

October 6, 2015

Nancy J. Kessinger
Veterans Benefits Administration (20M33)
Department of Veterans Affairs
810 Vermont Avenue NW
Washington, DC 20420

Re: OMB Control No. OMB Control No. 2900-0002

Dear Ms. Kessinger:

The Assisted living Federation of America (ALFA) appreciates the opportunity to comment on the Veterans Administration's (VA) proposed annual reporting requirements for veterans and surviving spouses who receive non-service connected pensions. We share the concerns of many that the suggested eligibility requirements posed as part of a new 10 page annual report are excessive on a large majority of eligible frail veterans in particular.

ALFA is the largest association representing providers of independent living, assisted living and memory care communities in all 50 states. Since its founding in 1990, ALFA has been committed to championing quality of life for older adults and enhancing consumer choice to age in place. Many seniors and their families turn to senior living communities, often during a time of crisis, to provide the services and supports needed to care for their loved ones. Assisted living and memory care communities are licensed and regulated by each state and provide 24 hour supervision, meals, activities and assistance with activities of daily living such as medication management, dressing, bathing, and ambulation as needed.

ALFA members are honored to currently serve thousands of veterans and their spouses in our senior living communities. These veterans and surviving spouses who benefit from Veterans Administration pensions have chosen to utilize their benefits to pay for and receive care in senior living communities they consider home. The veterans who live in senior living find their lives are enriched through the opportunity to live in a social environment that provides the needed assistance with activities of daily living and improved quality of life.

It is ALFA's understanding that the VA's reasoning for discontinuing the use of the past Annual Eligibility Verification Report discontinued in December of 2012 was that "Technological improvements, including expansion of data matching agreements with the Internal Revenue Service (IRS) and Social Security Administration (SSA) will allow the VA to verify pension applicant's income before awarding benefits. VA will continue to conduct data matching with these and other Federal agencies after awarding benefits to ensure that it is making benefit payments only to Veterans and survivors who remain eligible." Does the VA have issues with this process or have they encountered problems?

Before moving forward with new verification procedures on behalf of the thousands of veterans and surviving spouses who are residents of the senior living communities, we respectfully request that the VA consider the following:

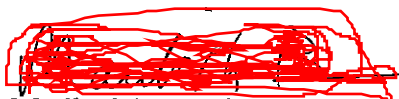
1. The costs and benefits of suspending the annual EVR process and verification with the IRS and SSA and impact to frail veterans and their surviving spouses,
2. Additional costs of the longer proposed form (21P-257/21P-527EZ) versus the suspended 21-0966 EVR as modified to appropriately evaluate pension eligibility,
3. Alternative formats for verifying income that can be achieved without undue and burdensome requirements on frail veterans.

Since 2007, ALFA has worked with the VA to help educate senior living providers, their residents and families about the variety of programs, and services available to veterans and their spouses to which they are legally entitled. ALFA has also recommend and has attempted to work with the VA to streamline the application process and certification procedures to ensure consistent, clear, easier to understand and user friendly procedures for applying and certifying benefits. Unfortunately, efforts to date have been unsuccessful and many eligible veterans have passed away before receiving entitled benefits.

ALFA remains very supportive of a majority of the recommendations made by the 2013 Government Accountability Office Report which seek to protect the integrity of the VA benefit program and protect vulnerable seniors from unscrupulous financial advisors. However, while ALFA supports proposals which seek to implement needed changes in an appropriate way taking into consideration safeguards, it does not support additional burdens on veterans or surviving spouses when they pose undue paperwork burdens that can be achieved by other alternatives that are less burdensome.

Thank you in advance for the opportunity to comment on the Information Collection Request as proposed by the VA relating to a new 10 page annual eligibility verification for veterans and surviving spouses receiving pensions. We strongly encourage the VA to consider alternatives to this approach that are less burdensome, particularly on the frail elderly who receive VA pensions and are home bound or reside in senior living communities.

Sincerely,

A redacted signature, likely of Maribeth Bersani, is shown in red ink. The signature is heavily scribbled over, making it illegible.

Maribeth Bersani
Senior Vice President of Public Policy
Assisted Living Federation of America