

## 30 Day FRN 2900-0798-Veteran Beneficiary Claim for Reimbursement of Travel Expenses

[Federal Register :: Agency Information Collection Activity Under OMB Review: Veteran/Beneficiary Claim for Reimbursement of Travel Expenses](#)

OMB received 16 public comments from 9/20/24-9/22/24. VTP received on 11/4/24 for response.



Add an  
appointment.pdf



VA Form  
10-3542\_rev Aug 20



VA Form  
10-3542\_rev Aug 20

### Attachments Received:

#### 1. PC-202402-2900-022-092024-012405-1

The proposed verification of attendance (VOA) required by VA Form 10-3542 new instruction 6 is a exact duplication of the information already available via the BTSSS and VA Form 10-3542.

Both the BTSSS and VA Form 10- 3542 have data elements for the treating facility name and address, date appointment was completed, etc. as well as a certification that the information is true and correct.

VHA has not specifically shown why this information cannot be used or modified for the purposes in Item 2.

The VOA serves no lawfully purpose and increases the public burden. The VOA is not required by any law or regulation.

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.

**VA Response:** VA has received your response and appreciates your feedback. 38 CFR 70.4 clarifies that eligibility is based on services received. This requirement supports VA's obligation to deter fraud, waste and abuse via improper payments as directed under the provisions of the Payment Integrity Information Act of 2019. This instruction provides clear direction to what may be submitted with the application for verification of services received.

#### 2. PC-202402-2900-022-092024-013832-1

The VA Form 10-3542 Item 2.a Claimant's status is not found on the BTSSS.

All collection instruments should mirror each other to the fullest extent possible.

Claimant's status is determined by 1.b Claimant's SSN and/or 3.b Veteran's SSN and is unnecessary.

Please remove Item 2.a Claimant's status from the VA Form 10-3542.

**VA Response:** VA has received your response and appreciates your feedback. The Veteran's status is integrated directly into BTSSS through the user's profile.

3. PC-202402-2900-022-092024-101139-1

VHA has been conducting, sponsoring and requiring responses to this information collection without a currently valid OMB control number since July 31, 2020.

The FRN says: "An agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a currently valid OMB control number."

<https://www.federalregister.gov/d/2024-21141/p-13>

The current status of the IC should be stated in the FRN

Expired OMB control numbers should be published in the FR.

PRA protections need to be enforced by OMB.

**VA Response:** VA has received your response and appreciates your feedback.

4. PC-202402-2900-022-092024-102421-1

The FRN Abstract says: "VHA must gather certain information".

<https://www.federalregister.gov/d/2024-21141/p-11>

This is wholly inadequate and informs the public of nothing.

Specify what specific information must be gathered.

Specify when the information must be gathered.

Specify where the information must be gathered.

Specify how the information must be gathered.

**VA Response:** VA has received your response and appreciates your feedback. The information required for a complete application is indicated on the form itself.

5. PC-202402-2900-022-092024-123349-1

The BTSSS Add an Appointment page is in conflict with the new form instruction 6.

BTSSS indicates proof of attendance is optional, the form says verification of attendance "are required". Supporting Statement A, 38 USC 111, 38 CFR 70 and The Payment Integrity Information Act of 2019 (PIIA) do not require proof/verification of attendance.

BTSSS: "When you create a claim for an appointment outside of a VA facility ( also known as community care), attach confirmation from your provider that you completed the appointment to expedite claim processing. If you do not attach proof of attendance, you may experience a longer processing time to payment for your mileage reimbursement claim."

VA Form 10-3542 instruction 6." Verification of attendance. Claims for expenses of travel to or from VA-authorized appointments with non-VA providers in the community are required to be submitted with documentation providing proof that are/services were received from the community provider. Examples of valid proof include, but are not limited to, work/school release note from the community provider document, on community provider letterhead showing date appointment was completed, etc. .. "

**VA Response:** VA has received your response and appreciates your feedback. 38 CFR 70.4 clarifies that eligibility is based on services received. This requirement supports VA's obligation to deter fraud, waste and abuse via improper payments as directed under the provisions of the Payment Integrity Information Act of 2019. This instruction provides clear direction to what may be submitted with the application for verification of services received. After approval of this form, the online system will be updated to reflect the same language.

6. PC-202402-2900-022-092024-124805-1

The BTSSS contains data elements not found on the VA Form 10-3542:

Time

Appointment Name

Appointment Type

Did you complete this appointment?

All collection instruments should mirror each other to the fullest extent possible.

VHA should remove data elements not found on the paper form or explain their necessity with instructions.

**VA Response:** VA has received your response and appreciates your feedback.

7. PC-202402-2900-022-092124-094547-1

Supporting Statement A, 13., c. says, "There is no anticipated recordkeeping burden beyond that which is considered usual and customary"

Please define "considered usual and customary" and provide examples.

**VA Response:** VA has received your response and appreciates your feedback. VA provides a paper claims submission modality which allows the claimant to receive a paper form from VA, complete this form, and submit it for processing.

8. PC-202402-2900-022-092124-095800-1

Supporting Statement A, 13., c. says, "The only cost is that for the time of the respondent."

The statement does not belong in this section, it's also false, and should be stricken.

(Do not include the cost of any hour burden shown in Items 12 and 14)

**VA Response:** VA has received your response and appreciates your feedback. VA provides a paper claims submission modality which allows the claimant to receive a paper form from VA, complete this form, and submit it for processing.

9. PC-202402-2900-022-092124-100651-1

Supporting Statement A, 13. b. says, "This request covers claims submitted using a paper form and the BTSSS – see chart in 12.a above.

VHA did not provide separate hour burden estimates for each form or follow the instruction to aggregate the hour burdens in Item 13.

b. "If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13."

**VA Response:** VA has received your response and appreciates your feedback. The time estimate is an average time it would take to complete the application process.

10. PC-202402-2900-022-092124-102457-1

Supporting Statement A, 14. totally ignores equipment, overhead, printing, and support staff...

Where are the costs for the BTSSS? This section needs to be expanded and broken down to much greater detail.

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 Response:** VA has received your response and appreciates your feedback. Information regarding records or files maintained by a federal agency may be requested by filing a Freedom of Information Act request.

11. PC-202402-2900-022-092124-105152-1

Supporting Statement A, 7. says, "There are no such special circumstances."

Yes, there are.

Information collection is conducted whenever the respondent submits a claim, the frequency is determined by them.

7. "Explain any special circumstances that would cause an information collection to be conducted more often than quarterly..."

**VA Response:** VA has received your response and appreciates your feedback.

12. PC-202402-2900-022-092224-052246-1

SSA, 3. Delete "The use of the paper form allows claimants to apply for reimbursement indirectly (at remote locations and outside of business hours), but use of information technology has enhanced the process. The BT Mileage Reimbursement Application was made available to claimants via self-serve kiosks located in VA facilities in April of 2015. However, these legacy kiosks have been removed due to outdated software."

This section is not asking about paper forms or outdated technology.

Add the URL for the BTSSS, screenshots, and what is required for access.

**VA Response:** VA has received your response and appreciates your feedback and suggestions.

13. PC-202402-2900-022-092224-053358-1

SSA, 8., b. Delete "Outside consultation is conducted with the public through the 60- and 30-day Federal Register notices".

No, that's not what FRN's are.

"VA meets with Veteran Service Organizations and public advocacy organizations on a regular basis"

Name the "VSO's and public advocacy organizations".

Specify the frequency of meetings.

Provide verification of meetings.

**VA Response:** VA has received your response and appreciates your feedback. Information regarding records or files maintained by a federal agency may be requested by filing a Freedom of Information Act request.

14.PC-202402-2900-022-092224-054515-1

SSA, 1., says, "...VHA must gather certain information..."

Add, "as specified in section 2", after "information" to clarify.

**VA Response:** VA has received your response and appreciates your feedback.

15.PC-202402-2900-022-092224-055752-1

SSA, 2., says, "VHA must determine..."

Change "determine" to "collect" to clarify.

This is the most important section in SSA, this is where you are identifying the specific data elements in your ICR--"identity of the claimant, the dates, addresses of starting and ending points, and whether expenses other than mileage are being claimed".

Add "Receipts are required for allowable non-mileage expenses, for example, bridge, road and tunnel tolls; parking; ferry fares; meals; lodging; and transport by bus, train, taxi, or other public transportation."

**VA Response:** VA has received your response and appreciates your feedback.

16.PC-202402-2900-022-092224-061044-1

New VA Form 10-3542 Instructions 1. "The claimant or legal representative of claimant may complete this form or apply for reimbursement online at <https://eauth.va.gov/accessva>"

When I click on the link on the form it comes back as "Bad Request".

**VA Response:** VA has received your response and appreciates your feedback. Veterans have the ability to submit through the hyperlink listed on the form. VA is making it easier to submit in the future as well through VA.gov