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Office of Information Technology
Data Governance and Analytics
Department of Veterans Affairs
810 Vermont Avenue NW
Washington, DC 20420

January 28, 2026

RE: OMB Control No. 2900-0674
Agency Information Collection Activity -
Notice of Disagreement: Appeal to the
Board of Veterans' Appeals

Dear Ms. Glasgow:

The National Organization of Veterans' Advocates, Inc., (NOVA) provides these comments in response to the notice regarding *Agency Information Collection Activity: Notice of Disagreement*. 90 FR 55244 (December 1, 2025).

NOVA is a not-for-profit 501(c)(6) educational membership organization incorporated in the District of Columbia in 1993. NOVA represents over 900 attorneys, agents, and qualified members assisting our nation's military veterans, their survivors, families, and caregivers seeking to obtain their earned VA benefits. NOVA members represent veterans before all levels of VA's disability claims process, and NOVA works to develop and encourage high standards of service and representation for all persons seeking VA benefits.

NOVA supports the changes proposed by VA. First, we agree that including a checkbox on the form to implement the CAVC's holding in *Williams v. McDonough* will help to mitigate potential delay. In *Williams v. McDonough*, 37 Vet.App. 305, the U.S. Court of Appeals for Veterans Claims interpreted 38 C.F.R. § 20.202(c)(2) as preventing the Board of Veterans' Appeals (Board) from issuing a decision before the time frame for changing the review option expires. This holding has resulted in the Board seeking appellant response to waive that period or hold the decision until such time has expired. Adding a checkbox will allow for appellants to waive that period at the outset of the appeal and save time and resources.

Likewise, NOVA supports VA including language informing appellants that the evidence and hearing lanes generally take longer than the direct review lane. This notification allows appellants to make informed decisions about their review options.

Finally, NOVA supports the removal of the VHA checkbox. VA states the reason for this removal as follows: "Removing the checkbox concerning denial of benefits by the VHA will eliminate the need for appellants to consider which Administration issued the decision they are appealing when completing the VA Form 10182." 90 FR 55244. NOVA agrees that unrepresented appellants may not understand the distinction between VBA and VHA, contributing to frustration or unnecessary delay in filing their appeal. However, NOVA expects that VA will continue to track, in other ways, data reflecting the origin of these appeals as that information serves a broader purpose.

Thank you for your consideration of these comments. Should you require additional information, please do not hesitate to contact me at 202.587.5708 or drauber@vetadvocates.org.

Sincerely,

/s/

Diane Boyd Rauber
Executive Director