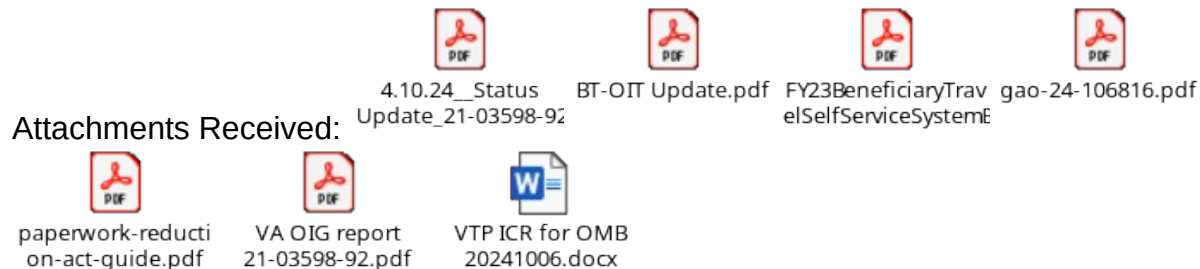


30 Day FRN 2900-0798-Veteran Beneficiary Claim for Reimbursement of Travel Expenses

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

OMB received 16 public comments from 9/23/24-10/7/24. VTP received on 11/4/24 for response.



1. PC-202402-2900-022-092324-022416-1

Please integrate information from attached documents into Supporting Statement A and add documents to "Supplementary Documents":

VA OIG 21-03598-92, "Goals Not Met for Implementation of the Beneficiary Travel Self-Service System", May 31, 2023.

<https://www.vaog.gov/sites/default/files/reports/2023-05/VAOIG-21-03598-92.pdf>
and

GAO-24-106816, "Additional Assessments of Mileage Reimbursement Data and Veterans' Travel Costs Needed", May 28, 2024.

<https://www.gao.gov/products/gao-24-106816>

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

2. PC-202402-2900-022-092324-124106-1

Supporting Statement A, 14. Add all cost data details discussed during the US House of Representatives Committee on Veterans' Affairs, Subcommittee on Technology Modernization Oversight Hearing on "The VA Beneficiary Travel Self-Service System: Mission Accomplished?" on Tuesday, June 11, 2024.

<https://docs.house.gov/Committee/Calendar/ByEvent.aspx?EventID=117397>

https://www.youtube.com/live/qDH7_ZJWM0U?t=2702s

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

3. PC-202402-2900-022-092424-022959-1

Please integrate the Privacy Impact Assessment for BTSSS, October 20, 2022, into Supporting Statement A and add to Supplementary Documents.

The PIA failed to provide OMB control number or that it expired on July 31, 2020.

1.3b "If the information is collected on a form and is subject to the Paperwork Reduction Act, give the form's OMB control number and the agency form number."

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

4. PC-202402-2900-022-092424-100102-1

The FRN needs to detail what information is being collected, "certain information" is insufficient.

"The Notice should include *details* about: What information is being collected"

<https://pra.digital.gov/clearance-process/>

FRN says, "VHA must gather *certain information* to determine whether BT eligibility and other criteria for approval have been met"

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

VA Response: VA has received your response and appreciates your feedback. The information being collected from the claimant is included on the form.

5. PC-202402-2900-022-092424-115121-1

Please add the required materials to your ICR.

PRA Guide 3.6: Information Collection Request (ICR) Requirements

1. "If this is an electronic application, you must provide screenshots of the entire online form."

"If the ICR involves the collection of personally identifiable information (PII),⁶ a privacy impact assessment (PIA) may need to be included in the ICR submission package. Please contact your designated security officer (DSO) to obtain a copy of the most current PIA that covers the information collection. Even if no PIA was completed for a particular collection in the past, if the form implicates PII, then OMB may not approve a renewal or amendment to the collection form unless a PIA has been completed. Therefore, a PIA must be created and approved BEFORE submitting the ICR for PRA approval."

"If the ICR involves the collection of PII AND the IT system associated with the information collection uses an element of PII, such as an ID number, social security number, date of birth, or other element, to retrieve the PII being

collected, a system of records notice (SORN) must be published in the Federal Register BEFORE submitting the ICR package for PRA approval."

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

6. PC-202402-2900-022-092424-115355-1

Please add the required information to your ICR.

PRA Guide APPENDIX H: INSTRUCTIONS FOR COMPLETING OMB FORM 83-I

14. Annual reporting and recordkeeping cost burden

a. "e.g., the cost of buying and setting up a computer needed to make the reports".

b. "Operations and maintenance costs include the costs of mailing, faxing, or calling in information, making paper copies, notary costs, and electronic transmissions. Regular maintenance of any equipment whose initial costs fall under "capital and start-up" would also belong here."

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.

7. PC-202402-2900-022-092624-055142-1

VACO ICR Reference No: 202402-2900-022 must be withdrawn or disapproved.

ICR is incomplete, inaccurate, misleading and does meet the requirements of the PRA Guide or 44 USC 3501 et seq.

ICR violates 38 USC 111 and 38 CFR 70 by establishing determination criteria not permitted by law and beyond the VA Secretary's authority.

ICR was not submitted properly.

Please see 22 additional, specific, comments.

<https://www.regulations.gov/document/VA-2024-VACO-0001-0500/comment>

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

8. PC-202402-2900-022-093024-075342-1

Where is the System of Records Notice for the BTSSS?

VA Response: VA has received your response and appreciates your feedback. The Privacy Act System of Record Number is 83VA10.

9. PC-202402-2900-022-100124-022722-1

Please incorporate into your ICR and add to Supplementary Documents:
"BENEFICIARY TRAVEL/OIT UPDATE"

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

10. PC-202402-2900-022-100124-024400-1

Please incorporate into your ICR and add to Supplementary Documents: "Status Request—Goals Not Met for Implementation of the Beneficiary Travel Self-Service System".

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

11. PC-202402-2900-022-100124-0259808-1

Please incorporate into your ICR and add to Supplementary Documents: "Status Request—Goals Not Met for Implementation of the Beneficiary Travel Self-Service System".

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

12. PC-202402-2900-022-100124-035419-1

Please add to Supporting Statement A, 14: "BTSSS cost \$38,794,532 to develop and operate between fiscal year 2016 and fiscal year 2024."

Information provided by William Mallison Staff Director, Subcommittee on Technology Modernization, Senior Advisor for Oversight, House Committee on Veterans' Affairs on 10/01/2024.

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

13. PC-202402-2900-022-100424-051718-1

Add to Supporting Statement A and Supplementary Documents:
"SUBCOMMITTEE ON TECHNOLOGY MODERNIZATION OVERSIGHT
HEARING 20240611"

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

14. PC-202402-2900-022-100424-054512-1

Supporting Statement A, 2: 38 CFR 70.20 (e) added "additional information" collection to deny payments for beneficiary travel.

This is beyond the authority of SecVA.

38 USC 111 does not establish "additional determination" determination criteria such as verification of attendance, proof of attendance, completion of appointment documentation, or provider updates to medical records.

OIRA has never, and must never, approve the undefined and unjustified "additional information" collection.

This is the ICR, there is no "additional information"!

The only data elements requested by all VHA Supporting Statement A, 2 is identity, addresses, dates, whether expenses other than mileage are being claimed and *one* signature.

38 CFR 70 is secondary to 38 USC 111 and cannot contradict it; 70.20 (e) contradicts 38 USC 111, is therefore invalid, and must be removed.

VHA must remove "additional information" and proposed VA Form 10-3542 Instruction 6.

OIRA must disapprove this ICR.

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

15.PC-202402-2900-022-100524-024552-1

Support Statement A, 13: Total annual cost burden.

a. "There are no capital, start-up, operational, or maintenance costs."

My capital, start-up, and operational costs for Information Collection via BTSSS are:

Computer \$1,000.00 one-time

Scanner \$200.00 one-time

DSL \$075.00 monthly

Sub Total: \$1,275.00

My capital, start-up, and operational costs for Information Collection via the paper VA Form 10-3542 are:

Printer \$200.00 one-time

Ink \$075.00 recurring

Paper \$10.00 recurring

Stamp \$00.73 recurring

Envelopes \$05.00 recurring

Pen \$05.00 recurring

Sub Total \$275.93

Grand Total: \$1,570.73 plus all applicable taxes.

If I am your only sample, you **must** use my numbers.

If not, you must justify your data with specific details and complete references.

b. "The only cost is that for the time of the respondent".

The hour burden is recorded in section 12, this statement does not belong in this section.

c." There is no anticipated recordkeeping burden beyond that which is considered usual and customary."

Define a usual and customary recordkeeping burden.

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.

16.PC-202402-2900-022-100724-095953-1

See attached document.

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