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

<u>Federal Register :: Agency Information Collection Activity Under OMB Review:</u> <u>Veteran/Beneficiary Claim for Reimbursement of Travel Expenses</u>

1. VA-2024-VACO-0001-0518

VACO is violating the PRA approval process.

The 30-day FRN published on 09/18/2024 is for, new, ICR Reference: 202402-2900-022, submitted to OIRA on 09/18/2024 and did *not* have a 60-day FRN published.

The 60-day FRN published on 03/05/2024 was for, Historical Inactive, ICR Reference: 202402-2900-007, it was Withdrawn on 09/17/2024.

Withdrawn: "Removed from consideration", making the 60-day FRN null and void.

VACO needs to start the approval process over with a new 60-day FRN.

Attachments: None

VA Response: Thank you for raising your concerns regarding Veteran/Beneficiary Claim for Reimbursement of Travel Expenses (VA Form 10– 3542 and BTSSS) (OMB Control Number 2900-0798).

Information Collection Request (ICR) Reference Numbers are generated when an Agency submits a collection to OMB for approval. Generally, this occurs at the same time as the 30-day notice is submitted. <u>ICR Reference No: 202402-</u> <u>2900-022</u> is the correct and accurate reference number for the 2024 information collection review of OMB Control Number 2900-0798. It was created when VA submitted the collection for OMB approval on September 18, 2024 – concurrent with the 30-day notice publication. The public can view the documents related to the collection by selecting "View Supporting Statement and Other Documents." The <u>resulting page</u> includes detail of the full 2024 2900-0798 ICR process, including the 60-day FRN completed on May 6, 2024 and the public comments received therein.

The <u>ICR Reference: 202402-2900-007</u> was generated when VA submitted an emergency review request (See Type of Review Request) in February 2024. The ICR Reference Number shows as removed from consideration because it was ultimately withdrawn by VA. ICR 202402-2900-007 was replaced by the ICR (202402-2900-022) that is currently under review.

2. VA-2024-VACO-0001-0519

VACO has not complied with terms of clearance from 07/17/2017, they have not provided screenshots/images of the kiosk/mobile technology (BTSSS).

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."



Attachments:

VA Response: VA has received your response and appreciates your feedback. Screenshots of the electronic claim submissions were provided, and proper OMB control numbers and statements have been added are included with to the submission modalities platforms.

3. VA-2024-VACO-0001-0520

SSA 13:

Add: Accurate numbers, your ICR requires a computer, scanner, printer, ink, paper, envelopes, stamps, pens...

Remove: "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)

Define: "usual and customary" recordkeeping and provide examples.

You say, "a. There are no capital, start-up, operational, or maintenance costs. b. Cost estimates are not expected to vary widely. The only cost is that for the time of the respondent. c. There is no anticipated record keeping burden beyond that which is considered usual and customary."

PRA Guide APPENDIX H: 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."

Attachments: None

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.

4. VA-2024-VACO-0001-0521

SSA 14. Totally ignores equipment, overhead, printing, support staff, and any other expense that would not have been incurred without this collection of information... Where are the costs for the BTSSS? This section needs to be expanded and broken down to much greater detail.

Add: Breakdown costs by submission and processing method...; oral, by mail, BTSSS Automatic Adjudication versus manual processing...

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

Attachments: None

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

5. VA-2024-VACO-0001-0522

Please incorporate the Privacy Impact Assessment for BTSSS, October 20, 2022, into Supporting

Statement A and add to Supplementary Documents.

The PIA failed to provide the OMB control number or note 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-2024-VACO-000 1-0522.A1.p.df

Attachments:

VA Response: VA has received your response and appreciates your feedback and suggestions. This FRN is in support of a form which does include the OMB number and will include the expiration date.

Please incorporate GAO-24-106816, "Additional Assessments of Mileage Reimbursement Data and Veterans' Travel Costs Needed", May 28, 2024, into Supporting Statement A and to Supplementary Documents.

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



Attachments:

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

7. VA-2024-VACO-0001-0524

Please incorporate VA OIG 21-03598-92, "Goals Not Met for Implementation of the Beneficiary Travel Self-Service System", May 31, 2023, into Supporting Statement A and add to Supplementary Documents. https://www.vaoig.gov/sites/default/files/reports/2023-05/VAOIG-21-03598-92.pdf



VA Response: VA has received your response and appreciates your feedback. VA has responded to OIG, implemented corrective actions, and OIG has closed all recommendations.

8. VA-2024-VACO-0001-0525

VACO did not provide a copy of the old form or highlight changes to the VA Form 10-3542.

"If you have revised your form or information collection since the 60-Day Federal Register Notice approval, provide a copy of the old and new editions highlighting the changes."

Attachment: None

VA Response: VA has received your response and appreciates your feedback. No changes were made from the 60 Day Federal Register notice.

9. VA-2024-VACO-0001-0526

The 30-day FRN VACO published on 09/18/2024 does not indicate whether any comments were received during the 60-day period. There were 28 public comments during the 60-day period.

https://www.federalregister.gov/d/2024-21141

"The 30-Day Notice also includes the date, volume number, and page number of the published 60-DayFederal Register Notice. In addition, it must indicate whether any comments were received during the 60-day period."

Attachment: None

VA Response: VA has received your response and appreciates your feedback. VA provided responses to the 60-day comment period.

10. VA-2024-VACO-0001-0527

SSA, 4. The proposed verification of attendance (VOA) required by VA Form 10-3542 *new* Instruction6, and nowhere else, is an exact duplication of the information already collected by the BTSSS and VA Form 10-3542.

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

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

The VOA serves no purpose, increases the public burden and 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.

11. VA-2024-VACO-0001-0528

SSA, 2. VACO must add "verification of attendance" to this section and specify what data elements are collected with screenshots of valid proof examples.

They should be required to create a new form for this purpose with all the proper legal disclaimers and disclosures.

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."

Attachment: None

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. Alternatives methods to collecting verification of attendance (e.g. medical care claim or clinical records sent to VA from providers) were considered as an alternative, however, these do not provide a timely mechanism for the Agency to verify services received upon receipt/adjudication of the travel reimbursement.

12. VA-2024-VACO-0001-0529

The proposed VA Form 10-3542 *new* Instruction 6 is in conflict with The BTSSS Add an Appointment page.

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) (Public Law 116-117) do not require, or even mention, proof/verification of attendance--Fact.

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. "



Attachments:

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.

13. VA-2024-VACO-0001-0530

SSA, 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.

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

Attachments: None

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

14. VA-2024-VACO-0001-0531

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 of BTSSS, and what is required for access.

Attachments: None

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

SSA, 2. Delete "If VA determines that additional information is needed to make a determination concerning an application for benefits, VA will notify the claimant in writing in accordance with 38 CFR70.20(e)."

The CFR can not negate the OMB prior approval required for information collection and also states "this collection of information has been approved by OMB". This means you can not collect information that was not specifically identified and approved via this process.

PRA Guide APPENDIX I: HOW TO CREATE A SUPPORTING STATEMENT

PART A. JUSTIFICATION

2. "Do not just make general statements about the overall use of the information but address the specific items of information being collected."

VHA must specify what "additional information" is or could be required for a beneficiary travel claim and provide samples.

SSA, 2. says: "If VA determines that additional information is needed to make a determination concerning an application for benefits, VA will notify the claimant in writing in accordance with 38 CFR 70.20(e)."

Attachments: None

VA Response: VA has received your response and appreciates your feedback and suggestions. Number 6 under instructions on the updated form provides what is required to make a determination regarding services received.

16.VA-2024-VACO-0001-0533

Proposed VA Form 10-3542 *new: Instruction, 6., and Supporting Statement A, must *specify* what law; *chapter, paragraph and sentence*, requires the collection of "verification of attendance". Why is it missing from Section 2?

There is no such requirement established, or even mentioned by 38 USC 111, 38 CFR 70, or the Payment Integrity Information Act of 2019 (PIIA) (Public Law 116-117).

Attachments: None

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. With the instructions of the 10-3542 #6 stating "Application will be evaluated to determine eligibility for travel benefits and services received.", VA is taking the steps to further clarify the instructions.

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 proof of meetings.

Attachments: None

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.

18. VA-2024-VACO-0001-0535

VACO FRN's say, "VHA must gather *certain information* to ..." The FRN needs to detail what information is being collected, "certain information" is wholly insufficient." The Notice should include *details* about: What information is being collected". <u>https://pra.digital.gov/clearance-process/</u>

Attachments: None

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

19. VA-2024-VACO-0001-0536

SSA, 2: 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."

Attachments: None

VA Response: VA has received your response and appreciates your feedback. Requirement to provide receipts is supported by 38 CFR 70.30(2).

20. VA-2024-VACO-0001-0537

SSA, 12. VACO did not provide separate hour burden estimates for each form or follow the instruction to aggregate the hour burdens in Item 13.

The burden should read 15 minutes per claim without VOA, 30 minutes with VOA.

Attachment: None

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

"Who is Eligible for Reimbursement of Travel Expenses" and "Instructions" from the reverse of VA Form10-3542 are not displayed on the BTSSS.

https://dvagov-btsss.dynamics365portals.us/

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

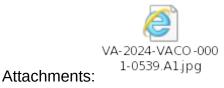
The information would be of great value.



VA Response: VA has received your response and appreciates your feedback. After approval of this form, the online system will be updated to reflect the same language.

22.VA-2024-VACO-0001-0539

SSA, 2: Please specify all data elements collected by all methods.



VA Response: VA has received your response and appreciates your feedback. The FRN pertains to the form and the collection of information from the claimant.

23. VA-2024-VACO-0001-0553

Delete proposed 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 care/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."

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

Verification of attendance is not mentioned, or required, by Supporting Statement A, 38 USC 111, 38 CFR70 or PL 116-117.

Attachments: None

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." VA is taking the steps to further clarify the instructions within the current Information Collection Request and submission of the application to the Office of Management and Budget (OMB).

24. VA-2024-VACO-0001-0554

Supporting Statement A, 8., b: Did VA notify Veteran Service Organizations and public advocacy organizations about this ICR and the public comment period?

If yes, how and when; provide proof. If not, why not?

Attachments: None

VA Response: VA has received your response and appreciates your feedback. The notice was made available to the public via the Federal Register Notice on March 5, 2024.

25. VA-2024-VACO-0001-0555

Explain, in detail, how you were able to publish a FRN on 03/05/ 2024 before your ICR was received by OIRA on 09/18/2024.

ICR Reference No: 202402-2900-007, OIRA Conclusion Action: Withdrawn, Conclusion Date: 09/17/2024

(in parliamentary procedure) remove or recall a motion, amendment, etc., from consideration.

OIRA says the Previous ICR Reference No is 201604-2900-019, Date Received in OIRA: 11/22/2016, Conclusion Date: 07/17/2017.



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

26. VA-2024-VACO-0001-0556

Supporting Statement A, 14: VACO totally ignored the many costs of the Beneficiary Travel Self Service System (BTSSS). Please add the total costs of BTSSS to date, as well as per claim and annual costs, with detailed breakdowns. This Include extra personnel, overtime, contract modifications...

Attachments: None

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. VA-2024-VACO-0001-0564

Verification of attendance creates unauthorized determination criteria for Payments or allowances for beneficiary travel not authorized by 38 USC 111.

The VA Secretary has no authority to add or change the determination criteria established by (b)(1) A though G.

"Under regulations *prescribed by the President, the Secretary *shall make the payments* provided for in this section to or for the following persons"

(a) *Under regulations *prescribed by the President* pursuant to the provisions of this section, the Secretary may pay the actual necessary expense of travel (including lodging and subsistence), or in lieu thereof an allowance based upon mileage (at a rate of 41.5 cents per mile), of any person to or from a Department facility or other place in connection with vocational rehabilitation, counseling required by the Secretary pursuant to chapter 34 or 35 of this title, or for the purpose of examination, treatment, or care. Actual necessary expense of travel includes the reasonable costs of airfare if travel by air is the only practical way to reach a Department facility. In addition to the mileage allowance authorized by this section, there may be allowed reimbursement for the actual cost of ferry fares, and bridge, road, and tunnel tolls.

(b)(1) Except as provided in subsection (c) of this section and notwithstanding subsection (g)(2) of this section or any other provision of law, if, with respect to any fiscal year, the Secretary exercises the authority under this section to make any payments, *the Secretary shall make the payments provided for in this section* to or for the following persons for travel during such fiscal year for examination, treatment, or care for which the person is eligible:

(A) A veteran or other person whose travel is

in connection with treatment or care for a

service-connected disability.

(B) A veteran with a service-connected disability rated at 30 percent or more.

(C) A veteran receiving pension under section 1521 of this title.

(D) A veteran (i) who is not traveling by air and whose annual income (as determined under section 1503of this title) does not exceed the maximum annual rate of pension which would be payable to such veteran if such veteran were eligible for pension under section 1521 of this title, or (ii) who is determined, under regulations prescribed by the Secretary, to be unable to defray the expenses of the travel for which payment under this section is claimed.

(E) Subject to paragraph (3) of this subsection, a veteran or other person whose travel to or from a Department facility is medically

required to be performed by a special mode of travel and who is determined under such regulations to be unable to defray the expenses of

the travel for which payment under this section is claimed.

(F) A veteran whose travel to a Department facility is incident to a scheduled compensation and pension examination.

(G) A veteran with vision impairment, a veteran with a spinal cord injury or disorder, or a veteran with double or multiple amputations

whose travel is in connection with care provided through a special disabilities rehabilitation program of the Department (including

programs provided by spinal cord injury centers, blind rehabilitation centers, and prosthetics rehabilitation centers) if such car prosthetics rehabilitation centers) if such care is provided—

(i) on an in-patient basis; or

(ii) during a period in which the Secretary provides the veteran with temporary lodging at a facility of the Department to make such care more accessible to the veteran.

(2) The Secretary may make payments provided for in this section to or for any person not covered by paragraph (1) of this subsection for travel by such person for examination, treatment, or care. Such payments shall be made in accordance with *regulations which the Secretary shall prescribe*.

Attachments: None

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."

28. VA-2024-VACO-0001-0565

Where is the URL for BTSSS? Where are the screenshots of BTSSS?

Attachments: None

VA Response: VA has received your response and appreciates your feedback. Screenshots of BTSSS were provided as part of the ICR.

29. VA-2024-VACO-0001-0566

Where is the System of Records Notice for the BTSSS?

Attachments: None

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

30. VA-2024-VACO-0001-0567

Please add GAO recommendations to your ICR. When when you implement?

Recommendation 1: 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. Status: OPEN

Recommendation 2: 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. Status: OPEN

Recommendation 3: 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 4: 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.

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



Attachments:

VA Response: VA has received your response and appreciates your feedback and suggestions. The GAO recommendations are being addressed within VTP.

31. VA-2024-VACO-0001-0568

Please add all modalities to your ICR.

Current modalities for Veterans to submit their BT applications include:

a. 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,3submitted for manual entry.

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

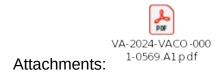
d. VetLink Kiosk Integration – Available at 38 VAMCs with Vecna contracts

Attachments: None

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

32. VA-2024-VACO-0001-0569

Please incorporate into your ICR and add to Supplementary Documents: "STATEMENT OF RYANHEIMAN, MHSA, CPTA DEPUTY EXECUTIVE DIRECTOR FOR MEMBER SERVICESVETERANS HEALTH ADMINISTRATION (VHA) DEPARTMENT OF VETERANS AFFAIRS (VA)BEFORE THE COMMITTEE ON VETERANS' AFFAIRS SUBCOMMITTEE ON TECHNOLOGYMODERNIZATION U.S. HOUSE OF REPRESENTATIVES JUNE 11, 2024".



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

33. VA-2024-VACO-0001-0570

Please incorporate into your ICR and add to Supplementary Documents: Department of Veterans Affairs, Kiosks and Veteran Experience Project Charter,

Veterans Health Administration, 3/26/24, Version 1.0.

VA-2024-VACO-000 1-0570.A1.p.df S:

Attachments:

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

34. VA-2024-VACO-0001-0571

Please incorporate into your ICR and add to Supplementary Documents: "VA Survey – Beneficiary Travel".



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

35. VA-2024-VACO-0001-0572

Please incorporate into your ICR and add to Supplementary Documents: "BTSSS Performance Measures".



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

36. VA-2024-VACO-0001-0573

Please incorporate into your ICR and add to Supplementary Documents: Beneficiary Travel (BT)Frequently Asked Questions".



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

37. VA-2024-VACO-0001-0574

Please add to your ICR and add to Supplementary Documents: "Beneficiary Travel Overview".



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

38. VA-2024-VACO-0001-0575

Please incorporate into your ICR and add to Supplementary Documents: "BT-OIT Update".



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

39. VA-2024-VACO-0001-0576

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-2024-VACO-000 1-0576.A1.p.df

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

40. VA-2024-VACO-0001-0578

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.

Attachments: None

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

41. VA-2024-VACO-0001-0579

Illegal regulations: 38 CFR 70.4 (b) & (c) and 70. 20 (e) contradict 38 USC 111.

The Secretary was not authorized to prescribe regulations to decrease payments or add determination criteria.

"Regulatory law deals with regulations, the edicts created by an executive branch agency. These edicts are different than laws since they are passed by that executive branch agency, based on the authority given to it by Congress through a law. A regulation, however, is secondary to a law and cannot contradict it."



Attachments:

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