I respectfully request reconsideration of the denial of my claim for the Program of Comprehensive Assistance for Family Caregivers (PCAFC). My claim was denied on the basis that I do not meet the regulatory requirement under 38 C.F.R. Part 71 for assistance with activities of daily living (ADLs) for a period exceeding six months. I submit that the medical and regulatory evidence in my record establishes my continuous need for personal care services for more than six months, fulfilling the eligibility criteria for PCAFC.

Medical Evidence Demonstrating Need for Assistance with ADLs

My primary care physician, Dr. Chavis, has documented my need for ongoing assistance with multiple critical ADLs, including bathing, showering, eating, dressing, attending to personal hygiene, toileting, and medication management. These needs stem from my severe diabetic neuropathy, which causes:

I experience numbness, weakness, and decreased strength in my upper extremities, which severely impair my grip and fine motor skills. This impacts my ability to feed myself, button clothing, shave, and maintain basic hygiene independently.

In my lower extremities, numbness, decreased strength, unsteady balance, and limited motion restrict my mobility to the extent that I am unable to leave my home without significant assistance.

These impairments are persistent and have been present continuously for over six months, meeting the "need for personal care services" standard defined in 38 C.F.R. § 71.15 and § 71.20(a)(2). This regulation requires an eligible veteran to require assistance with three or more activities of daily living (ADLs) over six consecutive months to qualify for PCAFC.

Impact of 100% P&T Mental Health Disability on Functional Capacity

In addition to my physical disabilities, my mental health is evaluated as 100% disabling and permanent and total (P&T) as of the November 7, 2022, VA decision. This decision highlights the profound impairments caused by my major depressive disorder, including but not limited to:

Anxiety, chronic sleep impairment, and depressed mood

Difficulty adapting to work-like settings and stressful situations

Grossly inappropriate behavior, impaired abstract thinking, impulse control, judgment, and memory loss.

Near-continuous depression that severely affects my ability to function independently, including intermittent inability to perform ADLs and maintain minimal personal hygiene

Persistent suicidal ideation, weekly panic attacks, and total occupational and social impairment

These symptoms corroborate the physical evidence of my limitations and further demonstrate that I cannot reliably perform or manage ADLs safely without supervision and personal care assistance.

Regulatory and Policy Support for Eligibility

The VA M21-1 Adjudication Procedures Manual affirms that veterans with a 100% P&T mental health rating, particularly with symptoms involving intermittent inability to perform ADLs, meet criteria for caregiver assistance under PCAFC.

Under 38 C.F.R. § 71.15, "inability to perform an activity of daily living" includes requiring personal care services each time one completes one or more ADLs such as dressing, grooming, feeding, toileting, and mobility.

38 C.F.R. § 71.20 defines eligibility as requiring assistance with three or more ADLs or needing continuous supervision, which my combined physical and mental impairments satisfy.

Evaluation criteria for major depressive disorder in 38 C.F.R. §§ 4.7, 4.125, 4.126, and 4.130 explicitly support a 100% rating when total occupational and social impairment, including intermittent inability to perform ADLs, is present, as reflected in my VA decision.

Conclusion

Given the unambiguous medical documentation from Dr. Chavis and the VA's evaluation of my mental health disability, it is clear that I require continual assistance with multiple ADLs for a period exceeding six months. The severity of my combined physical and psychiatric impairments meets all legal and regulatory criteria for eligibility in the Program of Comprehensive Assistance for Family Caregivers under 38 C.F.R. Part 71 and VA policy guidance.

I respectfully urge that my claim be granted in recognition of my documented and ongoing need for comprehensive personal care and supervision.

Thank you for your careful consideration.