

PUBLIC SUBMISSION

As of: 7/30/25, 4:02 PM
Received: July 27, 2025
Status: Posted
Posted: July 30, 2025
Tracking No. mdm-6bpk-gr05
Comments Due: August 25, 2025
Submission Type: Web

Docket: VA-2025-VACO-0001
Notices Requesting Comments

Comment On: VA-2025-VACO-0001-0058

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Program of Comprehensive Assistance for Family Caregivers Decision Appeal Form: (Doc No: 2025-14099/ OMB Control No. 2900-0894).

Document: VA-2025-VACO-0001-0064
Comment from L H on VA_FRDOC_0001-6864

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General Comment

Thank you for the opportunity to comment on VA Form 10-306, the “Program of Comprehensive Assistance for Family Caregivers Decision Appeal Form.” To reduce burden and enhance accessibility, I recommend:

1. First, I urge VA to implement an electronic submission option. By providing a secure online portal where veterans and family caregivers can log in with existing VA credentials, key fields such as: name, date of birth, last four digits of the Social Security number, mailing address, and facility could auto-populate from VA records. This approach would eliminate redundant data entry, reduce errors, and allow for a digital signature in place of the current wet-ink requirement, greatly speeding processing and reducing mailing delays.
2. Allow for a digital signature in lieu of wet ink. Adopting a digital-signature option would greatly improve accessibility and convenience; allowing veterans with mobility or health challenges to complete the form remotely without printing, mailing, or in-person visits. It also enhances security and integrity by using encrypted, tamper-evident technology and a clear audit trail, reducing the risk of lost or altered documents. Digital signatures integrate seamlessly with assistive technologies (screen readers, voice recognition, high-contrast displays), making the process fully accessible to visually impaired or cognitively challenged users. Finally, electronic routing eliminates postal delays and lost mail, ensuring faster, more reliable processing of appeal requests.
3. The form should also include a structured decision checklist (e.g., Initial Application, Approval Date, Tier Change, Denial, Revocation) with “From __ to __” date fields so requestors can precisely target past decisions. These fields would help both requestors and VA staff. Requestors could hone their inquiries to

the exact decision(s) of interest, and VA could limit its search to the relevant time frame, thereby reducing administrative burden.

4. To improve usability, the dense front-matter instructions should be condensed into brief bullet points or an infographic, with a clear link to the electronic submission option. Under the Paperwork Reduction Act.

5. Finally, I encourage VA to accommodate multiple requestors on a single form (e.g., veteran and caregiver) to submit a joint request which reduces duplicate mailings and administrative overhead.

These updates will help VA meet its obligations by streamlining paperwork, improving transparency, and protecting legacy participants' due-process rights. Thank you for considering these suggestions. I strongly encourage VA to pilot an electronic version of this form and to update the PRA burden estimate to reflect both paper and online processes.