

**VA Form 21-2680 – Exam for Housebound Status or Permanent Need for Regular  
Aid and Attendance  
Impact of Comments Received on Information Collection Extension  
June 21, 2018**

**Background:** On April 19, 2017, the Department of Veterans Affairs (VA) published a notice in the Federal Register to extend the approval of VA Form 21-2680, *Exam for Housebound Status or Permanent Need for Regular Aid and Attendance*. 82 FR 18537. The notice served only to request extension of the previously-approved information collection; no substantive changes to the form were proposed.

**Issue:** In response to the Federal Register notice, VA received two comments on the VA Form 21-2680. Both comments, received from professional organizations (Academy of Nutrition and Dietetics and Legal Aid Foundation of Los Angeles), suggested multiple substantive edits to the form. The comments suggesting changes to VA Form 21-2680 can be categorized into one or more of the following: adding specific medical questions; adding specific legal questions; removal of substantive questions; adding directions, or; non-specific additions (characterized as “clarifications”).

**Analysis:** Many of the comments from the Academy of Nutrition and Dietetics focused on the addition of medical questions pertaining to dietary and nutrition needs of the claimant.; they are designed to assess and formulate treatment plans and do not assist in the determination of benefits eligibility. The questions also tend to measure the impairment of specific disabilities and therefore would be of limited use in a form intended to cover as many disabilities as possible.

Regarding requests to add specific legal questions, the authority to make determinations on these questions (“Does the claimant require aid and attendance”) rests with the rating agency, and are inappropriate to pose to a medical professional.

The commenters’ suggestions to remove certain substantive questions would reduce the efficacy of the examination in obtaining evidence for an eligibility determination, while also showing a misunderstanding as to the purposes of the form itself. Similarly, the request to add directions, either for a claimant or an examiner, show a misunderstanding of the intent and purpose of the form.

Finally, several generic comments suggested a need for “clarification” of various items without identifying a current issue, suggesting how to clarify, or identifying the intended result. For a full analysis of each individual comment, please see the draft response to comments associated with this task.

**Conclusion:** No changes to the form are required based on the comments received. The comments did not identify substantive or critical flaws with the form, nor did the suggested edits offer any significant opportunities to improve the form and/or reduce the respondent burden at this time.