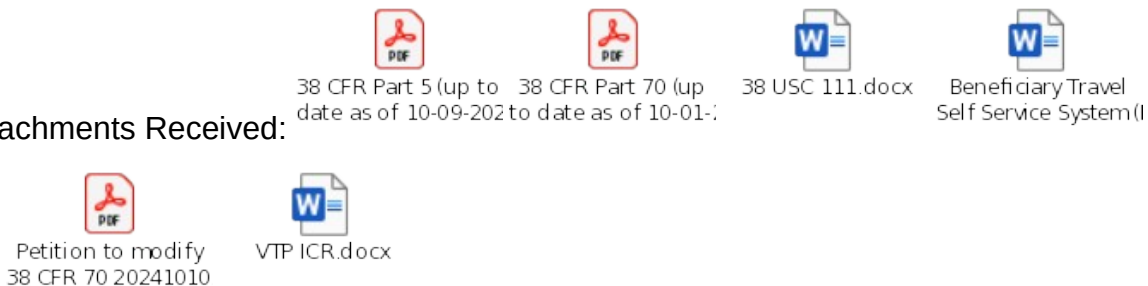


## 30 Day FRN 2900-0798-Veteran Beneficiary Claim for Reimbursement of Travel Expenses

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

OMB received 20 public comments from 10/11/24-10/15/24. VTP received on 11/4/24 for response.

### Attachments Received:



1. PC-202402-2900-022-101124-091837-1

see attached document.

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

2. PC-202402-2900-022-101224-011715-1

30-day FRN 2024-21141: <https://www.federalregister.gov/d/2024-21141>

FRN published on 09/18/2024, for ICR: 202402-2900-022, submitted to OIRA on 9/18/2024:

Did *\*not\** have a 60-day FRN published.

The 60-day FRN published on 03/05/2024 was for "historical inactive" ICR 202402-2900-007, *\*withdrawn\** on 09/17/2024.

<https://www.federalregister.gov/d/2024-04543>

[https://www.reginfo.gov/public/do/PRAViewICR?ref\\_nbr=202402-2900-007](https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202402-2900-007)

Withdrawn: "Removed from consideration", making the 60-day FRN null and void.

Start the approval process over with a new 60-day FRN.

Identify the ICR Reference No. and add hyperlink URL addressed to "View ICR - Agency Submission".

Add hyperlink URL addressed to "OMB Control Number History".

FRN says, "VHA must gather \*certain\* information to ...".

"The notice should include \*details\* about what information is being collected".

This is a wide spread, recurring issue with all VACO FRN's.

FRN does not indicate whether any comments were received during the 60-day period.

"The 30-Day Notice... must indicate whether any comments were received during the 60-day period."

Supporting Statement A:

<https://www.reginfo.gov/public/do/DownloadDocument?objectID=140144700>

1. VTP says, "Pursuant to 38 U.S.C. 111 and 38 C.F.R. Part 70, Subpart A..."

After "38 U.S.C. 111" insert "Payments or allowances for beneficiary travel".

After "and" insert "implemented by".

VTP says, "VHA must gather certain information..."

Change "gather certain information to "collect certain information specified in item 2"

After, "collect certain information specified in item 2", add, "according to statutory mandates, including The Paperwork

Reduction Act of 1995 (44 U.S.C 3501 et seq.).

"Detail any specific program problems you hope to resolve."

2. VTP says, "The claimant may provide self-attestation of their attendance at a VA authorized appointment with a non-VA provider."

No mention of "verification of attendance" (VOA) from the VA Form 10-3542.

VTP says, "If VA determines that \*additional\* information is needed to make a determination\* ..., VA will notify the claimant...in accordance with 38 CFR 70.20(e).

38 CFR 70.20(e) determination criteria is beyond the VTP authority to \*make\* payments or \*not make\* payments.

There is no undefined, "additional" information collection in an ICR.

This item identifies \*five\* data elements and \*only five\* data elements to be collected:

Identity, addresses, dates, other than mileage, signature.

Define *\*all\** data elements collected by any and *\*all\** methods.

"Do *\*not\** just make *\*general statements\** about the overall use of the information, but address the *\*specific\** data elements of information being collected."

"... you must demonstrate that you will be using all of the information collected for a practical<sup>\*</sup> and <sup>\*</sup>necessary program purpose."

Add *\*all\** modalities to your ICR:

Current modalities for Veterans to submit their BT applications include:

BTSSS – Online, on mobile devices, or via laptops and tablets offered at many VAMCs.

Paper Claims – VA Form 10-3542, Veteran/Beneficiary Claim for reimbursement of Travel Expenses,<sup>3</sup> submitted for manual entry.

Patient Check-In (PCI) App - Mobile check-in through va.gov, integrating BT claims for appointments into BTSSS.

VetLink Kiosk Integration – Available at 38 VAMCs with Vecna contracts."

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

3. PC-202402-2900-022-101224-012730-1

Supporting Statement A:

3. VTP has not complied with terms of clearance from 07/17/2017.

[https://www.reginfo.gov/public/do/PRAViewICR?ref\\_nbr=201604-2900-019#](https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=201604-2900-019#)

They have not provided screen shots/images of the kiosk/mobile technology/BTSSS.

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

Add BTSSS URL: <https://dvagov-btsss.dynamics365portals.us/>.

VA Form 10-3542 is *\*not\** modernization.

4. VTP's VOA is an exact duplication of information collection by BTSSS and the VA Form 10-3542.

VTP has not described why the VOA is required or why the information collection performed by the BTSSS and other VHA systems cannot be used or modified for the purposed described in item 2 above.

VTP already stated in item 2, "The claim includes a penalty statement and a statement indicating the claimant has traveled at their own expense and not used Government or cost-free resources for this purpose."

The statement also says, "I certify that the above information is correct."

This means the appointment was completed, service was received.

Add "I have received the services for the appointment related to this claim." to the certification on the VA Form 10-3542 and BTSSS if it makes you feel better.

Why does VTP trust the provider, but not the beneficiary?

Item 2 of this SSA identifies *\*five\** data elements and *\*only five\** data elements:

Identity, addresses, dates, other than mileage, signature.

"If the same or similar information is available, describe why it cannot be used or modified for the purposes described in item 2 above."

7. VTP says, "There are no such special circumstances."

Yes, there are. Information collection may be performed monthly, weekly, daily, hourly or by the minute; whenever a new claim is submitted.

VTP says, "The information will be *\*voluntary\**..."

The information collection is *\*not\** "voluntary", it is *\*required\** to obtain a benefit.

8. A 60-Day FRN for this ICR was *\*not\** published on Tuesday, March 5, 2024.

VTP says, "VA meets with Veteran Service Organizations and public advocacy organizations on a regular basis..."

Name the VSO's and public advocacy organizations.

Did you notify them about this ICR?

Why not?

Provide frequency of meetings.

Provide verification of meetings.

9. VTP says, "The BT mileage reimbursement program is established in 38 U.S.C. Section 111..."

The very first sentence must be, "This information collection is required to obtain a benefit."

12. VTP did not provide separate hour burden estimates for each form and by method of submission, and do not follow the instruction to "aggregate the hour burdens in Item 13."

Add and specify the time it takes to log on to the BTSSS, to enter data, attach document(s) and submit the claim, check the status of the claim, and the time for electronic messaging, telephone calls and letters to the local BT to resolve the claim.

BTSSS does not provide any notification when claim status changes.

BTSSS "Rejection Letters" do not identify the claim number being rejected.

"Indicate the... annual hour burden, and an explanation of how the burden was estimated "

**VA Response:** VA has received your response and appreciates your feedback. The estimated time is an average time for completion of the form. Information regarding records or files maintained by a federal agency may be requested by filing a Freedom of Information Act request.

4. PC-202402-2900-022-101224-013837-1

Supporting Statement A:

13. VTP says, "There are no capitol, start-up costs".

Add: Cost estimates for computer, internet access, scanner, printer, ink, paper, envelopes, stamps, pens, telephone calls, electronic messaging...

"The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information.

"Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers..."

"Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred."

"Operations and maintenance cost include the cost of mailing faxing or calling in information, making paper copies, notary costs, and electronic transmissions."

"Regular maintenance of any equipment initial cost fall under capital and start-up would also belong here."

14. VTP did \*not\* provide \*any\* costs of the BTSSS to the Federal Government.

Add: BTSSS development and operation costs, BTSSS recurring costs, additional personnel, overtime...

"... provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and \*any other expense\* that would not have been incurred without this collection of information."

VA Form 10-3542: Instruction 6:

<https://www.reginfo.gov/public/do/DownloadDocument?objectID=1400>

VTP regulation 38 CFR 70.20(e) "Additional information", cited in item 2, equals VOA \*determination\* criteria.

Determination criteria, is \*beyond\* VTP authority to \*make\* payments or \*not make\* payments.

VOA has transformed \*application\* procedures into \*determination\* criteria to \*deny\* payments.

VTP cannot alter determination criteria "Prescribed by the President".

38 USC 111, Payments or allowances for beneficiary travel:

"... the Secretary \*may\* pay... an allowance based upon mileage at a rate of 41.5 cents per mile ..."

"if\*... the Secretary exercises the authority under this section to \*make\* any payments..."

"... the Secretary \*shall\* make the payments... to or for the following persons:"

See (b)(1)(A) through (b)(3)(C)(a) for the \*only\* authorized determination criteria.

Cite the law; chapter, paragraph and sentence, requiring VOA, on the VA Form 10-3542 and in item 2 above.

**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.

5. PC-202402-2900-022-101324-010937-1

VHA MS VTP needs to add and describe all current modalities to the ICR and include screen shots of every page.

"Popular kiosks returned to VA clinics, hospitals after veterans complained about new online system" by LINDA F. HERSEY STARS AND STRIPES October 9, 2024.

Read more at: <https://www.stripes.com/veterans/2024-10-09/veterans-travel-expenses-medical-care-kiosks-15457893.html> Source - Stars and Stripes

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

6. PC-202402-2900-022-101324-012252-1

Petition for the modification of 38 CFR 70, Subpart A, "Beneficiary Travel... under 38 USC 111" attached.

This petition includes the removal of 38 CFR 70.20 (e) "additional information"... cited in SSA item 2.

Reference 38 CFR 5:20.

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

7. PC-202402-2900-022-101324-013618-1

Add "The BTSSS has cost the VA \$36 million as of July" to SSA item 14, costs to federal government.

<https://www.military.com/daily-news/2024/10/04/va-brings-back-travel-claims-kiosks-after-pushback-veterans-caregivers.html>

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

8. PC-202402-2900-022-101424-085526-1

See forty-three (43) comments at <https://www.regulations.gov/document/VA-2024-VACO-0002-0171/comment>. Comments Received; 45.

Docket: VA-2024-VACO-0002

"Agency Information Collection Activities; Proposals, Submissions, and Approvals: Veteran/Beneficiary Claim for Reimbursement of Travel Expenses; OMB No. 0798

Posted by the Department of Veterans Affairs on Oct 1, 2024"

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

9. PC-202402-2900-022-101424-090547-1

Review and add to Supplementary Documents.

"VA's online claims system comes under fire in House subcommittee", June 12, 2024.

<https://thehill.com/homenews/house/4718530-va-travel-claims-system-under-fire-house/>

"Lawmakers Unload on VA's Troubled Travel Reimbursement System", June 13, 2024.

<https://www.meritalk.com/articles/lawmakers-unload-on-vas-troubled-travel-reimbursement-system/>

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

10. PC-202402-2900-022-101524-054534-1

Supporting Statement A, Item 14, Cost to Federal Government:

In September 2021, VA reported to Congress that it had hired 148 full-time travel staff specifically to support the BTSSS implementation.

Letter from the VA Secretary to the US Senate Committee on Veterans' Affairs Chairman, September 2, 2021.

VA OIG 21-03598-92 | Page 20 | May 31, 2023

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

11. PC-202402-2900-022-101524-055207-1

Supporting Statement A, Item 14, Cost to Federal Government:

In September 2016, VA awarded a firm-fixed-price contract to a company to develop and implement BTSSS from a commercial off-the-shelf system. The company made customizations and enhancements for BTSSS to provide the tools to streamline claims, automate eligibility determinations and payment processing, detect improper payments, and enhance its reporting. The initial contract was awarded for nearly \$11 million, but as of July 2022, the cost to develop, implement, and enhance BTSSS was about \$13.5 million.

Modifications to the initial contract award included an extension of the period of performance from September 29, 2018, to April 29, 2021. This extension occurred due to changes in the system environment and additional time needed for the company to complete testing and deployment. One key change to the contract occurred in September 2018: this change removed the kiosk as an accessible interface and replaced it with smart phone applications. Specifically, the contract states, "BTSSS shall be accessible via the following user interfaces: smart phone applications such as android and Apple-based mobile applications." While this change removed initial planned efforts to integrate the kiosks with BTSSS, kiosks are still available for use at some medical facilities where veterans can input their information and print the paper form. The paper form is then submitted to travel staff who manually enter it into the travel system. In June 2022, the VTP director stated VA is holding discussions on future capabilities which could include having kiosks that connect directly to BTSSS. Beyond the original development contract, VA also awarded two BTSSS sustainment contracts. The first was awarded to the company under contract to complete system maintenance and upgrades for the new system. The second was awarded to a second vendor to provide software development and information technology operation services. This second contract provides the platform that BTSSS and several other VA systems use.

VA OIG 21-03598-92 | Page 26-27 | May 31, 2023

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

12. PC-202402-2900-022-101524-055854-1



Supporting Statement A, Item 8., b.: Consultation

VTP did not effectively communicate with veterans prior to transitioning between systems. During system development, VTP only solicited feedback from a narrow group of veterans who worked with the program office—excluding veterans not employed by VA and veterans service organizations.

VA OIG 21-03598-92 | Page 8 | May 31, 2023

**VA Response:** VA has received your response and appreciates your feedback. As of October 2023, VA has implemented a monthly survey soliciting feedback and input from Veterans who utilize the BTSSS system.

13.PC-202402-2900-022-101524-016048-1

VHA Does Not Collect Information on Underserved Subpopulations of Veterans' Use of the Benefit.

Although VHA has high-level information on veterans' use of the mileage benefit, it does not collect information on how extensively underserved subpopulations of veterans are using the mileage reimbursement benefit to help defray their mileage costs. VA identifies underserved veterans as those that previously have been denied consistent or fair treatment, such as those living in rural areas or having low incomes. VHA collects veteran demographic information, such as income and rurality, that VHA officials told us they could use to develop a method to determine subpopulations' use of the benefit. However, as of January 2024, officials stated they only access demographic information, such as veterans' rurality, to process claims. Additionally, officials do not use demographic information to assess benefit use by different groups of veterans, such as how many veterans who live in rural areas use the benefit or receive the deductible waiver. Officials stated that they have not assessed benefit use beyond high-level trends because they have been more focused on implementing the new travel system. In particular, officials said they assess information related to monitoring claims volume and improper payments. Officials added that they are looking into ways to standardize and improve the travel system's reporting capabilities, which may help them further assess benefit use. Officials said they plan to implement additional reporting tools in FY 2024. However, as of January 2024, VHA officials did not have a plan to routinely analyze subpopulation usage information. Officials explained the program's eligibility requirements are not based on being part of an underserved veteran population, unlike other veteran transportation programs, such as the Highly Rural Transportation Grants.

VHA and VA each has a strategic objective to increase equity and access for underserved veterans. Specifically, VHA's Long-Range Plan for FY 2022-2025 identifies the importance of understanding social risk factors, such as lack of transportation, as a way to improve access and meet its objective of ensuring

equity for veterans who are underserved. Moreover, VA's strategic plan identifies trend analysis as a way to identify underserved veterans' needs and to promote equity and access. The strategic plan also identifies as an objective evidence-based decision-making to ensure resources are allocated towards VA's priorities and ensure equitable access to VA resources. By assessing underserved veterans' use of the benefit, VHA can better understand how recent changes in use of the benefit caused by the COVID-19 pandemic might have affected groups of veterans differently. This type of assessment would align with VHA and VA strategic objectives, and could help VHA identify any inequities in access and make decisions on how to address them now that the COVID-19 public health emergency has ended.<sup>31</sup> For example, as officials anticipate an increase in benefit use, they may want to determine if veterans who live in rural areas are using the mileage reimbursement benefit more to access in-person care. This is important because rural veterans are less likely to have the broadband access necessary to access telehealth care...

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

14.PC-202402-2900-022-101524-061917-1

Supporting Statement A, 8., b., Consultation:

Veterans Lack Awareness of the Mileage Reimbursement Benefit; VHA Lacks an Outcome-Oriented Outreach Plan. According to representatives from selected national veterans service organizations and officials from the three VHA health care systems in our review, some veterans are not aware of the mileage reimbursement benefit or do not understand aspects of it. This may result in veterans not using the benefit to the fullest and may diminish their access to care. Veterans service organization representatives and officials from two of the VHA health care systems in our review stated some veterans were unclear about aspects of the benefit, including the impact of the deductible and the deductible waiver and benefit eligibility requirements. For example, representatives from one veterans service organization told us that their members view the criteria for deductible waiver eligibility as an additional barrier to accessing mileage reimbursement and are concerned that requesting the waiver could delay their reimbursement. In addition, officials from one VHA health care system stated that some VHA users were not aware of the benefit until after receiving emails from VHA about the transition to the new travel system, which was rolled out in 2020.<sup>43</sup> Officials from another VHA health care system told us that some veterans were unaware that benefit eligibility requirements differ from deductible waiver eligibility requirements. Specifically, they thought that if they are eligible for the benefit because of their disability rating then their deductible should be waived—which does not align with policy. Representatives from veterans service organizations and officials from two VHA health care systems in our review stated that VHA's existing communication methods regarding the benefit were at

times not helpful and varied from facility to facility. For example, representatives from one veterans service organization noted that the YouTube videos explaining the travel system were not clear. Representatives from another veterans service organization stated that some health care systems' staff remind veterans during appointments to submit claims for reimbursement, but others do not. VHA's Member Services has a strategic goal of simplifying transportation benefit delivery and identified increasing proactive outreach and training to internal and external transportation stakeholders as initiatives to achieve that goal. In November 2023, Member Services hired a veterans experience officer to assist with the strategic objective of increasing proactive outreach. Officials told us this individual will be responsible for evaluating existing outreach activities and working with field representatives to determine best practices at health care systems and assess the current state of outreach activities. Officials stated that this assessment will allow Member Services to identify gaps in communication and outreach and develop a plan to address these gaps. As of January 2024, VHA Member Services stated that they had begun outreach efforts. Specifically, they stated they have made changes to the VA website and held local outreach events. However, they have not finalized a plan specifically outlining how Member Services will increase outreach and achieve its goal...

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

15.PC-202402-2900-022-101524-062428-1

GAO Recommendations for Executive Action.

We are making the following four recommendations to VA:

The Under Secretary for Health should collect and assess information on subpopulations of veterans' use of the mileage reimbursement benefit and identify options, as appropriate, to help improve access to care for underserved veterans. (Recommendation 1)

The Under Secretary for Health should collect additional information on veterans' travel costs and assess costs by demographic, geographic, or other subpopulations to inform evidence-based decisions about transportation programs' resources. This additional information could include fuel costs and the cost of vehicle maintenance, accessories, parts, and tires. (Recommendation 2)

The Under Secretary for Health should finalize and implement an outreach plan for improving veterans' awareness of aspects of the mileage reimbursement benefit. The plan should include outcome-oriented performance measures and appropriate communication methods, based on factors such as the intended audience. (Recommendation 3)

The Under Secretary for Health should evaluate the effectiveness of the outreach plan for improving veterans' awareness of the benefit, and revise communication methods as appropriate. (Recommendation 4)

Page 31 GAO-24-106816 VA Mileage Reimbursement Benefit

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

16. PC-202402-2900-022-101524-063022-1

Beneficiary Travel Self Service System (BTSSS) Survey Sampling Methodology Report,

Prepared by Veteran Experience Office Version: 10 August 2023, attached for review and inclusion.

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

17. PC-202402-2900-022-101524-064459-1

Supporting Statement A, 2., Data Elements:

Identify all data elements collected by all methods and justify them.

"Please check any information listed below that your system collects, uses, disseminates, creates, or maintains. If additional SPI is collected, used, disseminated, created, or maintained, please list those in the text box below":

Name

Social Security Number

Date of Birth

Mother's Maiden Name

Personal Mailing Address

Personal Phone Number(s)

Personal Fax Number

Personal Email Address

Emergency Contact Information (Name, Phone Number, etc. of a different individual)

Financial Information

Health Insurance Beneficiary Numbers

Account numbers

Certificate/License numbers\*

Vehicle License Plate Number

Internet Protocol (IP) Address Numbers

Medications

Medical Records

Race/Ethnicity

Tax Identification Number

Medical Record Number

Gender Integrated Control Number (ICN)

Military History/Service Connection

Next of Kin Other Data Elements (list below)

•For Veterans, Dependents, or Caregivers the following information is collected:

First and Last name,

Email address,

Integrated Control Number (ICN),

Electronic Data Interchange Personal Identifier (EDIPI),

Correlated IDs,

Address,

Date of Birth,

Eligibility and Enrollment Data (such as service-connected percentages),

Appointment Data (such as appointment date, appointment status and facility location), Vendor ID, Dollar Amount, and Claims related data.

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

18.PC-202402-2900-022-101524-065322-1

Add to Supporting Statement A:

"Information that comes from the Veteran that is required for a claim submission is \*stored\* with the claim record in \*Microsoft Dynamics\*. This includes attachments submitted by the Veteran." Privacy Impact Assessment, Page 10 of 40, October 20, 2022.

Where is the SORN for Microsoft Dynamics?

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

19.PC-202402-2900-022-101524-094417-1

Supporting Statement A, item 3, Information Technology; item 4, Duplication; VA Form 10-3542, Instruction 6: "According to VHA health care system officials, VHA's new travel system has slowed processing times due to additional requirements for verifying community care appointments.

For example, the travel system does not automatically adjudicate claims related to non-VA appointments, such as community care appointments.

Instead, for these claims, the veteran needs to provide documentation that the appointment occurred, and local VHA staff need to manually verify the documentation.

According to officials, if the claim does not include documentation that the appointment was completed, the claim is placed under manual review, and ultimately denied until the veteran submits this documentation.

Officials from all three VHA health care systems told us that manual verifications slow the claims processing and contribute to delays in veterans receiving reimbursements."

GAO-24-106816, Page 29, May 2024.

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

20.PC-202402-2900-022-101524-094524-1

Supporting Statement A, item 14., Costs to Federal Government:

"Officials from one VHA health care system in our review stated that with these changes, a staff person can process about 64 to 80 claims per day in the new (BTSSS) travel system, whereas they previously could process 150 to 175 claims per day in the old system. Officials from this health care system also said it now takes 7 to 12 minutes to process a claim in the new system, whereas a staff person could process a claim in 2 minutes in the old system.

GAO-24-106816, Page 29-30, May 2024.

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