



Wesley A. McCauley

*Admitted to the United States Court of
Appeal for Veterans Claims*

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2025-December-11

VIA: DIRECT UPLOAD TO REGULATIONS.GOV

U.S Department of Veterans' Affairs
Office of Information Technology, Data Governance and Analytics
c/o Dorothy Glasgow
Acting, VA PRA Clearance Officer
810 Vermont Avenue, N.W.
Washington, D.C. 20420

*Re: Public Comments Concerning
F.R. Doc. No. 2025-21703; OMB Control No. 2900-0674*

Dear Sir/Madame:

United Veteran's Disability, LLC provides these comments in response to the proposed collection of certain information by the VA concerning VA Form 10182, Decision Review Request: Board Appeal (Notice of Disagreement).

United Veteran's Disability, LLC is a Veteran's advocacy firm owned by a VA accredited agent. Our office frequently provides representation before the

Wesley@unitedforvets.com
Phone: (229) 270-1571
Unitedforvets.us

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100 North Patterson Street
Suite 52
Valdosta, Georgia 31601

Board of Veterans' Appeals, which entails completing VA's Notice of Disagreement form.

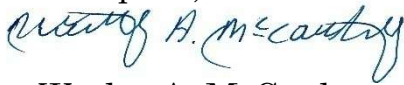
We fully support removal of the checkbox from Part III, number 11, which states: "Check here if you are appealing a denial of benefits by the Veterans Health Administration (VHA)." We agree that this adds a burden to the appellant that serves little to no value to the Board.

We further fully support creation of a checkbox enabling the appellant to waive their right to switch dockets, in accordance with *Williams v. McDonough*, 37 Vet. App. 305, 310-311 (2024). Currently, the Board has developed a "VLJS Docket Switch Waiver Letter" which it routinely sends to appellants, requesting a waiver of their right to change dockets. This has increased the administrative burden on the Board. It also adds delay in the adjudication of appeals, especially for cases that have been advanced on the Board's docket. Often times, our office has waived the right to change dockets in advance, concurrently with the Notice of Disagreement, but BVA staff nonetheless solicit for a waiver. This is creating unnecessary work for the Board and Appellants.

In sum, enabling appellants to waive their right to change dockets in accordance with *Williams* as part of their Notice of Disagreement will not only reduce the burden on the Board, but it will also enable appellants to obtain a decision from the Board faster. We thus fully support this proposed amendment.

Lastly, our office strongly suggests a continuation page be added for Part II, section A (Specific Issue(s)). This would enable appellants to list issues better, as it is not uncommon for a NOD to contain more than five issues.

Thank you for your consideration of these comments. Should you require additional information, please do not hesitate to contact us.

Godspeed,

Wesley A. McCauley
Chief Executive Officer
POA I9A; Accreditation Number 50884

“The veterans benefit system is designed to award ‘entitlements to a special class of citizens, those who risked harm to serve and defend their country’. This entire scheme is imbued with special beneficence from a grateful sovereign”, Barrett v. Principi 363 F.3d 1316, 1320 (Fed. Cir. 2004).