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501(C)(3) Veterans Non-Profit

March 30, 2023

Ms. Maribel Aponte
Office of Enterprise and Integration
Data Governance Analytics (008)
U.S. Department of Veterans Affairs
810 Vermont Avenue, NW
Washington, DC 20420

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

Dear Ms. Aponte,

Paralyzed Veterans of America (PVA) is writing to provide comment on the March 1, 2023, 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. In February 2023, we provided comments concerning the need for a standardized form for payment of bowel and bladder services, as well as the need for caregivers to be able to fill it out and submit it online. Since filing our comments, we have been able to review VA Form 10-314b and would like to comment on the information it requires.

According to the abstract, VA 10-314b is required for caregivers to receive reimbursement for bowel and bladder care services. The form is used to list the dates and times the care was rendered to the veteran and is then submitted monthly to VA to request payment for those services. The form uses the term “provider” which we are concerned may confuse family members and other individuals who provide this service for their veteran. We believe that it would be less confusing if the term “caregiver” could either be used in place of “provider” or if a notation could be made on the form that the provider is the individual providing the bowel and bladder care for the veteran.

The form also requests the veteran’s internal control number and referral number and refers the person completing the form to VA Referral Form 10-7080. We spoke to a veteran and their caregiver and neither of them could recall ever seeing VA Form 10-7080. Including this information on VA Form 10-314b could create delays and PVA recommends this information be removed from the form. VA has this information and should be responsible for providing it.

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