

SUPPORTING STATEMENT

VAF 20-0995 SUPPLEMENTAL CLAIM APPLICATION VAF 20-0996 REQUEST FOR HIGHER-LEVEL REVIEW

A. JUSTIFICATION:

1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.

The Department of Veterans Affairs (VA), through its Veterans Benefits Administration (VBA), administers an integrated program of benefits and services, established by law, for Veterans, service personnel, and their survivors. In August 2017, the President signed the Veterans Appeals Improvement and Modernization Act of 2017¹ – making substantial adjustments to VA’s benefits claims and appeals system. Among other changes, the legislation requires that claimants have access to a new three lane decision review process. A drastic departure from the current, legacy appeals process, the new process will give claimants the choice as to what kind of review is best for them.

The new statutory appeals framework features three differentiated lanes from which a claimant may choose to seek review of a VA decision: a Higher-Level Review Lane for review of the same evidence by a higher-level claims adjudicator in the agency of original jurisdiction (AOJ); a Supplemental Claim Lane for submitting new and relevant evidence for review by the AOJ; and an Appeal Lane for seeking review by a Veterans Law Judge (VLJ) at the Board of Veterans’ Appeals (Board).

As a part of the implementation of the Appeals Modernization Act, VA created an entirely new higher-level review process, along with the appropriate form for requesting a higher-level review. Information is requested by this form to formalize a request for higher-level review on a decision rendered by VA. Authority is found in Pub. L. 115-55, and *proposed* 38 C.F.R. § 3.2601.

As a part of the implementation of the Appeals Modernization Act, VA created an entirely new supplemental claim process, along with the appropriate form for submitting a supplemental claim. Information is requested by this form to formalize a request for a supplemental claim on a decision rendered by VA. Authority is found in Pub. L. 115-55, and *proposed* 38 C.F.R. § 3.2501.

In order to effectuate the new law, VBA is creating two new information collections under OMB Control Number 2900-XXXX, VA Form 20-0996, Decision Review Request: Higher-Level Review, and VA Form 20-0995, Decision Review Request: Supplemental Claim.

VA Form 20-0996, Decision Review Request: Higher-Level Review

As created by the Appeals Modernization Act, a request for higher-level review of a VA benefits decision requires the filing of a form prescribed by the Secretary. In addition to providing VA with the identity of the claimant, the higher-level review form must specifically indicate whether such review is requested by a higher-level adjudicator at the same office within the AOJ, or by an adjudicator at a different office of the AOJ. The

¹ Pub. L. 115-55 (2017).

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higher-level review form will indicate whether the claimant or representative has requested an informal conference with the higher-level adjudicator. This telephonic communication with the higher-level adjudicator is for the sole purpose of pointing out errors of fact or law in the prior decision, and may be held with either the claimant, or his or her duly appointed representative. Lastly, the higher-level review form will indicate the specific issues that the claimant is seeking review of in the Higher-Level Review Lane.

VA Form 20-0995, Decision Review Request: Supplemental Claim

As created by the Appeals Modernization Act, a review of an initial VA decision in the Supplemental Claim Lane requires the filing of a form prescribed by the Secretary. In addition to providing VA with the identity of the claimant, the Supplemental Claim Form must indicate the specific issues that the claimant disagrees with, and the form must identify any new and relevant evidence that supports a supplemental claim.

- 2. Indicate how, by whom, and for what purposes the information is to be used; indicate actual use the agency has made of the information received from current collection.**

VA Form 20-0996, Decision Review Request: Higher-Level Review

VA Form 20-0996, Decision Review Request: Higher-Level Review, will be used by a claimant and/or beneficiary to formally request a higher-level review of an initial VA decision, in accordance with the Appeals Modernization Act.

The information collected will be used by VA to identify the issues in dispute which the claimant seeks review of in the Higher-Level Review Lane. Additionally, the information collected will be used to schedule telephonic informal conferences as necessary, as noted in *proposed* 38 C.F.R. § 3.2601.

VA Form 20-0995, Decision Review Request: Supplemental Claim

VA Form 20-0995, Decision Review Request: Supplemental Claim, will be used by a claimant and/or beneficiary to formally request a review of an initial VA decision, based on new and relevant evidence, in accordance with the Appeals Modernization Act.

The information collected will be used by VA to identify the issues in dispute which the claimant seeks review of in the Supplemental Claim Lane.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

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The VA Form 20-0996 and VA Form 20-0995 will be available for filling out and printing, via the internet, at the following web address: <http://www.va.gov/vaforms/>.

VA Form 20-0996, Decision Review Request: Higher-Level Review

VA Form 20-0996 will be available on the One-VA web site in a fillable electronic format. VBA will host this form on a secure server and does not currently have the technology in place to allow for the complete submission of the form. Validation edits will be performed to assure data integrity. There currently is no utility process in place that will allow the data submitted on the form to be incorporated with an existing centralized legacy database.

VA Form 20-0995, Application for a Supplemental Claim

VA Form 20-0995 will be available on the One-VA web site in a fillable electronic format. VBA will host this form on a secure server and does not currently have the technology in place to allow for the complete submission of the form. Validation edits will be performed to assure data integrity. There currently is no utility process in place that will allow the data submitted on the form to be incorporated with an existing centralized legacy database.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

The information in these collections is unique to the circumstances and facts of each claim before VA, and specific to each claimant seeking either review through the Supplemental Claim Lane, or Higher-Level Review Lane.

- 5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

Some claimant's representatives, small service organizations or attorneys-at-law doing business as solo practitioners or at small firms, might qualify as small entities. However, insofar as the information requested is narrowly tailed to be the least required for the protection of a claimant's rights and the fulfillment of statutory requirements, the burden on these small entities will be minimal.

- 6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently as well as any technical or legal obstacles to reducing burden.**

Without the information solicited by this form, VA would be unable to initiate either a higher-level review or supplemental claim on behalf of a claimant/beneficiary, or determine the issues for which the claimant/beneficiary seeks review.

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The frequency of collection depends solely upon the desire of VA claimants to seek either a higher-level review or supplemental claim of an initial VA decision. In that sense, VA does not control the frequency of collection.

- 7. Explain any special circumstances that would cause an information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years; in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study and require the use of a statistical data classification that has not been reviewed and approved by OMB.**

These collections of information are conducted in a manner consistent with guidelines in 5 C.F.R. § 1320.5(d)(2). There are no special circumstances that would require respondents to prepare or submit the documents outlined above, or respond in fewer than 30 days.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor's notice, required by 5 C.F.R. § 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the sponsor in responses to these comments. Specifically address comments received on cost and hour burden.**

On August 10, 2018, in the proposed rule for *VA Claims and Appeals Modernization* at 83 FR 39818, VA requested comments on the collections of information. VA received three comments regarding the collections of information in response to this request. There were no comments on the cost and hour burden for the forms. The three commenters directed their comments at the format and content of the forms. In response, VA made several changes to include changing the title of the forms to *VA Form 20-0996, Decision Review Request: Higher-Level Review* and *VA Form 20-0995, Decision Review Request: Supplemental Claim* to allow for easier searchability. The comments and VA's responses to each comment are provided below. Changes to the forms in response to the comments did not result in any increase in burden hours or the costs associated with the forms.

Comment from Ryan Galucci, Director, National Veterans Service, Veterans of Foreign Wars of the United States

The commenter suggested that when VA Form 20-0995, "Supplemental Claim Application" is approved, that VA Form 21-526b be discontinued, as it is duplicative and its name is too similar. VA agrees with the suggestion and will be making amendments to VA Form 21-526b through a separate public notice as the form is

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currently under a separate information collection and is not within the scope of this request.

The commenter also requested VA include information on deadlines for submission of the form and other types of reviews that are available to the claimant. VA agrees with the suggestion and revised the instruction page of both VA Form 20-0995 and 20-0996 to include the time limits for filing the forms and directs the respondent to additional resources to find information on other review options that may be available.

The commenter requested that VA simplify the forms by eliminating boxes in blocks 1-9 and eliminating block 12 as the requirement to submit multiple forms for each benefit type is unduly burdensome. VA disagrees with both comments and did not make any changes in response. The individual cells in blocks 1-9 on the forms allows for VA to better read the information and assists in preventing incorrect data extraction from the form. Additionally, the requirement to specify a benefit type is important for appropriate routing. These forms will be used by multiple departments within VA which have different mailing addresses. To not delay processing of the form due to the form being sent to the wrong location, we ask upfront that respondents complete separate copies of the form if they are asking for review of different benefit types.

The commenter requested that VA change the term "date of decision" to "date of notification" on the forms. VA agrees with the need to provide clarity around the "date" VA is asking for and in response to the comment amended the term on the both forms to "date of decision notice."

The commenter asked that VA update the form to include additional fields for multiple addresses. VA has other forms available for change of address that can be used by claimants. VA made no change in response to this request.

The commenter requested that VA explain the other forms of evidence that may be submitted on the supplemental claim form as the supplemental claim form is to be used for multiple business lines and medical records are not the only type of records that are new and relevant. VA agrees that the form should be clear that medical records are not the only forms of new and relevant evidence. In response to this portion of the comment, VA amended VA Form 20-0995 to include a hyperlink to a factsheet that provides information on the evidence needed to substantiate a claim for compensation benefits and included a checkbox for claimants who are filing more than a year after they received notice from VA of its decision to request information if they cannot review it electronically through the provided hyperlink. In addition, references to medical records were removed and the form now instructs the claimant to review their decision notification letter for information on needed evidence and the authorization forms required by VA to assist in gathering that evidence.

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The commenter also requested that VA ask if additional evidence was being submitted with the form. In response to this portion of the comment, VA included statements informing the respondent to place both their name and file number on any additional sheets attached to the form to ensure they are routed appropriately and associated with the claims file.

The commenter also asked that VA remove the statement in the certification and signature block that says, "By signing this form you have given permission to make benefit payment changes that could result in the creation of an overpayment". The commenter stated there may be confusion on behalf of the claimant in understanding what this means. VA agrees that this statement could cause confusion on what actions VA is taking in response to submission of the forms. In response to this comment, VA removed the language from both the 20-0995 and 20-0996 forms.

The commenter asked that we revise the 20-0996 form as there appeared to be a typographical error in the instructions. The second paragraph of instructions misleadingly states "A higher-level review is a new review of an issue(s) previously decided by the Department of Veterans Affairs (VA) based on submission of new and relevant evidence." VA acknowledges that this was a technical error in the document and in response revise this sentence to state "'A higher-level review is a new review of an issue(s) previously decided by the Department of Veterans Affairs (VA) based on the evidence of record as of the date of notice of the prior decision.'"

The commenter stated that under "Part II - Higher Level Review Options" of VA Form 20-0996, the second paragraph instructions state "If we cannot fulfill your request to have your Higher-Level Review conducted at the same or a different office, we will notify you at the time the Higher-Level Review decision is made". This makes it seem as though VA cannot conduct the Higher-Level Review at any office. VA agrees that the sentence construction could be misleading. In response, VA revised the sentence to reflect that if VA cannot grant the claimant's request, then VA will provide notice at the time the higher-level review decision is made.

The commenter stated it is unclear from the 20-0996 form whether the Veteran or their representative would be contacted to conduct the informal conference. In response to this comment, VA revised the form to indicate that if the claimant wishes for the representative to be contacted, he or she must include the representative's contact information. VA will take that as a request to contact the representative when the contact information is provided. VA also amended the form to clarify that VA will call to schedule the informal conference and identify a time agreed to by both the higher-level reviewer and the Veteran and/or representative to conduct the call.

The commenter requested that the forms be made 508 complaint. Section 508 of the Rehabilitation Act requires federal agencies to ensure that all electronic and information technologies provide equal access for people with disabilities. Both VA

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Form 20-0995 and 20-0996 are 508 compliant forms. VA made no changes in response to this portion of the comment.

The commenter requested that the forms allow for authorized representatives to sign the forms on behalf of a claimant. VA never intended to exclude an authorized representative from signing on the claimant's behalf. To ensure clear understanding of the signature requirements, in response to this comment VA revised the "Certification and Signature" sections of both forms to include authorization for a VA authorized representative to sign on the claimant's behalf and updated the "Alternate Signer" information to clarify that a VA authorized representative can sign on behalf of a claimant and does not need to meet the alternate signer requirements.

Comment from Ethan Maron, Lieberman & Mark PLLC

This commenter also articulated a request to clarify that authorized representatives may sign the forms for supplemental claims and requests for higher-level review. As stated above, VA does allow for authorized representative to sign on behalf of a claimant and in response, revised both forms to reflect this information.

Comment from Anonymous, Anonymous

This commenter indicated that VA forms are too long and most of the information can be placed in a web link. In creating forms and notices, VA makes efforts to streamline the documents as much as possible while still maintaining legal requirements. In response to this comment and others received above, VA reviewed both forms and removed information that was either duplicative or explained in multiple locations. In addition, as previously indicated, VA added a hyperlink to the instructions page of VA Form 20-0995 for compensation benefit claims that provides additional information on the evidence needed to substantiate the claim. This factsheet is located on the internet and can be access by claimants wishing to receive additional information on the claims process. This information does not speak directly to the process for completing the form but provides additional information that may be beneficial to a claimant in supporting his or her supplemental claim. By placing this information in a web link, it reduces the time required to read through the instructions and complete the form.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payments or gifts to respondents have been made under this collection of information.

10. Describe any assurance of privacy to the extent permitted by law provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

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Under 38 U.S.C. § 5701(a), VA has statutory authority to protect the confidentiality of all files, records, reports, and other papers and documents pertaining to any claim under any of the laws administered by the Secretary and the names and addresses of present or former members of the Armed Forces, and their dependents.

VA also complies with the Privacy Act of 1974 (5 U.S.C. § 552a).

The records are maintained in the appropriate Privacy Act System of Records identified as “Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records-VA (58VA21/22/28),” published at 74 FR 29275 on June 19, 2009, and last amended at 77 FR 42593 (July 19, 2012).

- 11. Provide additional justification for any questions of a sensitive nature (Information that, with a reasonable degree of medical certainty, is likely to have a serious adverse effect on an individual's mental or physical health if revealed to him or her), such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private; include specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature.

- 12. Estimate of the hour burden of the collection of information:**

Although the Higher-Level Review Lane and the Supplemental Claim Lane are new features of the Appeals Modernization Act, we can make some assumptions based on the number of notices of disagreements (which is the sole mechanism for initiating an appeal in the legacy system, compared to the three options under the new framework of the Appeals Modernization Act) that have been submitted over the last four fiscal years for which data is available. That data shows that an average of 152,237 notices of disagreement have been received by VA field offices, with an average of 58,474 appeals perfected to the Board each year. Over the last four fiscal years for which data is available, an average of 38 percent of claimants who file a Notice of Disagreement subsequently perfect their appeal by filing a VA Form 9, Appeal to the Board of Veterans' Appeals.

Additionally, while claimants who disagree with a VA decision have previously only had the single option, namely an appeal, initiated by a Notice of Disagreement with the AOJ, and if the claimant still disagreed after review by the AOJ, then the claimant would need to “perfect” their appeal, through the timely filing of a VA Form 9 in order to receive VLJ review at the Board.

The new framework permits claimants other avenues for disagreement by submitting to their local VA office a Supplemental Claim Application or Request for Higher-Level Review. 38 U.S.C. §§ 5104B, 5108. Thus, the number of respondents for the Request for Higher-Level Review information collection is estimated at 35,000 per year. The number

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of respondents for the Supplemental Claim Application information collection is estimated at 80,000 per year.

VA Form 20-0996, Decision Review Request: Higher-Level Review

- a. Number of Respondents is estimated at 35,000 per year.
- b. Frequency of Response is one time.
- c. Annual burden hours are 8,750 hours.
- d. The estimated completion time for each form is as follows with an average of 15 minutes.
- e. The respondent population for VA Form 20-0996 is composed of individuals who are requesting Higher-Level Review of a claim for which VA has issued a decision and notification. VA cannot make further assumptions about the population of respondents because of the variability of factors such as the educational background and wage potential of respondents. Therefore, VBA used general wage data to estimate the respondents' costs associated with completing the information collection.

The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data, the mean weekly earnings of full-time wage and salary workers are \$973.60. Assuming a forty (40) hour work week, the mean hourly wage is \$24.34 based on the BLS wage code – “00-0000 All Occupations.” This information was taken from the following website:
(https://www.bls.gov/oes/current/oes_nat.htm, May 2017).

Legally, respondents may not pay a person or business for assistance in completing the information collection. Therefore, there are no expected overhead costs for completing the information collection. VBA estimates the total cost to all respondents to be \$212,975 (8,750 burden hours x \$24.34 per hour).

VA Form 20-0995, Decision Review Request: Supplemental Claim

- f. Number of Respondents is estimated at 80,000 per year.
- g. Frequency of Response is one time.
- h. Annual burden hours are 20,000 hours.
- i. The estimated completion time for each form is as follows with an average of 15 minutes.

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j. The respondent population for VA Form 20-0995 is composed of individuals who are requesting an Decision Review Request: Supplemental Claim to formally request a review of an initial VA decision. VBA cannot make further assumptions about the population of respondents because of the variability of factors such as the educational background and wage potential of respondents. Therefore, VBA used general wage data to estimate the respondents’ costs associated with completing the information collection.

The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data, the mean weekly earnings of full-time wage and salary workers are \$973.60. Assuming a forty (40) hour work week, the mean hourly wage is \$24.34 based on the BLS wage code – “00-0000 All Occupations.” This information was taken from the following website: (https://www.bls.gov/oes/current/oes_nat.htm, May 2017).

Legally, respondents may not pay a person or business for assistance in completing the information collection. Therefore, there are no expected overhead costs for completing the information collection. VBA estimates the total cost to all respondents to be \$486,800 (20,000 burden hours x \$24.34 per hour).

13. Provide an estimate of the total annual cost burden to respondents or record-keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

This submission does not involve any recordkeeping costs.

14. Provide estimates of annual cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operation expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

VA Form 20-0996, Decision Review Request: Higher-Level Review

Estimated Costs to the Federal Government:

Grade	Step	Burden Time	Fraction of Hour	Hourly Rate	Cost Per Response	Total Responses	Total
7	3	30	0.50	\$18.32	9.160	35,000	\$ 320,600.00
Overhead at 100% Salary							\$ 320,600.00
9	3	30	0.50	\$22.42	11.210	35,000	\$ 392,350.00
Overhead at 100% Salary							\$ 392,350.00

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11	3	15	0.25	\$27.12	6.780	35,000	\$ 237,300.00
Overhead at 100% Salary							\$ 237,300.00
Processing / Analyzing Costs							\$ 1,900,500.00
Printing and Production Cost							\$ 21,116.67
Total Cost to Government							\$ 1,921,616.67

VA Form 20-0995, Decision Review Request: Supplemental Claim

Estimated Costs to the Federal Government:

Grade	Step	Burden Time	Fraction of Hour	Hourly Rate	Cost Per Response	Total Responses	Total
7	3	30	0.50	\$18.32	9,160	80,000	\$ 732,800.00
Overhead at 100% Salary							\$ 732,800.00
9	3	30	0.50	\$22.42	11,210	80,000	\$ 896,800.00
Overhead at 100% Salary							\$ 896,800.00
11	3	15	0.25	\$27.12	6,780	80,000	\$ 542,400.00
Overhead at 100% Salary							\$ 542,400.00
Processing / Analyzing Costs							\$ 4,344,000.00
Printing and Production Cost							\$ 21,116.67
Total Cost to Government							\$ 4,365,116.67

Overhead costs are 100% of salary and are same as the wage listed above and the amounts are included in the total.

Note: The hourly wage information above is based on the hourly 2018 General Schedule (Base) Pay (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/GS_h.pdf). This rate does not include any locality adjustment as applicable.

The processing time estimates above are based on the actual amount of time employees of each grade level spend to process to completion a claim received on this form. The within-grade step (3) of each employee represents the average experience of employees within each grade.

15. Explain the reason for any burden hour changes since the last submission.

This is a new information collection.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending

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dates of the collection of information, completion of report, publication dates, and other actions.

While VA will present some data on publicly accessible internet websites relating to processing times for appeals and the level of appellate evidentiary development requested, the specific information gathered in the information collections described herein will not be published. The results of the other information collections will not be published for statistical use.

17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We are not seeking approval to omit the expiration date for OMB approval.

18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB 83-I.

This submission does not contain any exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

No statistical methods are used in this data collection.