

## 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 31 public comments on 10/18/24. VTP received on 11/4/24 for response.



2024 06 17 (Strong) Letter to VA Secretar



BTSSS In Manual Review status.pdf

### Attachments Received:

1. PC-202402-2900-022-101824-030003-1

Disapproved!

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

2. PC-202402-2900-022-101824-030211-1

Start from scratch and try again.

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

3. PC-202402-2900-022-101824-030340-1

This ICR does not meet the requirements of the PRA Guide or 44 USC 3501 et seq.

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

4. PC-202402-2900-022-101824-030532-1

The director of VHA MS VTP, clearly, has never read the PRA Guide or 44 USC 3501 et seq.

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

5. PC-202402-2900-022-101824-045201-1

Strong calls attention to Veterans Affairs' shortfalls in Beneficiary Travel Self-Service System

June 20, 2024 • Press Release

WASHINGTON — Earlier this week, Congressman Dale W. Strong (AL-05) wrote Secretary of the Department of Veterans Affairs (VA) Denis R. McDonough, to express concern over the efficiency of the VA's Beneficiary Travel Self-Service System (BTSSS).

The BTSSS is the VA's web-based travel reimbursement program. Both Department of Veterans Affairs Office of Inspector General (OIG) and Government Accountability Office (GAO) reviews have found significant issues with the system that have complicated the travel reimbursement process for veterans nationwide. "Over the past eighteen months, my office has received countless complaints about the BTSSS and requests for assistance to navigate the VA's reimbursement bureaucracy. These concerns include technical glitches and usability issues, processing delays, and the discouragement of paper claims, among other things," Strong wrote in the letter. Almost 9.8%, or nearly 57,200 residents, of the population of Alabama's Fifth Congressional District have veteran status, a higher rate than both Alabama at large and the majority of Congressional districts nationwide. The nearest VA hospital for North Alabama veterans is in Birmingham, AL, meaning many veterans in Congressman Strong's district rely on BTSSS to reimburse their travel to and from the Birmingham VA hospital. Strong continued, "This report [May 2024 GAO report, 'Additional Assessment of Mileage Reimbursement Data and Veterans' Travel Costs Needed,'] highlights that the Veterans' Health Agency is not accurately tracking the total cost of veterans' travel to VA appointments, which could assist with further program evaluation and help inform future VA decisions regarding resource allocation and expanding options for community care, which in turn would help alleviate the need to use BTSSS so frequently." In the letter, Strong requested Secretary McDonough's response to three specific questions:

Does the VA plan to implement the four recommendations made in the May 2024 GAO report (GAO-24-106816)?

How does the VA plan to address system bugs and processing delays within the BTSSS to ensure that all veterans, regardless of their preferred submission method, receive timely reimbursements?

What plans exist to expand resources and options for care available to veterans in Alabama's Fifth Congressional District?

The full text of Congressman Strong's letter to Secretary McDonough can be read at [https://strong.house.gov/sites/evo-subsites/strong.house.gov/files/evo-mediadocument/2024%2006%2017%20\(Strong\)%20Letter%20to%20VA%20Secretary%20re%20BTSSS.pdf](https://strong.house.gov/sites/evo-subsites/strong.house.gov/files/evo-mediadocument/2024%2006%2017%20(Strong)%20Letter%20to%20VA%20Secretary%20re%20BTSSS.pdf)

<https://strong.house.gov/media/press-releases/strong-calls-attention-veterans-affairs-shortfalls-beneficiary-travel-self>

**VA Response:** VA has received your response and appreciates your feedback. VA has implemented corrective actions for all 4 recommendations made by OIG, and OIG has closed that report. The GAO recommendations are being addressed and on track.

6. PC-202402-2900-022-101824-045923-1

See BTSSS "In Manual Review" status at <https://vetsbenefits.net/viewtopic.php?f=84&t=197309&view=print> and attached.

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

7. PC-202402-2900-022-101824-050221-1

See "So tired of BTSSS!"

[https://www.reddit.com/r/Veterans/comments/1bvpyos/so\\_tired\\_of\\_btsss/](https://www.reddit.com/r/Veterans/comments/1bvpyos/so_tired_of_btsss/)

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

8. PC-202402-2900-022-101824-05413-1

See "Veterans Affairs BTSSS" <https://discussions.apple.com/thread/254733989?sortBy=rank>

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

9. PC-202402-2900-022-101824-050600-1

See "VA BTSSS system" <https://answers.microsoft.com/en-us/bing/forum/all/va-btsss-system/079b39a6-12aa-4fdd-8fa5-32272579c4d6>

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

10. PC-202402-2900-022-101824-050929-1

See "Bing Maps problem loading when applying for mileage expense through VA at their website "Dvagoibtsss.dynamics365portals.us"  
<https://community.dynamics.com/forums/thread/details/?threadid=4b2baf26-222f-4484-9980-4acc07369b8e>

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

11. PC-202402-2900-022-101824-051123-1

See "Bing maps issue in Vet Admin claim form"

<https://answers.microsoft.com/en-us/bing/forum/all/bing-maps-issue-in-vetadmin-claim-form/fcdcb061-3931-47fd-b1bb-c0bc204f2b08>

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

12. PC-202402-2900-022-101824-081822-1

VTP has not followed the PRA guide or the letter and intent of the PRA itself, this ICR is wholly insufficient.

**VA Response:** VA has received your response and appreciates your feedback. VA consistently collaborates across other inter-agency partners to ensure PRA

requirements and guidelines are met and are confident we are meeting said requirements for this effort.

13. PC-202402-2900-022-101824-082239-1

Ben Williams, Director of VHA MS VTP, is responsible for OMB 2900-0798 being expired since July 31, 2020, he must resign.

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

14. PC-202402-2900-022-101824-082742-1

38 CFR 70 Subpart A is in conflict with 38 USC 111, regulations are secondary to laws and can not contradict them. Ben Williams and Joseph "Lee Cook" of VHA MS VTP are fully aware they are in violation of two USC.

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

15. PC-202402-2900-022-101824-083032-1

"The VA Beneficiary Travel Self-Service System: Mission Accomplished?"

[https://www.youtube.com/watch?v=qDH7\\_ZJWM0U&t=2714s](https://www.youtube.com/watch?v=qDH7_ZJWM0U&t=2714s)

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

16. PC-202402-2900-022-101824-095548-1

An Ethics complaint was filed with VA OIG on 10/10/2024 against VHA MS VTP, Director Benjamin Williams and Supervisor Joseph "Lee" Cook for flagrant violations of 38 USC 111, 44 USC 3501 et seq. and 38 CFR 0.

**VA Response:** VA has received your response, appreciates your feedback and will fully comply with VA OIG regarding any ethics complaint review.

17. PC-202402-2900-022-101824-050221-1

See "So tired of BTSSS!"

[https://www.reddit.com/r/Veterans/comments/1bvpyos/so\\_tired\\_of\\_btsss/](https://www.reddit.com/r/Veterans/comments/1bvpyos/so_tired_of_btsss/)

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

18. PC-202402-2900-022-101824-052101-1

Sens. Moran, Tester Introduce Legislation to Improve Beneficiary Travel Program for Veterans

Wednesday, October 4, 2023

WASHINGTON – U.S. Senators Jerry Moran (R-Kan.) and Jon Tester (D-Mont.) – ranking member and chairman of the Senate Veterans' Affairs Committee –

recently introduced legislation to make it easier for veterans to receive timely reimbursements through the Department of Veterans Affairs Beneficiary Travel Program.

The Road to Access Act would mandate VA to accept beneficiary travel claims up to 180 days after the date of eligible travel, improve outreach to veterans about the beneficiary travel process and make certain that veterans are able to continue filing beneficiary travel paper claims even as VA expands opportunities for electronic filing. Additionally, this legislation would require VA to process any beneficiary travel claims for veterans meeting certain criteria, including those who have a 50% or higher service-connected disability rating.

"I have heard from Kansas and other veterans who are facing difficulties filing their beneficiary travel claims and receiving their travel payments from the VA," said Sen. Moran. "Many of them rely on these benefits to offset the costs of driving long distances to get ongoing care from VA. This legislation will make certain veterans – particularly those in rural areas – are able to continue filing traditional paper claims and are provided more time to file their claims."

"In Montana and rural America, travel benefits are essential to making sure veterans can access the care and services they earned—no matter where they live," said Sen. Tester. "That's why we introduced our bipartisan bill to make sure VA's travel reimbursement program starts working for rural veterans who rely on it to attend appointments. This is an issue I have heard from veterans all across Montana, and I won't stop pushing until VA fixes this critical program."

<https://www.veterans.senate.gov/2023/10/sens-moran-tester-introduce-legislation-to-improve-beneficiary-travel-program-forveterans>

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

19. PC-202402-2900-022-101824-052523-1

See "Proposed Information Collection (Beneficiary Travel Mileage Reimbursement Application Form, VA Form 10-3542)"

<https://casetext.com/federal-register/proposed-information-collection-beneficiary-travel-mileage-reimbursement-applicationform-va-form>

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

20. PC-202402-2900-022-101824-053532-1

The VHA MS VTP is in violation of 38 CFR 0.

The director of VTP and VTP leadership, are knowingly, and purposely, in violation of 38 USC 111 and 44 USC 3501 et. seq.

It is illegal to "defer to the CFR". Regulations are secondary to laws and cannot contradict them.

The VTP written regulation 38 CFR 70 Subpart A is, and has been, in conflict with 38 USC 111 since July 30, 2008 when VHA adopted the final rule.

21. **VA Response:** VA has received your response and appreciates your feedback. Title 38 United States Code (U.S.C.) § 111 provides the Secretary with the authority to administer VA's Beneficiary Travel benefits. Title 38 Code of Federal Regulations (CFR) Part 70, Subpart A regulates how VA administers the benefit for VHA purposes. 38 CFR 70.20(e) requires the VA to notify the claimant should additional information be needed to adjudicate the claim as VA must verify care or services were received prior to reimbursement. Further 38 CFR 70.4 again 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. VA has this requirement and was approved under previous collection efforts under the instructions of the 10-3542 #6 stating "Application will be evaluated to determine eligibility for travel benefits and services received."PC-202402-2900-022-101824-054527-1

Retrieve Notice of Action (NOA)

<https://www.reginfo.gov/public/do/DownloadNOA?requestID=274040>

Terms of Clearance: By the time of the next submission, VA will (1) match the burden estimate on the form to the burden estimate on the supporting statement, (2) more clearly display the expiration date, (3) provide screenshots/images of the kiosk/mobile technology, (4) include the date of the BLS wage data, and (5) source and date the GS wage data used

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

22. **VA Response:** VA has received your response and appreciates your feedback. PC-202402-2900-022-101824-064328-1

Supporting Statement A for ICR 202402-2900-022 of OMB 2900-0798.

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 actually had to add about 140 more employees to process the travel claims manually."

"The project's budget started at \$11 million...but I understand it has doubled."

"The budget does not seem to include all the additional expense from extra staffing and rework."

Rep. Matt Rosendale (R-Mont.), the Chairman of the House Committee on Veterans' Affairs Subcommittee on Technology Modernization, June 11, 2024

<https://veterans.house.gov/news/documentsingle.aspx?DocumentID=6479#>

"The \$36 million web-based system was implemented nationwide in 2023 to speed up reimbursements to veterans."

<https://www.stripes.com/veterans/2024-10-09/veterans-travel-expenses-medical-care-kiosks-15457893.html>

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

23.PC-202402-2900-022-101824-064516-1

Supporting Statement A for ICR 202402-2900-022 of OMB 2900-0798.

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."

**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.

24.PC-202402-2900-022-101824-064641-1

Supporting Statement A for ICR 202402-2900-022 of OMB 2900-0798.

12. VTP did not provide separate hour burden estimates for each form and by method of submission and did 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, scan document(s), attach document(s), 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 the 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.

25.PC-202402-2900-022-101824-064741-1

Supporting Statement A for ICR 202402-2900-022 of OMB 2900-0798.

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."

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

26.PC-202402-2900-022-101824-064922-1

Supporting Statement A for ICR 202402-2900-022 of OMB 2900-0798.

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.

"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 "VHA Lacks an Outcome-Oriented Outreach Plan", GAO-24-106816, Page 25-27, May 2024. 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)

GAO-24-106816, Page 31, May 2024

**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.

27.PC-202402-2900-022-101824-065058-1

Supporting Statement A for ICR 202402-2900-022 of OMB 2900-0798.

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.

**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.

28.PC-202402-2900-022-101824-065258-1

Supporting Statement A for ICR 202402-2900-022 of OMB 2900-0798.

4. VTP's verification of attendance (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, services were 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."

**VA Response:** VA has received your response and appreciates your feedback. Title 38 United States Code (U.S.C.) § 111 provides the Secretary with the authority to administer VA's Beneficiary Travel benefits. Title 38 Code of Federal Regulations (CFR) Part 70, Subpart A regulates how VA administers the benefit for VHA purposes. 38 CFR 70.20(e) requires the VA to notify the claimant should additional information be needed to adjudicate the claim as VA must verify care or services were received prior to reimbursement. Further 38 CFR 70.4 again 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. VA has this requirement and was approved under previous collection efforts under the instructions of the 10-3542 #6 stating "Application will be evaluated to determine eligibility for travel benefits and services received."

29.PC-202402-2900-022-101824-065412-1

Supporting Statement A for ICR 202402-2900-022 of OMB 2900-0798.

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#)

VTP has 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.

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

30.PC-202402-2900-022-101824-065532-1

Supporting Statement A for ICR 202402-2900-022 of OMB 2900-0798.

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\** and *\*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.

b. Paper Claims – VA Form 10-3542, Veteran/Beneficiary Claim for reimbursement of Travel Expenses, submitted for

manual entry.

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

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

**VA Response:** VA has received your response and appreciates your feedback. Title 38 United States Code (U.S.C.) § 111 provides the Secretary with the authority to administer VA's Beneficiary Travel benefits. Title 38 Code of Federal Regulations (CFR) Part 70, Subpart A regulates how VA administers the benefit for VHA purposes. 38 CFR 70.20(e) requires the VA to notify the claimant should additional information be needed to adjudicate the claim as VA must verify care or services were received prior to reimbursement. Further 38 CFR 70.4 again 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. VA has this requirement and was approved under previous collection efforts under the instructions of the 10-3542 #6 stating "Application will be evaluated to determine eligibility for travel benefits and services received."

31.PC-202402-2900-022-101824-070253-1

Supporting Statement A for ICR 202402-2900-022 of OMB 2900-0798.

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" before "and" insert "Payments or allowances for beneficiary travel".

After "and" before "38" 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" insert "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."

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