



Pension and Fiduciary (P&F) Service

Pension Quality Call

Date: January 26, 2023

TMS: # VA 4640476

AGENDA TOPICS

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AGENDA ITEMS

Agenda item: STAR Error Trends

Presenter: Jennifer Kunkel, Analyst

Target Audience:
QRT and Management

Discussion:

A trend analysis was conducted regarding errors cited on National STAR Pension Quality Reviews completed between the months of November 2022 and December 2022 (transactions completed between **October 1, 2022 through November 30, 2022**). STAR reviews are performed the following month after a claim is completed.

Review Month	Review Category	Total Reviewed	Total Claims in Error	Number of Errors Cited	BE Errors Cited	Non-BE Errors Cited	BE Accuracy %	Recons Received
Nov	Authorization	31	11	14	2*	12	96.77%	1
	Rating	19	6	8	1	7	94.74%	0
	Total	50	17	22	3	19		1
Dec	Authorization	31	7	7	1	6	93.55%	0
	Rating	19	5	10	1	9	94.74%	0
	Total	50	12	17	2	15		0

* National STAR accuracy is claim based; therefore, although there were 3 Authorization benefit entitlement (BE) errors cited in November, only 2 errors were captured. One of the claims had 2 BE errors.

Out of a total of **100** claims reviewed for quality **29** claims had a total of **39** errors cited. Of the 39 errors, 1 non-BE error was overturned in response to a reconsideration (recon), resulting in **38 errors (6 were BE errors, 32 were Non-BE errors)**.

The 38 errors were found in the following categories:

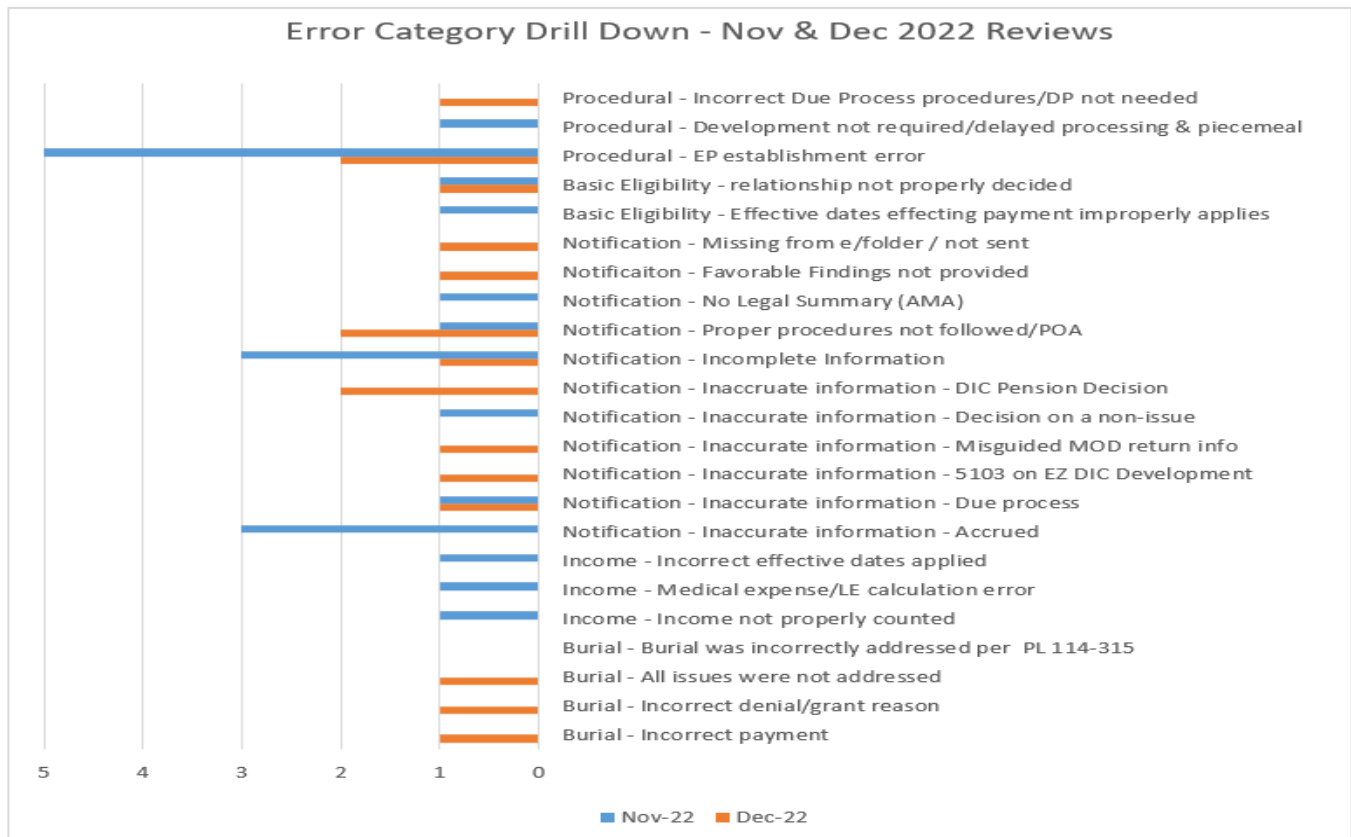
November:

BE	Non-BE
<ul style="list-style-type: none"> • 1 – Basic Eligibility • 3 – Income 	<ul style="list-style-type: none"> • 10 – Notification • 1 – Basic Eligibility • 6 – Procedural

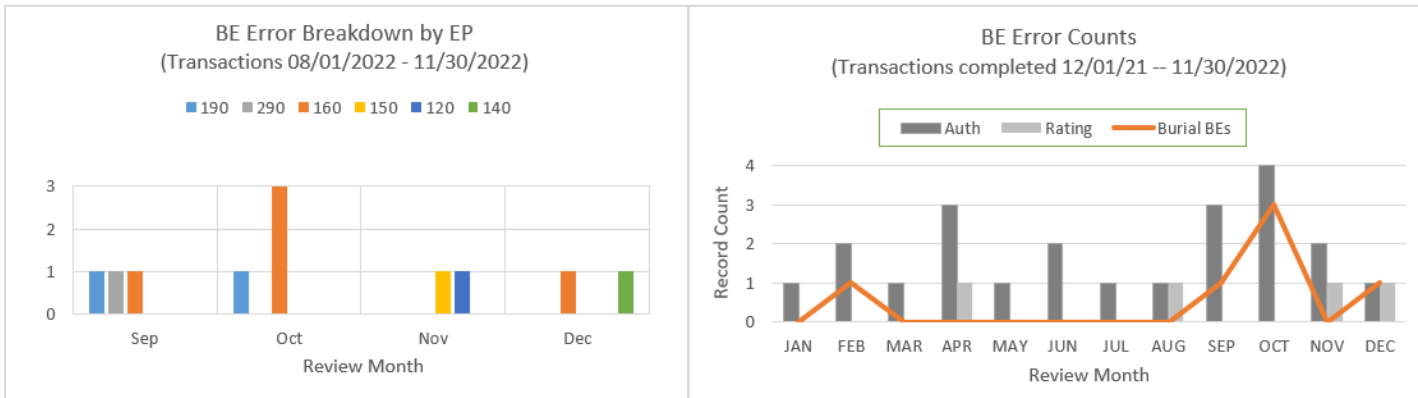
December:

BE	Non-BE
<ul style="list-style-type: none"> • 1 – Burial • 1 – Basic Eligibility 	<ul style="list-style-type: none"> • 2 – Burial • 10 – Notification • 3 – Procedural

The *Error Category Drill Down* graph below details the errors broken out by category/reasons.



Over the last four review months (September through December), the majority of the errors were Burial BE errors. An analysis showed that transportation charges were incorrectly applied, claimed issues were missed/incorrectly decided, incorrect payment in spite of evidence of expenses not being incurred and paying an improper claimant were noted as the root causes of the errors.



Sample error: Transportation benefits were granted although the claimant did not incur the expenses. The executor of estate submitted an application without checking the transportation box for incurring expenses. They also submitted a funeral bill showing the breakdown of the expenses; however, the bill did not show the executor listed as either responsible for the expenses or having paid the expenses.

Claims processors are encouraged to confirm whether burial expenses are noted as incurred on the application and determine if the transportation evidence matches what’s reported on the application. Please be sure to follow the notes provided in [M21-1 XI.iii.1.B.6.c.](#) regarding the amount of transportation expenses claimed on the application versus the amount verified by a receipt. VA can reimburse for expenses incurred and verified by the statement. Statements or receipts do not have to show paid in full, only what expenses were incurred by the claimant.

References/Contacts

- ✓ STAR Reports https://vbaw.vba.va.gov/bl/21/star/reports/star_rpts20.htm
- ✓ Pension STAR Dashboard | [Salesforce](#)

Agenda item: Updated IQR Recon Process

Presenter: Jennifer Kunkel, Analyst

Target Audience:
QRT and Management

Discussion:

In November 2022, OFO released information regarding changes that standardized individual quality review (IQR) recon process that went into effective December 5, 2022. Currently, this does not affect PMCs.

Target Audience:
QRT and Management

Discussion:

Philadelphia PMC Inquiry: We recognize that a 534EZ is a claim for DIC, Survivor Pension and Accrued, but we are struggling with understanding the necessity of addressing Survivor Pension with great detail when DIC is granted. It seems that only a very small fraction of claimants would want to receive Survivor Pension in lieu of DIC. Aside from when a \$90 Survivor Pension grant would be warranted, surely a tiny fraction of DIC claims awarded would rather receive a lower benefit (especially now that the DIC/SBP offset is fully ended).

We have received errors for stating that “We did not make a decision on your claim for survivor pension because we granted DIC” instead of stating that “We did not consider your claim for survivor pension because it was incomplete.” We have also received errors for not fully explaining that Pension would not be payable on account of excess income, or incomplete income information, where DIC is granted.

While amended letters have been sent, we would feel a discussion is warranted as to the necessity of this and how automation handles these cases. Though we do not see most automation decisions, it seems the majority do not provide the level of detail for Survivor Pension in DIC grants that we are being asked to make. Automation typically simply states Survivor Pension was not evaluated in DIC grants (regardless of what was completed on the application). We have not seen errors cited on automation SFR or automation STAR for this reason. Does automation offramp all DIC grants where income statements are provided?

The manual references cited tend to be general notification requirement references which speak to the requirement that decisions are explained fully and completely. The decision that Pension was not further considered on account of a DIC grant seems to meet that requirement, in our opinion.

The claimant has appeal rights where they could simply request a review option outlined on the 20-0998 (while continuing to receive DIC), if they do in fact want VA to further explain Pension because they want to elect a lesser (or denied) benefit. We would also note that in cases where an income statement is provided by the claimant on a 534EZ (where DIC is granted), many are not fully complete (and not further developed due to the grant of DIC). Providing a detailed explanation regarding excess income based on partial/incomplete information, maybe be as incorrect (or more so), as explaining to the claimant that Pension was simply not considered on account of the DIC grant.

P&F Service Response: We are currently working on this issue and will provide a response once it is finalized.

Milwaukee PMC Inquiry: Regarding the email “Updates to Alternate Signer Procedures” dated 01/06/2023:

1. Will there need to be evidence to show that the claimant cannot sign on their own?

Example: If a claimant cannot sign on their own due to physical limitation or mental incapacity, will there be a need to have supporting evidence to show that? It would seem

that with the alternate signer certification section taken from the July 2022 version of the [VA Form 21P-534EZ, Application for DIC, Survivors Pension, and/or Accrued Benefits](#) (shown in the email from 01/06/2023) that supporting evidence would not be required. However, we would like confirmation.

2. Our current understanding of the VA Form 21-0972, Alternate Signer Certification, is that the 0972 does not allow VSRs to call the alternate signer directly to obtain missing information, i.e. we still need to obtain the claimant's verbal permission after performing the ID protocol. Is this understanding correct? Will there be any changes to procedures allowing for us to call the alternate signer directly? We ask this due to the change mentioned in the email: "An alternate signer may now submit subsequent evidence in support of a **pending** claim."
3. Will there be any updates with guidance on which forms alternate signers may or may not sign? With the amount of forms listed on the 0972, it may be beneficial to have guidance on which forms the alternate signer cannot sign. For example, there have been questions on whether the alternate signer can sign the VA Form 21-22/a and VA Form 21-0845.

P&F Service Response:

1. Additional evidence is not necessarily required. As provided within the M21-1 guidance, when an alternate signer certifies or represents that he or she is an appropriate signer under the criteria set forth in [38 U.S.C. 5101](#), VA will generally accept the alternate signature in the absence of discrepant information.
2. Yes, that understanding is correct that telephone contact may not be used for an alternate signer. In order to ensure the security of claimants' information and to comply with release of information laws and regulations, the alternate signer certification is limited to written correspondence. At this time, there is no anticipated change in procedure to allow for telephone development without a valid [VA Form 21-0845, Authorization to Disclose Personal Information to a Third Party](#).
3. Certain forms have special legal or regulatory requirements which specify who may sign on behalf of a beneficiary. As it would not be feasible to specify every single form which has unique requirements, the updated M21-1 provides general instructions on this issue while including an example involving the VA Form 21-22a.

Agenda item: PACT Act Updates

Presenter: Shannon Hunsicker,
Analyst

Target Audience:
QRT and Management

Discussion:

The following PACT Act Updates were made since our last call in November:

- The [P&F PACT Act Intranet site](#) went live on December 5th
- An engagement session was held on December 21st with follow up Q&A released on December 30th
- A successful Live Chat was hosted from January 1st through January 20th
- P&F Service will conduct a special focused review beginning March 1st for claims processed in January and February
- P&F Service Quality Team is conducting spot checks on 10 claims per week

- Office of Field Operations (OFO) extended the quality 30-day grace period through April 1, 2023 for local IQR and STAR errors identified based on PACT Act guidance

Agenda item: PACT Act Inquiries

Presenter: Shannon Hunsicker,
Analyst

Target Audience:
QRT and Management

Discussion:

All inquiries from the live chat that took place January 1st through January 20th will be captured on a document and uploaded to the [P&F PACT Act Intranet site](#) in the near future. As a reminder, please submit PACT Act inquiries via the [P&F Service Field Inquiry Tool \(FIT\)](#).

Closing Comments

P&F Quality Call Topics:

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 send inquiries through the [P&F Service Field Inquiry Tool \(FIT\)](#).

Quality Call Bulletins

Quality Call Bulletins can be found within TMS along with call recordings. Once the monthly bulletin is finalized, information will be sent to the PMCs and Fiduciary Hubs which will include the TMS #.

The next Quality Call is tentatively scheduled for March 2023.