

PUBLIC SUBMISSION

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Notices Requesting Comments

Comment On: VA-2024-VACO-0001-0041
Agency Information Collection Activities; Proposals, Submissions, and Approvals: Veteran/Beneficiary Claim for Reimbursement of Travel Expenses; OMB No. 0798

Document: VA-2024-VACO-0001-0042
Comment on ICR-Veteran/Beneficiary Claim for Reimbursement of Travel Expenses; Thompson, John

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General Comment

Proof of attendance documentation is conspicuously absent from your ICR. The ICR only mentions the collection of identity, addresses, dates, one signature and receipts for expenses other than mileage.

VHA has been collecting proof of attendance documentation for well more a decade. They request an additional document be attached to the VHA Form 10-3542 or submitted to the Beneficiary Travel Self Service System (BTSSS) with a claim. They have requested it in numbers far greater greater than 10 persons on a regular basis without an OMB control number.

The VHA VTP has purposely evaded OMB control by leaving it out of the ICR and instructing each beneficiary travel office to generate and issue their own letters requesting proof of attendance documentation. VHA is collecting proof of attendance documentation right now, in real time, as reflected in the documents I have attached.

VHA cites 38 CFR 70.20 (e) to demand any information they desire whether authorized by OMB or not. If not provided, the claim will be denied. It has happened and it is happening. Proof of attendance documentation is absent from 38 USC 111. VHA has illegally added determination criteria without the authorization to do so.

Please clarify and define the specific information VHA is authorized to collect under this ICR. Explain why proof of attendance is missing from your ICR.

Attachments

Proof of attendance documentation