



Pension and Fiduciary Service (P&F)

Pension Quality Call

Date: November 29, 2023

TMS: # VA 4652353

AGENDA TOPICS

- [ITEM 1: STAR ERROR TRENDS](#)
- [ITEM 2: PACT ACT UPDATES](#)
- [ITEM 3: PRELIMINARY SPECIAL FOCUS REVIEW RESULTS](#)
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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 **September 2023 and October 2023** (transactions completed between August 1, 2023, and September 30, 2023). STAR reviews are performed the following month after a claim is completed.

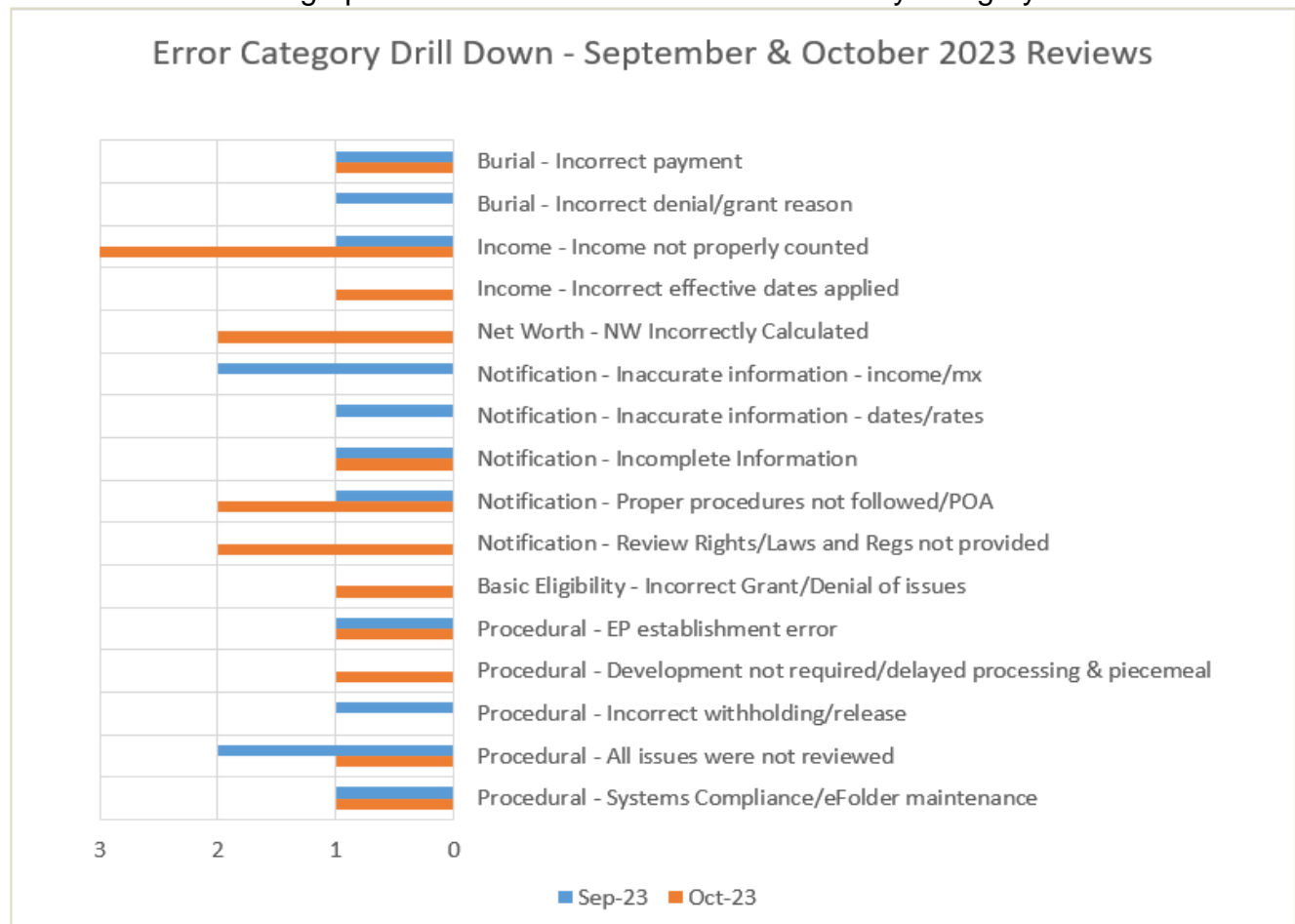
Review Month	Review Category	Total Reviewed	Total # of Errors	# Claims in Error	BE Errors	Recons Submitted	BE Accuracy %
Sept.	Authorization	24	6	5	1	0	95.83%
	Rating	14	7	5	0	0	100%
	Total	38	13	10	1	0	
Oct.	Authorization	24	7	5	0	0	100%
	Rating	14	10	8	2	2	85.71%
	Total	38	17	13	2	2	

As shown in the chart on the previous page, out of **76** claims reviewed for quality, **23** claims had a total of **30** errors cited, with **3** cited as BE errors.

The below chart provides a breakdown by category of the 30 errors cited in the months of September and October 2023.

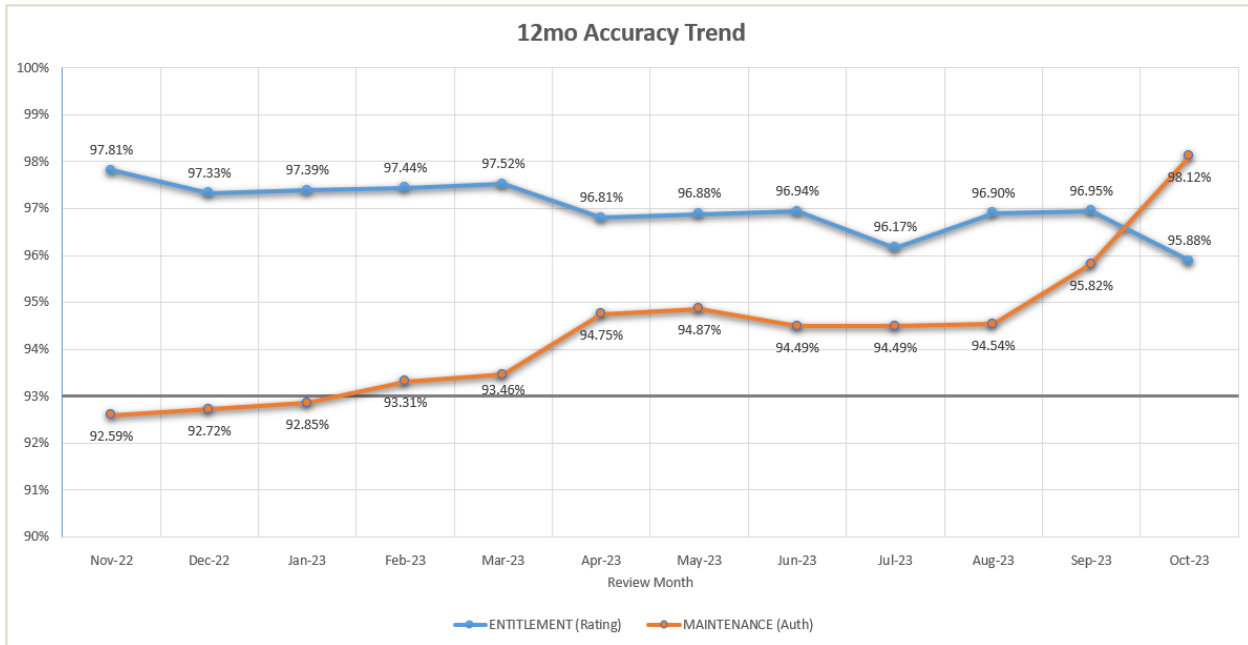
September		October	
BE	Non-BE	BE	Non-BE
<ul style="list-style-type: none"> • 1 – Burial 	<ul style="list-style-type: none"> • 5 – Notification • 1 – Burial • 1 – Income • 5 – Procedural 	<ul style="list-style-type: none"> • 1 – Income • 1 – Procedural 	<ul style="list-style-type: none"> • 1 – Burial • 3 – Income • 2 – Net Worth • 5 – Notification • 3 – Procedural • 1 – Basic Eligibility

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. These reviews showed an increase in income counting inaccuracies and procedural errors. Please remind your VSRs to be careful of income counting rules and effective dates when counting income.

During the latest 12-month review period of November 2022 through October 2023 (transactions between October 1, 2022, through September 30, 2023), the graph below shows accuracy over the last year.



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

Authorization quality has improved greatly over the last fiscal year. Great job, keep up the good work!

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:

- September 8, 2023 – SOP v4 released. Latest updates.
- November 21, 2023 - PACT SC Death special issue added to VBMS Core in anticipation of implementing a future VBMS-R special issue.

Questions regarding training courses should be directed to the Pension & Fiduciary Service Training Team, Policy questions should be directed to the Policy and Procedures team, case specific questions should be directed to Quality and Oversight via the [Field Inquiry Tool](#) (FIT).

New PACT Special Issue (SI):

On November 21, 2023, P&F released guidance advising claims processors about a new SI in VBMS. **PACT SC Death** SI has been added into VBMS Core in anticipation of implementing a future VBMS-R special issue for use by RVSRs. The SI in VBMS Core **should not** be used on PACT cases. Instead, please continue using “**PACT**” or “**PACT ACT DIC Reevaluation**”. The “**PACT**” and “**PACT ACT DIC Reevaluation**” special issues are used for tracking purposes and are required, as applicable, on all PACT cases. The **PACT SC Death** VBMS Core Special Issue is a placeholder until such a time that it is made available in VBMS-R; after a future system update it will be removed from VBMS Core.

For questions on the updated materials, please contact [VA/VBAWAS/CO/P&F POL & Proc.](#)

References/Contacts

- ✓ PMC Intranet Site [PACT Act - Pension and Fiduciary Service \(va.gov\)](#)
- ✓ Questions [Field Inquiry Tool](#) (FIT).

Agenda item: Preliminary Special Focus Review Results **Presenter:** Julieann Brantseg, Analyst

Target Audience: QRT and Management

Discussion:

P&F recently completed a Special Focus Review (SFR) on Deferrals. The SFR is pending final approval; however, P&F can informally share the results. This SFR was a follow up review based on a high deferral rate identified last year. This SFR reviewed the accuracy of deferrals to determine if the deferral was warranted and accurate. P&F looked at 110 deferrals on various EPs and found 4 errors for an accuracy rate of 96 percent. Two errors were found where the deferral returned the case to development for documents already of record in the eFolder. The other two errors found the deferral used the wrong deferral reasons in VBMS. Two cases required field correction and have been routed to the stations through QMS for corrective action. Once this SFR is approved, P&F will share the findings with the PMCs.

Please note, the Burial SFR discussed on the call was approved and is attached to this bulletin.

Agenda item: Automatically Establishing EP 590 **Presenter:** Glenda Russell, Analyst

Target Audience: QRT and Management

Discussion:

P&F received reports that in some situations the system does not always automatically establish an EP 590, Due Process for Incompetency after authorizing a rating EP with a rating decision proposing incompetency as noted in M21-1 Part X, Subpart ii, 6.D.2.b. This is a general reminder for authorizers to confirm that the system automatically generates the EP 590 after

authorizing a rating EP with a rating decision proposing incompetency. If the system does not automatically establish the EP 590, one should be manually established. NWQ will then transfer the EP 590 automatically to the hub of jurisdiction the following day.

Agenda item: SSA Income Match 1030 Reminders

Presenter: Rob Pomarico,
Analyst

Target Audience: QRT and Management

Discussion:

P&F has been reviewing the Social Security Administration (SSA) income match. We want to take this opportunity to remind PMCs to use the correct claim attributes when processing EPs and ensure that these are being reviewed as part of the local quality reviews.

Although the claims are currently on hold, per [M21-1 XIV.2.A.2.d](#), any EP 600 associated with the SSA income match should be established using the following attributes. **EP 600 PMC-SSA Match, with special issue *Upfront Verification***

P&F also noticed inconsistencies with Due Process letters associated with the SSA income match. Per [M21-1 X.ii.3.A.2](#), PMCs must list the rates and dates for all affected periods in the notice of proposed adverse action. Please ensure these are also being reviewed for local quality.

Below is an example of what the proposed rates and dates should look like in a notice of proposed adverse action.

Here's what we have paid you.	⇒ Starting December 1, 2018, \$1,127 per month	Here's how we'll change your benefits based on our current information.	⇒ Starting December 1, 2018, \$0 per month
	<i>then –</i>		<i>then –</i>
	Starting December 1, 2019, \$1,146 per month		Starting December 1, 2019, \$0 per month
	<i>then –</i>		<i>then –</i>
Starting December 1, 2020, \$1,160 per month	<i>then –</i>	Starting December 1, 2020, \$0 per month	<i>then –</i>
<i>then –</i>	Starting December 1, 2021, \$1,190 per month	Starting December 1, 2021, \$0 per month	<i>then –</i>

Any questions should be sent to the through the [P&F Field Inquiry Tool \(FIT\)](#).

Target Audience: QRT and Management

Discussion:

St. Paul PMC:

Question: Currently, batch processed EP 130s are established when both a Veteran and a non-Veteran has likely passed away. The current process per M21-1 (XI.i.1.B.1.a) is to use the FNOD function in the SHARE program to terminate the Veteran's award. What is the proper way to process the EP 130s for Veterans? Do we cancel or clear the EP 130? Do we then process the FNOD or do we process an award under the EP 130? Please note if the Veteran's award is in suspense, we need to process an award under the EP 130 since the FNOD will not properly terminate the suspended account.

Response: P&F agrees that the situation as described does not conform to current procedural guidance, due to a system error. Please follow the steps below if procedures outlined in M21-1, Part XI, Subpart i, 1.B.1.a and/or M21-1, Part XI, Subpart i, 1.A.1.a do not work to system error.

1. **Cancel** all pending EPs, including the survivor claims. Any EPs not assigned to you must be cancelled in SHARE by a Coach.
2. Remove the Veteran's date of death via a BIRLS Update in SHARE.
3. Wait until the date of death disappears from the VBMS sidebar, then establish a new EP 130 CPL 00 in VBMS.
4. Use this EP 130 to terminate the Veteran's award; select Terminate-Death of Claimant as the reason. Have that EP authorized.
5. Re-process the FNOD in SHARE and wait for the date of death to repopulate in the VBMS sidebar.
6. Re-establish the survivor claims that were cancelled in Step 1 and continue processing.

There are no anticipated changes to the M21-1 manual as a result of this inquiry.

Philadelphia PMC:

Question: It seems there is some variety in how QRS's are reviewing IQRs where there are multiple EPs pending. This most often comes up with a 140/160, but could also arise with a 190/290 or 190/165 or 140/165, etc. Our question is this: Should a QRS fully review actions taken under a non-selected EP and cite critical errors found under that transaction as part of the quality review for the selected EP?

- M21-4 Chapter 6.4.a notes "Perform a comprehensive review and analysis of all elements of processing the specific claim, issue, transaction, task, or end product (EP). All associated actions worked (or that should have been worked) with the transaction pulled in QMS, to include work items and concurrent EPs, are under review and are subject to error citations."
- M21-4 Chapter 6.5.c notes "The QRS will review all associated actions that were taken or that should have been taken associated with the transaction under review. IQRs should not be a de novo review of the entire case file but limited to the actions of the individual

for whom the review is being completed.” It later states that “Reviewers should evaluate the actions taken (or that should have been taken) based on the transaction date selected for review.”

The manual references above both speak of ‘associated actions.’ Are these transactions completed under separate EPs considered associated actions? The EPs are pending concurrently but are not really processed concurrently, since they cannot be processed in a single VBMS-A transaction, nor do they normally share a notification. How far would we look with regards to the part that discusses actions that should have been taken? Is it appropriate to cite an error for not completing a co-pending EP when we do not necessarily know how work is distributed by a PMC or by the NWQ?

Here are a few examples:

- SVSR authorizes a DIC claim and on the same day authorizes a burial claim for the same file. The DIC authorization is selected for quality. AQRS sees an error was made with the burial authorization as there was no transportation paid when payable. Should this be cited as a critical error under the 140 selected? What if the SVSR authorized the burial the following day?
- SVSR authorizes a survivor pension claim and on the same day authorizes an accrued claim for the same file (separately, because the award was paying accrued benefits). The survivor pension is selected for quality. AQRS sees an error was made with the accrued calculations. Should this be cited as a critical error under the survivor pension quality review? Would there be a distinction if the letters were combined or issued separately? What if the VSR didn’t take ANY action on the accrued and we see that someone else did it the next day?
- VSR generates a 290 MOD claim that was pending before the 190 was submitted and on the same day issues development under a pending 190. The 190 development is pulled for quality. AQRS sees an error made on the MOD notification. Should this be cited as a critical error under the 190 development?
- VSR generates a 160 and on the same day issues development under a pending 140. The 160 award is pulled for quality. AQRS sees an error made on the 140 development. Should this be cited as a critical error under the 160 award?

In any of these cases, we understand the need to communicate mistakes, but not sure if it is appropriate to be cited under the individual’s quality review as an ‘associated action.’ Would the use of question 12 ever be appropriate in this situation, as this is the non-critical error citation? Lastly, if we are to consider these associated actions, and cite errors on them, is there guidance for how to address a quality pull if the other transaction is pulled, perhaps as a replacement to a deselection? Would we cite the error again?

Response: Chapter 6 of M21-4 is written for Compensation Service Quality Review Team, with the exception of our shared checklists and corresponding guidance in [Chapter 6 Appendix A.a-c](#) and [Appendix B.a](#). The PMC Quality Review Team(s) otherwise operate out of [M21-4 Chapter 7](#).

[M21-4 Chapter 7.11.c](#) speaks to the fact that the IQR is limited to the transaction under review. However, P&F recognizes that multiple transactions may be taken at one time and could involve multiple EPs. To ensure a comprehensive review by QRT, all associated actions processed with the transaction pulled for the IQR are reviewed. [M21-4 Chapter 7.10.a](#) addresses the matter

more specifically and notes that those co-pending EPs and additional transactions should also be reviewed to ensure quality work is released. However, because the IQR is limited to the transaction pulled for review, any errors associated with the co-pending EP or additional transactions are cited as a non-critical error (or comment) on task 12 and subject to correction.

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 January 2024.

FY 2024 November Special Focus Review Report

Pension and Fiduciary Service

P.L. 116-315 Burial Transportation Changes

STATEMENT OF PURPOSE

- Public Law (P.L.) 116-315 was enacted on January 5, 2023, and expanded burial transportation benefits. New benefits include the reimbursement of transportation expenses for national, state, or tribal Veterans' cemeteries, include additional classes of individuals who are eligible to receive the transportation benefit, establishes a single payment rate for non-service-connected burial allowances, and extends the VA plot or interment allowance to tribal organizations.
- Pension and Fiduciary Service (P&F) published updates to [M21-1 Part XI. Subpart iii.1. B.6. a.](#), on April 3, 2023, incorporating new procedures based on the law.
- To determine whether claims processors properly applied the provisions of P.L. 116-315, P&F analyzed a sample of cases to assess accuracy of decisions made.
- The review also included claims processed as part of an audit of previously completed burial claims processed from January 5, 2023, to March 14, 2023.
- The desired outcome is to show the effectiveness of P.L. 116-315 expansion of burial transportation policy implementation; as well as the initial audit executed by P&F.

METHODOLOGY

- P&F conducted this Special Focus Review (SFR) from October 23, 2023, through October 27, 2023, of burial claims completed by the Philadelphia Pension Management Center (PMC) from May 1, 2023, through June 30, 2023.
- A sample of claims was reviewed to assess burial transportation claims processing accuracy and to identify trends, training needs and opportunities for process and procedural improvements.
- P&F's Data Analytics and Project Management team provided a random sample of 60 closed burial claims. Data provided included the following end products (EP):
 - 160s, representing burial claims.
 - Completed from May 1, 2023, to June 30, 2023.
 - 930s, (930NRCPMC) with special issues, Burial/DIC Entitlement Issue and VACO Special Issue 8, representing the audit of previously completed burial claims where burial transportation was subsequently paid.
 - Completed from July 1, 2023, to September 1, 2023.
 - 330s, (330REVIEWPMC) with special issues, Burial/DIC Entitlement Issue and VACO Special Issue 8, representing the audit of previously completed burial claims where the review found no entitlement to burial transportation.
 - Completed from July 1, 2023, to September 1, 2023.
- The EP 160s were completed by multiple stations. The burial transportation claim audit (EP 930 and 330) was completed by the Philadelphia PMC.

- One Management and Program Analyst from the P&F Quality and Oversight team conducted the case reviews.
- A benefit entitlement (BE) error was annotated if an action taken violated current regulations or other directives and affected the outcome or had the potential to affect the outcome.
- A non-benefit entitlement (Non-BE) error was annotated for procedural and other deficiencies that did not affect the outcome of a claim.
- *Appendix A* is a SFR review checklist created to analyze the sample of claims.

SUMMARY OF FINDINGS

A review of the sample cases found the following related to burial transportation issues:

Burial Transportation Errors				
EP	# Claims Reviewed	# BE Errors	# Non-BE Errors	Accuracy
160	20	3	0	85%
930	20	0	0	100%
330	20	15	0	25%
TOTAL	60	18	0	70%

EP 160 BE Errors: 3

- One claim incorrectly paid transportation based on ineligibility.
- Two claims failed to notify the claimant of possible eligibility and what information and evidence was needed for VA to award benefits.

EP 330 BE Errors: 15

- 15 claims were deemed entitled to burial transportation benefits under the expanded eligibility, but no action was taken to notify the claimant of the new eligibility.

Root Cause Analysis

The primary source of the errors was misapplication of the instructions provided to claims processors. On June 30, 2023, P&F issued burial transportation claim audit guidance that was not appropriately followed. See *Appendix B*, for a copy of the field instructions. When entitlement was shown but there was no itemized receipt to support awarding burial transportation, claims processors erroneously cleared an EP 330 for no entitlement found. Per the instructions, the correct action was to issue development for the itemized receipt and control it under the EP 930.

RECOMMENDATIONS

1. Return the claims needing correction to the field for corrective actions. Target completion date for assigning the work is December 8, 2023.
2. Conduct additional training with the Philadelphia PMC regarding burial transportation. Target completion date is January 15, 2024.
3. Complete a follow-up SFR. Target completion date is May 31, 2024.

ACTIONS TAKEN

1. Created SFR review checklist specifically to analyze the sample of claims.
2. SFR findings were discussed with the PMCs on the November 29, 2023, quality call.

Appendix A. SFR Review Checklist



SFR Review
Checklist.pdf

Appendix B. Burial Audit Claims Distribution Instructions



Burial
Transportation Audi

**Submitted by Pension & Fiduciary Service
November 2023**