

## **Fiduciary Hub IQR Guides Training**

**June 2022** 

June 13, 2022 Slide Count: 17





### **Objectives**

The Reviewer will understand:

FAC recommended changes

 The purpose for the Review and Step-by-Step Guides

How to use the guides when completing IQRs

### **Purpose**

To establish consistency when performing IQRs:

- Three role specific Review Guides and Step by Step Guides created for
  - Field Examiner IQRs
  - Fiduciary Service Representative IQRs
  - Legal Instruments Examiner IQRs

M21-4, Chapter 8





### **FAC Recommendations**

No recommended changes to IQR checklists

- FEIQR (26 claim transaction types)
  - √ 14 claim transactions removed

- LIEIQR (28 claim transaction types)
  - ✓ 9 claim transactions removed

- FSRIQR (23 claim transaction types)
  - ✓ No recommended changes





# **FAC Recommended Changes - FEIQR**

Review: Review	r Claim Transaction	FAC Recommendation	Workgroup Concur?
FEIQR	Background Check Mitigating Evidence (Closed)	Keep this transaction. It is important that Mitigations for CBI are reviewed.	
		Remove this transaction. The CBI mitigation should be reviewed on closed activity as the open will not	
FEIQR	Background Check Mitigating Evidence (Open)	have actions completed to review.	yes
		Remove this transaction. The employee adding a note to the system should not qualify for an entire	
FEIQR	Beneficiary Note Activity	quality review. Further the checklists were not developed to perform a quality review on a note.	yes.
		Remove this transaction. Establishing a claim should not constitute an enitre quality review. Further, the	
FEIQR	Claim Establishment	quality checklists do not capture this element.	yes.
FEIQR	Closed Only	Keep this transaction for QMS review. This is an entire field exam review.	
FEIQR	Field Exam	Remove this transaction. This activity will be included in the validation or closed only review.	yes.
		Remove this transaction. Suspense date updates, while important should not be considered for an entire	
FEIQR	Material Suspense Only	quality review. Futher, they don't offer many tasks to be reviewed from the quality checklists.	yes.
FEIQR	Misuse Allegation Activity	Keep this transaction we will need to review Misuse activity.	yes
FEIQR	Misuse Determination Activity	Do not concur, FE are not involved in this part of the process. FE only recommends.	No
FEIOR	Misuse Found Activity	Do not concur, FE are not involved in this part of the process. FE only recommends.	No
FEIOR	Misuse Investigation Activity	Keep this transaction. Misue investigation needs to be quality reviewed.	ves
			*
FEIQR	Misuse No Misuse Activity	Do not concur, FE are not involved in this part of the process. FE only recommends.	No
		Remove this transaction. Suspense date updates, while important should not be considered for an entire	
FEIQR	Non-Material Suspense Update	quality review. Futher, they don't offer many tasks to be reviewed per the quality checklists.	ves.
FEIGN	Non-Material Suspense o puate		yes.
		Keep this transaction for QMS review. This can be reviewed to show that development activity was	
FEIQR	Other Development Activity (Closed)	completed correctly.	
		Remove this transaction for QMS review. Opening Development Activity is the beginning to a process	
FEIQR	Other Development Activity (Open)	and will not accurately show completed work.	M21-4 Appendix F
			if not system
FEIQR	Out of System Fiduciary Letter	Remove this transaction. This activity will be included in the validation or closed only review.	generated
FEIQR	Ready for Decision	Remove this transaction. The FE typically does not work with cases that are made RFD.	yes.
		Remove this transaction. Cases are made ready to work when they are validated to the FSR for review.	·
FEIQR	Ready to Work	This will be reviewed under the validation transaction.	yes.
		Remove this transaction for QMS review. Workflow Activity can be any number of in-process system	
		updates. These transactions are often confusing for the QRT to interpret the transaction or activity by	
FEIQR	Workflow Activity	the employee. These transactions do not match well with the current checklist.	yes.
FEIQR	Workflow Activity Field Exam Assigned	Remove this transaction. This transaction happens when work is established and assigned to the FE.	yes. Set up correct EP
FEIQR	Workflow Activity Field Exam Validation	Keep this transaction for QMS review. This is an entire field exam review.	
FEIQR	Workflow Activity Fund Usage Review Approved	Keep this transaction. There may be instances when FEs are completing FUR.	
FEIOR	Workflow Activity Fund Usage Review Rejected	Keep this transaction. Some of the Hubs are using FEs for Fund Usage Review work.	
FEIQR	Workflow Activity Suspend Benefits	Keep this transaction. We will need to review suspended benefit activities.	
- Lindin	Tremon Astrony Suspension Delicing	many time a disease with the first to retreat adaptitude design accuracy.	
FEIOR	Workflow Activity Where abouts Unknown - 1st Attende	Remove this transaction. This activity will be included in the validation or closed only review.	ves
TEIQK	Workhow Activity Whereadouts Offkhown - 1st Attemp	Remove this transaction. This activity will be included in the validation of closed only review.	yes
	Manufallania Andricka Mikaman kanan Malanania and Antonia	Security ships and consider the contribution of the feet and the ship of the state	l
FEIQR	Workliow Activity where abouts unknown - 2nd Attem	Remove this transaction. This activity will be included in the validation or closed only review.	yes





# **FAC Recommended Changes - LIEIQR**

Review: R	evi Claim Transaction	FAC Recommendation	Workgroup Concur?
LIE IQR	Accounting Audit Tool Approved	Remove this transaction for QMS review. This will be captured when the accounting is approved.	yes
LIEIQR	Accounting Audit Tool Disapproved	Remove this transaction. This activity will be reviewed when the acccounting is disapproved.	yes
LIE IQR	Beneficiary Note Activity	Remove this transaction. The employee adding a note to the system should not qualify for an entire quality review. Further the checklists were not developed to perform a quality review on a note.	yes with same stipulations as FEs
LIEIQR	Claim Establishment	Keep this transaction. We need to ensure the LIE is establishing the work correctly.	
LIE IQR	Closed Only	Keep this transaction. These are completed work items that can be reviewed against the checklist.	
LIE IQR	Material Suspense Only	Remove this transaction. Suspense date updates, while important should not be considered for an entire quality review. Futher, they don't offer many tasks to be reviewed from the quality checklists.	yes
LIEIQR	Misuse Allegation Activity	Keep this transaction we will need to review Misuse activity.	
LIE IQR	Misuse Determination Activity	Keep this transaction we will need to review Misuse activity.	
LIE IQR	Misuse Found Activity	Keep this transaction we will need to review Misuse activity.	
LIE IQR	Misuse IGRC Activity	Keep this transaction we will need to review Misuse activity.	
LIEIQR	Misuse Investigation Activity	Keep this transaction we will need to review Misuse activity.	
LIEIQR	Misuse No Misuse Activity	Keep this transaction we will need to review Misuse activity.	
LIE IQR	Misuse Recon Activity Completed	Keep this transaction we will need to review Misuse activity.	
LIE IQR	Non-Material Suspense Update	Remove this transaction. Suspense date updates, while important should not be considered for an entire quality review. Futher, they don't offer many tasks to be reviewed per the quality checklists.  Keep this transaction for ONS review. This can be reviewed to show that development activity was	yes
LIEIOR	Other Development Activity (Closed)	completed correctly.	
		Remove this transaction for QMS review. Opening Development Activity is the beginning to a process	
LIE IQR	Other Development Activity (Open)	and will not accurately show completed work.	yes
LIEIQR	Out of System Fiduciary Letter	Remove this transaction. This activity will be included in the validation or closed only review.	yes
LIE IQR	Ready to Work	Keep this transaction. This can be reviewed when cases are determined to be ready for further activity.	
LIEIQR	Tracked Item Creation	Remove this transaction. The Hubs were instructed not to use tracked items.	yes
LIEIOR	Workflow Activity	Remove this transaction for QMS review. Workflow Activity can be any number of in-process system updates. These transactions are often confusing for the QRT to interpret the transaction or activity by the employee. These transactions do not match well with the current checklist.	ves
LIEIOR	Workflow Activity Accounting Approved	Keep this transaction. This should be reviewed when the accounting is approved.	,
LIEIQR	Workflow Activity Accounting Disapproved	Keep this transaction. We need to ensure accountings are disapproved accurately.	
LIEIQR	Workflow Activity Accounting Disapproved Follow Up	Remove this transaction for QMS review. This will be captured when the accounting is disapproved.	No. past due letter
LIEIOR	Workflow Activity Field Exam Assigned	Keep this transaction. It is important that the correct field exam was established by the LIE.	•
FEIQR	Workflow Activity Field Exam Validation	Remove this transaction. LIEs do not validate field exams.	ves
LIEIQR	Workflow Activity Fund Usage Review Approved	Keep this transaction. The approval of a fund usage review needs to be reviewed.	
LIE IQR	Workflow Activity Fund Usage Review Rejected	Keep this transaction. We need to ensure fundusage reviews are rejected accurately.  Remove this transaction. Returning a field exam for additional action is not covered in the current quality	
LIEIOR	Workflow Activity Returned Field Exam	checklists.	ves





## **FAC Recommended Changes - FSRIQR**

Review: R	ev Claim Transaction	FAC Recommendation	Workgroup Concur?
FSRIQR	Accounting Audit Tool Approved		
FSRIQR	Authorized		
FSRIQR	Award		
FSRIQR	Beneficiary Note Activity		
FSRIQR	Claim Establishment		
FSRIQR	Closed Only		
FSRIQR	Material Suspense Only		
FSRIQR	Misuse Found Activity		
FSRIQR	Misuse Recon Activity Completed		
FSRIQR	Non-Material Suspense Update		
FSRIQR	Other Development Activity (Closed)		
FSRIQR	Out of System Fiduciary Letter		
FSRIQR	Rating Decision Complete		
FSRIQR	Ready for Decision		
FSRIQR	Ready to Work		
FSRIQR	Returned by Other		
FSRIQR	Tracked Item Creation		
FSRIQR	Tracked Item in Error		
FSRIQR	Workflow Activity		
FSRIQR	Workflow Activity Field Exam Assigned		
FSRIQR	Workflow Activity Field Exam Validation		
FSRIQR	Workflow Activity Fund Usage Review Rejected		
FSRIQR	Workflow Activity Returned Field Exam		



### **Quality Action Plan Workgroup**

- Nine hub SMEs participated
- Broken out into three position types
  - √ 3 SMEs work on FEIQRs
  - √ 3 SMEs work on LIEIQRs
  - √ 3 SMEs work on FSRIQRs
- Created Review Guide and Step by Step Guide
- Eight Hub QRT Peer Reviewed Final Products



### **Review Guides**

- Error descriptor for IQR checklist
- Created an explanation of error
- Provided possible manual references
- Followed style found in M21-4, Chapter 8,
   Appendix A.b. and B.b.
- Will be published in updated M21-4, Chapter
   8



## Review Guide Sample - FEIQR

### FIELD EXAMINER (FE) REVIEW GUIDE

The following is an explanation of the checklist questions found in FEIQRs.

	Error Description	Explanation	Possible References
1a	A Criminal Background	FEs obtain the CBI through CLEAR prior	38 U.S.C. 5507
	Inquiry (CBI) for the	to conducting the interview. Obtaining	FPM 1.2.B.1.a.
	proposed fiduciary was	the CBI at the earliest practical	FPM 1.2.C.6.i.
	not completed and	opportunity prevents further	
	uploaded to the eFolder	investigation of a person that will not be	
	prior to the field	appointed based on the results of the	
	examination.	inquiry. When face-to-face is not	
		conducted, the CBI must be obtained	
		prior to contacting the proposed	
		fiduciary so the FE can conduct the	
		appropriate identification protocol.	
1b	The type of field	The three types of Initial Appointment	FPM I.2.A.2.b.
	examination selected was	(IA) field examinations are IA, Successor	FPM I.2.A.2.e.
	not in accordance with	(SIA), and Expedited (EIA). The four	
	current policy.	types of follow-up field examinations	
		are Scheduled, Telephone, Fund Usage,	
		and Unscheduled.	
2a	The spouse fiduciary	A spouse fiduciary may be	FPM 1.2.C.5.n.
	designation was not	designated based on the findings listed	
	made correctly.	below.	
	_		
		The Veteran is incapable of handling	
		the VA benefit payable, with or	
		without supervision, and the spouse	
		<ul> <li>Is recognized as a</li> </ul>	
		dependent by VA	
		<ul> <li>bas the ability to handle</li> </ul>	
		funds and is qualified to	
		receive and administer the	
		VA funds payable	
		<ul> <li>consents to act as a</li> </ul>	
		fiduciary and is willing to	
		perform the duties of a	
		ficluciary	
		is not barred from serving	
		prior to appointment	
		per FPM, Part I, 2.C.6.b	
		meets the CBI criteria	
		per FPM, Part I, 2.C.6.k.	
		and	

		<ul> <li>agrees to use the funds solely for the Veteran and the Veteran's dependents, and execute a <u>VA Form</u> <u>21P-4703</u>.</li> </ul>	
2b	The order of preference was not followed prior to appointment of a fiduciary.	When selecting a fiduciary, the FE must consider individuals and entities for appointment in the following order of preference, provided that the proposed fiduciary is qualified, willing to serve, and the appointment would serve the beneficiary's interest:  • the beneficiary's preference • the beneficiary's spouse • a relative who has care or custody of the beneficiary or his/her funds • any other relative of the beneficiary • any friend, acquaintance, or other person who is willing to serve as fiduciary for the beneficiary without a fee • the chief officer of a public or private institution in which the beneficiary • the bonded officer of an Indian reservation, if applicable • an individual or entity who • has been appointed by a court with jurisdiction to handle the	38 CFR 13.100.e FPM I.2.B.2.g. FPM I.2.C.5.b-c.
		beneficiary's affairs, or is not willing to serve without a fee, or a temporary fiduciary, if necessary.	





# Review Guide Sample - LIEIQR

### LEGAL INSTRUMENTS EXAMINER (LIE) REVIEW GUIDE

The following is an explanation of the checklist questions found in LIEIQRs.

	Error Description	Explanation	Possible References
1a	The date of claim (DOC)	LIEs should verify EPs DOC is generally a	M21-4 B.1.c
	of the end-product (EP)	date prior to a follow-up diary coming	FPM I.1.A.2.e.,
	worked was not correct.	due, unless otherwise specified. For	FPM I.1.B.2.b.,
		accounting EPs, the DOC is generally the	FPM I.1.B.3.u
		day after the accounting period end	FPM I.3.A.3.e, k.
		date unless otherwise specified in the	FPM I.3.C.1.e.,
		FPM. The DOC of fund usage reviews is	FPM I.3.C.5.e.,
		generally 30 days prior to the fund	FPM I.3.C.6.a-b.
		usage review date, unless otherwise	FPM I.3.E.1.b.
		specified in the FPM.	FPM 1.3.E.2.a.,
		·	FPM II.1.C.4.I.
			FPM II.3.a.2.f
1b	The claim label or end	The correct work should be completed	M21-4 B.1.b
	product were not correct	under the correct claim label. When it is	M21-4 B.2
	on the EP worked.	discovered that an EP is incorrect, the	FPM I.1.A.1.b
		hub should first attempt to perform a	FPM I.1.A.2.e.,
		PCHG in Share or select the pencil icon	FPM I.1.B.1.b.,
		to Update Claim Details in VBMS and	FPM I.2.A.3.b.,
		attempt to make the necessary	FPM I.2.D.4.b
		corrections before canceling the	FPM I.2.E.1.d.,
		incorrect EP.	FPM I.3.C.1.e
			FPM I.3.E.1.a - c.,
			FPM I.3.E.2.a - b
			FPM II.1.A.1.e.,
			FPM II.1.C.4.a, d.
			FPM II.3.A.2.f, I.
1c	Additional required tasks	The LIE must ensure any additional	FPM I.3.A-E
	or EPs were not correctly	required EPs or tasks are established.	FPM II.1.A.1.e - f.,
	established.	·	FPM II.1.D.4.b.,
			FPM II.2.B.1.i.,
			FPM II.2.B.2.a.
			FPM II.2.B.3.f.,
			FPM II.3.A.2.k.,
			FPM II.3.B.3.c.,
			FPM II.3.C.1.f.,
			FPM II.3.D.1.e - f.,
			FPM II.3.D.3.i, k.
			FPM II.3.D.4.d.
1d	The necessary VA Memos	Fiduciaries and beneficiaries are	FPM I.1.B.6.c - d.,
	were not completed	required to receive notification at	FPM 1.2.E.3.b.
	correctly or	various stages of the claims	FPM I.3.B.1.b-d., h.
	appropriately.		FPM I.3.B.2.e.,h.

		process. LIEs are required to send	FPM I.3.B.3.b.
1 1		these notifications as directed.	FPM I.3.B.4.a.d
1 1			FPM I.3.D.1.be.
1 1			FPM 1.3.D.1.b., e.
1 1			FPM I.3.E.1.a-c
1 1			FPM 1.3.E.2.a.
1 1			FPM II.1.C.4.d-f
1 1			FPM II.2.B.1.i.
1 1			FPM II.3.A.5
			FPM II.3.B.1.b.
1e	Documents were not	The LIE must ensure all documents	FPM I.3.B.1.d.,
1 1	uploaded to the	received in the hub (mail, FAST, etc.)	FPM I.3.B.2.e.,
1 1	necessary VA systems.	are uploaded into the eFolder.	FPM I.3.C.1.a.,
1 1			FPM 1.3.C.2.a
1 1	Note: This includes		FPM II.1.A.1-2
	physical mail, faxes,		FPM II.2.B.1.i.,
	electronically received		FPM II.2.D.1.f.
	items, items from other		
1 1	VA systems (such as		
1 1	FAST), or VA generated		
1 1	documentation and/or		
2a	forms. The first notice of death	The UE must ensure the energy of the	M21-1 XI.i.1.A
Za	(FNOD) was not	The LIE must ensure the appropriate actions are taken following notification	M21-1 XI.I,1.A,. FPM I.1.A.1.a-b
1 1	processed correctly.	of a beneficiary's death.	FPM I.1.A.3.c.
1 1	processed correctly.	or a beneficiary's deach.	FPM I.1.A.5.C.
1 1			FPM 1.3.B.3.a.
1 1			FPM I.I.C.3.a-e
2b	The correct actions were	VA requires a final accounting from a	FPM I.1.8.6.e.
	not followed for	VA-appointed fiduciary whenever a	FPM 1.3.8.3.a.
1 1	accounting and estate	condition listed in I.3.A.2 is met. Some	
	resolution after a	of these include upon the death of a	FPM II.1.C.3.a-e
	beneficiary's death.	beneficiary and the fiduciary was	
	•	required to account, when a successor	
		fiduciary is appointed and the previous	
		fiduciary was required to account, or	
		when a temporary fiduciary	
		appointment end. Once notifications	
		are sent and the accounting is	
		approved, close the beneficiary profile if	
$\square$		the beneficiary is deceased. (B3)	
2c	The competency request	The LIE is responsible for taking follow-	FPM I.1.B.2.b.,
	or restoration was not	up or corrective action required in any	FPM I.1.B.6.d.
	processed correctly.	case to include updating the CFID,	FPM I.2.C.5.e, j - I
		notifying the fiduciary to turn over any	FPM 1.2.E.3.a, c, h
		remaining funds to the beneficiary, and	FPM I.3.B.3.a.
ш		<u> </u>	FPM II.1.D.2.b.,g.





## Review Guide Sample - FSRIQR

### FIDUCIARY SERVICE REPRESENTATIVE REVIEW GUIDE

	Error Description	Explanation	Possible References
1a	The beneficiary was not afforded all due process	The beneficiary is allotted a controlled period of time to submit additional	I.1.B.1.a-d,
	'	1.	I.1.B.2.j.
	rights prior to issuance of a final decision	evidence or request a hearing. The	38 CFR 3.353
	a final decision	minimum due process period is 60 days,	38 CFR 3.103
		unless waived by the beneficiary. When	M21-1 Part X.ii.6.b.,
		a waiver is not received, finalization of	X.ii.6.D.3.b.
		the determination occurs after the 65th	Part to the best and a total
		day to allow time for evidence to reach	
		the fiduciary hub .	
1b	Reasonable efforts to	Reasonable efforts generally consist of	I.1.B.1.e-f
	contact the beneficiary by	an initial telephone contact to the	M21-1. Part X
	phone to verbally explain	beneficiary's current telephone number	
	the Brady Act were not	and at least one follow-up attempt if the	Subpart ii,6.D.3.d
	appropriately	initial attempt is unsuccessful. Document	
	documented	compliance with the requirement to give	
		oral notice of the three provisions	
		in M21-1, Part X, Subpart ii,	
		6.D.3.d and FPM, Part I, 1.B.1.e on a VA	
		Form 27-0820, Report of General	
		Information.	
		injornation.	
		If initial and follow-up attempts to	
		contact the beneficiary by telephone	
		are unsuccessful, document the actions	
		taken on VA Form 27-0820.	
		Notes:	
		If telephone contact with the	
		beneficiary is made, but oral	
		delivery of the notice is	
		*	
		unsuccessful because, for	
		example, the beneficiary is	
		physically or mentally	
		incapacitated, fully explain	
		the circumstances on VA Form	
		27-0820.	
		<ul> <li>If the beneficiary later reports</li> </ul>	
		never receiving or not	
		understanding the initial oral	
		notice, provide it again and	
		document the action on VA Form	

1c	The pertinent evidence	The final rating decision includes	I.1.B.2.i
	was not discussed in the		1.1.B.2.k
	rating decision	<ul> <li>a list of evidence that contains the</li> </ul>	
		<ul> <li>proposed rating decision</li> </ul>	M21-1, Part V,
		<ul> <li>due process notification</li> </ul>	Subpart iv, 1.A
		letter	
		<ul> <li>waiver of due process (if</li> </ul>	
		received), and	
		<ul> <li>all other evidence received</li> </ul>	
		after the proposed rating	
		decision that does not	
		conflict with the proposal	
1d	The effective date for the	a narrative that contains	1.1.B.2.k
	incompetency rating	the explanation of the	M21-1, Part V, Subpart iv, 1.A.
	decision was incorrect	effective date, which is the	
		date of the final decision.	
1e	Necessary examinations	In the absence of clear and convincing	I.1.B.2.h
	were not completed (or	evidence to the contrary, presume that a	I.1.B.2.j
	rescheduled) correctly	person is competent.	M21-1, Part IV,
	, , , , ,	, , , , , , , , , , , , , , , , , , , ,	Subpart i, 2.B
		A finding of incompetency cannot be	
		made without a definite expression by a	
		responsible medical authority unless the	
		medical evidence of record is	
		<ul> <li>clear</li> </ul>	
		<ul> <li>convincing, and</li> </ul>	
		<ul> <li>leaves no doubt as to the</li> </ul>	
		beneficiary's incompetency.	
1f	Case was not referred	The following cases are excluded from	I.1.B.1.h
	correctly to VSC/PMC	the fiduciary promulgation team	I.1.A.2.b
		processing due to their unique	1.2.E.3.C
		processing requirements:	NWQ Playbook
			·
		<ul> <li>Integrated Disability</li> </ul>	
		Evaluation System cases	
		<ul> <li>RACC cases</li> </ul>	
		<ul> <li>foreign cases, and</li> </ul>	
		<ul> <li>proposed ratings that contain</li> </ul>	
		adverse actions in addition to	
		the competency issue.	
		<ul> <li>For compensation based</li> </ul>	
		claims requiring follow-up	
		actions per this block, the	





## **Step by Step Guides**

 Based on recommended and approved Claim Transaction Type for all IQRs

 Created steps QRT would take when completing task based IQRs

Will be published in updated M21-4, Chapter



# Step by Step Guide Sample - FEIQR

Steps	Background Check Mitigating Evidence (Closed)	<b>V</b>
Step 1 Mitigation	The CLEAR report will return a calculated risk result of either green,	
CBI	yellow, or red. See the table below for the appropriate actions to	ΙI
	take based on calculated risk result.	ΙI
	Green	ΙI
	Green	
	Low risk. No further investigation of the CBI is required for the	ΙI
	satisfactory CBI. The FE must document the green result in the field	ΙI
	examination.	ΙI
		ΙI
	Yellow	
	Moderate risk. The FE must	
	•document the negative entries found on the CBI	
	•investigate all entries within the CBI to	
	ensure no items represent a bar to being a fiduciary per 38 CFR     13.130, and	
	•determine whether the totality of the entries should disqualify the	
	fiduciary from serving, and	ΙI
	<ul> <li>annotate in the field examination the situational details and the</li> </ul>	ΙI
	satisfactory CBI if situational details indicate the negative entries on the	ΙI
	CBI are justifiable.	ΙI
	Note: If the city of the city	ΙI
	Note: If the situational details cannot be justified, the FE must not appoint that person as fiduciary.	ΙI
	appoint that person as nouclary.	ΙI
	Red	
	High risk. Do not investigate the CBI further and do not appoint the	
	fiduciary unless one of the specific exceptions outlined in FPM, Part I,	ΙI
	2.C.6.I applies.	ΙI
Step 2 Mitigation	FE must complete a Criminal Background Inquiry High-Risk Score	П
CBI	Mitigation Request template for a red risk score	
Step 3 Mitigation	The approved request must be uploaded to the eFolder with the field	
CBI	examination if a Criminal Background Inquiry High Risk Score Mitigation	ΙI
	Request was obtained.	Ш
Steps	Closed Only - IA, SIA, or EIA	_
Step 1 (Closed	Prior to conducting the field examination, the FE must perform the	Ιl
only) IA/SIA/EIA	criminal background inquiry (CBI) on the proposed fiduciary.	Ш
Step 2 (Closed	During the field examination process, the FE must collect or verify the	
only) IA/SIA/EIA	following general information of the Beneficiary:	
	•full name	
	•date of birth	
	Social Security number (SSN)	
	•telephone number	oxdot

		_
	•mailing address, and	ı
	•physical address.	1
Step 3 (Closed	FE must attempt to contact each adult beneficiary's dependent or the	ı
only) IA/SIA/EIA	custodian of minor dependents and document the contact in the field	ı
	examination, if applicable.	ı
Step 4 (Closed	FE must document the beneficiary's fiduciary preference if the	T
only) IA/SIA/EIA	beneficiary had the capacity to state a preference.	ı
Step 5 (Closed	FE must collect or verify the following general information of the	Ť
only) IA/SIA/EIA	perspective Fiduciary:	ı
	•full name	ı
	•date of birth	ı
	•SSN or EIN	ı
	•relationship to the beneficiary	ı
	telephone number	ı
	•mailing address	ı
	•physical address, and	ı
	•e-mail address, if available.	ı
Step 6 (Closed	FE is required to document the provision of the training modules, the	t
only) IA/SIA/EIA	guide, and the use of FAST. The FE must document this action by	ı
	annotating the	ı
	•field examination	ı
	VA Form 27-0820, Report of General Information, or	ı
	NOTES section of the claims processing system.	ı
Step 7 (Closed	Any prospective fiduciary for any VA beneficiary must sign a VA Form	t
only) IA/SIA/EIA	21P-4703	ı
Step 8 (Closed	Perform the credit history check and the associated analysis to confirm	t
only) IA/SIA/EIA	the fiduciary's credit does not have any disqualifying factors, if	ı
	applicable	ı
Step 9 (Closed	FE must document the findings in the ADDITIONAL COMMENTS	t
only) IA/SIA/EIA	(CREDIT/BACKGROUND) field within the CREDIT AND CRIMINAL	ı
,,	BACKGROUND REVIEW section of the field examination, if applicable	ı
Step 10 (Closed	FE must evaluate the beneficiary's social and physical environment	t
only) IA/SIA/EIA	during the field examination	ı
Step 11 (Closed	When concerns are identified during the interview with the proposed	t
only) IA/SIA/EIA	fiduciary or beneficiary, FE must	ı
,,	•call the local law enforcement agency or 911, if the situation is a life-	ı
	threatening emergency	ı
	•report the concern to local adult or child protective services for	ı
	investigation, if applicable	ı
	document the unmet need or adverse condition in the field	ı
	examination, and	١
	document phone call referrals on VA Form 27-0820 or create an	١
	electronic document that shows the online referral and upload the	١
	document to the eFolder.	١
Stop 13 (Class d		+
Step 12 (Closed only) IA/SIA/EIA	FE must evaluate the beneficiary's ability to manage funds	١
omy) ra/sra/EIA		Τ



# Step by Step Guide Sample - LIEIQR

Steps	Claim Establishment – Accounting	<b>V</b>
Step 1	The LIE determined accounting oversight is required. The LIE will ensure	$\vdash$
	the accounting diary is updated appropriately on the beneficiary profile.	l
Step 2	The LIE will establish the required accounting EP.	
	Claim Establishment – Correspondence	
Step 1	The LIE may need to establish an EP400-FID Correspondence to send a	
	letter (such as a Death - NOK or Bond Exonerate).	l
	Claim Establishment – Field Exam	П
Step 1	From a telephonic inquiry: The LIE will document information obtained	$\vdash$
	during telephonic contact with the beneficiary or fiduciary on VA Form	l
	27-0820, Report of General Information, uploaded to the eFolder.	l
Step 2	The LIE will use the information obtained to complete VA Form 21-	П
	3537a, Field Examination Request. The form must clearly document	l
	who is to be contacted and why. The LIE will upload the form to the	l
	eFolder.	l
		l
	Go to Step 4.	
Step 3	From a mail inquiry: The LIE will ensure the mail received is uploaded to	Г
	the eFolder. The LIE will then complete a VA Form 21-3537a, Field	
	Examination Request, with information from the mail inquiry. The form	l
	must clearly document who is to be contacted and why. The LIE will	l
	upload the form to the eFolder.	l
		l
	Go to Step 4.	l
Step 4	The LIE will establish either an unscheduled field exam (when contact is	П
	required with the beneficiary) or a fund usage field exam (when contact	l
	is required with the fiduciary). End.	
Step 5	From an accounting/fund usage review: The LIE will complete VA Form	
	21-3537a, Field Examination Request, with the information required for	l
	the accounting or fund usage review. The LIE will upload the form to	l
	the eFolder.	<u> </u>
Step 6	The LIE will establish a fund usage field exam for contact with the	
	fiduciary.	
	Claim Establishment – Fund Usage Review	
Step 1	The LIE determined fund usage review oversight is required. The LIE will	l
	ensure the fund usage review date diary is updated appropriately on the	
	beneficiary profile and establish the required fund usage review EP.	L
Step 2	The LIE will complete VA Form 21-3537a, Field Examination Request,	
	with the information required for the fund usage review. The LIE will	l
	upload the form to the eFolder. (Covered under Field Exam – Step 5)	$oxed{oxed}$
Step 3	The LIE will update beneficiary profile and establish the required fund	
	usage field exam EP.	L
	Claim Establishment – Misuse	
Step 1	The LIE receives an allegation of misuse (by telephone, mail, email, etc.)	
	and documents the allegation on VA Form 27-0820, Report of General	
	Information.	I

	I	_
Step 3	The LIE must review each allegation of misuse and decide if a misuse	ΙI
	investigation is warranted.	ΙI
		ΙI
	Allegation is Warranted - complete a VA Form 21-3537a.	ΙI
		ΙI
	Allegation is Not Warranted- complete a Misuse Allegation	ΙI
	memorandum per II.3.A.2.n	ΙI
Step 4	The LIE uploads the VA Form 21-3537a for misuse investigation to the e-	Н
2rch 4	folder and updates the EP accordingly in order to assign the	ΙI
		ΙI
	investigation to the appropriate hub employee (FE).	ΙI
		ΙI
	Additionally, the LIE will update the INVESTIGATION ESTABLISHED field	ΙI
	on the corresponding misuse record with the date of the VA Form 21-	ΙI
	3537a requesting the investigation.	ΙI
		ΙI
	After the Misuse Allegation memorandum is approved, the LIE will	
	ensure the memorandum is uploaded to the eFolder, update the	ΙI
	ACTION and SUSPENSE DATE fields in the misuse EP and verify that all	ΙI
	fields in the misuse record applicable to the misuse case are updated.	ΙI
	The LIE will ensure that the misuse EP is closed.	ΙI
Steps	Misuse Determination Activity	1
Step 1	If misuse is found, the misuse determination serves as the basis to establish	Н
step 1	a debt for the VA and represents a bar to continued or future service as a	ΙI
	fiduciary for any VA beneficiary.	ΙI
Step 2	The LIE will review the eFolder to ensure the misuse investigation report	$\vdash$
Step 2	with supporting exhibits, and any other relevant material is of record.	ΙI
Store 3	11 0 1	$\vdash$
Step 3	Each misuse determination must be completed on the approved Misuse	ΙI
	Determination memorandum authorized for use by P&F Service and,	ΙI
	regardless of the finding, must include several elements.	ΙI
	The Determination recovered as a contain the following	ΙI
	The Determination memorandum must contain the following:	ΙI
	List all the allegations, including sources and receipt dates, in relation to the	ΙI
	misuse and any additional problems identified during the misuse process.	ΙI
	Belowest witness state too and regulations	ΙI
	Relevant misuse statutes and regulations.	ΙI
	Definition of misuse.	ΙI
	Definition of misuse.	ΙI
	Statutes related to fee autitlement when prices is found	ΙI
	Statutes related to fee entitlement when misuse is found.	ΙI
	Details relevant use and henefit regulations	
	Details relevant use and benefit regulations.  List relevant information associated with the misuse determination. This	
	includes the	
	Veteran's name	
	claim number	
	beneficiary's name	
	fiduciary's name	
I	<ul> <li>fiduciary category (individual or entity)</li> </ul>	ıl





# Step by Step Guide Sample - FSRIQR

Steps	Accounting Audit Tool Approved	✓
	Work Completed: Approval of an accounting in VBMS-Fiduciary.	
	Verify that:	
Step 1	A proper credit report or CBI is of record.	
Step 2	Correct actions have been completed in the accounting submission	
	system (FAST, mail upload, etc.)	
Step 3	The accounting was not disapproved without valid grounds.	
	Disapproval is clearly documented.	
Step 4	The beginning balance was correct.	П
Step 5	The income held by the fiduciary was verified and accounted for.	
Step 6	Any unusual or inappropriate expenditures were questioned and	
	appropriately clarified.	
Step 7	Any excessive fees were reimbursed to the beneficiary prior to	
	accounting approval.	
Step 8	Investments by the fiduciary were registered to denote the fiduciary	
	relationship.	
Step 9	All financial accounts, U.S. Savings Bonds, and other securities were	$\vdash$
	properly verified.	
Step 10	Funds in the accounts were not over the FDIC/NCUA limitations	$\vdash$
	(currently \$250,000).	
Step 11	The accounting was appropriately reconciled, to include any notes to	
	resolve discrepancies being documented in the Accounting Audit	
	Tool.	
Step 12	All requirement elements were met prior to approving the	
and the	accounting.	
Step 13	If required, notification for a final accounting requirement was sent	
	to the fiduciary.	
Step 14	All appropriate follow-up tasks were established in the beneficiary	$\vdash$
	record (e.g., receipt of a final accounting, receipt of a court	
	accounting, etc.).	
Steps	Authorized	<b>V</b>
	Work Completed: Authorization of an EP 590. Verify that:	
Step 1	The beneficiary was afforded all due process rights prior to issuance	
	of a final rating decision.	
Step 2	Reasonable efforts to contact the beneficiary by phone to verbally	
	explain the Brady Act were appropriately documented.	
Step 3	All pertinent evidence was discussed in the rating decision (proposed	
	rating, due process letter, any waivers of due process (if applicable).	
Step 4	The effective date for the incompetency rating was correct. This	
	should match the date the rating is completed.	
Step 5	Any necessary examinations were completed (or rescheduled)	
	correctly.	
Step 6	The case was referred correctly to VSC/PMC, when necessary (to	$\vdash$
	include establishing correct EP).	
Choo 7	The competency decision was correct.	
Step /		
Step 7 Step 8	The appropriate notification was sent to all required parties, to	$\vdash$

54 0	A	
Step 9	Any award adjustments (other than appropriate withholding action)	
	was valid.	
Step 10	All necessary payment changes were effectuated (e.g., CFID	
	completed).	
Step 11	Award net effect is \$0	
	Work Completed: Exam closure, Authorization of award with	
	Fiduciary Appointment, Resume Award. Verify that:	
Step 1	The fiduciary certification is of record.	
Step 2	The change of fiduciary (CFID) was completed correctly.	
Step 3	The fiduciary was not made aware of his/her appointment and	
	responsibilities as fiduciary in writing (e.g., the IA Fiduciary	
	Notification Letter including a signed VA Form 21P-4703).	
Step 4	The fiduciary was aware of their fee approval and/or date they may	
	start taking a fee (e.g., ensure a copy of the Beneficiary Fee Notice	
	Letter is of record).	
Step 5	The appropriate notification was sent to all required parties, to	
	include Power of Attorney.	
Step 6	The appropriate EP was established for PMC/VSC if any additional	
	actions were needed for their review/processing (e.g., pension,	
	dependency, etc.).	
Step 7	The follow-up field examination type and date were correct.	
Step 8	The fiduciary oversight type and/or date were correct.	
Step 9	The follow-up activity was completed correctly (e.g., SDP, Insurance,	
	21P-555, etc.).	
Step 10	A task was established to control for future actions in accordance	
	with FPM guidance (direct deposit, surety bond receipt, etc.).	
Step 11	A surety bond was requested and/or documented correctly (e.g.,	
	development letter) when VA FUM was over \$25,000.	
Step 12	Any retroactive funds were withheld/released correctly, to include a	
	memo to VSC/PMC when applicable.	
Step 13	A properly titled account was requested.	
Step 14	Any award adjustment (other than appropriate withholding action)	
	was valid.	
Step 15	The resumption of benefits was implemented correctly.	
Step 16	The award was suspended/terminated correctly, if applicable.	
Step 17	All necessary payment changes were effectuated (e.g., CFID	
-	completed).	
Step 18	The case was referred correctly to VSC/PMC, when necessary (to	
	include establishing correct EP).	
Step 19	Retired pay was withheld correctly, or appropriate EP was	
	established to control for action by appropriate VSC/PMC team.	
Step 20	Severance pay was withheld correctly, or appropriate EP was	
	established to control for action by appropriate VSC/PMC team.	
Step 21	Drill pay was withheld correctly, or appropriate EP was established to	
	control for action by appropriate VSC/PMC team.	





### **Discussion and Questions**



Any questions should be directed to your local QRT