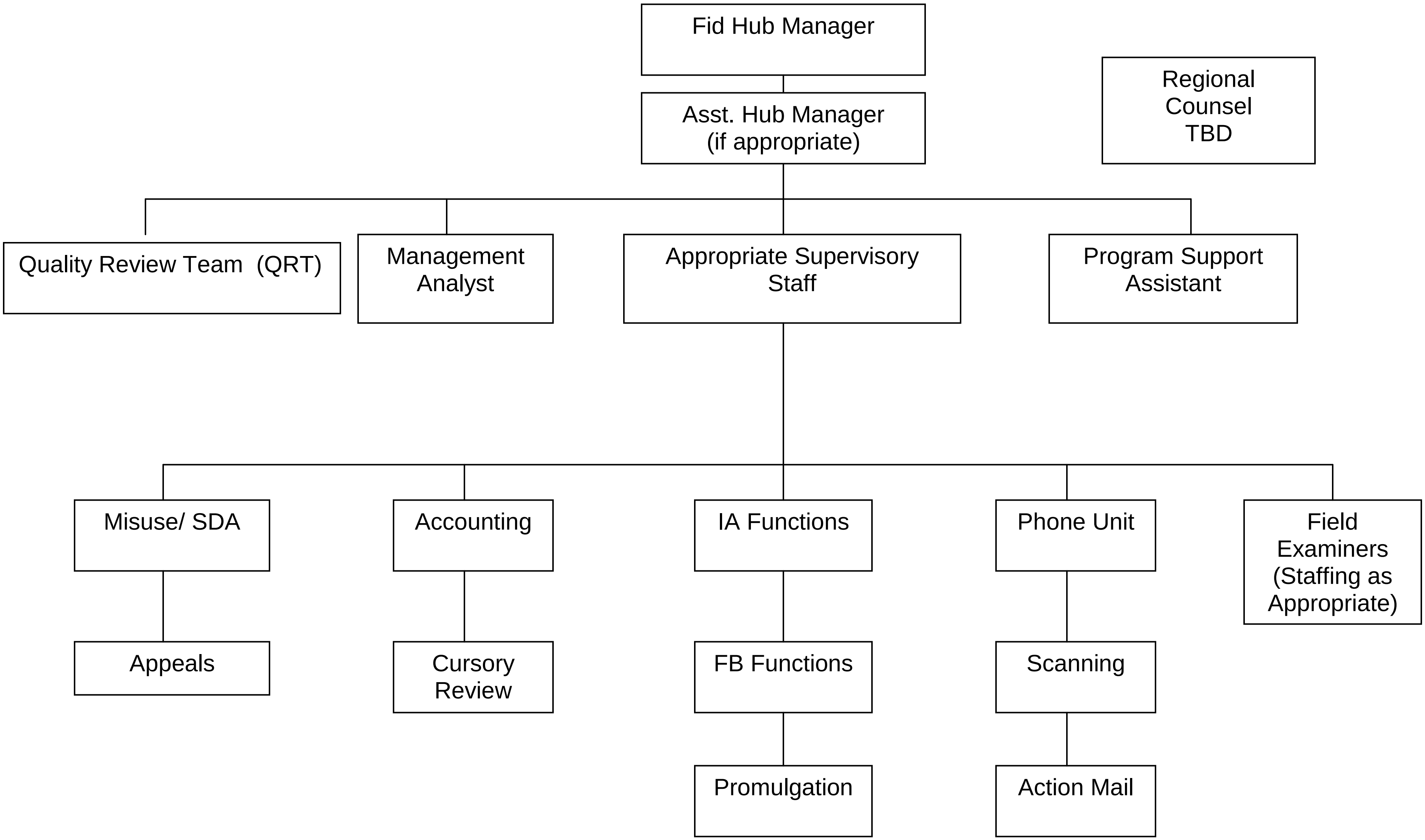
National Fiduciary Hub

Organizational Model

Enclosure A

The following Fiduciary Hub organizational model is intended to supplement the information from the October 2010 National Plan. The primary objective of the model is to insure consistency across the Hubs in developing high performance teams and work processes. Under this model, each element of the fiduciary workload will receive the attention needed to support the integrity of the fiduciary program. The intent of this narrative is to document the functions of each team as agreed upon by the Regional Office Directors and Fiduciary Hub that participated in the July 7-8, 2010 Work Group in Washington DC.

Fiduciary Hub Organizational Model



Supervisory Staff

Introduction: This group of employees are responsible for the overall management and performance of the fiduciary Hub.

Purpose:
- Ensure compliance with Workload Management Plan (WMP)
- Maintain appropriate team staffing levels and assignments
- Ensure accountability for meeting individual, team, and station goals
- Analyze and improve processes
- Provide necessary tools for employees to be successful
- Ensure program requirements are met to include supervisory visits and on-site reviews

Personnel/Structure:
- Hub Manager
- Assistant Hub Manager (As appropriate)
- Supervisory Field Examiners (Coaches)
- Assistant Supervisory Field Examiners (Assistant Coaches: as appropriate to allow for career progression of Hub employees)

Measurable Expectations/Targets:
- Performance meets or exceeds all established goals

Factors Critical to Success:
- Recruit a strong coaching staff
- Co-locate coaches with the Hub in most circumstances
- Allow flexibility for out-based coaches so that each Hub can address its unique circumstances
- Recognize that the number of functions/teams assigned to a coach will vary at each Hub based on the size of the Hub and workload demands
- Hubs will have the latitude to establish Assistant Coach positions to promote upward mobility within the Hub

Misuse/Seriously Delinquent Accounting (SDA) Team

Introduction: The Misuse/SDA team will work closely with Regional Counsel (RC) and the Office of Inspector General (OIG) to investigate and process misuse allegations. In addition, this team will take all needed actions to aggressively follow-up on SDA.

Purpose (SDA) Team:

- Review case documentation, solicit and follow-up on accountings to prevent them from becoming seriously delinquent
- Aggressively follow-up on SDA accountings (120 days past due and older)
- Establish Work Process Code (WPC) 513 Successor Initial Appointment (SIA), EP 290 suspension of benefits and referrals for misuse investigations
- Make recommendations regarding accounting requirements and or changes of payee status
- Eliminate and/or reduce the possibility of fiduciary misuse

Purpose Misuse Team:

- Conduct an in-depth analysis, quasi-legal examination, detailed investigation and financial assessment of inquires and documents pertaining to allegations of misuse
- Establish appropriate WPC for misuse allegations, investigations and reports
- Prepare development of misuse cases
- Work with Support Services Division (SSD) and the Debt Management Center (DMC) to collect, investigate and prepare evidence for referral to the OIG or RC
- Prepare misuse determinations and notifications for management concurrence
- Collect VA derived assets from Federal Fiduciaries found to have misused the beneficiary's benefits
- Review evidence and respond to reconsideration requests
- Refer misuse cases to appropriate agency, OIG, and RC
- Provide recommendations to management
- Assist with on-site reviews

Personnel/Structure:

- Sufficient number of Legal Instrument Examiners (LIE) to manage workload
- The team would benefit from the assistance of a program support clerk
- Cooperation with Field Examiners experienced and seasoned in evidentiary case development, preferably with LIE/accounting audit back-ground, required for the on-site investigations in misuse cases

- Consideration should be given to the number of SDA cases and historical data. At least one to two experienced LIEs should be focused on this task only.

Measurable Expectations/Targets:

- Ensure safety and assets of VA beneficiaries
- Avoid re-issuance of benefits due to negligence by the VA
- Determine and correct misuse early in the process
- Collect VA derived assets
- Provide recommendations regarding changes in Fiduciary program
- Provide statistical reporting of historical and current misuse data
- SDA and misuse have a direct correlation. Reduction of SDA generally reduces or eliminates future misuse.
- Early detection and determination allows legal remedies within statutory limits and restitution through Surety Bonds
- All misuse cases processed within established timeframes and no more than 5% of accountings in SDA status

Factors Critical to Success:

- Journey level LIEs are recommended for this team
- Manageable workload for proper case development
- Team oriented with adequate personnel
- Consistent operating and efficiency of tools (VVA, SHARE, FBS, TCIS)
- Adequate sensitive level access
- Additional work tools as deemed necessary (software programs, etc.) for case development and follow-up
- Direct working relationship with OIG, RC, management, Field Examiners, Finance, Central Office and other VA personnel to include Loan Guaranty and Veterans Health Administration (VHA) personnel
- Access to other federal agencies to include the Social Security Administration (SSA)
- Access to state agencies, court personnel, Adult Protective Services (APS) and public guardians
- Allows the LIE to focus on SDA, one of the early factors in eliminating/reducing misuse
- Timely management review and processing in all areas of case development (WPC 570 – 575)
- Travel funding, investigation and case development must be maintained within timeliness requirements
- Open discussion and review of recommendations to eliminate potential misuse
- Development of future Misuse/On-site Review Teams

Accounting Team

Introduction: The Accounting Team is responsible for conducting an in-depth analysis of all accounting documents received in the Hub and auditing accountings.

Purpose:

- Audit Federal and Court Accountings
- Follow-up on accountings due from prior payees when successor payees have been appointed
- Identify and refer SDA to the SDA team
- Recommend change of payee when serious problems with Fiduciary compliance are evident
- Follow-up on miscellaneous diaries
- Assist with on-site reviews

Personnel/Structure:

- Sufficient number of LIEs to manage workload

Measurable Expectations/Targets:

- 94% of accountings are reviewed within 14 days of receipt

Factors Critical to Success:

- Familiarization with nuances of various state laws
- Direct working relationship with RC and management

Cursory Review Team

Introduction: The Cursory Review Team is an integral element of the organizational model. This team increases the efficiency of the accounting process by triaging all incoming accountings for completeness.

Purpose:

- Review all incoming accountings for completeness and assign to Accounting Team as appropriate or return to fiduciary to be completed
- Prepare paperwork for scanning
- Establish WPC control on accounting workload and control/balance workload distribution
- Utilize VVA and FBS to determine if the incoming correspondence is the initial receipt or additional information
- Distribute the workload virtually by utilizing a Hub online program tracking tool and the Work-In-Process (WIP) list in FBS
- Certify originality of mail
- Prepare accounting cover sheet and additional documents for scanning and indexing into VVA

Personnel/Structure:

- Sufficient number of LIEs to manage workload

Measurable Expectations/Targets:

- 94% of accountings are reviewed within 14 days of receipt
- Establish WPC and assign to the Accounting Team within 1 business day

Factors Critical to Success:

- Close interaction and coordination with supervisor & Accounting Team
- Close interaction with Action Mail Clerk

Initial Appointment (IA) Team

Introduction: The IA Team is responsible for completing all actions associated with the initial appointment of a recognized VA fiduciary.

Purpose:
- Establish and assign IA exams in FBS and close out pending IA when complete
- Update FBS records
- Ensure VVA is up to date with all necessary exam materials

Personnel/Structure:
- Sufficient number of LIEs to manage workload

Measurable Expectations/Targets:
- 90% of IA pending less than or equal to 45 days
- 92% of IA processed less than or equal to 45 days
- Timeliness: The assignment/closure process must be completed within station timeliness standards

Factors Critical to Success:
- Utilizing a clear and concise WMP.
- Coordination and communication with Field Examiners and Coaches
- Ability to open, close, save, and retrieve files
- Utilize office technology effectively

Fiduciary-Beneficiary (FB) Team

Introduction: The FB Team is responsible for completing all actions associated with field examinations conducted that are not an initial or successor appointment and supports the IA Team as needed.

Purpose:
- Establish, assign, and close-out Fiduciary/Beneficiary field exams
- Ensure VVA is up to date with all necessary exam materials
- Review ("scrub") monthly FB assignments to ensure case is active and contact information is correct
- Update FBS records
- Follow-up on WPC 550

Personnel/Structure:
- Sufficient number of LIEs to manage workload

Measurable Expectations/Targets:
- 90% of FB Appointments pending less than or equal to 120 days
- 92% of FB Appointments processed less than or equal to 120 days
- Timeliness: The assignment/closure process must be completed within station timeliness standards

Factors Critical to Success:
- Utilizing a clear and concise WMP
- Coordination and communication with Field Examiners and Coaches
- Ability to open, close, save, and retrieve files
- Utilize office technology effectively

Phone Unit

Introduction: The Phone Unit is responsible for answering incoming calls, returning calls, taking action on issues arising from calls, and assisting other teams as necessary.

Purpose:

- Answer incoming phone calls for Hub region
- Return calls when required to resolve any issue
- Perform Action Mail duties when needed (All Phone Unit members have access to IRIS)

Personnel/Structure:

- A sufficient number of LIEs to answer calls including follow-ups
- Utilize LIEs from other teams for lunch/vacation/peak volume coverage

Measurable Expectations/Targets:

- Average wait time of 160 seconds or less

Factors Critical to Success:

- Familiarity with state laws
- Document all actions in VVA on VA Form 21-0820 and VA Form 21-3045
- Supervisory monitoring and analysis of call flow and availability to maintain an adequate level of service
- Ability of all LIEs to join phone queue
- Have an IRIS mailbox established for each Hub to receive IRIS

Scanning Team

Introduction: The Scanning Team is responsible for scanning all fiduciary documents in Virtual VA.

Purpose:
- Scan all incoming mail, accountings, and special projects

Personnel/Structure:
- A sufficient number of scanning clerks to retrieve all incoming mail from the mailroom, prepare and sort it by action needed, scan it and index it by file number

Measurable Expectations/Targets:
- Scan all incoming documents within one working day
- Ensure documents are properly scanned, stored and dated for archiving or destruction
- Ensure 99% or better scanning quality consistent with VBA Letter 20-11-17

Factors Critical to Success:
- Proper preparation of documents before scanning
- Quality of scanning
- Accuracy of indexing
- Proper disposition of paper documents after scanning

Action Mail Team

Introduction: The Action Mail Team is responsible for directing all incoming mail to the appropriate team.

Purpose:

- Process all documents and correspondence coming via fax, paper mail, email, and IRIS. Among these are; incoming inquiries from veterans and fiduciaries, expenditure requests from fiduciaries, and Congressional requests. This team interfaces closely with the Scanning Team.

Personnel/Structure:

- A sufficient number of clerks and LIEs to manage workload
- Each employee has a specific emphasis:

> Scanning Clerk – This clerk retrieves all incoming mail from the mailroom, sorts it by action needed, scans it and indexes it by file number.
>
> Triage Clerk (general) – This clerk assists the scanning clerk in preparing mail for scanning and covers all other miscellaneous clerical tasks.
>
> LIE (Action Mail/Corporate Mailbox emphasis) This LIE monitors the outward facing corporate Hub mailbox for actionable items such as VA Form 21-592 from other stations and distributes to other teams as necessary. This LIE is primarily responsible for working all items in the inward facing ACTION MAIL mailbox.
>
> LIE (Expenditure Requests) This LIE primarily processes the expenditure requests by monitoring the ACTION MAIL box but may also assist with all other types of action mail.
>
> LIE (Congressional Liaison) This LIE primarily responds to all Congressional inquiries. This LIE may also act as the Homeless, OIF/OEF coordinator and is responsible for completing data integrity lists such as reviewing old EP 290s & EP 297s.

Measurable Expectations/Targets:

- Process Action Mail within 5 business days
- Resolve IRIS inquiries within 2 business days

Factors Critical to Success:

- Familiarity with state laws
- LIEs work in a specific area of emphasis

Field Examiner Team

Introduction: The Field Examiner Team is responsible for the completion of all program and non-program field exams, and other reports as required.

Purpose:

- To assess the competence, adjustment, and personal welfare of beneficiaries
- To qualify and select a fiduciary that is best suited to the needs and situation of the beneficiary
- To investigate and determine when a fiduciary's misuse of a beneficiary's funds is alleged or suspected

Personnel/Structure:

- Sufficient number of Field Examiners to manage workload

Measurable Expectations/Targets:

- Completion of all IA exams within 45 days
- Completion of FB exams within 120 days
- Completion of Misuse Investigations WPC 571 within 45 days
- Conduct on-site reviews of fiduciaries
- Conduct special field examinations

Factors Critical to Success:

- Effective workload management by Field Examiners
- Effective continuous training of Field Examiners

Promulgation Team

Introduction: The Promulgation Team is responsible for processing the release of retroactive benefits, resumption, suspension, and termination of benefits for program recipients.

Purpose:
- Ensure timely action is taken to release retroactive VA benefits to beneficiaries upon receipt of VA Form 21-555
- Ensure timely action is taken to stop, suspend, or resume benefits for incompetent beneficiaries

Personnel/Structure:
- Sufficient number of LIEs and Lead LIEs to ensure timely award actions

Measurable Expectations/Targets:
- Awards are promulgated and authorized within five workdays of receipt of VA Form 21-555
- All other award actions are promulgated and authorized within five workdays of receipt of information

Factors Critical to Success:
- Utilizing a clear and concise WMP
- Open and effective communication among other Hub teams

Appeals Team

Introduction: **(To be Determined)**

Purpose:

Personnel/Structure:

Measurable Expectations/Targets:

Factors Critical to Success:

Quality Review Team (QRT)

Introduction: The mission of the Quality Review Team is to ensure the integrity and performance of each fiduciary Hub by improving the quality of it's production.

Purpose:

- Reviews STAR and local errors a recommends training based on identified trends
- Provides training on STAR errors
- Ensures all STAR cases are made available in Virtual VA for review or, in the event a case is unavailable, contacts STAR staff for a replacement case
- Conducts local quality reviews
- Provides training on local errors
- Enforces the correction of errors at the local and national levels
- Prepares reconsideration requests (STAR errors)
- Serve as TPSS Coordinator
- Serve as TMS Coordinator
- Provides introductory training to new FE and LIE
- Conducts second signature reviews
- Provides intermediate level training for journey level FE and LIE
- Oversees peer training (mentoring) by journey level FE and LIE
- Tracks quality data
- Ensures completion of mandatory annual training requirements
- Acts as liaison between Hub and station Training Manager
- Conducts all other training
- Conducts scanning quality per VBA Letter 20-11-17

Personnel/Structure:

- Team members will include at least one supervisor, at least one Program Specialist and other Hub personnel (Collateral Duty) as needed to ensure it's mission is accomplished. Rotations of QRT collateral duty personnel are permissible, however, members should serve on the team for at least one year before rotation.
- The team will be permanent, separate and distinct from other teams within the Hub under direct supervision of the Hub Manager.
- The ratio of reviewers to employees should be no greater than: 1:25

Measurable Expectations/Targets:

- Maintain local and national Fiduciary Hub accuracy at 90% or above
- Complete local quality reviews by the fifteenth (15th) of each month
- Provides timely status reports to supervisors regarding completion of required annual training by all Fiduciary Hub employees

Factors Critical to Success:

- Utilize rules-based templates and standardized letters
- Enforcement of error corrections (Both local and national)
- Monthly training based on error trends (Both local and national)
- Monthly training that directly applies manual regulations, federal and state law, fast letters, court decisions and/or local and national policies