

Pension and Fiduciary (P&F) Service

Pension & Fiduciary Quality Call

Date: July 29, 2021

TMS: # VA XXXXXXX

AGENDA TOPICS

- [ITEM 1: PMC STAR QUALITY ANALYSIS](#)
- [ITEM 2: FIDUCIARY STAR QUALITY ANALYSIS](#)
- [ITEM 3: SCHEDULING FUTURE TELEPHONIC OVERSIGHT ACTIONS](#)
- [ITEM 4: QUALITY ERRORS ON ERRONEOUSLY CLEARING EPs](#)
- [ITEM 5: SAMPLE NOTE BLURBS – FIELD EXAM AND ACCOUNTING AUDIT TOOL](#)
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AGENDA ITEMS

Agenda item: PMC STAR Quality Analysis

Presenter: Wakita Thompson, Analyst

Target Audience:
QRT and Management

Discussion:

A trend analysis was conducted regarding errors cited on National Pension Quality Reviews completed during the month of June 2021.

The below chart shows a breakdown in the number of National STAR Quality Reviews completed in the month of June 2021.

Review Category	Total # of Claims Reviewed	Total # of Errors Cited	# of BE Errors Cited
Non-Rating (Authorization)	35	7	3
Rating	21	2	2
Total	56	9	5

As shown in the above chart, out of a total of 56 claims reviewed for National STAR Quality, 9 (16.07%) errors were cited, with 5 cited as benefit entitlement (BE) errors. The nine errors cited fell within three categories: Notification, Income, and Other. A breakdown of each error category is provided below.

The below chart provides a brief description of the reason for each of the 9 errors, broken out by category.

Error Category	Reason for Error
Notification	<ul style="list-style-type: none"> 1 – Inaccurate information in the notification letter
Income Errors	<ul style="list-style-type: none"> 1 – Income not properly counted 3 – Medical expenses incorrectly calculated
Other	<ul style="list-style-type: none"> 4 of the errors were due to proper procedures not being followed. <ul style="list-style-type: none"> Development issued when not required Transportation reimbursement paid when not entitled VCAA compliant development not done prior to deciding the claim Correct effective date not used

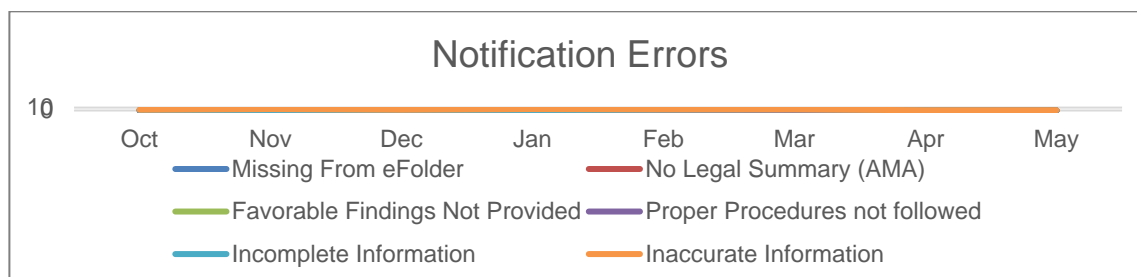
The next chart shows the total number of errors cited, broken down into categories showing whether the error was a BE or Non-BE error.

June 2021 Errors by Category (BE vs Non-BE Breakdown)				
Error Category	BE Errors	Non-BE	Total	%
Income Errors	2	2	4	44.44%
Notification Errors	0	1	1	11.11%
Other	3	1	4	44.44%
Total	5	4	9	

The above chart shows errors cited in the month of June 2021 on claims completed by the PMC's in May 2021.

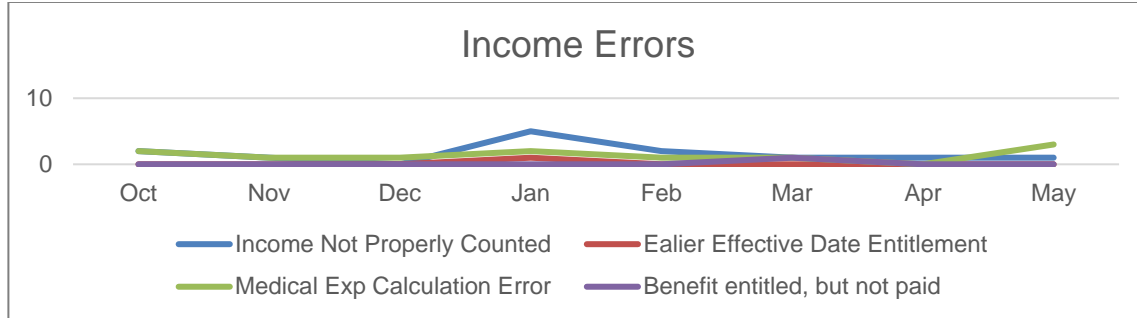
The next two charts provide a drill-down of Notification and Income errors cited during National STAR Quality Reviews performed November 2020 through June 2021 on claims completed by the PMC's, October 2020 through May 2021.

The below chart shows a drill-down of errors cited within the Notification error category.



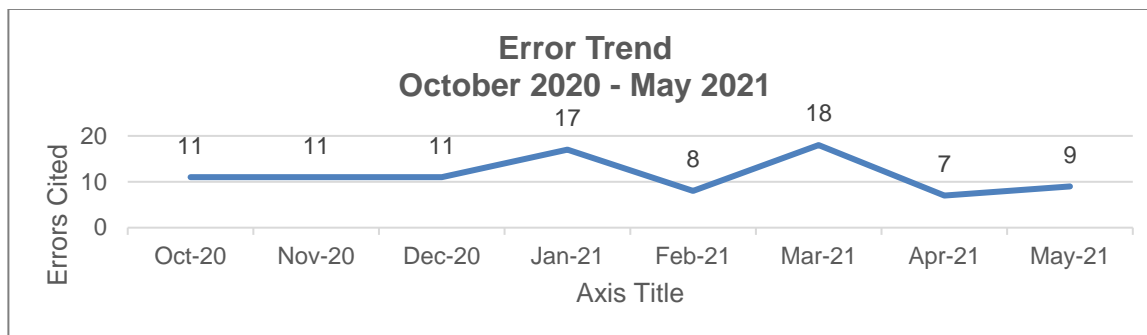
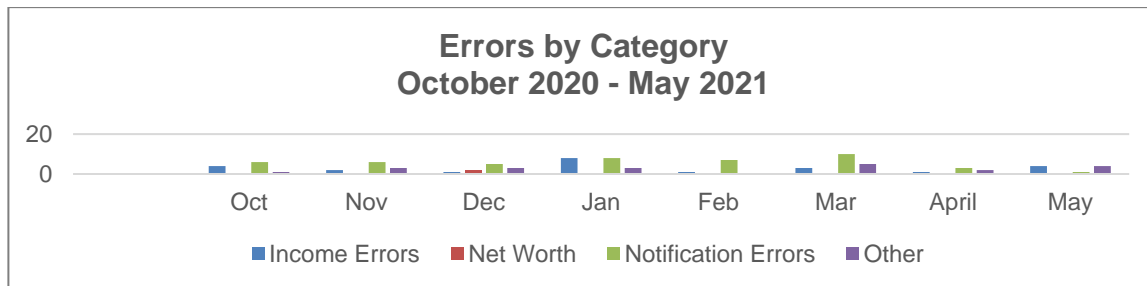
As shown in the above chart, “Inaccurate Information” in the Notification letters is the area with highest occurrence of errors. However, there’s currently a downward trend in the occurrence of errors in the “Inaccurate Information” and “Incomplete Information” categories, which denotes an improvement in the Notification error category.

The below chart shows a drill-down of errors cited within the Income error category.



As shown in the above chart, there was a spike in the “Medical Expense Calculation Error” category in the month of May 2021, with “Income Not Properly Counted” category maintaining a steady path of improvement.

The next two charts provide an overview of how each error category is trending from October 2020 through May 2021, which reflects National STAR Quality Reviews performed FY21 to date, June 2021.



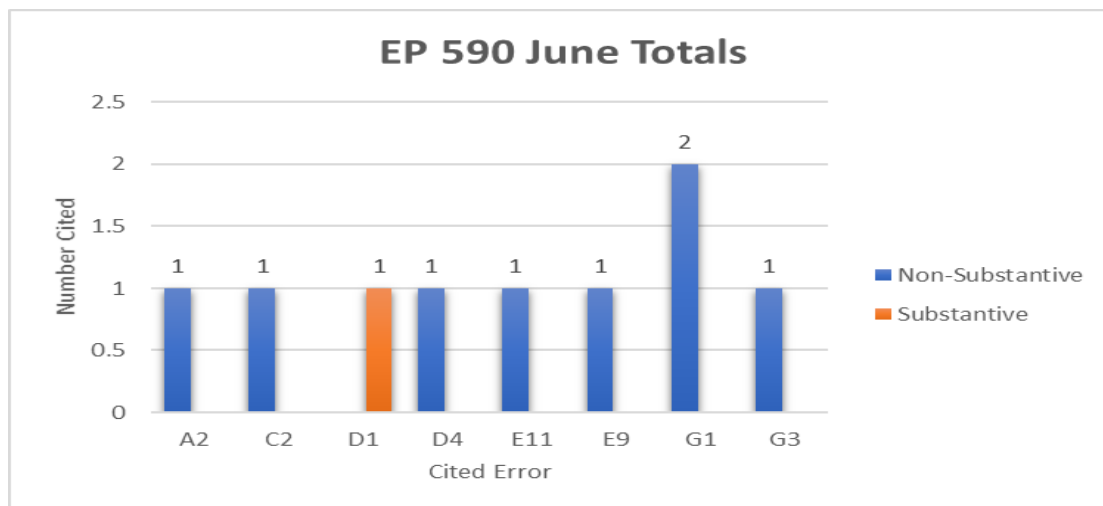
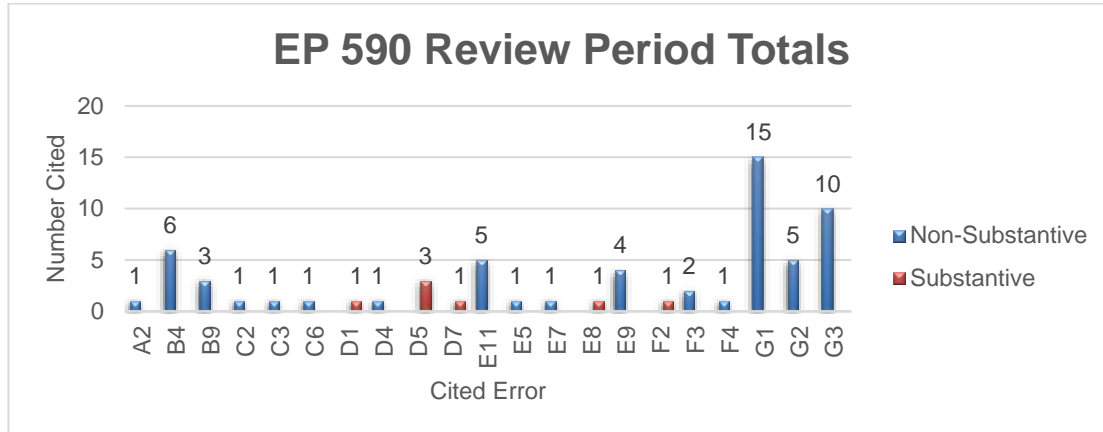
References/Contacts

✓ STAR Reports

https://vbaw.vba.va.gov/bl/21/star/reports/star_rpts20.htm

Target Audience:
QRT and Management

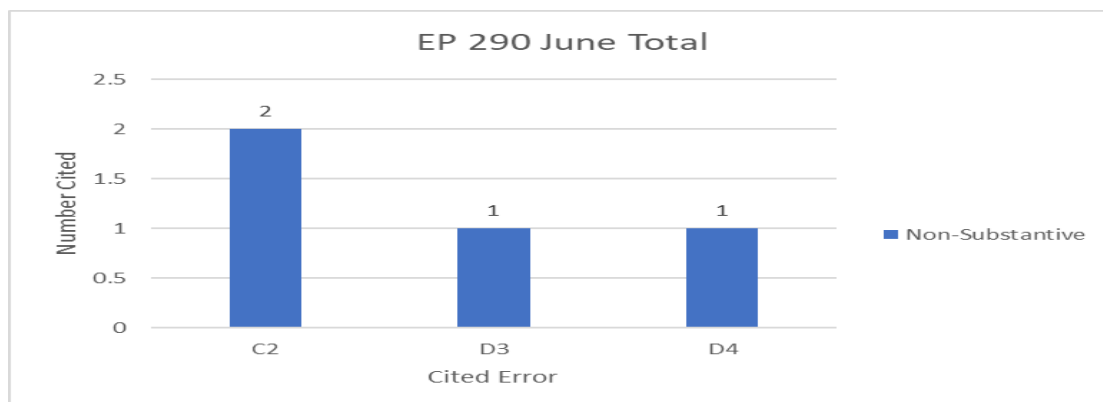
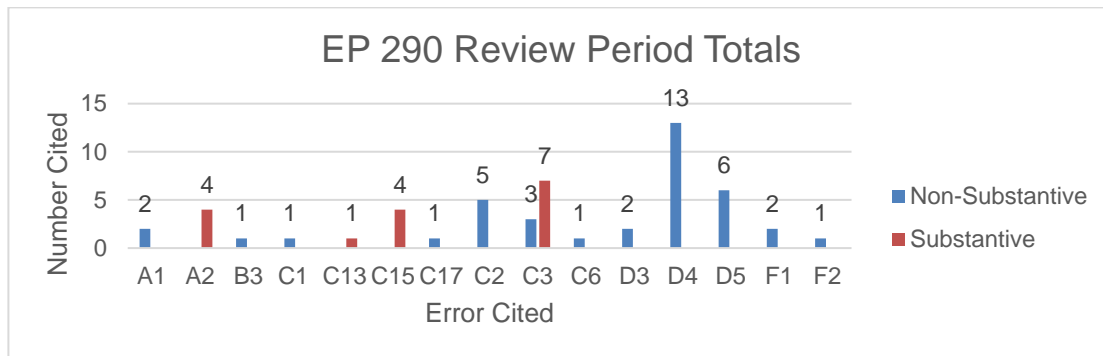
Discussion:



For the review period of March through June 2021, there were 69 total errors cited from STAR reviews of completed EP 590s. Of the 69 errors cited, seven were substantive errors with three being national STAR field examination checklist D5 errors. Question D5 ascertains if liquid assets were reported/documented in an Initial Examination (IA) or Successor Initial Appointment (SIA) Examination. All the D5 errors were cited early in the first three months of the review period, March, April and May. In addition, there were 15 G1 (non-substantive errors) cited during the review period. The G1 error is an administrative error and is associated with updating the beneficiary and fiduciary profiles. Ten of 15 (67%) of the G1 errors were found in the first month, March, of the review period. The second most cited non-substantive administrative error was G3 and ascertains whether appropriate diary dates were established. There were four additional non-substantive error categories (B4, E11, E9, and G2) that had four or more errors cited that relate to future scheduling of field examinations (type and date), documentation of FAST being discussed during the field examination and establishment of appropriate tasks for future control.

When the review period results are compared to the last month (June 2021) of reviews, the number of cited errors has significantly decreased with a total of only nine errors with one being substantive. The one substantive error cited is the first occurrence and does not indicate a trend for the nation. The review period total indicated there was a trend in G1 errors, but that seems to be correcting itself when compared to the last month of reviews.

Ultimately, most errors cited were related to not properly updating the beneficiary and/or fiduciary profiles. Overall, the nation is trending in the right direction and has significantly improved the quality of completed field examinations.



For the review period of March through June 2021, there were 61 total errors cited from STAR reviews of completed EP 290s. Of the 61 errors cited, 16 were substantive errors with ten being national STAR accounting checklist C3 errors. Question C3 ascertains if a credit report was properly obtained and reviewed during the audit of an accounting. It should be noted that the chart illustrates two bars for C3 errors and the blue bar with 3 errors were cited during the grace period and were not counted as substantive errors at that time. Eight substantive errors were from questions A2 and C15 with each error being cited four times each during the review period. A2 was cited because of missing required elements of a complete accounting were not present prior to approval, such as missing financial statements. C15 was cited because during the accounting audit process it was determined surety bonds were not appropriately verified and/or adjusted prior to approval of the accounting.

As for the non-substantive errors, D4 was the most cited error for the entire review period with 13 errors being cited. The D4 error is solely based on whether the beneficiary and fiduciary profiles were updated in VBMS-Fid. Two other non-substantive errors C2 (5 cited) and D5 (6 cited) were also among the more frequent errors cited. The C2 error relates to dates matching

in FAST and VBMS and the D5 error relates to properly scheduling accountings without overlapping accounting due dates.

When the review period results are compared to the last month of review (June 2021), the nation has made great significant improvements. The last month resulted in no substantive errors being called and only one D4 error, the most cited error for the review period.

Overall, the accounting quality for the nation has trended away from substantive errors and into minimal non-substantive errors.

References/Contacts

- ✓ Fiduciary Quality Analysis

Agenda item: Scheduling Future Telephonic Oversight Actions

Presenter: Tom Visser, Analyst

Target Audience:
QRT and Management

Discussion:

- **Question from Louisville:** Is there any way a Field Examiner can diary for future telephonic oversight if they confirm in their report that the beneficiary is able to communicate and comprehend, regardless of whether one of these conditions are in their corporate record? In other words, is there any “wiggle” room for the FE to use their judgment? Sometimes the beneficiaries condition becomes better. Please advise.

Discussion: STAR and local quality have called errors when FE sets future diary for Telephonic Oversight and the corporate record shows some evidence of cognitive impairment even though the bene may be able to communicate appropriately. The reference states:

Beneficiaries will not qualify for scheduled telephonic contact if documentation in the eFolder shows evidence of:

- *documented moderate to severe cognitive impairment as evidenced by*
 - *a rating of special monthly compensation under [38 U.S.C. 1114\(t\)](#)*
- **Response:** Procedural guidance within [FPM, Part I, 2.D.5.c](#) specifically prohibits scheduled telephonic oversight when the eFolder contains documentation showing moderate to severe cognitive impairment, as evidenced by a rating of special monthly compensation under [38 U.S.C. 1114\(t\)](#), medical or lay evidence indicating current symptoms of dementia, or current institutionalization of the beneficiary due to mental health. This rationale is mirrored in restricting the same population from waiving due process by telephone under [FPM, Part I, 1.B.1.g](#). The restrictive nature of this guidance is intentional.

The harm in conducting scheduled telephonic oversight in these situations is that the field examiner may miss obvious signs of mistreatment, misuse, or exploitation when there is evidence that the beneficiary's cognitive capabilities present the possibility for unreliable welfare verifications.

References/Contacts

- ✓ Email dated July 13, 2021
- ✓ [FPM I.2.D.5.b., VA's Policy Regarding Telephonic Oversight](#)

Agenda item: Quality Errors on Erroneously Clearing EPs **Presenter:** Amy Hamma, Analyst

Target Audience:
QRT and Management

Discussion:

- **Question from St Paul:** Should a quality error be called for erroneously clearing the EP 400, since the station did get credit for this EP and should not have? Or is this a comment only, as the VSR realized their mistake immediately and took corrective action on the same day?

Discussion: An IQR transaction itself was incorrect; however, corrective action was completed by the VSR on the same day. For example, the transaction pulled is an EP 400 clear. VBMS notes show an EP 160 was changed to an EP 400 and cleared as an outdated form. However, the form received was not outdated. No outdated form letter was sent, the VSR re-established an EP 160 the same day, and took the necessary action to move it to the next step.

- **Response:** The QRS should be reviewing the case file limited to the actions of the individual for whom the individual quality review (IQR) is being completed and apply each question in the checklist to determine if it was successfully met. If the VSR made the wrong transaction, then an error should be called accordingly. For example, if a PMC erroneously takes credit for an EP not authorized or establishes an EP and then does not complete all required procedures to finalize the EP, then these actions would be considered errors. If an employee makes corrections for the error, this should be cited with the error.

Please note, due to the lack of evidence and no claim number, P&F Service was limited in its ability to provide a more detailed response to this specific claim scenario.

References/Contacts

- ✓ Email dated July 13, 2021
- ✓ [M21-4 7.10.a; Fundamental of Quality Reviews](#)
- ✓ [M21-4 7.11.c; Standard of Review for IQRs](#)
- ✓ [M21-4 7.10.e; Error Narratives; Required Elements](#)
- ✓ [M21-4 Appendix B.1.b; National Pension Authorization Review Checklist](#)

Agenda item: Sample Note Blurbs – Field Exam and Accounting Audit Tool

Presenter: Sandy Lundquist, Analyst

Target Audience:
QRT and Management

- **Question from Milwaukee Fid Hub:** Could you provide examples of exactly what types of notes are being requested and exactly what notations would be sufficient to meet the requirements of various manual references? Would an annotation such as “developed account 1234 as it was not previously of record” be sufficient for everyone who is looking at that case to know what specific information must be submitted for a new account, or at least this annotation sufficient to direct anyone looking at the record to the development letter for additional details, if needed?

Discussion: There appears to be no examples of how much information would be acceptable to meet the vague requirements that are now listed in the manual and it appears that employees are being asked to recreate the evidence in the Notes section for Accounting Audit Tools and Field Examination Reports. For example, FPM I.3.D.1.d. and I.3.D.2.i. states that the Notes section of the Accounting Audit Tool to state specific information that is missing and what the fiduciary must submit. It also indicates to provide a detailed explanation of any resolved discrepancies.

- **Response:** P&F Service has solicited input from QRT at the Hubs. We have taken the feedback we received and compiled a list of sufficient sample responses to various topics in the FPM. A copy of these will be uploaded to the Intranet site for everyone’s use. P&F Service would appreciate any updates you see when completing local quality reviews of any notes you would like to see added to this list. As a reminder, the sample notes are only to be used as a guide.

References/Contacts

- ✓ Email dated May 18, 2021

Agenda item: M21 Reorganization

Presenter: Gabrielle Mancuso, Analyst

Target Audience:
QRT and Management

Discussion:

What is the M21-1 Reorganization

In an effort to make the M21-1 a more consumable and navigable resource, a six-phased reorganization began on May 10, 2021. The M21-1’s content was reorganized in a manner consistent with the progression of the claims process and content on special issues was grouped in a single, consolidated location, resulting in the expansion of the M21-1 from 9 parts into 14 parts.

P&F Service Impact

As of July 15, 6 of the 14 new parts had been published, including the following parts that contain content primarily maintained by P&F Policy and Procedures Team:

- Part XI, *Notice of Death, Benefits Payable at Death, and Burial Benefits*, on June 17, 2021, and
- Part XII, *Dependency and Indemnity Compensation (DIC and Other Survivor's Benefits (Excluding Survivor's Pension))* on June 30, 2021.

P&F Service is currently supporting efforts to transition content during the next phase which will tentatively be completed by September 1, 2021 and will involve formation of new

- Part VI, Authorization Process (based on select content from Parts III and IV)
- Part VIII, Special Compensation Issues (based on select content from Parts III and IV, and all of Part VI),
- Part IX, Pension (based on all content from Part V), and
- Part X, Benefits Administration and Oversight (based on select content from Parts I, III, IV, and IX).

How to Stay Informed

The best way to stay informed of the status of all M21-1 changes and movements made by both Compensation Service and P&F Service, is through the Compensation Service Calendar updates. This will be the primary method of communicating M21-1 Reorganization updates and allows the most accurate information to be provided in a timely manner. Additionally, the FY21 Reorganization Guide located within the M21-1 in KM contains the Reorganization Matrix, which provides the field with a table of all reference changes which have been published to date.

As reorganization progresses, Compensation Service and P&F Service will continue to provide updates on M21-1 changes and movements in

- the [M21-1, Adjudication Procedures Manual, FY21 Reorganization Guide](#) above
- [M21-1 FY21 Reorganization Announcements \(va.gov\)](#)
- the [Compensation Pension Knowledge Management Portal \(CPKM\)](#) landing page under the *Breaking News* header, and
- [Compensation Service Calendar](#) updates, normally occurring on Fridays, identifying M21-1 content published during the week

References/Contacts

- ✓ Email dated July 21, 2021
- ✓ [M21-1, Adjudication Procedures Manual, FY21 Reorganization Guide](#)
- ✓ [M21-1 FY21 Reorganization Announcements \(va.gov\)](#)
- ✓ [Compensation Pension Knowledge Management Portal \(CPKM\)](#)
- ✓ [Compensation Service Calendar](#)

Agenda item: Administrative Decision Training

Presenter: Julia Meyer, Analyst

Target Audience:
QRT and Management

Discussion: Please see attached slides.

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. For specific policy and procedures related topics, please email to the Policy and Procedures mailbox at FPOLPROC.VBACO@va.gov.

Quality Call Bulletins

Quality Call Bulletins can be found in the following locations:
https://vbaw.vba.va.gov/PENSIONANDFIDUCIARY/Quality_Call_Bulletins.asp. The next Quality Call is tentatively scheduled for October 2021.

TMS Courses

All Pension and Fiduciary Quality Calls and bulletins will be available in TMS. Once the monthly bulletin is finalized, information will be sent to the PMCs and Fiduciary Hubs which will include the TMS #.