

**Department of Veterans Affairs
Veterans Health Administration
Payment Operations (104P), VHA Office of Finance**

Agency Information Collection Activity:

Preauthorization and Request for Payment of Bowel and Bladder Services (OMB Control No. 2900-NEW)

VA received one public comment, dated Feb 13, 2023 on the 60-day FRN for this information collection (VA Forms 10-314a,b).

VA-2022-vaco-0001-0260.A1 - We appreciate the commentor's concerns-suggestions, and PO responds as follows:

The payment process is problematic for caregivers because it relies on outdated practices due to Caregivers being required to complete a time sheet that must include the following information:

- Veteran name and social security number (SSN) – PO is not able to change the requirement for patient identifying information. The request for payment form requires minimal Veteran information for identification purposes and coverage determination. The SSN is not required, but the ICN is, in compliance with modernization efforts.
- Independent caregiver's name, address, and SSN - PO is not able to change the requirement for vendor/payee identifying information. The Caregiver's SSN is required as this is their registered Tax ID Number and a standard billing requirement.
- Number of units (1 Unit = 15 minutes) by date of service - The form requires reporting hours and minutes by date of service, not a minute to unit calculation.
- Independent caregiver's signature and date - Form 314B does allow for electronic signature.

The Caregiver has two options for submitting the request for payment to the Regional Payment Center in Vancouver, WA for processing, via fax or mail:

- Not all veterans have access to a fax machine and this method of transmitting information is outdated - PO is not able to provide an EDI method of submission at this time but is working on an electronic filing solution. If fax is not available, mail is able to be used.

- To accommodate the diverse needs of respondents, VA Form 10-314b should be available in both paper and online fillable versions. Additionally, both versions should allow for electronic submission and electronic signature as applicable - **VA Form 10-314B will be available in both paper and online fillable forms.** Currently, there is not an option for electronic submission of the form and the caregiver will need to continue submitting via fax or US Mail.

Submitted by:

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