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501(C)(3) Veterans Non-Profit

February 13, 2023

Ms. Janel Keyes
Office of Regulations, Appeals, and Policy (10BRAP)
U.S. Department of Veterans Affairs
810 Vermont Avenue, NW
Washington, DC 20420

RE: Agency Information Collection Activity: Preauthorization and Request for Payment of Bowel and Bladder Services (OMB Control No. 2900-NEW)

Dear Ms. Keyes,

Paralyzed Veterans of America (PVA) is writing to provide comment on the December 15, 2022, Request for Information (RFI) notice published by the Veterans Health Administration, Department of Veterans Affairs (VA) regarding preauthorization and request for payment of bowel and bladder services.

PVA will limit its comments to VA Form 10–314b, which is required for caregivers to receive reimbursement for bowel and bladder care services. The payment process is problematic for caregivers because it relies on outdated practices. Caregivers are required to complete a time sheet that must include the following information:

- Veteran name and social security number (SSN)
- Independent caregiver's name, address and SSN
- Number of units (1 Unit = 15 minutes) by date of service
- Independent caregiver's signature and date

Once the caregiver completes the time sheet, they have two options for submitting it to the Regional Payment Center in Vancouver, WA for processing. They can fax the time sheet to the Regional Processing Center or mail it. Not all veterans have access to a fax machine and this method of transmitting information is outdated.

To accommodate the diverse needs of respondents, VA Form 10-314b should be available in both paper and online fillable versions. The respondent should have the option to choose which version best meet their needs. Additionally, both versions should allow for electronic submission and electronic signature as applicable.

Thank you for your attention to our comments.

Sincerely,

A handwritten signature in black ink that reads "Heather L. Ansley". The signature is written in a cursive, flowing style.

Heather L. Ansley, Esq., MSW
Associate Executive Director of Government Relations
Paralyzed Veterans of America