APPENDIX W

SEPTEMBER 9, 1997

VETERANS BENEFITS ADMINISTRATION'S ALL STATIONS MEMORANDUM CONCERNING QUALITY REVIEW OF PERSIAN GULF WAR ILLNESSES CASES



DEPARTMENT OF VETERANS AFFAIRS Veterans Benefits Administration Washington DC 20420

214B (97-112)

September 9, 1997

Director (00/21/27)
All VBA Regional Offices and Centers

SUBJ: Results of the Analysis of Persian Gulf War Quality Improvement Reports for the Months of June and July 1997

- 1. Members of my staff have completed an analysis of the Quality Improvement reports that you have submitted for the months of June 1997 and July 1997. The analysis was transmitted to the Area Directors on August 28, 1997 by the Acting Under Secretary for Benefits. The reports do show several areas for local training efforts. I fully concur with Dr. Lemons' sentiments that the analysis gives us several areas on which we can focus our resources to improve our processing of Persian Gulf War claims. I am enclosing a copy of the report for your information.
- 2. We continue to analyze your monthly reports and offer assistance to the regional offices through the continuing efforts of the PGW Rapid Response Team and the weekly conference calls. If you have any questions regarding this analysis or PGW claims processing in general, please contact Rick Hirst of the Program Review Staff at (202) 273-7220.

/s/

Kristine A. Moffitt, Director Compensation and Pension Service

Enclosure

Department of Veterans Affairs Memorandum

Date:

From: Acting Under Secretary for Benefits (20)

Subj: Results of Analysis of Persian Gulf War Quality Improvement Reports for the Months of June and July 1997

To. Area Directors 201A, 201B, 201C & 201D

- 1. The Director of the Compensation and Pension Service has provided an analysis of the results of the Quality Improvement Review of Persian Gulf War claims conducted by the regional offices for the months of June and July. The stations have identified several areas for their local improvement efforts, and the Service has provided a summary of them in the attachment.
- 2. It is vital to the success of the PGW program that your offices establish some method of follow up for the purposes of training in the program areas noted. Such an effort will ensure needed improvement in the quality of claims processing and the service we provide to this group of veterans.

Stephen L. Lemons

Attachment

cc: SIU

SUMMARY ANALYSIS of the QUALITY IMPROVEMENT REVIEW OF PGW CASES CONDUCTED by the REGIONAL OFFICES for JUNE and JULY 1997

The Compensation and Pension Service issued guidance to the regional offices (RO) to prepare them for the redistribution of Persian Gulf War claims. Fast Letter 97-60 (Revised) dated May 30, 1997, contained an implementation plan for the RO's to follow. The offices were asked to submit certain reports regarding the progress of the readjudication of the PGW claims.

One of these reports asked for a quality review of a judgment sample of PGW cases each month, starting in June, conducted according to the guidance of the quality improvement (QI) program as noted in M21-4, Chapter 2. QI is a process-oriented review which has the goal of identifying program processing areas that need improvement so the local offices can then work to effect the improvement in processing through training and follow-up. The review is designed to create an environment that encourages improvement by putting emphasis on the steps needed to realize improvement and not the attainment of acceptable measurement indicators.

With this guidance as background, the RO's conducted a thorough review during the months of June and July and forwarded the results to the C&P Service in July and August. The results of the reviews will provide, first, each station the information it needs to effect improvement locally and, second, all stations additional information to utilize in their local review. The raw data from the findings is attached. While two months of data cannot establish patterns or trends, certain categories are prominent and serve as areas for training, special focus during subsequent reviews, and for possible change to local processing:

- ♦ All issues related to the claim must be addressed;
- Greater attention to the coding of the undiagnosed illness is needed;
- Greater attention needs to be paid to the appropriateness of the rating decisions;
- ♦ The reasons for various aspects of the rating decision must be stated more clearly and thoroughly;
- The initial development must be improved to ensure it is appropriate and comprehensive;
- Greater attention to claims control and follow-up is in order;

The results of the QI review will be shared with all the offices during subsequent weekly telephone conference calls by the C&P's Rapid Response Team. Emphasis, of course, will be placed on the more prominent areas of improvement. It is expected that each office will use its own findings, plus the complied ones that will be shared, to aggressively work to improve how the PGW claims are processed. As the results of the August review are analyzed and compiled, C&P will use the trends and patterns that become evident as the basis for follow-up satellite broadcasts or training letters.

JUNE 1997

1.	QUALITY OF DECISIONS		78
	a. Effective dates	8	
	b. All issues not addressed	18	
	c. Inappropriate deferral of issue in rating	1	
	d. Incorrect rating decision	9	
	e. Improper coding of undiagnosed illness	16	
	f. Reasons for decision/dates not clearly documented	21	
	g. Improper rating coding	5	
2.	NOTIFICATION	12	
	a. Failure to notify POA/wrong POA code	2	
	b. Failure to notify veteran of future VAE	2	
	c. Letter not specific on PGW claim/wrong denial letter	3	
	d. Wrong address	3	
	e. Wrong date in explanation to veteran	1	
	f. Redundancy in letter	1	

3.	DEVELOPMENT OF EVIDENCE	59
	a. Development inappropriate/not simultaneous	47
	b. Development not documented	2
	c. Failure to schedule VAE for inferred issue	1
	d. Duty to assist	8
	e. Improper deferral	1
4.	MAINTAINING CONTROL OF CLAIM	40
	a. Wrong date of claim	7
	b. Initial control not timely	1
	c. Evidence drop-filed	1
	d. No EP pending/wrong EP	12
	e. Follow-ups: not done, not timely, not annotated	9
	f. Future VAE not input/wrong date	8
	g. No date stamp	2
5.	DATABASE	4
6.	MISCELLANEOUS	2

JULY 1997

1.	QUALITY OF DECISIONS	112
	a. Effective dates	5
	b. All issues not addressed	35
	c. Inappropriate deferral of issue in rating	0
	d. Incorrect rating decision	27
	e. Improper coding of undiagnosed illness	11
	f. Reasons for decision/dates not clearly documented	33
	g. Improper rating coding	1
2.	NOTIFICATION	21
	a. Failure to notify POA/wrong POA code	0
	b. Failure to notify veteran of future VAE	0
	c. Letter not specific on PGW claim/wrong denial letter	12
	d. Wrong address	8
	e. Wrong date in explanation to veteran	1
	f. Redundancy in letter	0

3.	DEVELOPMENT OF EVIDENCE	42
	a. Development inappropriate/not simultaneous	33
	b. Development not documented	0
	c. Failure to schedule VAE for inferred issue	0
	d. Duty to assist	9
	e. Improper deferral	0
4.	MAINTAINING CONTROL OF CLAIM	19
	a. Wrong date of claim	4
	b. Initial control not timely	4
	c. Evidence drop-filed	0
	d. No EP pending/wrong EP	4
	e. Follow-ups: not done, not timely, not annotated	3
	f. Future VAE not input/wrong date	1
	g. No date stamp	3
5.	DATABASE	23
6.	MISCELLANEOUS	5

June 1997

Effective Date - 1	0
All issues not addressed - 1	8
Failure to notify POA - 2	<u>17</u>
	11
Inappropriate development - 3	19
Development not documented - 3	2
Wrong date of claim - 4	7
Initial control not timely - 4	
Evidence drop filed - 4	1
No EP pending - 4	2
Follow-up not done, not timely, not annotated -	8
Inappropriate referrals - 3	1
Wrong EP - 4	9
Development not simultaneous - 3	28
Failure to schedule VAE for inferred issue - 3	1
Inappropriate deferral of issue on denial rating-	1
	<u> </u>
Failure to bring forward code from prior rtg - 1	1
Other - 6	2
Initial control action incorrect - 4	<u> </u>
Future exam not input/requested timely - 4	8
Failed to notify vet of future exam - 2	2
Incorrect rating decision - 1	9
Improper coding of undiagnosed illnesses - 1	16
Failure to consider SMP - 1	1
No date stamp - 4	2
Improper/no coding in PGW data base - 5	4
Reasons for dates not documented on rating-1	3
Letter not specific re PGW claim - 2	2
Wrong address - 2	3
Duty to assist - 3	8
Incorrect POA code - 2	1
Reasons for decision not clearly documented -	13
11	
Reasons for effective date not clear/adequate -	5
1	J
Improper disallowance code - 1	4
Failure to remove RFE - 4	1
Wrong date in explanation to vet - 2	1
Redundancy in notification letter - 2	1
Wrong denial letter sent - 2	
Wilding definal letter Selit - 2	<u> </u>
	195
	
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1 - Quality of Decision	
2 - Notification Deficiency	
3 - Development of Evidence	
4 - Maintaining Control of Claim	
5 - Database	

6 - Other (unspecified) Deficiency

July 1997

Duty to assist - 3	9
Development not documented - 3	0
Development not simultaneous - 3	17
Failure to schedule VAE for inferred issue - 3	0
Follow-up not done, not timely, not annotated-4	3
Future exam not input/requested timely - 4	11
Inappropriate development - 3	15
Wrong address - 2	8
Effective Date - 1	5
Evidence drop filed - 4	0
Inappropriate referrals - 3	1
Initial control action incorrect - 4	0
Initial control not timely - 4	3
No date stamp - 4	0
No EP pending - 4	
Wrong date of claim - 4	4
Wrong EP - 4	
Failed to notify vet of future exam - 2	0
Failure to notify POA - 2	0
Improper/incomplete notification letter - 2	12 0
Wrong date in explanation to vet - 2	34
All issues not addressed - 1 Failure to bring forward code from prior rtg - 1	2
Failure to bring forward code from prior rig - 1	0
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Improper/incomplete/no due process - 2 Inappropriate deferral of issue on denial rating-	0
Inappropriate deterral of issue on demarkating-	U
Incorrect individual/combined evaluation - 1	2
Incorrect rating decision - 1	24
Reasons for dates not documented on rating-1	0
Reasons for decision not clearly documented-1	24
Reasons for effective date not clear/adequate-1	9
Reasons for evaluation % not shown/improper-	0
1	
Diagnosed illness coded as undiagnosed - 1	1
Improper/no coding in PGW data base - 5	15
Improper coding of undiagnosed illnesses - 1	11
Improper disallowance code - 1	0
Incorrect POA code - 2	0
Rating date incorrect in BDN - 5	8
Other - 6	5
	222
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1 - Quality of Decision	
2 - Notification Deficiency	
3 - Development of Evidence	
4 - Maintaining Control of Claim	
5 - Database	
6 - Other (unspecified) Deficiency	: