

**Department of
Veterans Affairs**

Memorandum

Date: September 9, 2022

From: Office of Field Operations (OFO), Compensation Service, Pension and Fiduciary Service, and Office of Administrative Review

To: Veterans Benefits Administration (VBA) Regional Offices, to include Pension Management Centers and Decision Review Operation Centers

Subject: Interim Claim Processing Guidance Based on the Sergeant First Class Heath Robinson Honoring Our Promise to Address Comprehensive Toxics (PACT) Act, Public Law (PL) 117-168.

Purpose

This memorandum provides:

- Background information on the provisions of the PACT Act.
- Interim procedures on handling claims, to include holding contentions until further notice.

Important: This memorandum provides a brief overview of the PACT Act. For more information on the impact of the bill, see the attached enclosure. At this time, claims processors should only take action on impacted claims in accordance with the guidance described in Table 7 of this memorandum.

Summary of the Law

On August 10, 2022, President Biden signed the PACT Act into law, establishing the most substantial legislation impacting the Department of Veterans Affairs in a generation. Among the many provisions in the PACT Act, several extend benefits to Veterans and their survivors through the following:

- Creation of new procedures for claims based on toxic exposure with a lowered threshold for requesting a disability examination for non-presumptive claims related to toxic exposure,
- Expansion of presumptive conditions and locations associated with herbicide exposure,
- Addition of presumptive conditions based on exposure to burn pits and other toxins,
- Expansion of the definition of Persian Gulf Veteran with amendments to existing presumptives, and
- Expansion of locations associated with radiation exposure.

Please note that claims for toxic exposures may include (but are not limited to), the following:

- Chemicals (Agent Orange/herbicides, pesticides, sulfur fire, depleted uranium, chromium, Camp Lejeune water supplies, perfluoroalkyl and polyfluoroalkyl substances (PFAS), industrial solvents, polychlorinated biphenyl (PCB)),
- Radiation (nuclear weapons, x-rays, depleted uranium),
- Air pollutants (burn pit smoke, sulfur fire, oil well fire, particulate matter),
- Occupational hazards (asbestos, lead, Chemical Agent Resistant Coating (CARC) Paint, fuels),
- Warfare agents (chemical and biological weapons, chemical warfare agents, mustard gas, nerve agents, Edgewood/Aberdeen Experiments, Project 112/Project SHAD (Shipboard Hazard and Defense)), and
- Other garrison exposures (environmental exposures experienced while stationed on a military base).

For more information on identifying claims impacted by the PACT Act, see the content titled, “*Requirement to identify PACT Act related claims*” on page 6 below.

Section 303 Creation of lowered threshold for requesting a disability examination on non-presumptive claims related to toxic exposure

VBA is developing policy to apply to the lowered examination threshold for non-presumptive claims based on toxic exposure. Additional guidance will be forthcoming. In the meantime, these claims must be processed under current authorities (direct, secondary, aggravation, or established presumptions *other* than those specified by the PACT Act). If they cannot be granted under a current authority, impacted claims must be held by following the procedures in Table 7 below.

Sections 401 and 402 Expansion of Locations Associated with Radiation Exposure

Expanded Locations. The PACT Act establishes the following locations and dates of service in each respective location as radiation risk activity for presumption of radiation exposure:

Table 1: New locations and dates associated with radiation exposure

Location	Dates
Enewetak Atoll radioactive cleanup	January 1, 1977, to December 31, 1980
Palomares, Spain, nuclear response	January 17, 1966, to March 31, 1967

Thule, Greenland, nuclear response	January 21, 1968, to September 25, 1968
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Sections 403 and 404 Expansion of Presumptive Conditions and Locations Associated with Herbicide Exposure

Expanded conditions. The PACT Act establishes the following conditions as presumptively associated with herbicide exposure during the Vietnam War Era:

Table 2: Expanded conditions and diagnostic codes associated with herbicide exposure

Condition	Diagnostic Code(s)
Monoclonal gammopathy of undetermined significance	7712
Hypertension	7101

Note: The above diagnostic codes are provided to assist claims processors with consistency in applying the guidance in Table 7.

Expanded Locations. The PACT Act establishes the following locations and dates of service in each respective location as qualifying for presumption of exposure to herbicides during the Vietnam War Era for any presumptive condition under [38 C.F.R. § 3.309\(e\)](#).

Table 3: New locations and dates associated with herbicide exposure

Location	Dates
Thailand at any United States or Royal Thai base; without regard to where on the base the Veteran was located or what military job specialty (MOS) the Veteran performed.	January 9, 1962, to June 30, 1976
Laos	December 1, 1965, to September 30, 1969
Cambodia at Mimot or Krek; Kampong Cham Province	April 16, 1969, to April 30, 1969
Guam, American Samoa, or the territorial waters thereof	January 9, 1962, to July 31, 1980

Johnston Atoll or on a ship that called at Johnston Atoll	January 1, 1972, to September 30, 1977
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Note: Further information on the requirements for qualifying service, such as the definition of territorial waters of Guam and American Samoa, will be provided in future guidance.

Section 405 Expansion of the Definition of Persian Gulf Veteran with Amendments to Existing Presumptives

Expanded Eligibility Requirements. The PACT Act expands eligibility to presumptive service connection for Persian Gulf Veterans for undiagnosed illness and medically unexplained chronic multi-symptom illnesses (MUCMIs) by:

- Removing the requirement under [38 C.F.R. § 3.317\(a\)\(1\)\(i\)](#) that a condition must manifest to a degree of 10 percent or more for Gulf War illnesses,
- Providing a permanent extension of eligibility for Gulf War illnesses,
- Requiring healthcare personnel to complete a Disability Benefits Questionnaire (DBQ) if a Veteran presents at a VA healthcare facility with at least one symptom of Gulf War illness, and
- Expanding the definition of a Persian Gulf War Veteran to mean a Veteran who served not only in the Southwest Asia theater of operations but also in Afghanistan, Israel, Egypt, Turkey, Syria, or Jordan.

Table 4: Additional locations associated with undiagnosed illness/MUCMIs

Location	Dates
Afghanistan, Israel, Egypt, Turkey, Syria, Jordan	On or after August 2, 1990

Section 302/406 Addition of Presumptive Conditions Based on Exposure to Burn Pits and Other Toxins

Toxic Exposure Locations. The PACT Act establishes the following locations and dates of service in each respective location as qualifying for presumption of exposure:

Table 5: Locations and dates associated with burn pits/other toxins

Location	Dates
In, or in the airspace above, Bahrain, Iraq, Kuwait, Oman, Qatar, Saudi Arabia, Somalia, and United Arab Emirates	On or after August 2, 1990

In, or in the airspace above, Afghanistan, Djibouti, Egypt, Jordan, Lebanon, Syria, Yemen, or Uzbekistan	On or after September 11, 2001
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Expanded Conditions. The PACT Act establishes the following conditions as presumptively associated with exposure to burn pits and other toxins:

Table 6: Expanded conditions and diagnostic codes associated with burn pits/other toxins

Condition	Diagnostic Code(s)
Asthma diagnosed after service	6602
Head cancer of any type	5012, 5329, 6014, 6208, 7123, 7818, 8540, 9918
Neck cancer of any type	5012, 5329, 6819, 7123, 7818, 7914, 8021, 8540
Respiratory cancer of any type	6819
Gastrointestinal cancer of any type	7343
Reproductive cancer of any type	7528, 7627, 7630
Lymphoma cancer of any type	7709, 7715
Lymphomatic cancer of any type	7703, 7709, 7712, 7715, 7717, 7718, 7719, 7724, 7725
Kidney cancer	7528
Brain cancer	8002
Melanoma	7833
Pancreatic cancer	7343
Chronic bronchitis	6600
Chronic Obstructive Pulmonary Disease (COPD)	6604
Constrictive bronchiolitis or obliterative bronchiolitis	6600, 6601, 6602, 6603, 6604
Emphysema	6603
Granulomatous disease	6524, 6820, 6828
Interstitial lung disease	6825, 6826, 6827, 6828, 6829, 6830, 6831, 6832, 6833
Pleuritis	6732, 6845
Pulmonary fibrosis	6825, 6826, 6827, 6828, 6829, 6830, 6831, 6832, 6833, 6845
Sarcoidosis	6846
Chronic sinusitis	6510, 6511, 6512, 6513, 6514
Chronic rhinitis	6501 (historic), 6522, 6523, 6524
Glioblastoma	8002

Note: The above list is provided to assist claims processors with consistency in applying the guidance in Table 7 below; however, not all conditions under these diagnostic codes will qualify for the presumptions. When there is a question as to whether a claim is related to the PACT Act, claims processors should err on the side of caution and hold the issue if it cannot be granted on another basis, per Table 7 below.

Interim Guidance on Identification, Establishment and Holding of Claims Associated with the PACT Act

Important: VBA will start processing claims under the PACT Act in January 2023. Implementation guidance will be issued prior to January to allow for claims processing while concurrently working to formalize the new law through rulemaking.

Requirement to identify PACT Act related claims

For the purposes of this Interim Guidance, a “*PACT Act related claim*” will be defined as a claim for a condition that the Veteran explicitly claims as such, the evidence of record supports as such, or if after review of the record, the claims processor liberally construes the condition as such.

For the purposes of applying the guidance in Table 7 below, claims must be liberally construed. This may include claims in which:

- the Veteran explicitly states a disability is related to service in a newly-recognized or existing presumptive location (i.e., service in a location listed in Tables 1, 3, 4 or 5), or as due to toxic exposure,
- the Veteran does not explicitly state what has caused a claimed disability, but there is service in a newly-recognized or existing presumptive location (i.e., service in a location listed in Tables 1, 3, 4 or 5),
- the Veteran claims a newly-recognized presumptive disability (i.e., a condition listed in Tables 2 or 6, or
- it is unclear whether it may be related to toxic exposure.

Important: Non-presumptive claims must be liberally construed under PACT Act provisions. When a toxic exposure is not explicitly reported and/or a presumptive condition is not explicitly claimed but the Veteran served in an area noted in Tables 1, 3, 4 or 5 or served in a previously established exposure region (e.g., in-country Vietnam), a claim based on toxic exposure should be assumed *unless* the claimed conditions are clearly due to other causes, such as trauma (e.g., knee injury, traumatic brain injury (TBI), etc.) or a mental health condition (e.g., posttraumatic stress disorder (PTSD), anxiety, depression, etc.).

When there is a question as to whether a claim is covered by the PACT Act and the claimed condition cannot be granted under existing procedures and existing authority (i.e., direct, secondary, aggravation, or established presumptions *other* than those specified by the PACT Act), claims processors should err on the side of caution and treat the condition *as if* it was PACT Act related.

Table 7: Identification, establishment and holding of claims associated with the PACT Act

INTAKE	
Step	Action
I1	At the time of claim establishment and/or development, identify any explicitly claimed or liberally construed PACT Act related conditions as described in the section above titled, “<i>Requirement to identify PACT Act related claims.</i>” Important: Mail automation will establish claims and apply the <i>PACT</i> special issue whenever possible; however, all claims processors must review the claimed conditions, along with other evidence of record, to determine if any of the claimed conditions are PACT Act related. (If mail automation erroneously established a claim that was not filed on the proper claim form, follow the request for application procedures outlined in M21-1, Part II, Subpart iii, 2.G.1.) If the criteria for a PACT Act related claim is met, continue to Step I2.
I2	If the criteria for a PACT Act related claim is met, • add the <i>PACT</i> special issue to each of the relevant contention(s) if it is not already affixed, • assign the appropriate contention classification, • apply all applicable special issues or flashes under normal guidance found in M21-1 and/or M21-4, and • continue to the next step. Note 1: For claims that were held under the Immediate Guidance issued by OFO on August 10, 2022, the <i>VACO Special Issue 1</i> should no longer be used to hold claims. If upon review of a PACT Act claim, <i>VACO Special Issue 1</i> is still attached to any contention, it should be removed and replaced with the <i>PACT</i> special issue. Note 2: PACT Act related contentions that are already service connected (i.e., claims for increase) should <i>not</i> have the <i>PACT</i> special issue applied, unless there is another potential benefit specific to the provisions of PACT Act (e.g., potential entitlement to an earlier effective date under 38 C.F.R. § 3.114), as described in the steps below.
DEVELOPMENT	
Step	Action
D1	Initiate development to include gathering records and sending development letters under existing/current procedures and existing/current authorities (i.e., direct, secondary, aggravation, or established presumptions <i>other</i> than those specified by the PACT Act).

	Reminder: For non-presumptive conditions claimed as related to exposures, such as herbicides, service connection may be warranted under existing authorities (i.e., direct or secondary basis). Follow the guidance in M21-1, Part VIII, Subpart i, 1.A.1.h. and M21-1, Part VIII, Subpart iii, 9.B.3. Exception: For hypertension or MGUS claims related to herbicide exposure, claims processors should <i>not</i> send the claimant a letter with the Veterans Benefits Management System (VBMS) development paragraph “AO-not a recognized condition.” Note 1: Ensure all military records, to include service treatment records (STRs) and the entire Official Military Personnel File (OMPF) are of record prior to submission of a Military Records Research Center (MRRC) request per M21-1, Part VIII, Subpart i, 1.A.1.f. and M21-1, Part VIII, Subpart iv.1.A.4.b. Note 2: If the Veteran is claiming radiation exposure at one of the newly-recognized locations, the procedures in M21-1, Part VIII, Subpart iii, 4.A.2.a should be followed to determine if the claim should be sent for centralized processing to the Jackson RO. Note 3: Prior to requesting any examination, ensure all evidence required for the examination is of record (e.g., STRs, OMPF, VA Medical Center (VAMC) records, private treatment records, etc.). Continue to Examinations, Step E1.
EXAMINATIONS	
Step	Action
E1	Is an examination and/or medical opinion warranted for the claimed condition(s) under existing procedures and existing authorities (i.e., direct, secondary, aggravation, or established presumptions <i>other</i> than those specified by the PACT Act)? • If yes, request examination and/or medical opinion for the condition(s) under existing procedures/authorities, as needed. • If <i>no</i>, continue to Step E2.
E2	If an examination is <i>not</i> warranted under existing authorities but service connection can be considered under PACT Act either due to the expanded qualifying service and/or inclusion of new presumptive conditions, review the record for qualifying service and medical / lay evidence of the claimed condition. An examination under PACT Act should only be requested if the following criteria is met:

	- the claimed condition involves: - a newly-recognized or existing presumptive condition related to herbicides (Table 2) and the Veteran has qualifying service in an existing location or newly-recognized location (Table 3), or - a newly-recognized presumptive condition related to burn pit exposure (Table 6) and the Veteran has qualifying service (Table 5), or - an existing presumptive condition related to the newly added radiation locations (Table 1) or newly-added Persian Gulf War locations (Table 4) and the Veteran has qualifying service, respectively, AND - there is evidence of a diagnosis of the claimed presumptive condition. If the above criteria in this step are met, an examination should only be requested to assess the level of severity of the condition; do not request a medical opinion. A medical opinion would only be necessary should another theory of entitlement to service connection, other than under the PACT Act, need to be considered for the contention, as indicated in E1. When requesting an examination for a PACT Act related presumptive condition, in the Examination Scheduling Request (ESR) “This is a PACT Act Claim” must be added in the Additional Information section to the contentions that are related to PACT Act. This will enable tracking of PACT Act related examinations until the necessary Exam Management System enhancements can be implemented. If an examination is <i>not</i> warranted under existing authorities and the Veteran is claiming a non-presumptive condition based on <i>any</i> toxic exposure during <i>any</i> period of service, do not order an exam. The affected contentions must be held for future guidance. Continue to Step E3.				
E3	If an examination cannot be requested for a PACT Act related presumptive condition, the condition must be held until additional PACT Act policy guidance is provided. <table border="1" data-bbox="331 1593 1349 1892"> <thead> <tr> <th data-bbox="331 1593 846 1635">If ...</th><th data-bbox="846 1593 1349 1635">Then ...</th></tr> </thead> <tbody> <tr> <td data-bbox="331 1635 846 1892">the claim only consists of PACT Act related condition(s) and contains no other non-PACT Act conditions and the claim cannot be decided without consideration of forthcoming PACT Act policy guidance</td><td data-bbox="846 1635 1349 1892"> - do not make a decision on the claim. - continue to Step E4 for instructions on holding a PACT Act related claim. </td></tr> </tbody> </table>	If ...	Then ...	the claim only consists of PACT Act related condition(s) and contains no other non-PACT Act conditions and the claim cannot be decided without consideration of forthcoming PACT Act policy guidance	- do not make a decision on the claim. - continue to Step E4 for instructions on holding a PACT Act related claim.
If ...	Then ...				
the claim only consists of PACT Act related condition(s) and contains no other non-PACT Act conditions and the claim cannot be decided without consideration of forthcoming PACT Act policy guidance	- do not make a decision on the claim. - continue to Step E4 for instructions on holding a PACT Act related claim.				

	the claim contains non-PACT Act related conditions that would all result in denials and the PACT Act related conditions cannot be decided a partial rating can be completed per the guidance in M21-1 Part V, Subpart ii, 3.B.1	- do not complete a partial rating decision (See M21-1 Part V, Subpart ii, 3.B.1.). - continue to Step E4 for instructions on holding a PACT Act related claim. complete a partial rating following the guidance in Step R4 to defer the PACT Act related conditions.	
E4	To hold a PACT Act related claim, where no rating decision is to be made at this time, in VBMS: - apply the <i>NWQ Review Project #4</i> special issue to the corresponding PACT Act condition and - create a deferral for the contention(s): - Primary Deferral Reason: <i>PACT Act</i> - Detailed Reason: <i>Awaiting Implementation of PACT Legislation</i> Note: Claims must have <i>both</i> the <i>NWQ Review Project #4</i> and <i>PACT</i> special issue to trigger NWQ recall and facilitate NWQ holding the claim pending further guidance.		
RATING			
Step	Action		
R1	Can service connection for the PACT Act related condition(s) be granted under existing procedures and existing authorities (direct, secondary, aggravation, or established presumptions <i>other</i> than those specified by the PACT Act)? - If yes, continue to Step R2. - If <i>no</i>, continue to Step R4 for instruction on deferring the PACT Act related condition. Important: Any condition associated with or construed to be related to the PACT Act cannot be rated (granted or denied) until further guidance is released. This means, even if an examination for a presumptive condition was completed, if the basis for a grant would solely be under the PACT Act, follow the steps below to hold the claim. VBA will begin processing PACT Act decisions in January 2023. Reminder: Award presumptive grants when possible under existing authorities, such as herbicide exposure, under existing M21-1, Part VIII, Subpart i, 1.A and B. Note: Conditions that are not PACT Act related can be decided under existing procedures and authorities. If the condition(s) not related to the PACT Act would result in a denial and there is a separate condition that must		

	be held under the PACT Act, follow the guidance in Step E4 for deferring the claim.
R2	Is the assigned effective date of the PACT Act condition(s) granted under existing procedures and authorities <i>after</i> August 10, 2022? • If <i>yes</i>, continue to Step R3. • If <i>no</i>, meaning the assigned effective date is <i>before</i> August 10, 2022, do not hold or defer the condition. No further rating action or readjudication is needed.
R3	When the condition is granted under existing procedures and authorities, and an effective date after August 10, 2022 is assigned, the condition will need to be held for future readjudication to determine if there is entitlement to an earlier effective date on a presumptive basis under 38 C.F.R. § 3.114. To hold a condition that has been granted under existing procedures and authorities but needs future readjudication of the effective date, a new, separate contention must be established to control for the required subsequent review. The separate contention must be added and deferred in the rating decision. To add the separate contention in VBMS-Core, the claims processor will do the following: • Create a new contention in VBMS: <i><enter name of granted PACT condition>, consideration for entitlement to an earlier effective date.</i> • Classification: Administrative Issue • Special Issue: PACT Continue to Step R4 for instruction on deferring the issue in VBMS-R.
R4	If the PACT Act related claim cannot be decided without additional PACT Act policy guidance, or if an earlier effective date must be considered (continuation from R3) in future readjudication (or both), defer the condition(s). To defer the condition the claims processor will: • In VBMS-Core: ○ Create a deferral for the contention(s) (to include the newly-created contention if consideration of earlier effective date is at issue): ▪ Primary Deferral Reason: <i>PACT Act</i> ▪ Detailed Reason: <i>Awaiting Implementation of PACT Legislation</i> • In VBMS-R: ○ Bring the condition(s) to issue and defer the condition(s) on the Disability Decision Information tab. Input "Awaiting

	Implementation of PACT Act Legislation” as the deferral reason that will show in the Rating Decision Narrative, and ○ Add an authorization note to the codesheet for the authorizer to continue the end product (EP). Important: Be sure to follow the order of operations for deferrals. Since a partial rating decision is being completed, finalize the draft deferral <i>prior</i> to finalizing the partial rating decision.
AUTHORIZATION	
Step	Action
A1	Process the condition(s) unrelated to toxic exposure and any PACT Act condition(s) granted under current authorities. Continue the EP. Once the partial rating decision has been authorized, the authorizer will apply the <i>NWQ Review Project #4</i> special issue to, at minimum, one of the corresponding toxic exposure condition(s) and ensure the status of the claim has reverted to open. Note: Claims must have both the <i>NWQ Review Project #4</i> and <i>PACT</i> special issues to trigger NWQ recall and facilitate NWQ holding the claim pending further guidance.

Important: At this time, any PACT Act related claim/condition should NOT be denied, regardless the reason for denial (e.g., no diagnosis, no exposure, etc.). If the claim/condition cannot be awarded under current authority (e.g., direct, secondary, presumptive (other than PACT Act), etc.), the claim/condition should be held, as described in Table 7 above.

Service-connected death benefits

The guidance above also applies to claims for service-connected death benefits for survivors if:

- the Veteran’s service falls into one of the expanded exposure populations **and** there is evidence to indicate the Veteran’s death was caused by or is secondary to one of the existing or newly established presumptive conditions associated with that toxic exposure,
- there is evidence indicating that the principal or contributory cause of the Veteran’s death is, or is secondary to one of the newly-established presumptive conditions **and** the Veteran’s service meets the current or expanded exposure population criteria associated with the presumptive condition(s),
- there is specific allegation of eligibility by the claimant under the PACT Act, or
- the claim otherwise raises a question as to whether the PACT Act may affect eligibility.

Upon identification of a PACT Act related claim for service-connected death benefits,

if warranted, initiate development as noted above to include gathering records and sending development letters, and order medical opinions or exams under existing/current procedures and existing/current authorities. If the benefit sought may be granted under existing procedures and authorities, but an effective date after August 10, 2022, would be assigned, and it is based on the date of claim rather than the first day of the month in which the Veteran's death occurred, then consistent with R3, the claim will need to be held for future readjudication to determine if there is entitlement to an earlier effective date. If the PACT Act related claim cannot be decided without additional PACT Act policy guidance, or if an earlier effective date must be considered in future readjudication, then the undecided issues must be deferred and the *NWQ Review Project #4* special issue must be applied to the EP.

Dependency and Indemnity Compensation Reevaluation Requests

The PACT Act contains a provision allowing claimants to request a reevaluation of a previously denied claim for Dependency and Indemnity Compensation (DIC). A reevaluation of a previously denied claim must be elected by the claimant or their authorized representative, and if entitlement is shown, can result in retroactive benefits that predate the PACT Act enactment. When such an election is made, no further development should occur, and these unique claims must be held for future adjudication pending additional policy guidance. Accordingly, such a claim must be identified separately from 'new' PACT Act claims by adding the *PACT ACT DIC Reevaluation* and *NWQ Review Project #4* special issues upon claims establishment or when otherwise identified. The *PACT ACT DIC Reevaluation* and *PACT* special issue should not both be applied to the same EP. Therefore, when the *PACT ACT DIC Reevaluation* special issue is applicable, then the *PACT* special issue should *not* be added and, if it was already applied, then it should be removed prior to applying the *PACT ACT DIC Reevaluation* special issue to the EP.

Additional Note for Claims Processing Automation Prototype sites:

Claims for asthma, sinusitis, and rhinitis under [38 C.F.R. § 3.320](#) presumptive service connection guidance may be processed through the Claims Processing Automation model. The automation rules will function specific to [38 C.F.R. § 3.320](#) guidance until the toxic exposure PACT Act claim hold is removed. In addition, claims for certain PACT Act-related conditions may be processed through the Claims Processing Automation model when the *PACT* Special Issue is applied by mail automation. These cases will be routed to the Claims Processing Automation Prototype sites.

Questions

- Questions concerning this memorandum's guidance should be directed via e-mail through station leadership to [CS PACTACT](#).
- For questions on higher-level reviews or legacy appeals, please email them to the Office of Administrative Review at OARADMIN.VBAWAS@va.gov.
- For questions on DIC benefits, please email Pension and Fiduciary Service at [VAVBAWAS/CO/P&F POL & PROC](#).

Attachment: Summary of Relevant Sections