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Chapter 2
QUALITY ASSURANCE PROGRAM

2.01 Introduction

Public Law 106-117, The Veterans Millennium Health Care and Benefits Act, mandates that the Veterans Benefits Administration (VBA) establish and execute a Quality Assurance (QA) program. This program must meet applicable governmental standards for independent and internal controls for the performance of quality reviews in compliance with the Government Performance and Results Act (GPRA). The QA reviews focus on assessing the required legal provisions of service delivery, and ensures that actions are documented in accordance with statutes, Department of Veterans Affairs (VA) regulations, manual procedures, circulars, and other directives.

This chapter provides the processes and procedures in executing the Vocational Rehabilitation and Employment (VR&E) Quality Assurance program at the national and local levels. Additional guidelines are provided in Appendix BC, Elements of the QA Reviews.

2.02 References and Resources

Laws: Public Law 106-117, The Veterans Millennium Health Care and Benefits Act

            38 CFR 21.414
            38 CFR 21.420

Web Sites: vbaw.vba.va.gov/bl/28/vrcintra.htm
           vbaw.vba.va.gov/apps/weblogon.asp
           vreqa@va.gov

2.03 Objectives of the QA Program

The QA program is designed to achieve the following:

• Measure VR&E office’s quality and accuracy in administering Chapter 31 benefits in accordance with statutes, VA regulations, manual procedures, circulars and other directives.

• Ensure that VR&E staff meets required standards of practice and ethical standards for the delivery of vocational rehabilitation services.
• Assess vocational rehabilitation activities that affect Servicemembers, Veterans, and their dependents.

• Provide data for quality improvement by identifying trends that can be used to evaluate management, resource, system, and training needs.

2.04 QA Review Procedures

a. Scope of the QA Reviews

QA case reviews evaluate VR&E case management activities contained in the Counseling/Evaluation/Rehabilitation (CER) folder, CWINRS, and the Benefits Delivery Network (BDN).

During a QA review, the work of the Vocational Rehabilitation Counselor (VRC), or Employment Coordinator (EC), who determines entitlement and/or, is responsible for providing direct rehabilitation services, is reviewed.

b. Levels of Case Reviews

QA reviews are conducted in two levels:

1. Systematic Technical Accuracy Review (STAR) or National Level

   The Systematic Technical Accuracy Review (STAR) Team members conduct case reviews of all Regional Offices (RO). The team is comprised of VR&E Service staff members. The national or STAR reviews are conducted monthly. The results are used to evaluate the performance of individual Regional Offices (RO).

2. Regional Office or Local Level

   The VR&E Officer (VREO), and/or his/her designee, conducts case reviews for their particular offices. The local QA reviews are conducted monthly or quarterly. The results are used to evaluate the performance of individual case managers.

   Note: The STAR Team is responsible for the administration and oversight of these reviews.

c. QA Review Websites

1. QAWeb

   (a) STAR or National Reviews
The QAWeb is an intranet application specifically developed for the STAR Team to provide the means to enter national review findings into a database system. This database requires unique log-on identification for each STAR Team member who reviews cases, identifies information for each case being reviewed, and enters the responses to the review questions.

(b) Inquiry Function

The QAWeb also provides inquiry functions for reviews conducted nationally.

2. Review of Quality (ROQ) Website

(a) Local QA Reviews

The ROQ website is an intranet application that provides the VR&E Officers or their designee(s) to enter local review findings into a database system.

(b) Logon Instructions

Logon instructions and a link to the ROQ are located in the VR&E intranet home page at http://vbaw.vba.va.gov/bl/28/vrcintra.htm

The ROQ may also be accessed at https://vbaw.vba.va.gov/apps/weblogon.asp

2.05 QA Review Schedule

a. STAR or National Review

The schedule for STAR reviews is developed prior to the beginning of the fiscal year. Each regional office’s cases are reviewed monthly for each fiscal year. VR&E Service provides the ROs with a list of cases pulled for review in a letter via email. The CER folders are to be submitted for the national review at least three weeks prior to the scheduled review.

Once an RO receives the notification request for cases selected for the STAR review, no changes are allowed on the selected cases prior to submission. Adding and/or deleting information or documentation in the CER folder after any case has been identified for a STAR review is considered a change, which is not allowable.
b. RO or Local Review

VR&E Service provides ROs with the list of cases to be reviewed each month. The list of cases is posted and may be accessed at the Intranet Reports site. The reviews must be completed at least quarterly. VREOs or their designees must conduct reviews of the selected cases and accurately enter them in ROQ website.

2.06 Case Selection

The Office of Performance Analysis and Integrity (PA&I) randomly selects all cases for the STAR and local reviews. VR&E Service provides the lists of the selected cases to the ROs.

a. Case Types

The cases for review are selected by case types, namely:

- Entitlement Determination and Rehabilitation Planning (EDRP)
- Rehabilitation Services Delivery (RSD)
- Outcome – Rehabilitated (OR)
- Outcome – Discontinued (OD)

Note: OR and OD case types are not included in the local reviews.

b. Case Type Selection Criteria

The standards for selecting Chapter 31 case review are provided below:

1. Entitlement Determination/Rehabilitation Planning (EDRP)
   - Case must have exited Evaluation and Planning (EP) status within the 12-month period prior to the selection.
   - Case must have an entitlement decision documenting whether the Veteran has an Employment Handicap (EH) and/or Serious Employment Handicap (SEH).

2. Rehabilitation Services Delivery (RSD)

   Services must have been provided in one or more of the following case statuses for at least 12 months prior to the review:
Interrupted (INT) Status
Extended Evaluation (EE) Status
Independent Living (IL) Status
Rehabilitation to the Point of Employability (RTE) Status
Job Ready (JR) Status

3. Outcome – Rehabilitated (OR)

- Case must have been closed as Rehabilitated (REH) within the 12-month period prior to the review.
- Case must have been closed as Rehabilitated after entering IL or JR status.

4. Outcome – Discontinued (OD)

- Case must have been closed as Discontinued (DIS) within the 12-month period prior to the review.
- Case must have been closed as Discontinued (DIS) after entering IL, RTE, or JR status.

2.07 QA Review Rating

a. QA Review Instruments

Each case type is reviewed using specific review forms, referred to as QA Review Worksheets. The QA instruments are based on the case types for review.

Refer to Appendix AL, QA Review Worksheets for the QA review instruments.

b. Casework Review

The review focuses on decisions and procedures based on the documentation found in the CER folder, CWINRS and BDN data for casework using the following guidelines:

1. For EDRP cases, the reviews are conducted on casework performed from application through the development of the rehab plan, on cases in which
the entitlement determination was made within the 12-month period prior to the date of review.

2. For RSD cases, the reviews are conducted on all activities related to the provision of services in accordance with the rehabilitation plan (IEEP, IILP, IWRP, or IEAP), within the 12-month period prior to the date of review.

3. For outcome cases, OR and OD, the reviews are conducted on all activities related to the provision of rehabilitation services as outlined in the rehabilitation plan (IILP, IWRP, or IEAP) and performed during the 12-month period prior to the declaration of rehabilitation or discontinuance of the case.

c. Scoring the QA Instrument

The scoring for the STAR and the local reviews differ from each other. The questions in the ROQ and QAWeb are in a slightly different order. The QA Standard Operating Procedures (SOP) follows the order of questions in the QAWeb. Questions on both STAR and local reviews are answered with a “Yes” or “No”. Although “N/A” is an option, for scoring purposes, it is only used on question 1.A and 1.B in Chapter 36 STAR reviews. Otherwise, if the question does not apply, “Yes” is selected.

d. Response Criteria

The evaluation of the QA review responses are explained below:

1. If the QA reviewer’s response is “Yes”, he/she has determined that the VA actions and decisions meet the intent of VA laws, regulations, manual procedures, circulars, and other directives.

2. If the QA reviewer’s response is “No”, he/she has determined that VA actions and decisions do not meet the intent of VA laws, regulations, manual procedures, circulars, and other directives.

3. If the QA reviewer’s response is “N/A”, he/she has determined that the question does not apply to the review. Although “N/A” is an option, for scoring purposes, it is only used on question 1.A or 1.B in Chapter 36 STAR reviews. Otherwise, if the question does not apply, “Yes” is selected.

e. Required Actions for Each Response

The next steps after assigning a response are described below:
1. If the QA reviewer’s response is “Yes”, then he/she:
   - May not select any of the sub-items.
   - May make a comment on the item being reviewed.
   - May provide additional comments in the General Comments section.

2. If the QA reviewer’s response is “No”, then he/she:
   - Must select one or more sub-items to explain the response.
   - Must make a comment on the item being reviewed.
   - May provide additional comments in the General Comments section.
   - Must provide a corrective action in the General Comments section when the identified error is significant.

3. If the QA reviewer’s response is “N/A”, then he/she must continue to the next question.

f. Citing an Error

The reviewers must guard against making assumptions or imposing personal judgment regarding the decisions made by the VRC or EC. The reviewer must find a clear violation of a law, regulation, manual, or other directive to establish that an error exists.

Additionally, the reviewer must cite the law, regulation, manual, or other directive that supports the decision for the error.

g. Filing QA Worksheets in the CER Folder

A printed copy of the completed QA review worksheets must be filed in chronological order in the middle section of the CER folder.

2.08 VR&E Service Responsibilities

a. Overview

VR&E Service is responsible for conducting case reviews at the national level by reviewing a sample of cases from each RO during each fiscal year.
VR&E Service is also responsible for establishing the criteria to identify cases to be reviewed at the national and local levels.

b. Systematic Technical Accuracy Review (STAR) Team

The STAR Team conducts the reviews at the national level. The team is comprised of trained VRCs at the journeyman level who have gained the required experience from working in an RO.

The STAR Team members are VA Central Office (CO) employees assigned to VR&E Service. The STAR reviews are conducted and entered into the QAWeb, as described in section 2.04.c.1 of this chapter.

c. Review of Quality (ROQ) Website

VR&E Service provides the QA Review User’s Guide that explains the log-on procedures. The Intranet logon site for the local reviews is located at https://vbaw.vba.va.gov/apps/weblogon.asp

d. Scope of the STAR Reviews

The national or STAR review includes both Chapter 31 and Chapter 36 casework. Special reviews of other cases may be conducted as needed.

e. Sampling Procedures

The Office of Performance Analysis and Integrity (PA&I) makes the selection of the random sample of cases for each of the ROs. The selection is based on the selection criteria established by VR&E Service.

2.09 STAR or National QA Review Procedures

a. Request for Cases

VR&E Service provides each RO with the case lists identifying the names and claim numbers of the cases selected for the national review.

1. Case Request Letter

A case request letter is sent via email to the RO with guidelines for sending in requested CER folders for review. The letter specifies that all cases must be sent to the STAR Team, via tractable mail to ensure timely receipt.
2. Missing or Unavailable CER Folders

If the selected case is lost or missing, the RO must reconstruct the CER folder and submit it for review. If the selected case is unavailable due to VBA Appeals review, etc., the RO must inform the STAR Team of the unavailability of the case and the reason for the unavailability via the QA mailbox.

3. Transferred Cases

If a case identified for review has been transferred to another RO, the office being reviewed will request that the current RO forward it to the STAR Team. The office being reviewed must e-mail a copy of the request to the QA mailbox at vreqa@va.gov.

Note: A QA review will not be conducted on casework that has been completed by another RO such as entitlement determination, case management, or case closure.

b. Correction of Errors after Selection for STAR Review

1. Addition or Deletion on Requested CER Folders

Once an RO receives notification of cases selected for review, no additions or deletions may be made in the selected CER folders prior to sending the cases for review.

2. Corrections After Notification of Case Selection

An error is cited for any issue found and corrected after the date of the STAR notification letter. The review is intended to assess the accuracy of decisions and quality of services at the time the benefits are being administered to the Veterans. An error corrected after the case is selected for review is considered a ‘correction’ in response to the case selection.

3. Corrections Prior to Notification of Case Selection

An error is not cited for any issue found and corrected prior to the case being selected for the STAR review.

4. Required Corrections
An identified error that negatively affects a Veteran’s benefits, such as errors resulting in an overpayment or underpayment, must be corrected immediately.

5. Uncorrectable Errors

An error that cannot be corrected, such as failure to maintain required follow-up contact with the Veteran or an untimely provision of due process, may be specified in CWINRS Notes.

c. The STAR Review Process

1. Grace Period

All VREOs must ensure that appropriate training is provided to staff members within 90 calendar days of implementation to ensure effective application of the new or revised policies. The ROs are provided a grace period of 90 calendar days from the effective date of each new or revised policy. The effective date may be the date of the letter or the date of implementation as specified in the letter. Within the grace period, the STAR Team will not cite any errors on the issue(s) related to the new or revised policy. However, the identified issue will be marked as “Notice of Future Error”. In addition, feedback for training purposes is marked as “Comment Only”.

2. Dual Reviews

Dual reviews are conducted on a random selection of cases to ensure consistency in review processes and results. Two STAR Team members conduct the dual reviews independently on each case. The QA Supervisor or designee reviews the results to resolve any disagreements.

3. Corrective Actions

When a significant error is found during the review, the reviewer must specify the corresponding corrective action(s). The RO must prepare a report of compliance on a memorandum form within 30 days after the RO’s receipt of the STAR results letter. The memorandum must be submitted to the Director of VR&E Service via the QA mailbox at vreqa@va.gov.

Submission of the memorandum is not required if corrective actions are not cited during the review.
Note: The STAR Team monitors each RO’s compliance with the corrective actions. Notifications are sent to ROs that have not submitted their compliance reports.

2.10 Local QA Review Procedures

a. Purpose

The local QA review evaluates the case manager’s casework. The review results may identify individual training needs, deficiencies in staff competencies, resource issues, management concerns, and other areas and may serve as a basis for planning actions to improve quality of services.

b. VR&E Officer’s Responsibilities

The VREO is responsible for ensuring the quality of service delivery in the VR&E Division. The responsibilities include reviewing and assessing the quality of work performed by VR&E employees and contract service providers, and using the data gathered during the local reviews as part of an overall program of quality review and improvement.

c. Delegation of Local QA Reviews

For local QA reviews, the reviewer may be the VREO or a designee. A designated reviewer must be qualified to perform the local QA reviews and enter the appropriate reviews in the ROQ website. A qualified reviewer is defined as a VRC at the journeyman level, who has supervisory role, or whose performance level is outstanding or excellent. A designated reviewer cannot review any of his/her assigned cases.

d. Review Period

Local QA reviews may be conducted monthly upon receipt of the list of cases for review. However, all local reviews must be completed prior to the end of each quarter. The VREO must ensure that reviews are entered accurately and timely in the ROQ website.

e. Case Selection

Cases for review at the local level are selected in the same manner as those selected for the STAR reviews. VR&E Service determines the number of cases to be reviewed for each RO. The number of cases varies by RO, as it is based on the size of each RO’s workload.
f. Sampling Procedures and Criteria

The criteria for the case selection for the local reviews differ from the criteria for STAR, as local review includes only EDRP and RSD case review types.

g. Missing or Unavailable Cases

If the selected case is lost or missing, the RO must reconstruct the CER folder and must review the case. If the case is unavailable due to VBA Appeals review, transferred to another RO, etc., the RO must inform the STAR Team of the unavailability.

The VREO or his/her designee may select another case for the review and must inform the STAR Team of the substitution and the reason for the substitution via the QA mailbox.

Note: A QA review will not be conducted on casework that has been completed by another RO such as entitlement determination, case management, or case closure.

h. Case Substitution

The VREO or his/her designee may select another case to substitute for a selected case in which the case manager no longer works in the RO. The RO must inform the STAR Team of the substitution of cases and the reason for the substitution via the QA mailbox.

i. Identified Errors with Corrective Actions

The VREO will evaluate identified problems to plan corrective actions, which may include training, process improvement, or other management action.

1. Entitlement Determinations and Outcome Decisions

   (a) If an error is identified on entitlement determinations or outcome decisions, the VREO refers the case to the responsible case manager to make the corrective action.

   (b) If the case manager disagrees with the VREO’s decision of error, the VREO will request an administrative review by the Director of VR&E Service through the RO Director.

   • If a positive entitlement determination or outcome determination is reversed, the Veteran will be provided required due process, and
will be referred to other service providers to ensure that negative consequences to the Veteran are minimized.

- If a negative entitlement determination or outcome determination is reversed, the Veteran must be rescheduled for re-evaluation.

Note: Adverse decisions for entitlement to rehabilitation services may be appealed to the Board of Veterans Appeals or the United States Court of Appeals for Veterans Claims. However, a Veteran or an accredited representative may request an administrative review prior to filing an appeal to BVA.

2. Fiscal Activities

The VREO must ensure that errors identified in fiscal activities are corrected immediately. Appropriate due process must be provided to the Veteran when the review results in an adverse action.

Note: A clear and unmistakable error may be identified through the STAR or local QA review. In any of these instances, the case manager must make the request for revision of decision and submit the request to the VREO for concurrence.

2.11 Reconsideration Process

a. QA Review Board

A standard process to address the ROs’ disagreements with the STAR results is established to ensure consistency within the review process. This process also assists in identifying prevalent errors that may be addressed through nationwide and/or local training.

The QA Review Board (QARB) consists of members from the STAR Team and selected VREOs and/or Assistant VREOs.

b. Request for Reconsideration

To request reconsideration for STAR decision(s), the VR&E Officer must:

1. Submit the request for reconsideration in a memorandum format and provide an explanation of specific issue(s) of the disagreement.

2. Include the applicable statutory or regulatory guidelines, manual or circular references, or policy letters related to the disagreement.
3. Submit reconsideration requests for multiple cases in separate memoranda.

4. Submit the reconsideration request, with the CER folder and the original STAR review worksheet, to the STAR Team via tractable mail.

c. The Reconsideration Process

1. Initially, the QA Officer or designee reviews the requests for consideration. The review is conducted on the specified issue of disagreement.

2. If the QA Officer or designee agrees with the reconsideration request, correction to the original QA review is made and is not submitted to the QARB for deliberation.

3. If the QA Officer or designee disagrees with the reconsideration request, the request is submitted to the QARB for deliberation.

4. A dual review is conducted for each request. Two QARB members, one from the STAR Team and one from the field, conduct the review for reconsideration independently.

5. If a disagreement occurs from the two QARB members’ review, the issue is presented to the Board for deliberation and resolution.

6. Upon completion of the reconsideration process, each office is notified in writing with the final decision. The decision notification is sent to the RO with the CER folder.

7. The decisions of the QARB are final and are not subject to further reviews.

2.12 Variance in the QA Review Results

a. Definition of Variance

For the purpose of the QA reviews, variance is defined as a measure of the difference in the scores obtained from the STAR and local QA reviews.

b. Methodology

The STAR composite scores are compared with the local composite scores. The variance in these scores is evaluated to determine congruency between the STAR and local review results. The validation is conducted after completion of the QA reviews for the STAR and local level for each fiscal year. If the variance between the STAR review score and the local review
score for any indicator does not fall within the assigned standard value, VR&E Service will indicate that the scores are not congruent.

c. Discrepancies between STAR and Local QA Scores

The Office of Field Operations (OFO) will be notified when a VR&E Office is identified with a variance that does not coincide with the assigned standard value.

2.13 QA Accuracy Scores

a. QA Score Indicators

Some of the QA review results are used as score indicators for the performance standards on Accuracy Measures. These measures are:

- Entitlement Determination Accuracy (EDA)
- Fiscal Accuracy (FA)
- Evaluation, Planning & Services Accuracy (EPRSA)
- Program Outcome Accuracy (POA)

b. Source Data

The data generated for the scores are derived from the STAR reviews entered in the QAWeb. The scores from the reviews are posted monthly on the Dashboard under the QA Accuracy scores. The scores are displayed based on a rolling 12-month period.

c. QA Scores Calculation

The table below provides the case type and the question number(s) used for calculating each accuracy measure.
### Accuracy Measure

<table>
<thead>
<tr>
<th>Entitlement Determination Accuracy (EDA)</th>
<th>EDRP (Entitlement Determination/Rehabilitation Planning) – Question #1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fiscal Accuracy (FA)</td>
<td>• RSD (Rehabilitation Services Delivery) – Question #2 &lt;br&gt;• OD (Outcome-Discontinued) – Question #3 &lt;br&gt;• OR (Outcome-Rehabilitated) – Question #3</td>
</tr>
<tr>
<td>Evaluation, Planning, and Rehabilitation Services Accuracy (EPRSA)</td>
<td>• EDRP (Entitlement Determination/Rehabilitation Planning) – Questions 1 through 6 &lt;br&gt;• RSD (Rehabilitation Services Delivery) – Questions 1 through 4 &lt;br&gt;• OD (Outcome-Discontinued) – Questions 1 through 5 &lt;br&gt;• OR (Outcome-Rehabilitated) – Questions 1 through 5</td>
</tr>
<tr>
<td>Program Outcome Accuracy (POA)</td>
<td>• OD (Outcome-Discontinued) – Question #1 &lt;br&gt;• OR (Outcome-Rehabilitated) – Question #1</td>
</tr>
</tbody>
</table>

### Use of the QA Review Scores

The QA review scores provide management with the data necessary to improve an office’s program operation and quality in the delivery of services. The scores may identify areas that require improvement, provide information to develop effective national and local staff training, and provide appropriate resource allocation. The scores may also identify best practices in the office.

STAR results are used to evaluate performance of each office at the national level. Conversely, the local review results are used to evaluate performance of each case manager in a local office.

### Chapter 36 Case Reviews

#### a. Scope of Review

The case review focuses on accuracy of provision of Chapter 36 services to assist eligible Veterans and Servicemembers in identifying a suitable vocational goal. The services include vocational assessments, transferable skills analysis and vocational exploration.

#### b. Review Schedule
The schedule for the Chapter 36 case reviews is developed prior to the beginning of each fiscal year. Every regional office's cases are reviewed monthly each fiscal year. VR&E Service provides the ROs with a list of cases to be submitted to the STAR Team at least three weeks prior to the scheduled review.

Once an RO receives the notification request for cases selected for review, no changes are allowed on the selected cases prior to submission. Adding and/or deleting information or documentation in the case after a case has been identified for review is considered a change, which is not allowable.

c. Case Selection

PA&I makes the selection of the random sample of cases for each of the RO. The selection is based on the selection criteria established by VR&E Service.

The cases for review are selected by case types as defined below. These cases must have been closed within the 12-month period prior to the review.

1. Completed with Counseling

   Completed with counseling refers to a case that was closed after the required services were provided to the claimant.

2. Completed without Counseling

   Completed without counseling refers to a case was closed after reasonable attempts failed to motivate the claimant to participate in the services.

d. Request for Cases

VR&E Service provides each RO with the case lists identifying the names and claim numbers of the cases selected for the review. A case request letter is sent via email to the RO with guidelines for sending in requested Chapter 36 folders for review. The letter specifies that all cases must be sent to the STAR Team, via tractable mail to ensure timely receipt.

If a case identified for review has been transferred to another RO, the office being reviewed will request that the office to which the Chapter 36 folder has been transferred forward it to the STAR Team. The office being reviewed must e-mail a copy of the request to the QA mailbox at vreqa@va.gov.
e. Review Instrument

See Appendix AL, QA Review Worksheets, for a copy of the specific worksheet to conduct this review.

f. Case Review

This review assesses the appropriateness of services and procedures based on the documentation in the Chapter 36 folder and CWI/NRS data for casework completed during the 12-month period prior to the review.

The reviewer answers each question with either “Yes,” “No,” or “N/A.” (N/A is used for Questions 1.A and 1.b only.) After assigning a response, the reviewer must complete one of the following actions:

1. If the reviewer’s response is “Yes”, then he/she:
   - May not select any of the sub-items.
   - May make a comment on the item being reviewed.
   - May provide additional comments in the General Comments section.

2. If the reviewer’s response is “No”, then he/she:
   - Must select one or more sub-items to explain the response.
   - Must provide an explanation on the item being reviewed.
   - May provide additional comments in the General Comments section.
   - Must provide a corrective action in the Explanation section when the identified error is significant.

3. If the QA reviewer’s response is “N/A”, he/she has determined that the question does not apply to the review.

Note: A printed copy of the completed Chapter 36 review worksheet must be filed in the middle section of the CER folder.

g. Reporting Mechanism

Results of the Chapter 36 reviews are provided along with the results of the STAR that are e-mailed monthly to the ROs. The results are sent in a letter format with the scores and analysis outlined in an Excel spreadsheet.
Additionally, the Accuracy scores for this review are posted in the Director’s Dashboard.

h. Corrective Actions

The RO must prepare a report of compliance on a memorandum form within 30 days after the RO’s receipt of the Chapter 36 review results. The memorandum must be submitted to the Director of VR&E Service via the QA mailbox at vreqa@va.gov.

Submission of the memorandum is not required if corrective actions are not cited during the review.

Note: The STAR Team monitors compliance with the corrective actions. Notifications are sent to ROs that have not submitted their compliance reports.