Pension and Fiduciary Service National Fiduciary Quality & Training Call Notes

Call Information	
	Date: Tuesday, March 21, 2017
	Time: 1:00 – 2:00 pm ET
	TMS: VA 4202933 (Self-Study)

Contents

Call Meeting Minutes

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<tr><th>Call Agenda Item</th><th>Details</th></tr>
<tr><td rowspan="2">Quality Error Trends</td><td>Fiduciary Quality Accuracy Director’s Performance Dashboard

January 2017: 86.7%
February 2017: Unavailable

As discussed in the call last month, the January 2017 Director’s Dashboard Fiduciary Accuracy Measure indicates the National weighted accuracy is 86.7%. This covers the period of September 1, 2016 through November 30, 2016.

Pension and Fiduciary (P&F) Service cited 149 errors were cited during the reporting period. 100 of the errors fell into the category of Administrative Errors and 49 of the errors fell into the category of Beneficiary Protection.</td></tr>
<tr><td>P&F Service provided examples of error citations to include Fiduciary Program Manual (FPM) references.

Administrative Errors

• Notifying beneficiaries and their representatives of selection of the fiduciary to manage the beneficiary’s funds
    • Example error: The Beneficiary Notification Letter sent on 11/17/16 did not “CC” the beneficiary's Power Of Attorney, California Department of Veterans Affairs, as required. Beneficiaries and their representatives, if any, must be notified of the selection of a fiduciary in writing.

    • Chapter 2 reference: FPM 2.I.3.c states that both the beneficiary and their representative, if any, must receive written notification within five days of the selection of a fiduciary to manage the beneficiary’s VA benefits. The Beneficiary Notification Letter is required for all beneficiaries who are rated as unable to manage his or her VA funds, including those paid by Supervised Direct Pay. Citation of this type of error will fall under C1f until the quality checklist is updated.</td></tr>
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	Beneficiary Protection Errors
	
	• Establishing appropriate follow-up field examination diaries
	  • *<u>Example error</u>*: Scheduling guidelines for personal contact apply unless the case meets the criteria for streamlined supervision. Field examination report dated 09/01/2016 documents 08/30/2018 as the date of the next field exam for streamlined supervision. This case does not meet the criteria for streamlined supervision scheduled in 2 year intervals since the beneficiary resides in a facility with an expired license as of 08/12/2016. The case must be scheduled for personal contact unless it can be established that the facility is now in good standing.
	
	  • *<u>Chapter 2 reference</u>:* FPM 2.D.9.b states, “Fiduciary Program policy is to conduct the least restrictive method of supervision of beneficiaries ... However, if information received determines streamlined field examination is insufficient to fulfill the supervision criteria, the fiduciary hub personnel must schedule a face-to-face follow-up field examination.” The license of the facility in which the beneficiary resides was expired in this example. Expiration of a facility license is grounds to deem the information as insufficient to fulfill supervision criteria. The Fiduciary Program would provide better oversight in this situation by conducting a face-to-face visit with the beneficiary. Citation of this type of error will fall under B3e until the quality checklist is updated.
	
	• Noting income and expense information on the FX report in the field examination report
	  • *<u>Example error</u>:* The FE must review and document current expenses, to include charge or loan account numbers, balances, and purpose for any outstanding debts. FX report dated 11/02/2016 documents an expense for a credit card; however, the account number, balance, and purpose for the debt was not documented.
	
	  • *<u>Chapter 2 reference</u>*: FPM 2.D.3.d states, that the name of the creditor must be included and at the Field Examiner discretion, the account number, if available. This information will assist with future accountings and can be

	used to confirm information during a follow-up field examination. The Field Examiner must document all expense information available and share it with the fiduciary to ensure the fiduciary can make informed decisions regarding which expenses will be met. Citation of this type of error will fall under B3i until the quality checklist is updated.
Quality Assurance	P&F Service published updates to FPM, Chapter 2, *Field Examinations*, effective February 27, 2017. The rewrite of FPM focused on updates to outdated language, inclusion of guidance from fast letters and policy letters, and changes in policy and procedural guidance. P&F Service will not report quality accuracy for cases completed between February 27 – March 31, 2017 for inclusion on the Director's Performance Dashboard Measures. P&F Service will continue to conduct and monitor quality during this timeframe for training and policy purposes only. P&F Service will resume reporting quality accuracy with cases completed on or after April 1, 2017. To ensure a statistically valid sample, P&F Service will increase the number of reviews for each hub in April.

Fiduciary Program Manual Chapter 9, Program Oversight	In addition, P&F Service published FPM, Chapter 9, Section B, *Quality Assurance Program* on March 9, 2017. Fiduciary program quality guidance is no longer housed in M21-4. Please review the chapter and note the following references.
	
	• 9.B.5 – Fiduciary Hubs are required to report corrective action taken within 10 business days of receipt of a substantive error or comment. There numerous cases awaiting corrective action pending in Beneficiary Fiduciary Field System (BFFS) currently. A clean-up list will be coming from the Office of Field Operations (OFO).
	• 9.B.6 - P&F Service staff will review all selected cases in BFFS. Cases from Manila will remain the only exception to this guidance.
	• 9.B.7 -
	    • Request for reconsideration is only appropriate for substantive errors. Non-substantive errors are not eligible for reconsideration. Please message the F&FE mailbox if you would like clarification on a non-substantive error.
	    • Submission of an additional request for reconsideration on an upheld substantive error must be received from the Fiduciary Hub Manager and on the proper memo within five business days of when the Fiduciary Hub receives notification of an upheld

	error.
Quality Checklists	P&F Service is working to create and release the National quality assurance checklists. Revision of the singular checklist includes breaking the checklist into three different lists: • accounting, • initial appointment, and • follow-up appointments. The revision is imperative to achieve accurate application of manual regulations and to maintain consistency in the quality assurance program. The new accounting checklist will target four areas of review: the audit, the funds under management protection, the disposition of funds, and the administrative tasks associate with accountings. The Office of Field Operations sent the accounting checklist to the field for review and comment the week of March 13, 2017. P&F Service will submit the remaining checklists for field review the week of March 27, 2017.
Fiduciary Program Manual Updates	As P&F Service updates the FPM, old verbiage will display with red front and a strikethrough. New additions to verbiage will display in blue font. The variance in text color is to help employees identify changes quickly. P&F Service made the following FPM changes: • Added language to FPM Chapters 3 and 5 to prevent the inappropriate waiving of required accountings • Changed the work item selected when a streamlined field examination is not applied. The Fiduciary Hub must change the work item 531 to a work item 521 or 526.

Questions from the Field

P&F Service will provide responses to policy and procedural questions on the appropriate Frequently Asked Questions (FAQ) document within Knowledge Management.

Area	Question	Answer
Quality Review	Will P&F Service wait to cite quality errors until the new quality review checklists are available?	No, P&F Service will provide a companion document that associates the current FPM references to the current quality review checklist. Local and National quality reviewers will continue to use the current checklist.
	Will P&F Service update the frequently asked questions FAQ document to include the date of the responses to questions and answers?	Yes, P&F Service will update the FAQ document to include the date of the answers to questions.
	When requesting reconsiderations of quality review errors, should the hub use the current references for cases with errors prior to the release of the revisions to the FPM?	No, fiduciary hubs should request reconsideration using references active on the date of work item completion.
	Will P&F Service provide a period for which errors will be non-punitive?	Yes, P&F Service will conduct quality reviews for training purposes only between March 1-31, 2017.
	Will P&F Service begin to complete task-based instead of work item based quality reviews?	P&F Service will continue to report case level accuracy. P&F Service will consider task based reviews in fiscal year 2018.
	Will P&F Service institute a misuse process specific quality review checklist?	Yes, P&F Service will provide a misuse specific quality review checklist in FY 18 following the completion of misuse in process reviews.
	Will P&F Service update BFFS to mirror the revised checklist(s) when the updates to the checklist are complete?	Yes, P&F Service will update BFFS to reflect revisions to the quality checklist.

	Is it possible to add a location on the quality review checklist to allow National and local quality reviewers to provide comments to field personnel to address non-actionable quality concerns?	Currently, both National and local quality reviewers have the ability to add notes to the quality review checklist.
	Do the hubs have the ability to access a BFFS report to identify cases that are currently a work item 531 that should now be a 521 work item?	Currently, a report is not available to identify a change in work item code. A case review would be required to identify the necessity of a change in work item from 531 to a 521 work item.
	Are errors on in the Administrative Section of the Quality Review checklist punitive?	The administrative section of the checklist is non-substantive.

Ongoing Events

Date	Event
March 31, 2017	Completion deadline for FPM Chapter 2 Change Training , in TMS
April 1, 2017	FPM Chapter 2 updates subject to National quality review
April 10, 2017	BFFS 3.8 Release
May 8, 2017	FE Centralized Training FY 2017-3 begins
June 19, 2017	LIE Centralized Training FY 2017-1 begins

Next Monthly Quality & Training Call

The next National Fiduciary Quality & Training Call is on **Tuesday, April 18, 2017.**

P&F Service maintains a distribution list of all field QRT personnel for notification of upcoming Quality and Training calls. Please send an email to FFE.VBACO@va.gov notifying P&F Service of any changes to local QRT personnel.

Submit all comments and questions regarding these call notes and future calls to FFE.VBACO@va.gov.