## Chapter 6. Semiannual Review of Potential Duplicate Payment Cases

#### 1. List of Potential Duplicate Payment Cases

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| Introduction | This topic contains information about the list of potential duplicate payment cases, including* identification of potential duplicate payment cases
* determining whether action is required
* responsibility for ensuring corrective action is taken, and
* where to go for help.
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| a. Identification of Potential Duplicate Payment Cases | Twice each year (typically around February and August), Central Office (CO) sends regional offices (ROs) a list of corporate records under their jurisdiction in which identical Social Security numbers (SSNs) appear. The corporate records identified on the list represent cases in which the Department of Veterans Affairs (VA) *might be* erroneously paying duplicate benefits to the same payee. |

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| b. Determining Whether Action Is Required | Corporate records in which identical SSNs appear are grouped together on the list of potential duplicate payment cases referenced in M21-1, Part X, 6.1.a. * If a red *X* is written next to a group of corporate records, ***no*** action is required for the records in that group.
* The analysis described in M21-1, Part X, 6.2 ***is*** required for the records in a group if
* no annotation is present, or
* a red *RX* is written next to the group.
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| c. Responsibility for Ensuring Corrective Action Is Taken | It is not uncommon for corporate records in which identical SSNs appear to fall under the jurisdiction of different ROs. When this occurs, the RO on whose list of duplicate payment cases the corporate records appear is responsible for working with the other RO(s) to ensure any necessary corrective action is taken. |

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| d. Where to Go for Help | CO provides a point of contact on the transmittal sheet that accompanies each list of potential duplicate payment cases it sends to ROs. Direct any questions regarding the list, annotations on the list, or corrective actions stemming from review of the list, to that point of contact. |

#### 2. Analyzing Corporate Records in Which Identical SSNs Appear

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| Introduction | This topic contains instructions for analyzing corporate records in which identical SSNs appear, including* initial analysis of corporate records
* beneficiaries that are entitled to benefits under more than one claim number, and
* end product (EP) credit and justification for clearing an EP.
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| a. Initial Analysis of Corporate Records | Follow the instructions in the table below for every group of corporate records (on a list of potential duplicate payment cases) that require analysis according to M21-1, Part X, 6.1.b. |

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| If ... | Then ... |
| * two corporate records exist under the same SSN, and
* the corporate records do *not* belong to the same payee
 | ensure the correct SSN was entered into the Beneficiary Identification and Records Locator Subsystem (BIRLS).***Note***: If BIRLS contains the wrong SSN, update it by using the *BIRLS Update* command.***Reference***: For more information about updating BIRLS, see the [*Share User’s Guide*](http://css.vba.va.gov/SHARE/). |
| the same beneficiary is receiving benefits under more than one claim number | verify the beneficiary is entitled to benefits under the claim numbers listed.***Reference***: For more information about beneficiaries that are entitled to benefits under more than one claim number, see M21-1, Part X, 6.2.b. |

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| ***Important***: Upon discovering that VA is erroneously making or has erroneously made duplicate payments to the same beneficiary, follow the instructions in M21-1, Part III, Subpart v, 1.I. |

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| b. Beneficiaries That Are Entitled to Benefits Under More Than One Claim Number | Some individuals may receive VA benefits under more than one claim number, depending on their eligibility and status as a claimant. For example, a Veteran may receive* disability compensation or Veterans Pension under one claim number based on his/her status as a Veteran
* survivors benefits under another claim number based on his/her status as the surviving spouse of a deceased Veteran, and
* Parents DIC under another claim number based on his/her status as the parent of a deceased Veteran.

***Important***: A Veteran may receive disability compensation or Veterans Pension under one claim number only.***Exceptions***:* Per [38 CFR 3.700(a)(4)](http://www.ecfr.gov/cgi-bin/text-idx?SID=63078285a98c7c944f33bf1433d6ace8&mc=true&node=se38.1.3_1700&rgn=div8), a Veteran may ***not*** concurrently receive
* Veterans (current-law) Pension, and
* Section 306 Pension or Old Law Pension based on his/her status as the surviving spouse of a deceased Veteran.
* If a surviving spouse is eligible for survivors benefits based on the death of more than one Veteran, VA may pay benefits to the surviving spouse under the claim number of only one of the deceased Veterans.

Consider the additional guidance in the table below when processing awards for individuals that are entitled to benefits under more than one claim number. |

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| When ... | Then ... |
| a Veteran is entitled to* Veterans Pension, and
* DIC as a surviving spouse
 | make sure VA is counting the DIC as other income or other retirement income on the pension award. |
| a Veteran is entitled to* disability compensation, and
* DIC as a surviving spouse
 | determine whether VA is paying the Veteran additional disability compensation for a spouse and, if so, whether the payment is proper under [38 CFR 3.55](http://www.ecfr.gov/cgi-bin/text-idx?SID=878b6d73a9c7eb54d0b4bc6b16d1a343&mc=true&node=se38.1.3_155&rgn=div8). |
| a Veteran is entitled to* Veterans Pension, and
* Parents DIC
 | make sure VA is counting the Parents DIC as other income or other retirement income on the pension award.***Important***: If the Veteran is married to the other parent of the deceased Veteran (on whose service the Parents DIC award is based) count the DIC that ***both*** parents receive as income on the pension award. |
| a Veteran is entitled to* disability compensation, and
* Survivors Pension
 | make sure VA is counting the disability compensation as other income or other retirement income on the pension award. |
| an individual is entitled to* Parents DIC based on the death of one Veteran-child, and
* a separate award of Parents DIC based on the death of a different Veteran-child
 | make sure VA is* counting Parents DIC as other income or other retirement income on both awards, and
* paying the same monthly rate under both awards.

***Notes***:* If the monthly rates are different, make sure
* VA correctly counted and calculated all income on the awards, and
* the matched SSNs on the list of potential duplicate payment cases belong to the *parent* (not one of the deceased Veteran-children).
* If the matched SSNs on the list of potential duplicate payment cases belong to one of the deceased Veteran-children, update the corporate record (through a BIRLS update) to reflect the Veteran’s correct SSN, if he/she has an SSN.

***Reference***: For more information about updating BIRLS, see the [*Share User’s Guide*](http://css.vba.va.gov/SHARE/). |

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| c. EP Credit and Justification for Clearing an EP | Clear an end product (EP) 290 for every group of corporate records on a list of potential duplicate payment cases that require the analysis described in M21-1, Part X, 6.2, even if such analysis results in a determination that no corrective action is necessary.Justify the clearing of EP 290 by * saving a copy of only that row of the list that refers to the claim number under which the EP 290 was cleared, and
* uploading the copy into the corresponding electronic claims folder (eFolder).

***Notes***:* Individual rows from a list of potential duplicate payment cases may be copied and pasted into a Word document (for uploading into an eFolder) by using the Snipping Tool accessory in Windows.
* Uploading a copy of the *entire* list of potential duplicate payment cases would be inappropriate as it contains personally identifiable information about other claimants/beneficiaries.

***Reference***: Follow the instructions in M21-1, Part X, 6.2.1.b to determine which of the groups of corporate records on the list of potential duplicate payment cases require the analysis described in M21-1, Part X, 6.2. |

#### 3. Consolidation of Records

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| Introduction | This topic discusses the consolidation of VA records, including* why it is necessary to consolidate certain records
* action to take when two BIRLS records exist for the same individual, and
* action to take when two corporate records exist for the same individual.
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| a. Why It Is Necessary to Consolidate Certain Records | Sometimes, VA employees mistakenly create multiple records for the same individual. When this occurs, the records must be consolidated so that each individual has only one record.***Note***: Duplicate records are most commonly created when VA establishes a claims folder that is identified by a claim number and then later establishes a second folder for the same claimant/beneficiary that is identified by a Veteran’s SSN. |

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| b. Action to Take When Two BIRLS Records Exist for the Same Individual | Follow the instructions in M21-1, Part III, Subpart ii, 4.E.3 when two BIRLS records exist for the same individual. |

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| **c. Action to Take When Two Corporate Records Exist for the Same Individual** | Follow the instructions in M21-1, Part III, Subpart ii, 4.E.5 when two corporate records exist for the same individual.***Important***:* If VA made payments to the same individual under two separate corporate records, the local finance activity must audit the records to ensure none of the payments was improper.
* If the corporate record VA retains as a result of the consolidation process described in M21-1, Part III, Subpart ii, 4.E.5, is identified by an incorrect SSN, follow the instructions in the table below.
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| Step | Action |
| 1 | Does a corresponding Veterans Benefits Management System (VBMS) eFolder exist for the corporate record that is identified by an incorrect SSN?* If *yes*, proceed to the next step.
* If *no*,
* correct the SSN by using the *BIRLS Update* command, and
* disregard the remaining steps in this table.
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| 2 | Create a new BIRLS record under the correct SSN by using the *BIRLS Add* command in Share.***Note***: The only required entries on the VETERANS IDENTIFICATION DATA tab are the name, date of birth, and SSN. |
| 3 | Follow the instructions in the [*VBMS User Guide*](http://vbaw.vba.va.gov/VBMS/Resources_Technical_Information.asp) for moving the documents in the eFolder that is identified by the *incorrect* SSN to the eFolder that is identified by the *correct* SSN. |
| 4 | Delete the BIRLS record created in Step 2, using the *BIRLS Record Delete* command in Share.***Note***: As an alternative, consolidate the BIRLS record that is identified by an incorrect SSN with the BIRLS record created in Step 2, using the *DUPC* command in the Benefits Delivery Network (BDN). Retain the record that is identified by an *incorrect* SSN.***Reference***: M21-1, Part III, Subpart ii, 4.E.3 contains instructions for consolidating BIRLS records using the *DUPC* command. |
| 5 | Remove the correct SSN from the duplicate corporate record using the *Corporate Update* command in Share. |
| 6 | Use the *BIRLS Update* command in Share to change the incorrect SSN to the correct SSN. |
| 7 | Follow the instructions in M21-1, Part III, Subpart ii, 4.E.5.a for disposing of the duplicate corporate record. |

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| ***References***: For more information about * correcting the erroneous payment of benefits to an individual, see M21-1, Part III, Subpart v, 1.I
* using Share, see the [*Share User’s Guide*](http://css.vba.va.gov/SHARE/), or
* using VBMS, see the [*VBMS User Guide*](http://vbaw.vba.va.gov/VBMS/Resources_Technical_Information.asp).
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#### 4. Reporting Requirements

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| Introduction | This topic contains information about the reporting requirements associated with the list of potential duplicate payment cases, including* requirement to certify completion of corrective actions, and
* sample language for certifying completion of corrective actions.
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| a. Requirement to Certify Completion of Corrective Actions | Once an RO has completed all corrective actions necessitated by its analysis of the records identified on a list of potential duplicate payment cases, it must certify completion of the actions by sending an e-mail to the mailbox shown on the transmittal sheet that accompanied the list.***Notes***:* Reference *RCS 20-0633* in the body of the e-mail.
* Do ***not*** include in the e-mail a description of the specific action(s) the RO took on individual cases.
* If the “corrective actions” referenced in the above paragraph included an update to BIRLS or the corporate record, or an award adjustment, make sure such transactions processed correctly before submitting certification.
* Include in the e-mail the name and telephone number of RO employees that processed the list, so the recipient of the e-mail has a point of contact should questions about the RO’s actions arise.
* ROs may also submit the certification referenced in this block by mail or fax.
* The due date for submitting certification is shown on the transmittal sheet that accompanies each list of potential duplicate payment cases.

***Reference***: To view a sample of the certification referenced in this block, see M21-1, Part X, 6.4.b. |

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| b. Sample Language for Certifying Completion of Corrective Actions | ROs may use language similar to that shown in the paragraph below when preparing the certification referenced in M21-1, Part X, 6.4.a:*This certifies that all required action has been completed and checked in VETSNET and VBMS for the* **[Insert the month and year of the list of potential duplicate payment cases.]** *semiannual review of potential duplicate payment cases (RCS 20-0633) for RO* **[Enter the RO number.]**. *Questions about the report may be directed as follows:**digits 00-49 Elvis Examiner (703) 555-1212**digits 50-99 Veronica VSR (703) 555-1313*. |