

Pension and Fiduciary Service (P&F)

Pension Quality Call

Date: September 27, 2023

TMS: VA 4649900

AGENDA TOPICS

ITEM 1: STAR ERROR TRENDS
ITEM 2: PACT ACT UPDATES

ITEM 3: SAFEGUARDING FTI MANUAL UPDATES

ITEM 4: PRELIMINARY SPECIAL FOCUS REVIEW RESULTS

CLOSING, QUESTIONS, NEXT QUALITY CALL

AGENDA ITEMS

Agenda item: STAR Error Trends Presenter: Jennifer Kunkel,

Analyst

Target Audience:QRT and Management

Discussion:

The overall sample size for this fiscal year is 38 reviews per month. Samples are calculated based on an average performance from the past 2 years.

A trend analysis was conducted regarding errors cited on National STAR Pension Quality Reviews completed between the months of **July 2023 and August 2023** (transactions completed between June 1, 2023, through July 31, 2023). STAR reviews are performed the month after a claim is completed.

Review Month	Review Category	Total Reviewed	# Claims in Error	BE Errors	Total # of Errors	Recons Submitted	BE Accuracy %
July	Authorization	24	5	0	6	0	100%
	Rating	14	5	1	6	2	92.86%
	Total	38	10	1	12	2	
August	Authorization	24	3	0	3	2	100%
	Rating	14	2	0	3	0	100%
	Total	38	5	0	6	2	

4 reconsiderations (recons) were submitted:

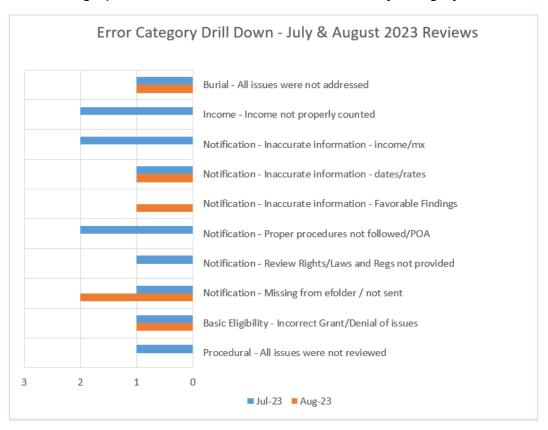
Mitigated	Overturned	Upheld
1 (BE)	2 (non-BE)	1 (non-BE)

Out of a total of **76** claims reviewed for quality, 15 claims had a total of **18** errors cited; **1** of those claims had a BE error.

The 18 errors were within the following categories:

BE	Non-BE			
July				
• 1 – Income	7 – Notification			
	• 1 – Burial			
	• 1 – Income			
	 1 – Basic Eligibility 			
	• 1 – Procedural			
August				
None	4 – Notification			
	1 – Basic Eligibility			
	• 1 – Burial			

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



Notification continues to be the highest area of errors. Please remember to include all appropriate attachments and review all letters for accuracy before releasing.

The graph below shows accuracy progress over the last year The graph below shows accuracy over the last year 12-month review period of May 2022 through April 2023 (transactions between August 1, 2022, through July 31, 2023).



Although both rating and accuracy are still at the Outstanding level (94% or better), please be aware that additional BE errors may cause accuracy to decrease.

Sample Case: Recent reviews have showed increased instances of non-BE eligibility issues. This case study will look at an EP 180, non-BE error for denying the claim for the wrong reason. This claim will demonstrate how proper review of the claim could lead to correct decisions and timely processing.

References/Contacts

✓ STAR Reports

https://vbaw.vba.va.gov/bl/21/star/reports/star rpts20.htm

✓ Pension STAR

Dashboard

Pension STAR Dashboard | Salesforce

Agenda item: PACT Act Updates Presenter: Jennifer Kunkel,

Analyst

Target Audience:

QRT and Management

Discussion:

Recent Key-Releases and events:

- Updated PACT SOP (v3) released April 2023
- DIC TERA Memo Tool released May 11, 2023
- Quality Grace period ended May 31, 2023
- TERA Tool training June 1, 2023

- PACT Training was updated and released August 1, 2023
- Updated Special Issue guidance released August 21, 2023
- Updated supplemental (21-0995) guidance and PACT released September 1, 2023
- Updated PACT SOP (v4) released September 8, 2023

PACT SOP v4 has Major Updates for Survivor Claims

The PACT SOP, version 4, was released on September 8, 2023. This version had major updates in multiple sections for survivor claims processing.

For a full complete listing of updates, see the PACT SOP Version History on page 88.

Updated Procedural Guidance on Supplemental Claims.

Procedural guidance was released to the field on September 1, 2023, regarding supplemental claims and PACT. In addition to previously provided guidance regarding written requests and requests submitted on a VA Form 21-P534EZ (with the appropriate box checked for an election), VA may also accept a properly completed, VA Form 20-0995 as another valid method to request reconsideration of a previously denied claim of DIC.

Therefore, when reviewing a VA Form 20-0995, there is no need for claimants to specifically indicate that they are requesting a reevaluation under the PACT Act. VA only requires that the claimant indicate that they are electing the reevaluation of a previously denied DIC claim. Please note, when a supplemental claim is received claims processors must ensure that the entries made on the form are complete and adhere to guidance in M21-1 II.iii.2.B.1.

PART II - ISSUE(S) FOR SUPPLEMENTAL CLAIM			
13. YOU MUST LIST EACH ISSUE DECIDED BY VA THAT YOU WOULD LIKE VA TO REVIEW AS PART OF YOUR SUPPLEMENTAL CLAIM. Please refer to your decision notice(s) for a list of adjudicated issues. For each issue, please identify the date of VA's decision. (You may attach additional sheets of paper, if necessary. Include your name and file number on each additional sheet.			
If you are responding to a Statement of the Case (SOC) or a Supplemental Statement of the Case (SSOC): By submitting this form, I agree to participate in the modernized review system for the following issues decided in a SOC or SSOC. I am withdrawing the eligible appeal issues listed in 13A in their entirety, and any associated hearing requests, from the legacy appeals system. I understand I cannot return to the legacy appeals system for the issue(s) withdrawn.			
13A. SPECIFIC ISSUE(S)	13B. DATE OF VA DECISION NOTICE (MM/DD/YYYY)		

Noted Improvements on Previously Identified PACT Error Trends:

P&F has noted improvements in quality demonstrating the success of field feedback and updated guidance.

PACT Special Focused Review (SFR):

All of the findings from the PACT SFR have been addressed with the release of the TERA memo tool on May 11, 2023, updated training released on August 1, 2023, Special Issue guidance released on August 21, 2023, and updates in the SOP (v4) released on September 8, 2023.

Please submit PACT related questions to P&F via the <u>Field Inquiry Tool</u> (FIT).

References/Contacts

✓ PMC Intranet Site PACT Act - Pension and Fiduciary Service (va.gov)

✓ Questions Field Inquiry Tool (FIT).

Agenda item: Safeguarding Federal Tax Information (FTI) **Presenter:** Shannon Hunsicker,

Manual Updates Analyst

Target Audience:

QRT and Management

Discussion:

The 2023 IRS Safeguarding FTI Audit came to a close on September 12, 2023. P&F thanks all those who have assisted with the audit.

Please note, the manual was updated to align with <u>IRS Publication 1075</u>. Specifically, <u>M21-1</u>, <u>Part XIV, Chapter 4, Section B - Federal Tax Information (FTI) Match: Safeguarding (XIV.4.B)</u> was updated regarding minimum protection standards, tailgating or piggybacking, inspection of security procedures, reporting destroyed FTI, prohibition of releasing FTI by fax, and e-mailing FTI.

If there are any questions or concerns regarding the safeguarding of FTI, please email the P&F Quality mailbox at PFTNGQUALOVRST.VBACO@va.gov.

Agenda item: SFR Results Presenter: Michael Domzalski,

Analyst

Target Audience:

QRT and Management

Discussion:

P&F Q&O Staff conducted an SFR of the upfront verification of income using FTI to verify that FTI is properly and accurately used and that documents containing FTI are properly secured.

P&F reviewed a random sample of 90 claims completed by the Pension Management Centers (PMCs) from March 1, 2023, through May 31, 2023. We reviewed EP 180s and 190s. No errors were found regarding the review, use, or counting of FTI resulting in an accuracy rate of 100 percent. This is a 9.8 percent improvement from the 91.11 percent accuracy shown in the June 14, 2022, SFR.

P&F found no failures to secure and safeguard FTI within the PMCs.

Please refer to Attachments A and B for the final SFRs for End Product (EP) 930 Corrections and PIES O99 Requests.

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

<u>PFTNGQUALOVRST.VBACO@va.gov</u>. 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 November 2023.

Special Focus Review Report Pension and Fiduciary Service End Product 930 Corrections

STATEMENT OF PURPOSE

- Pension and Fiduciary (P&F) Service Quality and Oversight (Q&O) Staff conducted a Special Focused Review (SFR) of End Product (EP) 930 corrections to provide further analysis on the corrections of previous erroneous actions completed by the Pension Management Centers (PMCs).
- The desired outcome is to identify the root cause of field corrections.

METHODOLOGY

- P&F Service conducted an SFR from May 1, 2023 through May 31, 2023 of EP 930 corrections completed in fiscal year (FY) 2022.
- In FY 2022, the PMCs completed 421,217 EPs. Of those completed EPs, 10,605 (2.52%) were EP 930's. The Office of Performance Analysis & Integrity (PA&I) provided a random sample of 45 cases involving field corrections completed in FY 2022.
 - Data provided for this SFR included EP 930's for both payee 00 and 10 in closed claim status.
- An analyst from the P&F Service Q&O team conducted the case reviews.
- The reviewed claims were analyzed based on a quality review checklist created specifically for this SFR (see attachment).



SUMMARY OF FINDINGS

The 45 reviewed cases required the EP 930, and proper corrective actions were taken to address previous erroneous actions. A breakdown of the original EP that resulted in the need to establish an EP 930 correction is shown below.

Original EP	Number of Claims Requiring EP 930 Correction	Percentage of Total Corrections	
EP 140 & 190	23	51.10%	
Other EP (020,040,130,150,600)	14	31.10%	
EP 160 & 165	6	13.30%	
EP 180	2	4.40%	
Total	45		

The following chart shows the stage where errors were made in the original EP that required an EP 930 correction.

Error Stage of Original EP	Number of Claims Requiring EP 930 Correction	Percentage of Total Corrections	
Decision	13	28.90%	
Notification	15	33.30%	
Multiple (Decision & Notification)	6	13.30%	
Other (System Correction)	11	24.40%	
Total	45		

Error Breakdown:

- In 15 cases, inaccurate notification letters resulted in an EP 930 correction. In most cases the
 notification letters failed to provide complete decision notice requirements as listed under M21-1
 VI.i.1.B.1.b.
- In ten cases, incorrect calculation of income or medical expenses resulted in an EP 930.
- In four cases, an EP 930 was established to correct an error from an automation claim.
- In three cases, a correction to an effective date resulted in an EP 930.
- The remaining 16 cases involved a variety of issues that required correction. Examples include:
 - Fixing dependent payee code(s)
 - Correcting language in Rating Decision(s)
 - Duplicate payment(s) Veteran married to Veteran
 - Paying additional Month of Death Benefit(s) based on Board of Veterans' Appeals Decision(s)

Root Cause Analysis:

- Inaccurate notification letters continue to be a high category for errors. This is a known issue.
- No other systematic trends were observed.

Since the root causes are well established, no future SFR is needed.

<u>RECOMMENDATIONS</u>

- 1. Share the SFR findings during the next available P&F Service Q&O quality call. Target completion date is July 31, 2023.
 - o Topics to be covered:
 - Notification letters require all elements listed under M21-1 VI.i.1.B.1.b.
 - Confirmation that the correct payee code was used.
 - Verify correct income and medical expense calculation.
- 2. Refer the automation errors to the Pension Automation (PA) team. Target completion date is July 31, 2023.

The expected outcome of these recommendations is to improve the accuracy of claims processing. No additional approvals or collaboration outside of P&F Service are required to implement the recommendations.

ACTIONS TAKEN

- 1. Preliminary findings were shared with the PMCs on July 5, 2023.
- 2. Preliminary findings concerning the automaton errors were shared with PA Q&O on July 3, 2023.

Q3 FY 2023 Special Focus Review Report Pension and Fiduciary Service PIES 099

STATEMENT OF PURPOSE

- Pension and Fiduciary Service (P&F) conducted this Special Focus Review (SFR) in May
 of fiscal year (FY) 2023, to review PIES O99 requests submitted by the Pension
 Management Centers (PMC). P&F analyzed a sample of cases to determine process
 improvements and provide more timely claims decisions for Veterans and survivors
 through the elimination of over-development.
- Two previous PIES O99 SFRs were completed in response to the Over-Development Reduction Task Force:
 - March 1, 2022: Found 26.4% of claims reviewed properly used the PIES O99 request.
 - October 27, 2022: Found 70% of claims reviewed properly used the PIES O99 request.
- Although the results from the October 2022 SFR demonstrated a 165.2% improvement, the need for continued improvement was apparent, resulting in this recent review to measure the success of the mitigation efforts that were implemented after October 2022.
- For this SFR, P&F conducted case reviews between May 15-31, 2023, to ascertain whether claims processors properly used the PIES O99.
- The desired outcome is to show claims processing improvement, assess the effectiveness of remediation efforts to improve quality from previous SFRs, ensure compliance with established procedures, identify error trends to highlight opportunities to update or clarify procedures, and address additional training needs.

METHODOLOGY

- P&F conducted this SFR by reviewing 50 PIES O99 requests submitted between December 1, 2022, through February 28, 2023. The Office of Performance Analysis & Integrity (PA&I) pulled a random sample of requests submitted by the PMCs. Data provided for this SFR included the following end products (EP):
 - 020s and 140s, representing Dependency and Indemnity Compensation (DIC) claims;
 - o 160s, representing burial claims; and
 - o 180s and 190s, representing initial disability and survivor pension claims.
- The P&F Quality and Oversight (Q&O) team conducted the case reviews.
- Appendix A is a quality review checklist created specifically for this SFR and was used to analyze the sample of claims.

SUMMARY OF FINDINGS

Out of 50 claims reviewed, 40 claims reflected the proper use of a PIES O99 request, and 10 claims reflected a request made in error, resulting in an accuracy rate of 80%, a 14.3% improvement from the 70% accuracy shown in the October 27, 2022, SFR.

Station Accuracy

The below data provides a breakdown of requests submitted by station and identifies the PIES O99 requests submitted in error:

Station	Number of Requests Reviewed	PIES O99 Request Submitted in Error	Accuracy
310	47	9	80.90%
330	1	1	0%
335	1	0	100%
101	1	0	100%
Total	50	10	80%

The Philadelphia PMC was responsible for most of the PIES O99 requests as centralized processing of Burial and Dependency and Indemnity Compensation (DIC) claims took place beginning in August 2021.

Error Breakdown

- In eight cases, a PIES O99 was requested in error when the required service treatment records (STR) and personnel records were already uploaded to the Veterans Benefits Management System (VBMS). In most cases, the STRs were embedded within the Personnel Records or vice versa.
 - Users failed to perform a complete review of available records in VBMS and erroneously submitted follow-up PIES O99 requests for additional service records.
- In one case, the original PIES O50 request was not completed. A PIES O99 should only be used as a secondary request after the PIES O50 request is completed.
- In one case, evidence showed the records were Fire-Related.
 - The PIES O99 request was submitted in error. The procedures listed under M21-1 III.ii.2.F.1 should have been followed. If the claimant provides the Department of Veterans Affairs with a completed NA Form 13055, a PIES M05 is needed.

Additional Findings

Of the 10 errors, there were no instances where the Rating Veterans Service Representative (RVSR) erroneously instructed the Veterans Service Representative (VSR) to request additional service records. This is an improvement from the October 27, 2022, SFR, which showed one instance of the RVSR erroneously instructing the VSR to request additional service records.

To improve in this area, P&F shared the findings of the previous SFRs with the PMCs during a quality call. P&F also developed TMS Course *VA 4624831 Obtaining and Verifying Service Records for PMCs*. The course is mandated for all PMCs as part of the FY 2023 National Training Curriculum. *VA 4624831* is also part of the Pension Training Modernization efforts for FY 2023. It was published to TMS on January 6, 2023.

Root Cause Analysis

The findings show most errors occurred when a PIES O99 request was completed for service records already available in VBMS. Users failed to provide a complete review of available records in VBMS, resulting in an unneeded PIES O99 request which delayed claims processing. Question 12 of the National Pension Rating Quality Review Checklist addresses overdevelopment and can identify future errors (see appendix B).

Since continuous improvement has been shown in this subject area over the three SFRs between March 2022 and July 2023, no future SFR will be scheduled.

RECOMMENDATIONS

- 1. Discuss the SFR findings with the PMCs at the next quality call. Target completion date is September 30, 2023.
- 2. Share the SFR with the PMCs. Target completion date is August 31, 2023.

As there are no systemic issues causing these errors, continued field training and awareness are the best course of action to improve the accuracy of PIES requests and prevent overdevelopment. No additional approvals or collaboration outside of P&F are required to implement the recommendations.

ACTIONS TAKEN

Preliminary findings were shared with the PMCs on July 5, 2023.

Appendix A. Quality Review Checklist



Appendix B. National Pension Rating Quality Review Checklist

