



Pension and Fiduciary (P&F) Service

Pension Quality Call

Date: November 21, 2019

TMS: # VA 4540061

AGENDA TOPICS

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[ITEM 2: ANALYSIS OF OCTOBER STAR QUALITY](#)
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AGENDA ITEMS

Agenda item: Overview of P&F Service

Presenter: Wakita Thompson,
Analyst

Target Audience:

PMC Employees

Discussion:

To support VA's mission and optimize delivery of Pension, DIC, Accrued, Burial and Fiduciary Services, P&F Service has 6 special focused teams that work jointly to provide guidance and support to the PMCs. **The 6 teams are listed below:**

- Training
 - Develop and deliver training content and resources to support the PMCs.
 - Evaluate Field training effectiveness and adjust training material based on findings
- Quality and Oversight
 - Conduct National STAR Reviews, Local Quality support and oversight, and Improper Payments Elimination and Recovery Improvement Act (IPERA) mitigation activities.

- Conduct Site Visits to assess policy and procedure compliance and identify and address unnecessary processes and/or procedural gaps within the PMCs and Fiduciary Hubs.
- Handle Negligence Determinations for misuse cases,
- Maintain FBI's National Instant Criminal Background Check System (NICS) mailbox.
- Policy
 - To improve our service to Veterans and their survivors our Policy Team works to:
 - Propose legislative changes to Congress,
 - Draft new regulations and update existing regulations,
 - Implement regulation changes.
 - Manage communication and engagement with Congress.
- Procedures
 - Provide oversight and maintenance of M21 and Fiduciary Program Manual (FPM) publications.
 - Manage the Policy and Procedures mailbox within P&F Service.
- Business Management
 - Identify system defects and enhancements to improve user experience, quality, and timeliness,
 - Write system requirements to add new system functionality or fix a system defect.
 - Perform system testing to ensure desired functionality is functioning as expected.
- Analytics Team
 - Monitor PMC performance standards (Director's Dashboard)
 - Evaluates production impacts of P&F initiatives i.e. procedural changes or training events
 - Reviews performance and forecasts future success

Agenda item: Analysis of October STAR Quality

Presenter: Wakita Thompson, Analyst

Target Audience:

QRT and Management

Discussion:

A trend analysis was conducted by analyzing the top 3 rating and top 3 non-rating questions that received an error from September 1, 2019 through September 30, 2019. The analysis showed the #1 area on both the Rating and Non-Rating claim types was "Notification Error." The #2 highest error category was "Income Errors." Out of a total of 40 Errors cited in the month of September 26 of those errors were notification errors, which equates to 65.0%; and 5 of Errors were income errors, which equates to 12.50%.

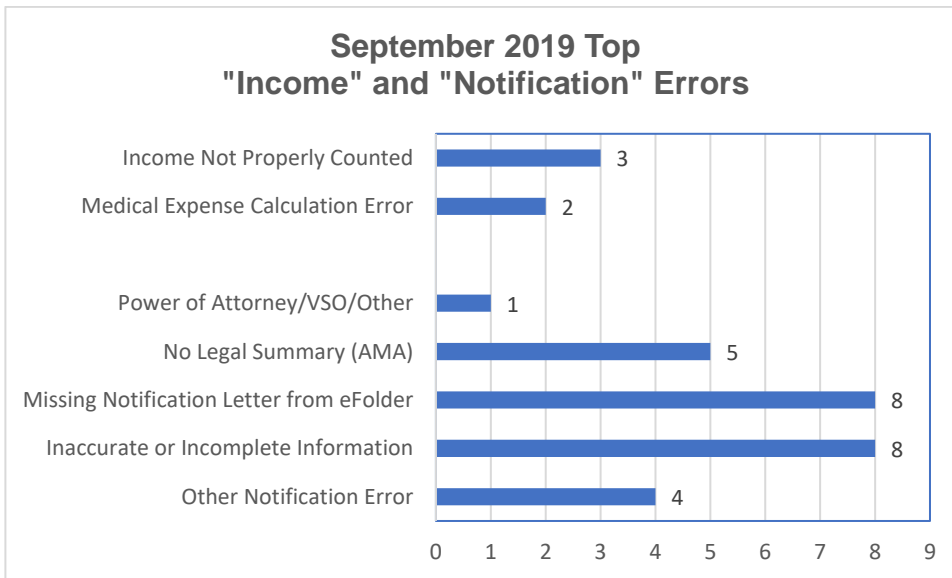
The below charts show the number of errors cited for all Pension Management Centers (PMC's); to include a "drill down" of "Notification" and "Income" errors.

Notification Error Category	Totals
Inaccurate or Incomplete Information	8
Missing Notification Letter from eFolder	8

No Legal Summary (AMA)	5
Power of Attorney/VSO/Other	1
Other	4
Total	26

Income Error Category	Totals
Medical Expense Calculation Error	2
Income Not Properly Counted	3
Total	5

Please see chart below for a full view of the “Income” and “Notification” error categories.



Agenda item: CBCM Reminder

Presenter: Dave Coyle, Analyst

Target Audience:

PMC Claims Processors, QRT, Management

Discussion:

P&F Service completed its training on Centralized Benefits Communication Management (CBCM) for the PMCs on October 2, 2019. P&F Service provided the expectation that the PMCs would train all employees on CBCM in 30 days for this new requirement. CBCM should now be utilized for all outgoing correspondence with the exception of letters containing FTI information.

For quality purposes, proper use of Package Manager and CBCM will be cited as a critical error for local and national STAR quality effective November 2, 2019. This includes any applicable transaction or EP completion starting on November 2, 2019.

References/Contacts

- ✓ Procedures for Handling Outgoing Mail [M21-1 III.ii.1.B.4.b](#)
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Agenda item: Requirements of Reconsiderations

Presenter: Daniel Joyce, Analyst

Target Audience:

QRT and Management

Discussion:

Occasionally PMCs may receive a STAR review result with which they disagree or believe the explanation offered is unclear or inadequate. Any basic disagreement over the correctness of an error citation must be formally addressed via QMS and should include references or citations supporting the request for reconsideration. Requests for reconsiderations must be submitted within 10 business days. Requests for extensions past this timeframe must be submitted to the P&F Service Training, Quality and Oversight mailbox. Requests must include an explanation for the untimely submission.

References/Contacts

- ✓ Requests for Reconsideration [M21-4 7.6](#)
 - ✓ P&F Quality and Oversight mailbox PFTNGQUALOVRST.VBACO@va.gov
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Agenda item: Milwaukee Site Visit Findings

Presenter: Dave Coyle, Analyst

Target Audience:

QRT and Management

Discussion:

P&F Service conducted a site visit to the Milwaukee PMC from August 28-29, 2019. All site visit findings can now be found on the P&F Service intranet site. P&F Service wishes to thank the PMC for hosting the first iteration of a new and improved site visit protocol, which includes an abbreviated two day “on-site” visit. Most aspects of the site visit were conducted virtually.

Milwaukee was recognized for many commendations and best practices, to include:

- Weekly authorization goal spreadsheet which is shared with employees,
- QRT’s proactive approach to complex situations with fliers, handouts, job aids, etc.,
- QRT’s regular meeting with other PMCs to keep consistency,
- High local accuracy rates,
- Increased QRT production to reduce IQR deselection replacements.

P&F Service is looking forward to engaging all PMCs to ensure local quality is monitored effectively.

P&F Service is excited to visit the St. Paul PMC in March 2020. More information to follow.

References/Contacts

✓ P&F Service Site Visit Homepage

[Site Visit Schedule and Findings](#)

Agenda item: PMC Deferrals

Presenter: Dave Coyle, Analyst

Target Audience:

PMC Claims Processors, QRT, Management

Discussion:

Deferral functionality within VBMS allows a claims processor to return a claim to an earlier place within the claims cycle to correct both unavoidable and avoidable erroneous actions. Avoidable deferrals indicate erroneous claims processing associated with a failure to follow established regulations, policies, or procedures. Unavoidable deferrals indicate erroneous claims processing caused by an action outside of the control of the claims processor.

On November 12, 2019, the VBMS production environment was updated with new PMC-based secondary deferral reasons. On the same day, specific guidance regarding PMC deferrals was updated when M21-4 Chapter 7 Topic 17 (Overview of VBMS Deferrals) was added to the PMC QRT section of the CPKM. P&F Service created a VBMS Deferrals job aid which was sent to the PMCs on November 8, 2019.

Deferrals must include all relevant details to include:

- Manual reference(s)
- Most appropriate reason(s) for deferral
- Relevant bookmarks

Employees who disagree with a deferral must follow the appropriate steps found in M21-4 7.17 (b) to file for a deferral review. QRTs at the PMCs must resolve all deferral reviews.

References/Contacts

✓ Overview of VBMS Deferrals

[M21-4 7.17](#)

✓ NWQ_Phase_1and2_Playbook

[NWQ Shared Documents SharePoint](#)

Agenda item: STAR Quality Calculations

Presenter: Daniel Joyce, Analyst

Target Audience:

QRT and Management

Discussion:

The Office of Performance Analysis and Integrity (PA&I) has updated the methodology for all business lines by which sample sizes for STAR are determined. The FY20 update moves

Pension to monthly sample pulls (currently bi-weekly) and reduces the size of the sample from 90 per month to 48 per month (46.7% reduction). The mid-month sample pull for November has been put on hold pending implementation of the new sample.

STAR Sampling Methodology

- PA&I is using a single-tailed sample methodology rather than a two-tailed methodology. In summary, this is because on the national-level claims are either right or wrong (i.e. single-tailed) not graded on a sliding scale (i.e. two-tailed). This aligns VBA with industry standards. The majority of other business lines have already accepted this change to include Compensation Service.
- Moving to a monthly sample pull also reduces the size of the sample required since bi-weekly samples required the pulls to be rounded up.
- The new FY 20 monthly sampling size for National Pension STAR reviews will include 26 rating and 22 authorization reviews per month, for a total of 48 reviews monthly or 576 annually.
- FY19 National STAR sample size included 46 rating and 44 authorization reviews per month, for a total of 90 reviews monthly or 1080 annually.

QMS Reporting/ Director Performance Dashboard

- QMS has reporting tools to identify all National STAR errors including benefit entitlement errors that are captured in the Director's Performance Dashboard totals.
- Compensation Services is responsible for the review of National STAR errors and updating any weighted averages of STAR errors for both Compensation Service and Pension. Compensation Service then provides PA&I with the data which is uploaded to the Director's Performance Dashboard.
- All narratives for National Pension STAR errors can be found on the [STAR reporting page](#). While this reporting data may not include any weighted averages captured in the Director's Performance Dashboards, it does provide the content for all Pension STAR errors.

References/Contacts

- ✓ PA&I Contact PAIPA.VBACO@va.gov
- ✓ P&F Quality and Oversight mailbox PFTNGQUALOVRST.VBACO@va.gov

Closing Comments

P&F Quality Mailbox:

We will solicit for agenda topic(s) for each future Quality Call. 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

P&F Service Website:

P&F has been actively working on improving the content of the P&F Service website. Some examples of new content is shown below (but is not all inclusive):

- Updated P&F Staff
- P&F Oversight Protocol and Program Schedule
- Site Visit Findings and Information
- STAR link
- Monthly Quality Call Bulletins

The website can be found:

<https://vbaw.vba.va.gov/PENSIONANDFIDUCIARY/pension/index.asp>

Quality Call Bulletins:

P&F Service is pleased to announce that the finalized monthly Quality Call Bulletins will be found on the P&F Service website. The specific link can be found [HERE](#).

Next Quality Call:

There will be no 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.

Post-Call Follow Up

Quality Call Recording:

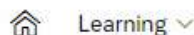
A recording of the November 2019 Pension Quality Call can be found here (open in Chrome):

<https://vbatraining.adobeconnect.com/ptpc68vegpit/>

TMS Course:

P&F Service is pleased to announce that starting with the November Quality Call, content from the Quality Call (bulletin, recording, etc.) will be available in TMS! The TMS # for the November Pension Quality Call is **4540061** (Pension and Fiduciary Quality Call – Pension November 2019)

The link to TMS is [HERE](#). It is recommended to use Google Chrome when viewing the TMS information.



My Learning

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Pension & Fiduciary Quality Call - Pension November 2019

Q&A:

Question 1: STP PMC

When will the penalty period calculator be updated on the P&F Intranet Site?

P&F Response:

On January 13, 2020, P&F Service updated the AO73 Penalty Period Calculator to account for the December 1, 2019 COLA update. The new penalty period calculator (and previous calculator) is now available on the P&F Intranet site as shown below.

<https://vbaw.vba.va.gov/PENSIONANDFIDUCIARY/pension/index.asp>

Question 2: STP PMC

St. Paul is providing station training on December 17, 2019 on AO73 changes. We request to discuss the requirement of In-Home Care frequency. V.iii.1.G.3.m and 38 CFR 3.278(d)(2) states that payments to an IHC provider must be commensurate with the number of hours that the provider attends to the disabled person. The three PMCs do not agree on whether or not the hours worked and/or hourly rate of payment are required to count IHC expenses. How is this manual reference to be interpreted.

P&F Response:

Manual changes were published on January 16, 2020 to [M21-1 V.iii.1.G - Deductible Expenses](#) which provided additional procedural guidance regarding in-home attendants. In addition, Policy and Procedures Team issued a formal response to the PMCs on January 21, 2020. The hourly rate of an in-home attendant is required to determine if the rate is excessive. Claims processors must request verification of in-home attendant fees in the following situations:

- 1) Hourly rate exceeds \$35
- 2) Fees do not appear to be commensurate with the number of hours the provider attends to the disabled person.

If documentation requirements found in [M21-1 V.iii.1.G.3.o](#) are submitted, PMCs are to allow the expense. Additional questions can be forwarded to the P&F [Policy and Procedures](#) mailbox.

Question 3: MKE PMC

Jordan requested additional information on avoidable vs. unavoidable deferral reasons and if there would be additional information given to the PMCs that detailed out each deferral reason and if they trigger an avoidable or unavoidable deferral. Any spreadsheet or job aid would help the employees realize why the deferral reason is being used and the result of the deferral.

P&F Response:

The new deferral functionality which was added to VBMS effective November 12, 2019, is working as intended. The VBMS Deferrals Tableau does have information regarding avoidable vs unavoidable reasons (4th tab from left). The link to the deferrals dashboard is as follows:

https://tableau.vba.va.gov/views/VBMSDeferralsReport_0/AbouttheVBMSDeferralsReport?:embed=y&:showShareOptions=true&:display_count=no&:showVizHome=no#2

P&F Service worked with PA&I to update the “Avoidable vs Unavoidable Reasons” tab on the VBMS Deferrals page. On December 10, 2019, all pension specific deferrals added on November 12, 2019 are now reflected in Tableau. Information on all deferrals can now be found on that tab.

Question 4: MKE PMC

Milwaukee stated that the PMCs agreed to use November 17, 2019 as the effective date to cite critical CBCM/package manager errors and asked to use that date to no longer provide a grace period.

P&F Response:

P&F Service has no issue with local quality using November 17, 2019 as the end of the grace period for CBCM. However, STAR errors will be cited for improper use of CBCM/Package Manager for EP completions starting with November 2, 2019.

Solicitation Q&A:

Question 1: PHI PMC (submitted November 7, 2019)

Compensation Service has released a Divorce Effective Date table that is on the Job Aids site here: <https://vbaw.vba.va.gov/bl/21/rating/rat00.htm> Are PMCs permitted to use this document as well when the need would arise?

P&F Response:

Yes, PMCs may use this job aid. The aid assists users in determining the effective date of a divorce by state and the applicable remarriage waiting period for each state. The aid also provides information for other areas such as Puerto Rico and the Philippines. The PMCs are reminded to use M21-1 to determine appropriate effective dates.

Question 2: PHI PMC (submitted November 7, 2019)

We would like clarification as to when PMCs should begin calling errors on IQRs when guidance is released by P&F on a particular issue, but said guidance is not yet updated in the manual, etc. For example, sometimes questions are posed to P&F and the answers are shared with the questioning PMC.

1. Should the PMC which received the response share with the other PMCs and then set a date 30 days from confirmation that the guidance was shared with all other PMCS before calling a critical error?
2. Should the PMCs wait for official guidance shared with all 3 PMCs (such as an update in a P&F bulletin) and then set a date 30 days from that date before calling a critical error?
3. Should the PMCs wait for a manual or other guide update and then set a date 30 days from that update before calling a critical error?
4. Should we be doing something entirely different?

References reviewed M21-4 7.10.a, M21-4 7.10.d, M21-1 7.10.e.

P&F Response:

P&F Service will ensure that responses to inquiries will include all PMCs when appropriate. Generally, P&F responses to PMC inquiries which do require a manual change will not occur until the manual change is published. The grace period for local quality is 30 calendar days after the relevant information is published in CPKM per M21-4 7.10.d. The grace period for

STAR quality is 30 calendar days after the relevant information is published in CPKM per M21-4 7.3.c. Most inquiries do not require a manual change.

In addition, all PMCs receive all published significant changes in the monthly field service inquiry highlights. P&F Service will attempt to release future responses with a corresponding manual change immediately instead of waiting for the monthly inquiry highlights.

See you in January 2020!

