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Gregory O. Block  
Clerk, U.S. Court of Appeals for Veterans Claims  
625 Indiana Avenue, NW, Suite 900  
Washington, DC 20004-2950

January 26, 2021

**Re: CAVC Case No. 18-765, Appellant Clifton Arline**  
**Supplemental Citation of Authority**

Dear Mr. Block:

Pursuant to U.S. Court of Appeals for Veterans Claims' Rule of Practice and Procedure 30(b), Appellant notifies the Court of the following supplemental authority: *Skaar v. Wilkie*, --Vet.App.--, No. 17-2574, 2020 WL 7393453 (Dec. 17, 2020).

*Skaar* concerned the adequacy of the Board's assessment of whether scientific evidence was "sound." *Id.* at \*9. The Court recognized that this assessment rests on underlying "scientific determinations" on which "it may not be proper for the Board to opine"—"just as it may not make its own independent medical judgments." *Id.* (citing *Kahana v. Shinseki*, 24 Vet.App. 428, 434-35 (2011), and *Colvin v. Derwinski*, 1 Vet.App. 171, 172 (1991)).

When scientific determinations must be made, the Court held, "the Board should seek appropriate evidence to make its decision, just as it does with respect to medical matters." *Id.* In this regard, the Court explained, "The type of expert assistance the Board may need will depend on the facts before it, just as it does when the Board assesses medical matters." *Id.*

The Court's decision in *Skaar* is pertinent to the argument at pages 24-25 of Appellant's opening brief, where he argued that, in the absence of evidence that a VA examiner had vocational training or expertise, the examiner's opinion on Appellant's employability was not competent evidence for purposes of the Board's adjudication of entitlement to TDIU. *Skaar* is also pertinent to the argument at pages 1-8 of Appellant's Response to Appellee's Supplemental Brief, where he argued that, "when it comes to matters implicating specialized knowledge," such as vocational questions, the Board must rely on, and cite to, independent and qualified expert evidence that supports its decision.

Accordingly, Appellant notifies the Court that *Skaar* is significant authority that is pertinent to this appeal.

Very truly yours,

/s/ April Donahower

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