

# Pension and Fiduciary (P&F) Service

## Pension Quality Call

Date: May 19, 2022

TMS: # VA 4626272

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### AGENDA TOPICS

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- [ITEM 1: PMC STAR QUALITY ANALYSIS](#)
- [ITEM 2: SPECIAL FOCUSED REVIEWS \(SFRs\)](#)
- [ITEM 3: FIELD REMINDERS](#)
- [CLOSING, QUESTIONS, NEXT QUALITY CALL](#)

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### AGENDA ITEMS

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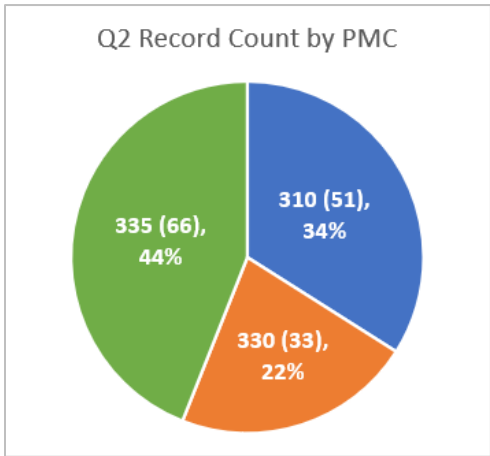
**Agenda item:** PMC STAR Quality Analysis

**Presenter:** Jennifer Kunkel, Analyst

**Target Audience:**  
QRT and Management

**Discussion:**  
A trend analysis was conducted regarding errors cited on National Pension Quality Reviews completed for the Second Quarter of the fiscal year (FY) 2022.

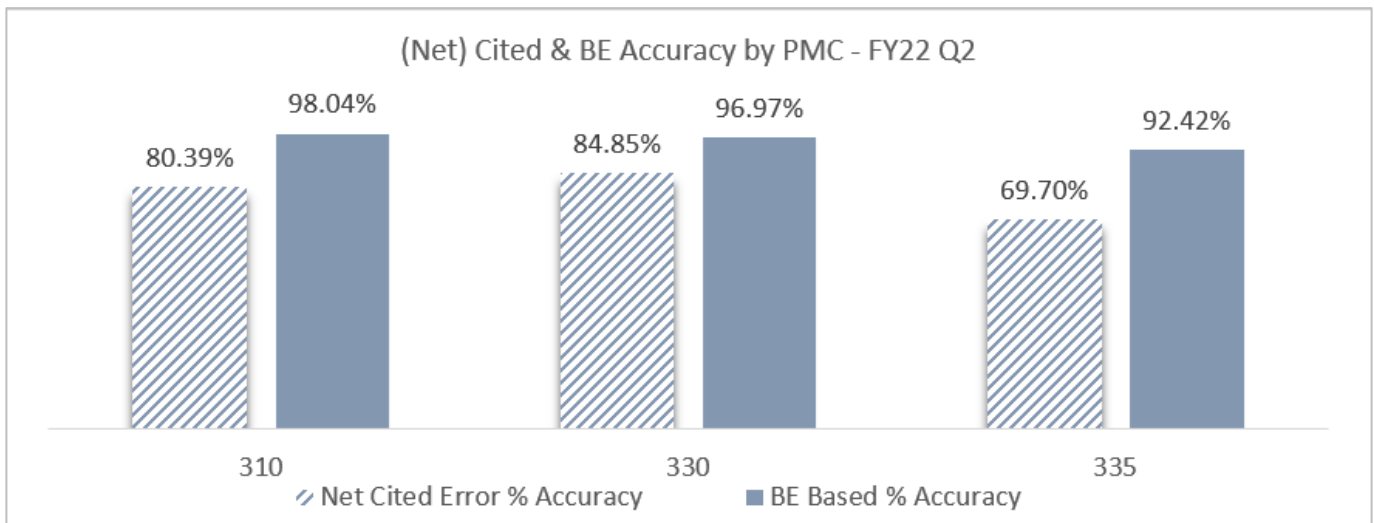
The chart below shows a breakdown of the number of National STAR Quality Reviews completed February 2022 through April 2022 (transactions completed between January 1, 2022, through March 31, 2022).



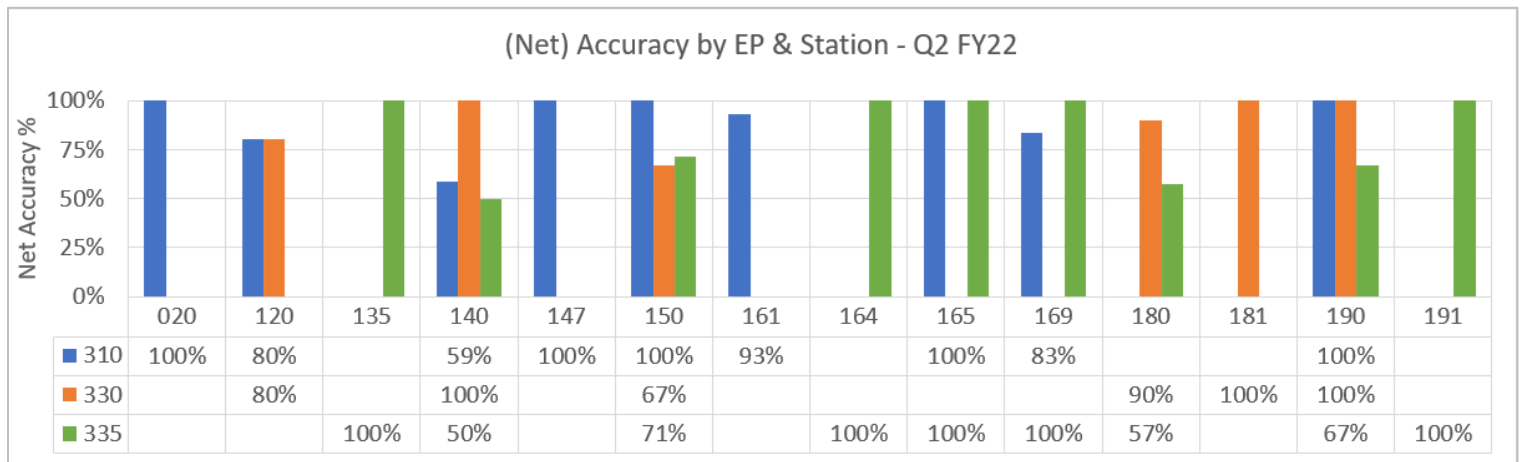
P&F Service reviewed 93 Authorization (non-rating claims) and 57 rating claims, totaling 150 claims in the second quarter.

Station	Review Category	Total # of Claims Reviewed	Total # of Errors Cited	# of BE Errors Cited
310	Non-Rating (Authorization)	27	2	1
	Rating	24	8	0
	<b>Station Total</b>	<b>51</b>	<b>10</b>	<b>1</b>
330	Non-Rating (Authorization)	9	2	1
	Rating	24	3	0
	<b>Station Total</b>	<b>33</b>	<b>5</b>	<b>1</b>
335	Non-Rating (Authorization)	57	16	4
	Rating	9	4	1
	<b>Station Total</b>	<b>66</b>	<b>20</b>	<b>5</b>
	<b>Total</b>	<b>150</b>	<b>35</b>	<b>7</b>

Of the 35 cited errors, no errors were overturned.



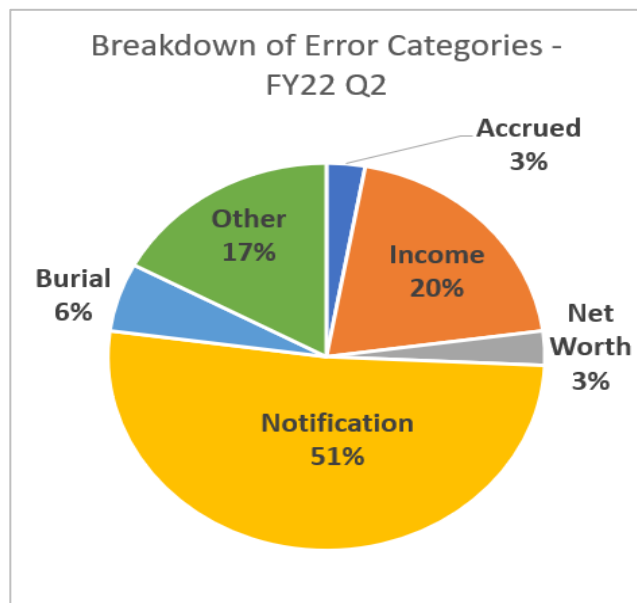
The BE Based Accuracy % (solid blue column) is used to determine STAR quality accuracy. The stripe column is the Net Cited Accuracy, an overall metric comprised of BE, non-BE, and overturned errors.



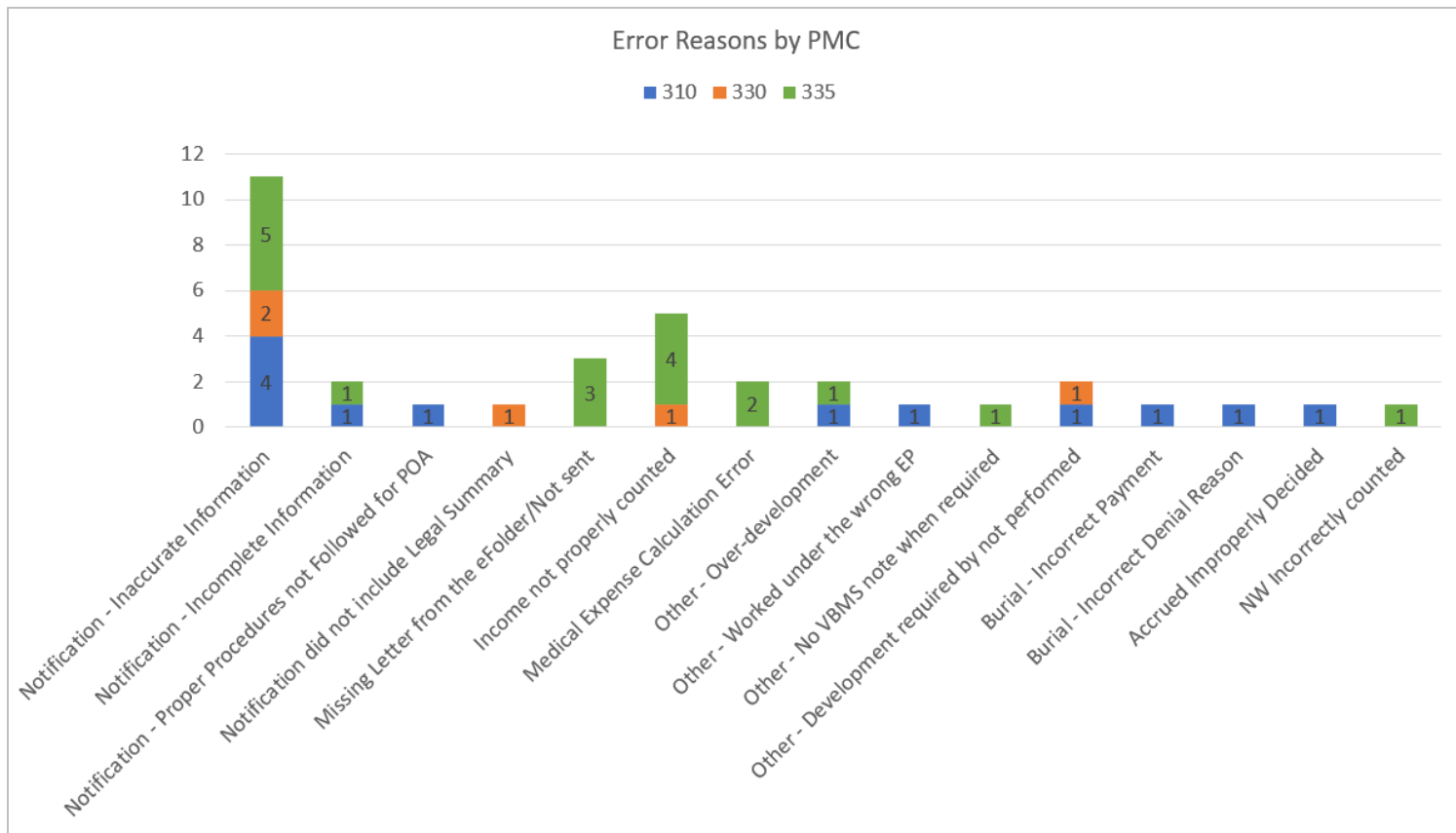
The chart above shows the strengths of each station with the net accuracy of the EPs worked.

The 35 errors cited in Quarter 2 were noted within the following categories:

- Notification
- Income
- Other (procedural)
- Burial
- Net Worth
- Accrued



The graph below details the errors broken out by category/reasons and station.



**References/Contacts**

✓ STAR Reports

[https://vbaw.vba.va.gov/bl/21/star/reports/star\\_rpts20.htm](https://vbaw.vba.va.gov/bl/21/star/reports/star_rpts20.htm)

**Agenda item:** Special Focused Reviews (SFRs)

**Presenter:** Julieann Brantseg, Analyst

**Target Audience:**

QRT and Management

**Discussion:**

Completed Special Focused Reviews (SFRs):

- Upfront Verification of Income using Federal Tax Information (FTI) SFR had a 91.1 percent accuracy rate.
  - Most errors were associated with counting FTI. The PMCs failed to count the higher FTI.
  - All claims were properly marked and filed as FTI documents.
- FTI lookback SFR had a 91 percent accuracy rate.
  - Errors were associated with clearing the EP when award action or due process was needed and releasing unnecessary due process.

- All claims were properly marked and filed as FTI documents.
- BWN/Nehmer SFR had a 70 percent accuracy rate.
  - The majority of errors continue to be related to burial benefits
- GPO Printing Delay SFR had a 97.1 percent accuracy rate.
  - All errors were related to claim action taken prior to the end of the extension period.
- SC Death Rating Review SFR had a 96.5 percent rating accuracy rate and a 57.8 percent authorization accuracy rate.
  - The rating errors were related to medical opinions.
  - The authorization errors were related to notification, development, and eligibility issues.

Pending SFRs:

- PMC Individual Quality Review (IQR) SFR is reviewing random local IQRs for accuracy.
- Service verification (AR13) SFR is reviewing service verification based on changes to 38 CFR 3.203

Future SFR:

- PIES O99 (overdevelopment)

The individual case reviews and errors for the following SFRs were recorded in QMS using the noted Review Type:

SFR	Review Type
Upfront Verification of Income FTI	NPFTISFR
FTI Lookback	NPFTISFR
DIC/Burial Rating	NPDIC310SFR
BWN/Nehmer	P687SFR

The GPO Printing Delay SFR was not completed in QMS.

**Agenda item:** Field Reminders

**Presenter:** Michael Domzalski,  
Analyst

**Target Audience:**

QRT and Management

**Discussion:**

As a reminder, all administrative errors over \$25K and Character of Discharge denials must come to P&F Service’s Training, Quality and Oversight mailbox for review. We have noticed

some recurring issues with the submissions and wanted to take this opportunity to provide a few reminders and ask for a close review of the submissions before they are sent to P&F Service.

For Administrative Errors:

- All errors must include a discussion of what happened, what should have happened, and why it is an error. It also must include the dates of the overpayment and why those are the applicable dates.
- Be sure the appropriate signatures are applied. PMCM, APMCM, or designee is required to sign. If a coach is signing it, it must clearly indicate that they are serving as the designee.
- Please include a discussion about the awareness of the error by the claimant. If they knew they were being improperly paid, then it may not allow us to avoid creating the overpayment. The waiver process may be the appropriate recourse.
- If the overpayment has already been created, we cannot review the error under our review process. We are not allowed to authorize a known improper payment, even if it is to waive an overpayment of a debt that could have been eligible for a waiver under the P&F Service review process.

For Character of Discharge Administrative Decision:

- The manual contains a template for the decision under M21-1, Part X, Subpart iv, 1.A.1.I. COD Determination Template
- A statement regarding sanity is required in every administrative decision
- M21-1, Part X, Subpart iv, 1.A.1.I. COD Determination Template
- Be sure to clarify if there is a statutory or regulatory bar to benefits
  - Explain which bar applies and why

For both types of submissions:

- Please review for overall formatting. We frequently receive documents using several different fonts.
- Be sure to accurately list all related evidence. Please do not list only the last award action.

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### *Closing Comments*

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#### **P&F Service 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](mailto:PFTNGQUALOVRST.VBACO@va.gov). For specific policy and procedures related topics, please email the Policy and Procedures mailbox at [PFPOLPROC.VBACO@va.gov](mailto:PFPOLPROC.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](https://vbaw.vba.va.gov/PENSIONANDFIDUCIARY/Quality_Call_Bulletins.asp). The next Quality Call is tentatively scheduled for July 2022.

## 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, which will include the TMS #.

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### *Post-Call Follow Up*

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#### Quality Call Recording:

A recording of the May 2022 Pension Quality Call can be found here (open in Chrome): [Watch 'P&F Service Pension Quality Call - May 2022' | Microsoft Stream](#)

#### TMS Course:

Available content from the Quality Call (bulletin, recording, etc.) will be available in TMS. The TMS # for the May 2022 Pension and Fiduciary Quality Call is VA 4626272 (Pension and Fiduciary Service Quality Call – May 2022)

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

#### Questions & Answers:

##### Question 1: St. Paul PMC

Should the private POA's address on the OGC accreditation list always be used over any other address of record?

Regarding the address used for private POAs, M21-1 I.i.2.B.1.d. directs claims processors to "check the default address against the OGC accreditation list to ensure the address is current." There are sometimes as many as three addresses in play. A representative's mailing address in the carbon copy (cc) line of correspondence is sometimes derived from a recent VA Form 21-22a that may or may not match the accreditation list and/or default address.

There have been some local quality errors called for using the address on VA Form 21-22a over the address listed in the online OGC directory.

##### P&F Service Response:

The address listed on the OGC accreditation list should always be used for a private attorney or agent over any other address of record. As mentioned in the inquiry, [M21-1 I.i.2.B.1.d](#) explains

that it is the responsibility of the claims processor to check the default address against the OGC accreditation list to ensure the address of the private attorney or agent is current. Furthermore, step 2 within the step-action table in [M21-1 I.i.2.B.1.h.](#) explains how to edit and update an address for a representative, following confirmation with the OGC accreditation list, when adding a private attorney or agent to a VBMS generated letter.

Additionally, a review of the Search Tips listed on the [OGC Accreditation Search website](#) indicates that the data linked to the search criteria refreshes every Monday, Wednesday, and Friday evening. Based on this information, the OGC accreditation list includes the most up-to-date address information for all accredited attorneys, agents, and Veteran Service Organizations and should be utilized when determining the appropriate address to use for an accredited representative.

### Question 2: St. Paul PMC

We request clarification on whether the PMCs are required to reissue due process (DP) letters since the batch COLA DP letters did not list proposed rates to claimants in receipt of Pension and/or Parents DIC. M21-1.X.ii.3.A.2.b states the DP letter must provide proposed rates for each rate change for all affected periods of entitlement. It is important to note this section of the manual was updated in February 2022 to state DP letters related to the annual Social Security Administration COLA “must include the proposed rate change information” even if they are part of a batch process. M21-1.X.ii.3.A.2.b, however, conflicts with the attached guidance we received from P&F on April 20, 2022. In that attached guidance P&F specifically stated to not reissue the DP letter even though the automated COLA DP letter did not list proposed rates, but that seems to be in direct conflict with M21-1. Are there plans to update M21-1.X.ii.3.A.2.b to remove the language highlighted in yellow in the below snip of the manual? Currently the attached P&F guidance seems to direct AQRS to disregard the current manual guidance when completing local quality reviews, leaving these reviews open to reversals on appeal, AQRS errors during IQR quality reviews, and potentially STAR errors. If a manual update is not foreseeable, we request further clarification to specify under what context(s) a DP letter is considered “correct” with or without the proposed rate change information.

### P&F Service Response:

This issue is under review with P&F Service leadership. We will provide a response when it is available.