Department of Veterans Affairs

Memorandum

Date: October 26, 2016

From: Director, Verification Program (VP)

Subj: Federal Comprehensive Case Completion Report (CCCR) Review Process

To: VP Distribution

1. **Purpose**: This memorandum establishes the process for acceptance or rejection of the contractor's Comprehensive Case Completion Report (CCCR) in VCMS.

2. **Overview**: VIP 7.0 requires the formal acceptance or rejection of the contractor's Comprehensive Case Completion Report (CCCR) at the conclusion of the federal review process. This action is logged in VCMS and becomes a reportable metric, which will assist the Contracting Officer's Representative (COR) with monthly invoicing validation and performance analysis. **Only the COR is authorized to accept or reject a CCCR as established in the policy below.**

3. **Definitions**:
    a. *Accept CCCR*: The Comprehensive Case Completion Report was determined to be complete and satisfactory, without any substantive mistakes or unsupported interpretive analysis.
    b. *Reject CCCR*: The Comprehensive Case Completion Report was determined to be incomplete and/or unsatisfactory. Substantive mistakes and/or unsupported interpretive analysis were identified. The case is not eligible to proceed forward in the process, and the case will be returned to the contractor for rework.
    c. *Substantive*: "black and white" or objective issue
    d. *Interpretive*: "gray" or subjective issue

4. **Policy**:

    a. As part of the full Federal Review process established by current policies and procedures, the Federal Reviewer will review the CCCR file located in VCMS Section 10.9.

        1) The Federal Reviewer will verify that the contractor's review was performed completely and correctly in accordance with current policies, procedures, and standards.

        2) The Federal Reviewer will verify that the contractor uploaded the correct CCCR in accordance with the contract:

            1. Case Assessment Report (CAR)
            2. Post-Welcome Call Removal Report (PWRR)
            3. Post-Interview Withdrawal Report (PIWR)
            4. Post-Interview Removal Report (PIRR)
            5. Post-Research Withdrawal Report (PRWR)
            6. Post-Research Removal Report (PRRR)
            7. Post-Application Withdrawal Report (PAWR)
            8. Required Document Removal Report (RDRR)
            9. Clarifying Document Removal Report (CDRR)
            10. Post-Findings Withdrawal Report (PFWR)
            11. Request for Reconsideration Report (R4R)
            12. Change Request Report (CRR)
            13. Joint Venture Report (JVR)

    b. The Federal Reviewer will follow these rules when determining whether to recommend to the COR that the CCCR be accepted or rejected:

        1) The Federal Reviewer will **recommend that the CCCR be accepted** (Step 4.c) if he or she agrees with the contractor's

recommendation and no substantive mistakes or interpretive disagreements were identified.

2) The Federal Reviewer will **recommend that the CCCR be accepted** (Step 4.c) if he or she disagrees with the contractor's recommendation, but no substantive mistakes were identified, and any interpretive disagreements <u>can</u> be reasonably justified (e.g., difference of opinion on a gray area issue where the contractor presented a complete, logical argument).

Note: In these instances, the Federal Reviewer is required to submit a Federal Review Feedback Report to document the reasons for the recommendation overturn.

3) The Federal Reviewer will **recommend that the CCCR be rejected** (Step 4.d) if at least one of the following scenarios exists:

1. The Federal Reviewer identifies that a substantive mistake was made (regardless of whether he or she agrees with the contractor's recommendation). A mistake is automatically considered substantive if identified in one of the following areas:
    a. Legal Organization
    b. Direct Ownership
    c. Community Property
    d. Unconditional Ownership
    e. Control of Decision-making
    f. Highest Officer Position
    g. Highest Compensation
    h. Size
2. The Federal Reviewer determines that any interpretive disagreements <u>cannot</u> be reasonably justified.

3. The Federal Reviewer determines that the CCCR is missing required information or analysis as established by current policies, procedures, and standards.

Note: In these instances, after the COR has reviewed the issue (Step 4.d(2)), the Federal Reviewer is required to submit a Federal Review Feedback Report to document the feedback

4) At any time prior to making the decision to recommend accepting or rejecting the CCCR, the Federal Reviewer may **return the application** to the contractor to obtain clarification or documentation from the contractor or applicant. This option should be utilized when the issue does not rise to the level of CCCR rejection based on the Federal Reviewer's best judgment. However, please note that prior to submitting a letter to the Director for signature, the CCCR must be recommended for acceptance.

c. The process for recommending CCCR **acceptance** is as follows:

1) Locate the CCCR line item in document section 10.9 and click the "Review" link. Click "OK" to review the document.

2) The "Submission Attempt?" field will pre-populate, but check to ensure it is correct. Escalate to supervisor if incorrect.

3) In the "Accept this document?" field, click "Yes" to recommend that the CCCR be accepted.

4) Click "OK" to finish.

5) The COR will make the final decision to accept the CCCR when he or she reviews the end-of-month CCCR productivity report.

d. The process for recommending CCCR **rejection** is as follows:

1) The Federal Reviewer will assign the case to the COR in VCMS by setting the following values:

  Queue: Federal Review

  Activity: FR CCCR Escalation to COR

  Team: CVE Bullpen Federal Reviewers

  User: William Macken (or current COR)

  Reason: [detailed justification for recommending CCCR rejection]

2) The COR will monitor his or her queue daily for any new CCCR escalation cases. Upon receipt of a recommended CCCR rejection, the COR will review the facts of the case to determine whether CCCR rejection is warranted.

  1. If CCCR rejection is warranted, the COR will follow these steps:

    a. Locate the CCCR line item in document section 10.9 and click the "Review" link. Click "OK" to review the document.

    b. The "Submission Attempt?" field will pre-populate, but check to ensure it is correct.

    c. In the "Accept this document?" field, click "No" to reject it. Any CCCR rejection must include an explanatory remark. **Reminder: only the COR is authorized to reject a CCCR.**

    d. Click "OK" to finish.

e. Assign the case to the MyVA Verification contractor Project Manager in VCMS by setting the following values:

> *Queue*: Assessment
>
> *Activity*: PM Re-Assignment
>
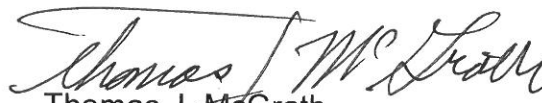> *Team*: MyVA Team A
>
> *User*: Gary Valentine (or current Project Manager)
>
> *Reason*: [detailed justification for recommending CCCR rejection]

f. Send an email to the MyVA Verification contractor Project Manager notifying him or her that a CCCR has been rejected and reassigned to him or her in VCMS. Copy the Federal Review Coordinator, Lead Portfolio Manager, and Federal Reviewer.

2. If CCCR rejection is not warranted, the COR will assign the case back to the Federal Reviewer and include justification for why the recommendation for CCCR rejection was denied. Send a notification email to the Federal Reviewer and Federal Review Coordinator.

5. **Timing**: This policy is effective immediately.

Thomas J. McGrath

Director