

# PUBLIC SUBMISSION

<b>As of:</b> 11/24/21 7:47 AM
<b>Received:</b> November 23, 2021
<b>Status:</b> Posted
<b>Posted:</b> November 24, 2021
<b>Tracking No.</b> kwc-m11m-543u
<b>Comments Due:</b> January 24, 2022
<b>Submission Type:</b> API

**Docket:** VA-2021-VACO-0001  
2021 Notice with Comments

**Comment On:** VA-2021-VACO-0001-0427  
Agency Information Collection Activities; Proposals, Submissions, and Approvals: Health Eligibility Center Income Verification Forms; OMB No. 0867; FR Doc. 2021-25530

**Document:** VA-2021-VACO-0001-0430  
Comment on ICR-Health Eligibility Center Income Verification Forms; Crowe, James

---

## Submitter Information

**Name:** James Crowe  
**Email:** jmcrowe92@gmail.com

---

## General Comment

This collection is estimated to entail almost 50,000 burden hours from over 120,000 respondents every year. This commenter believes that it is likely that a non-trivial portion of this collection is unnecessary and avoidable burden.

The VA performs a data match with the IRS/SSA and then mails income verification forms to all relevant veterans/enrollees. The veteran (or eligible enrollee) and their spouse then need complete a detailed income verification form and spend time (and money) to mail the completed form back.

The Privacy Act of 1974 requires that VA perform this verification if the SSA/IRS would lead the veteran to be placed in a worse VHA priority group than his or her self-reported income would, so that part of the collection is necessary.

However, the VA has not conducted or presented sufficient analysis about the subgroups where VA potentially imposes a burden for no benefit or reason. In particular, the following subpopulations:

1. If after the IRS/SSA match, the veteran is in the same priority group as their self-reported income/where they have been, then VA mails multiple copies of the form to the enrollee/spouse asking for it to be completed and mailed back. This is true even though VA does not use this information. It is also not required by the Privacy Act or VA regulation. If the veteran/enrollee did not respond, VA would just use the IRS/SSA information anyway.

VA has not presented any analysis to show that individuals who would be in the same priority group after self-reported income and the IRS/SSA data match move to a different priority group after completing this information collection. Such an analysis is necessary to demonstrate that there is some practical utility to having this subpopulation complete this collection.

VA should consider either not requesting this information from veterans/enrollees who are remaining in the same priority group following the IRS/SSA data match, providing a prominent disclosure on the form that it only needs to be returned if the respondent disputes it, or exploring lower burden approaches (such as allowing the veteran to indicate online that they received the notice and are not disputing it, rather than needing to complete the whole form and mail it back only to have it not be used).

2. If after the IRS/SSA match, the veteran moves to a better priority group compared to their self-reported income/where they have been, then VA mails multiple copies of the form to the enrollee/spouse asking for it to be completed and mailed back. As above, this is true even though VA does not use this information. It is also not required by the Privacy Act or VA regulation. If the veteran/enrollee did not respond, VA would just use the IRS/SSA information anyway.

VA has not presented analysis in the collection to show how many veterans complete this information collection but move to a better priority group based on the IRS/SSA data match, but are then changed to a different priority group based on a response to VA's mailings after the data match. Such an analysis would be necessary to demonstrate that these mailings to this subpopulation have any practical utility.

VA should consider either not requesting this information from veterans/enrollees who are being moved to a better priority group based on the IRS/SSA data match, providing a prominent disclosure on the form that it only needs to be returned if the respondent disputes it, or exploring lower burden approaches (such as allowing the veteran to indicate online that they received the notice and are not disputing it, rather than needing to complete the whole income verification form and mail it back only to have it not be used).