



National Service & Legislative  
Headquarters  
807 Maine Avenue SW  
Washington, DC 20024-2410  
Phone: 202-554-3501  
Fax: 202-554-3581

June 30, 2020

The Honorable Colin Allred  
United States House of Representatives  
328 Cannon House Office Building  
Washington, DC 20515

Dear Representative Allred:

On behalf of DAV and our over one million members, all of whom were wounded, injured or made ill during wartime service, I write to offer our support for legislation that would re-establish the veteran's representatives' 48-hour review, which VA recently eliminated.

The 48-hour review period, as previously outlined in the Department of Veterans Affairs (VA) M21-1 Adjudication Procedures Manual, was an essential feature of the VA claims process. During this review process, accredited Veterans Service Organizations (VSOs) had the opportunity to review VA decisions to ensure that all claimed conditions have been addressed and properly adjudicated. This process served as an independent quality control check prior to VA's internal review procedure, known as Systematic Technical Accuracy Review (STAR).

After reviewing a rating decision, VSOs were permitted to notify VA of any irregularities, missed conditions, typographical errors, or other mistakes before a disability rating was formally promulgated. This process allowed for errors to be resolved without requiring veterans to seek redress in the time-consuming and often costly claims appeals process.

The appeals backlog has reached over 300,000 pending appeals with more than 70,000 pending hearings. The Board of Veterans Appeals is remanding or overturning approximately 70 percent of all appeals, even with VA's quality review. The elimination of the 48-hour review will substantially stress the already pressed appeals infrastructure.

DAV supports the draft legislation, the Veterans Claim Transparency Act, as it would provide representatives the ability to work with VA to identify and correct errors in VA decisions prior to final promulgation, acting as another layer of quality review for VA and veterans. DAV is disappointed with VA's recent decision to eliminate this practice which was in place for over seven decades and we believe the Veterans Claim Transparency Act can assist in alleviating potentially thousands of new appeals and provide immediate justice for veterans and their families.

Representative Allred, thank you for introducing this important legislation and for your continued efforts to support our nation's veterans disabled in their service.

Sincerely,

  
JOY A. ILEM  
National Legislative Director

JJI:Imb