

60 Day FRN Public Comment for PRA Collection – Program of Comprehensive Assistance for Family Caregivers (PCAFC)

Regarding the subject matter above posted in the Federal Register (FR) as a Notice on 10/25/2018 as “Agency Information Collection Activity Under OMB Review: Program of Comprehensive Assistance for Family Caregivers”, the Notice requests public comments yet does not provide the documents that need to be commented on.

Whenever a Department of Veteran Affairs (VA) Notice is published in the online Federal Register (FR - <https://www.federalregister.gov/agencies/veterans-affairs-department>) pertaining to requesting public comment on a change to an existing collection of records OR a new collection of records maintained by VA, there are significant lack of necessary documents to allow such public comment. The new or revised form/content is not included in the VA FR Notice so there is no way to compare these changes with what is already part of the collection. Additionally, in many cases, there may be other Supporting Statements associated with this collection change that may provide insight on why this change is being proposed but they are not part of the FR Notice. This is the case in all Notices up for OMB review AND many other Notices that indicate a change to a record collection maintained by VA.

The online FR as indicated in the link above ALREADY has an easy way to rectify this situation and provide those missing documents that would then allow public comment. The online FR allows a sidebar section titled “Enhanced Content” that has a subsection within it called “Supporting/Related Materials”. Those missing documents (new/revised collection form/content as well as any Supporting Statement) could be included within that subsection in the VA FR Notice.

I suggest making this change to include those missing documents in the Enhanced Content portion of the online FR Notice and this will then allow any necessary public comment to be provided. This only needs to be provided for revisions and additions to record collections (in some cases reinstatements of record collections that no longer have available content on the Internet). Extensions of already approved collections do NOT need to have this Enhanced Content.

I have requested this change NUMEROUS times through FR official comments to revisions and new record collection changes. When contacting the FR posting contacts in the past they have indicated such data is available in the ROCIS and PRA document systems. Since the ROCIS system is not available to the public and the PRA system will often NOT have this data at the time of the publishing of the FR Notice, and sometimes not even before the closing of the FR comment period, that response is unacceptable and the VA should consider my suggestion above that will fully allow such comment by the public AT THE TIME of the publishing of such FR Notice that requests public comment AND doesn't require the commenter to perform an exhaustive search on other websites to find those documents if they are even available.

IF THE FR AND VA DO NOT MAKE THESE CHANGES IT IS INDICATIVE THAT THE VA HAS NO REAL INTENT TO SOLICIT ANY PUBLIC COMMENT ABOUT RECORD COLLECTION CHANGES, APPEARS TO BE A VIOLATION OF THE PROVISIONS OF PUBLIC LAW 79-404 AS CODIFIED BY 5 U.S. CODE § 552(a)(1)(C) ET AL. AND CERTAINLY DOES NOT CONTRIBUTE IN A POSITIVE WAY TO ANY TRANSPARENCY OF GOVERNMENT INITIATIVES.