

Fiduciary December 2024 Quality Call

Primary Topics

Topic 1 Fiduciary STAR Bi-Monthly Analysis
Topic 2 IQR Critical Box
Topic 3 Misuse TPR FY 2025
Topic 4 Training SharePoint Site
Topic 5 Hub Inquiries
Topic 6 Case Study

Fiduciary STAR Bi-Monthly Analysis

Presenter (Travis Jones, Analyst)

This is a review of the national accuracy reporting results of October 2024 and November 2024 from transactions completed in September 2024 and October 2024.

The national fiduciary accuracy continues to exceed the "Outstanding" target of 94 percent.

National Fiduciary Accuracy (Quality)	
October 2024	November 2024
95.5%	95.3%



Field Examination Reviews

There were six field examination errors in total. They were administrative and <u>non-critical</u>:

- <u>NFFEQR1b</u> with **one** instance of failure to follow procedures to schedules and/or reschedule a field examination for a beneficiary.
- <u>NFFEQR1c</u> with **one** instance of failure to follow procedures to schedule and/or reschedule a field examination for a fiduciary.
- <u>NFFEQR17a</u> with **one** instance of the beneficiary and fiduciary profiles not being updated with the most current information.
- NFFEQR17b with **one** instance of the Hub not establishing an appropriate task for future control actions, such as receipt for a properly titled account of surety bond.
- <u>NFFEQR17e</u> with **two** instances of not completing all documentation properly and uploading to the eFolder.

Field Examination Error Key Takeaways

- During the Field Exam process it is important to familiarize oneself with data gathering requirements regarding contact with the Fiduciary per FPM L2.C.1.e and when Face-to-Face interviews with a Fiduciary will not be conducted per FPM L2.C.1.g. Both references provide helpful hints for appropriate actions during these scenarios.
- Please remember to complete the VA Form 21P-555 at the time of the Initial Appointment Field Exam and to ensure the Fiduciary designation is selected on the form. Per FPM, I.2.E.1.d. hub personnel must enter the information gathered during the field examination process in the appropriate system or the appropriate form. If an error in this process occurs, the hub must complete an updated VA Form 21P-555 and select the appropriate Fiduciary Designation "VA-Appointed Fiduciary."
- When uploading a VA Form SF-1199a, please ensure that all three sections of the SF-1199a are completed to include the financial institution certification per FPM II.1.B.2.c If properly titled, enter the new payment account in Share. The document(s) used to verify a properly titled account must clearly have all required elements as outlined in FPM II.1.B.2.a. If any element is missing, an alternate allowable document containing all elements must be used. FPM II.1.B.2.a states that properly titled accounts are titled in the beneficiary's and fiduciary's names and note the existence of the fiduciary relationship; (beneficiary's name), by (fiduciary's name).

Accounting and Fund Usage Reviews

There were a combined 69 accounting and Fund Usage Review errors for the review period with a breakdown of 22 critical errors and 47 non-critical errors. The top two critical errors are listed below:

- NFAQR1a with **four** instances of the beginning and/or ending date of the next accounting period was not correct.
- NFAQR10a with **three** instances of the account balance was not appropriately reconciled prior to the accounting approval.

Accounting and Fund Usage Error Key Takeaways

- Always check the ending date of the last accounting approval letter prior to drafting the
 new accounting approval letter to prevent an overlap in the accounting period. Verify this
 information with the last bank statement and the accounting audit tool (AAT). Per FPM
 L.3.C.2.b, after identifying the accounting period start and end dates, the Legal Instrument
 Examiner must confirm that the required financial statements are of record for the entire
 accounting period. If an error in this process occurs, per FPM L.3.A.3.n, the hub must
 correct the accounting period diary dates and send a corrected accounting approval letter
 with the correct dates.
- When updating the AAT, please report the full amount of the VA monthly benefit payment and never round the numbers. Per FPM <u>I.3.C.3.d.</u> income must be input into the AAT to show the amount of VA compensation or pension income paid monthly, quarterly, semiannually, or annually. If an error in this process occurs, the hub must correct the VA income in the AAT and send a corrected letter. Remember always to verify the income and review SHARE and the bank statements.
- When completing a FUR review and you identify it is past due, please send a second FUR letter. Per FPM <u>I.6.B.1.b.</u>, fiduciaries must submit a completed fund usage report within 14 calendar days of the date of the past due notification.

References

M21-4 Chapter 8. Fiduciary Hub (Hub) National Quality Reviews

FPM I.2. Field Examinations

FPM I.3. Accounting

FPM I.6. Fund Usage Oversight

IQR Critical Box

Presenter (Kelly Hardy, Analyst)

M21-4, 8.12.c is very specific and states that when completing an IQR the Program Specialist should only uncheck the CRITICAL ERROR box within each question if the noted error is within 30 days of a manual change as noted in M21-4, 8.11.d. It is also noted that if a deficiency is found and it does not specifically fit into one of the specific questions or error descriptions, the deficiency will be recorded as a non-critical error (a comment) and will not count against the employee. Absent either of these two scenarios, the error is critical.

In some situations, mitigation of a cited error may be appropriated as noted in M21-4, 8.12.i. Acceptable reasons for mitigation of an error include errors cited:

- during an applicable grace period, or
- while an employee is in a training status during which errors are not to be counted against the employee's performance.

References

M21-4 Chapter 8. Fiduciary Hub (Hub) National Quality Reviews

Misuse TPR FY 2025

Presenter (Nicole Weatherall, Analyst)

Pension and Fiduciary Service (P&F) conducted a Targeted Program Review (TPR) as a followup to the Misuse Special Focused Review completed on May 23, 2024. A sample of Misuse Determinations was reviewed from August 5, 2024, through October 20, 2024, to assess the accuracy of the misuse process and to identify trends, training needs, and opportunities for process and procedural improvements.

The review showed the following.

- 34 of 58 cases (59%) required an Additional Action Memorandum (AAM)
- 23 of the 34 AAMs placed a Hold on completion of the Negligence Determination (ND)
- 15% Reduction #AAM's placed an ND on Hold as compared from the SFR (83%) to TPR (68%)

Improvements can be attributed to P&F sharing the results of the previous SFR with the field, increasing awareness of this issue during a Fiduciary Quality Call, and including misuse discussions during site visits.

An updated misuse calculator to improve the quality and consistency of the misuse amount calculation was released in November 2024.

References

Pension and Fiduciary (P&F) Service Intranet Link

Training SharePoint Site

Presenter (Christina Hanson, Analyst)

The Training Team developed a new SharePoint site. A demonstration was provided showing its features and functionalities. The demonstration is available on the call recording.

Hub Inquiries

Presenter (Kelly Hardy, Analyst)

We appreciate all the inquiries that were recently submitted and are providing the responses below. For some of the inquiries we are seeking clarification and will provide a response in a future bulletin.

Question: Is it possible to have P&F Quality and Training Staff to train the Hub Program Specialists on FPM changes and coordinate quarterly Q&A meetings to discuss implementation information/changes?

P&F Response: Yes, the bi-monthly Fiduciary Quality Calls are designed to address FPM changes and discuss implementation information. Quality & Oversight team analysts, and other P&F team analysts present topics on quality issues, FPM changes and other changes which directly impact quality, as well as topics submitted from the field. For specific topic suggestions and/or change implementation questions you would like addressed in an upcoming quality call, please reply to the agenda topic solicitation email sent prior to the call, email the Quality and Oversight mailbox, or send through the P&F Field Inquiry Tool (FIT).

Question: Is it possible to have P&F Quality and Training Staff to train the Hub Program Specialists on error review/errors called for the Hub (best practices)?

P&F Response: Training on error review and citation best practices are best suited to be delivered at the hub level. Hubs utilize a series of checklists that outline potential errors when conducting quality reviews. Individual Quality Reviews (IQR) are task based to determine an individual's quality. Systematic Technical Accuracy Reviews (STAR) are the national method process which require a comprehensive review and analysis of all elements associated with a specific claim. Both checklists measure fiduciary program quality but because they are different, hubs are best supported and served through IQR best practices training at the local Fiduciary Hub level.

Question: Is it possible to have P&F Quality and Training Staff to provide shadowing opportunities in reference to STAR checklist reviews?

P&F Response: P&F has recently implemented case studies in the bi-monthly Fiduciary Quality Calls. These are designed to give an in depth look at how STARs are conducted. Case studies will demonstrate the processes and systems used in identifying errors and show how manual references support errors cited. However, we will take this suggestion under advisement for a future program or enhancement to our process.

References

M21-4 Chapter 3. National Quality Reviews
M21-4 Chapter 8. Fiduciary Hub (Hub) National Quality Reviews

Case Study

Presenter (Stephanie Means, Analyst)

A case study was presented on a NFACQR 290FURFID where a NFAQR21c error was cited. The full case study is available on the call recording

TMS Courses and Quality Call Bulletins

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 P&F Quality and Oversight mailbox at PFTNGQUALOVRST.VBACO@va.gov. For specific policy and procedures related topics, please send inquiries through the P&F Field Inquiry Tool (FIT).

Quality Call Bulletins can be found in TMS along with call recordings.

The next Quality Call is scheduled for February 18, 2025.

Helpful Tools

QMS Reporting Tool
Field Inquiry Tool (FIT)
Fiduciary Quality Accuracy Reporting Tool