Directors and Fiduciary Hub mailboxes providing the highlights of the questions received and answered by P&F during the month. The most recent email was distributed on November 21, 2019.

Question 7: Indianapolis Fiduciary Hub

P&F Service referenced a “previous checklist” during the call. Are we not using the new checklist?

P&F Response:

All references to the National Quality Checklist made during the quality call were for the current checklist which is located in the [M21-4.8, Appendices A and B](#). It is noted, new quality checklists were implemented on the local level for Legal Instruments Examiners, Field Examiners and Fiduciary Service Representatives in conjunction with the new performance standards on October 1, 2019.

**Reminder:**

There will be no Fiduciary Quality Call scheduled for December 2019. P&F Service wishes everyone a safe and happy Holiday season. Information regarding the January 2020 Quality call will be forwarded in the future.

