

**Department of Veterans Affairs
Veterans Health Administration
Prosthetic and Sensory Aids**

Agency Information Collection Activity:

Application for Annual Clothing Allowance – VA Form 10-8678

OMB Control No. 2900-0198

VA received a comment (with attachment)* in response to the Application for the Annual Clothing Allowance 60-Day Federal Register Notice (VA-2026-VACO-0001-0027, FR Doc No: 2026-02202) on March 31, 2026.

*We note that three identical comments were uploaded at the same time by one group. It is likely that the comment was inadvertently uploaded three times. Therefore, this response addresses only one comment submission.

VA-2026-VACO-0001-0119 – We appreciate the commenter’s concerns-suggestions, and Prosthetic and Sensory Aids Service (PSAS) responds as follows:

- I.a. - The commenter suggests that VA Form 10-8678 clarify the filing requirements for continued eligibility for the clothing allowance benefit. The commenter notes that the Statute (38 USC 1162) provides for payments to continue on an automatically recurring basis until the Veteran elects to no longer receive the benefit or VA determines the Veteran is no longer eligible for the benefit. The commenter states the form language may imply that annual re-application is required by August 1 to maintain the benefit. The commenter also takes issue with the Acknowledgment section of the form, which states that a yearly submission is required if the Veteran receives more than one clothing allowance benefit.
 - o VA acknowledges the commenter’s concerns and suggestions, and we take them under advisement. While the form Instructions do not explicitly require a Veteran to apply annually for the benefit, we decided to amend the Instructions section and added a link to the clothing benefit external website. Veterans will be notified by VA once the periodic review is implemented, per the Statute, which may require a new application.
 - o The Acknowledgment section of the form has already been removed by the program office (PO) in a redesigned version that will be submitted to OMB for the next PRA clearance.
- I.b. - The commenter suggests the form should clarify that Veterans who are determined to be permanently eligible for the benefit are not required to re-apply annually for the benefit. The commenter notes the Statute provides that if a Veteran’s situation is determined “as likely as not subject to no change,” then the Veteran shall be deemed continually eligible for the clothing allowance until a notice of termination or the discovery of evidence indicating otherwise is confirmed by VA. The commenter suggests that the form should contain the qualifications and standards for determining that a Veteran is continually eligible for the benefit (“Rolling Eligibility”).

- o VA acknowledges the commenter's concerns and suggestions, and we take them under advisement. While the form Instructions do not explicitly require a Veteran to apply annually for the benefit, we amended the language for the clothing allowance in the Instructions section and added a link to the clothing benefit external website. Veterans will be notified by VA once the periodic review is implemented, per the Statute, which may require a new application.
 - o VA has redesigned the form to make it easier and less burdensome for a Veteran to apply for the benefit. VA is reluctant to add qualifications and standards information used in making determinations, as that would extend the length of the form. This information is available in other resources, such as the VA program website page.
- I.c. - The commenter suggests that, in the alternative to Rolling Eligibility and/or automatic re-enrollment, VA should send periodic reminders – at 120, 90, 60, 30 days - to Veterans to encourage them to re-apply for the clothing allowance prior to the August 1 filing deadline. The commenter further proposes the addition of “opt-in” and “opt-out” check boxes in the form for these reminders.
 - o VA will take these suggestions under advisement – however, it may be a strain on resources to send so many annual reminders to Veterans who are aware of the benefit submission date. VA will consider a modified number of reminders to Veterans, if feasible. Again, VA has revised the form to make it easier and less burdensome for a Veteran to apply for the benefit. VA is reluctant to add more form fields that may have a limited or no effect on increasing Veteran applications for the benefit.
- I.d. - The commenter suggests that VA should clarify the requirements to apply for the clothing allowance by specifying that Veterans may have either a prosthetic/orthopedic appliance, use skin medication(s) causing irreparable staining/damage to outer garments, or both.
 - o VA believes that the current language in the form covers the requirements to apply for the benefit, as a Veteran may need to use only one or the other element (prosthetic/orthopedic appliance or skin medication) to apply for the clothing allowance. A Veteran needing to use both elements, as opposed to just one element, does not impact their ability to apply for the clothing allowance. VA has up-to-date application criteria on the revised form and VA public facing website. However, VA will consider whether to modify the form to add “and/or” to indicate that using one or both elements is sufficient to apply for the benefit.
- II. - The commenter suggests that VA add to the form the monetary amount to be received if the Veteran is deemed eligible for the clothing allowance benefit. The commenter further notes that the benefit amount was \$716 in 2009 and should be increased to \$1,079 in 2026 to account for cost of living and inflation.
 - o VA is reluctant to specify on the form the monetary amount to be received by the Veteran for the reason that the amounts may change on an annual basis, which would render the form unusable until updated with a new

amount. All up-to-date amounts can be found on the VA public-facing website.

- III.a. - The commenter recommends editing certain language in the form to match the statutory language. The commenter suggests replacing the word “staining” with “damage,” as used in the Statute, to refer to side effects of skin medications on outer garments.
 - VA acknowledges the commenter’s concerns and suggestions, and we take them under advisement. For skin medications, the Statute specifically states “irreparable staining,” and we will make that change to the form.
- III.b. - The commenter suggests using the word “prescribed” only before “skin medication(s)” and not in the context of prosthetic and orthopedic appliances. The commenter makes the distinction that appliances are not prescribed – and only skin medication is prescribed for a Veteran. The commenter further states this would align the form with the language of the Statute.
 - VA acknowledges the commenter’s concerns and suggestions. However, both prosthetics and skin medications are “prescribed” by VA for use by the Veteran.
- III.c. - The commenter contends that the Statute does not specify which clothing and outer garments qualify and do not qualify for the clothing allowance benefit. The commenter suggests that VA should not limit the types of garments listed in the form and should consider removing this section.
 - VA acknowledges the commenter’s concerns and suggestions. However, VA maintains that it is within the agency’s purview to determine which clothing and outer garments comply with the intent of the benefit. Further, the language in the form is meant only to offer helpful examples of clothing, and it specifically states “and similar garments” so as not to limit the types of clothing that may or may not qualify for the benefit.
- IV.a. - The commenter suggests making certain edits to language in the form to address potential ambiguities and confusing language, such as removing the outdated “2014” reference in the Instructions section example.
 - VA appreciates the commenter’s suggestion. However, the PO has already removed the “2014” example in a revised version of the form, which will be submitted to OMB for the next PRA clearance.
- IV.b. - The commenter suggests expanding the examples listed in fields 7 and 8 of the current form to cover additional types of appliances, names of skin medications, and service-connected disabilities that give rise to the need for the clothing allowance. The commenter also suggests expanding the parenthetical examples in section 11.
 - VA appreciates the commenter’s suggestion. However, the PO has already modified these fields to remove all parenthetical example references. The

revised version of the form will be submitted to OMB for the next PRA clearance.

- IV.c. - The commenter encourages VA to provide more specificity in the form for the types of clothing and outer garments that are covered and not covered by the benefit. The commenter suggests italicizing the words “*similar garments*” in the form. The commenter also contends that the email address field should be removed from the form.
 - o VA appreciates the commenter’s first suggestion, although we do not believe it is necessary to provide further examples beyond those already specified in the form. However, the PO will consider whether to italicize these words in the revised version of the form.
 - o The PO has already removed the email address field from the revised version of the form, which will be submitted to OMB for the next PRA clearance.
- V.a. - The commenter encourages VA to streamline the clothing allowance application process by allowing VA Forms 21-526 and 10-8678 to be filed together.
 - o VA notes that 21-526 is the Application for Disability Compensation and Related Compensation Benefits, which must be filed first for a general determination of a Veteran’s disability status/rating and eligibility for related benefits. VA Form 10-8678 is specific to the clothing allowance and cannot be filed until a Veteran has a disability determination from VBA. Therefore, it is not feasible for these forms to be submitted together. Further, it is not onerous for a Veteran to complete the 10-8678 form, which averages ten minutes per respondent, following receipt of their disability rating.
- V.b. - In the alternative, the commenter suggests that VA should allow filing of an application for the clothing allowance immediately following the determination of a Veteran’s disability rating through a link or automatic notification. The commenter encourages VA to promote an electronic submission option to consolidate the application process. The commenter also contends that the form should state when and how an eligibility determination notice will be delivered to the Veteran – and the Veteran should be permitted to opt-in to paperless electronic notifications, in addition to regular mail delivery. Further, the commenter suggests the form should clarify that a Veteran is allowed to receive third party assistance with completion of the application, if impeded by their disability.
 - o VA appreciates the commenter’s suggestions and will take them under advisement. While VA is currently working on an electronic/digital version of the 10-8678 form, there is no plan at this time to link it to an automatic notification following receipt of a Veteran’s disability rating. Also, VA does not believe it is necessary to add information to the form regarding when and how a determination notice will be delivered to the Veteran, with an opt-in for electronic notifications, and indicating whether a Veteran may receive third party assistance with completing the form. As previously noted, VA has redesigned the form to make it easier to apply for the clothing allowance and reduce the burden on Veterans. To this end, VA has limited the information

on the form to that which is necessary to make a determination of a Veteran's eligibility for the benefit. Additional detailed program information and guidance is available on the VA website page for the PSAS program.

- V.c. - The commenter believes the form should have the capability of being saved electronically for pre-population when the Veteran re-applies for the clothing allowance.
 - o As noted, VA is currently working on an electronic/digital version of the 10-8678 form. This should allow retention of the form data to facilitate pre-population of the form when a Veteran must re-apply for the benefit.

PSAS appreciates the opportunity to review and respond to these comments. As noted above, we take the commenter's suggestions under advisement and have provided our determinations for each point. Although PSAS has decided to make a few minor edits to the clothing allowance application for clarification, we will make no additional substantive changes at this time.

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