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Agency Information Collection Activities; Proposals, Submissions, and Approvals: Medical Expense Report [FR Doc No: 2026-15353; OMB Control No. 2900-0161]

Document: VA-2026-VACO-0001-0351
Comment from Reggie Greenwood on VA-2026-VACO-0001-0301

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General Comment

I respectfully submit the following comments regarding the Veterans Benefits Administration's proposed extension of OMB Control No. 2900-0161, VA Form 21P-8416, Medical Expense Report.

1. Necessity and Practical Utility

The collection serves a legitimate and necessary function because unreimbursed medical expenses may materially affect countable income and eligibility or payment rates for needs-based VA benefits. Accurate collection of these expenses is therefore essential. However, VBA should periodically evaluate each requested data element to ensure it remains necessary for an identifiable adjudicative purpose and eliminate information that is duplicative, obsolete, or reasonably available from existing VA records.

2. Accuracy of the Burden Estimate

VBA estimates 60,000 annual respondents at 30 minutes each, producing 30,000 burden hours. The mathematical calculation is correct, but the underlying 30-minute assumption should be empirically validated. Completing the form may require respondents to locate medical bills, insurance statements, pharmacy records, mileage or transportation information, payment dates, and reimbursement records. The burden may be greater for older beneficiaries, caregivers, individuals reporting recurring expenses, and claimants with numerous providers. VBA should disclose the methodology and data used to establish the 30-minute estimate and consider whether record-retrieval and verification time is adequately represented.

3. Quality, Utility, and Clarity

VBA should improve the form and instructions by clearly distinguishing deductible from nondeductible expenses; explaining how reimbursements, insurance payments, recurring expenses, transportation costs, and expenses paid for household members should be reported; and providing concise examples for common situations. Definitions and terminology should align with governing eligibility rules. Electronic validation should identify missing or internally inconsistent entries before submission without preventing claimants from explaining unusual circumstances.

4. Minimizing Respondent Burden

VBA should expand secure electronic completion and submission, permit claimants to save and resume partially completed reports, support accessible mobile and desktop interfaces, and allow structured uploading of supporting documentation. Where legally and technically appropriate, known claimant information should be prepopulated rather than repeatedly requested. VBA should also examine whether information already maintained within VA systems can be reused, with appropriate consent, security, and verification controls.

Automation should reduce—not merely relocate—administrative burden. Claimants should retain a practical alternative submission method for those unable or unwilling to use electronic systems, and electronic processes should provide confirmation of receipt and a copy of the submitted information.

Given the scale of this collection, even modest reductions in average completion time could produce meaningful aggregate burden savings. I recommend that VBA continue the collection only with ongoing burden measurement, data minimization, clearer instructions, and expanded user-centered electronic processing consistent with the objectives of the Paperwork Reduction Act.

Veteran Affairs Response

Hello,

Thank you for your comments on the 21P-8416 form. As we continue our efforts to simplify the application process for claimants, we appreciate the time and thought you put into providing feedback. We remain committed to ensuring our forms are effective, accessible, and modernized. Thank you again for your engagement and support in enhancing this form.

Department of Veterans Affairs