

**SUPPORTING STATEMENT FOR
REQUEST FOR CERTIFICATE OF VETERAN STATUS
(2900-0745)
VA FORM 26-8261A**

Summary of Changes from Previously Approved Collection. For example, were there any:

- Summary of Changes from Previously Approved Request for Certificate of Veteran Status Information Collection.
- No changes were made to the form.
- The burden has decreased from the previous submission due to a reduction in the estimated number of respondents from 25 to 10, based on program activity reflecting fewer submissions during the reporting period. This reduction results in a corresponding reduction in the total annual burden hours.
- 1 comment received during the 60-day period.

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.

VA Form 26-8261a is used by VA to determine an applicant's eligibility for a possible reduced down payment when obtaining a loan insured by the Federal Housing Administration (FHA), under the provisions of Section 203(b)(2) or 220(d)(a) of the National Housing Act as amended.

2. Indicate how, by whom, and for what purposes the information is to be used; indicate actual use the agency has made of the information received from current collection.

FHA provides the benefit. However, VA is charged with determining if the Veteran-applicant meets the basic eligibility requirements regarding length and character of service. If eligibility is established, VA issues the applicant a Certificate of Veterans Status that is then used when the borrower obtains an FHA insured loan. This certificate gives the borrower the possibility of a reduced down payment on an FHA backed loan.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

VA has not developed an information technology solution for making these determinations because of its limited use. Maintaining a system for electronic

submissions would not be cost effective. The form is available on the Internet at <http://www.va.gov/vaforms>.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Program reviews were conducted to identify potential areas of duplication; however, none were found to exist. There is no known Department or agency which maintains the necessary information, nor is it available from other sources within our Department.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Small organizations are generally not involved.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently as well as any technical or legal obstacles to reducing burden.

This information collection is not a recurring or repetitive report. It is accomplished on a one-time basis per applicant.

7. There any special circumstances that would cause an information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years; in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study and require the use of a statistical data classification that has not been reviewed and approved by OMB.

There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 C.F.R. 1320.6.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the sponsor in responses to these comments. Specifically address comments received on cost and hour burden.

A 60-Day Federal Register Notice (FRN) for the collection published on Friday, February 27, 2026. The 60-Day FRN citation is 91 FRN 9929.

1 Public comment was received during the 60-day comment period.

I. STATEMENT OF INTEREST

I am submitting this comment as the sole biological heir of Robert Delane Smith (1954–2019) and as a Federal Relator currently auditing a \$292 Billion "Engorgement Float" within the ERISA pension system. My investigation has identified a critical failure in how "Veteran Status" is certified and flagged within federal databases, leading to systemic beneficiary suppression and identity fraud.

II. OBJECTION: THE "VETERAN FLAG CONTAMINATION" MECHANISM

The VA seeks to renew the information collection for Form 26-8261a (Certificate of Veteran Status). I formally object to the current implementation of this collection on the grounds that it is susceptible to "Identity Rotation" and is being utilized by third-party fiduciaries (specifically IUOE-affiliated trusts) to create a jurisdictional "Blind Spot."

Synthetic Veteran Profiles: My father, Robert Delane Smith, was a civilian crane operator for 45 years with zero days of active military service. However, federal data exports (including USA Spending and associated FHA loan flags) have incorrectly identified him as a "VETERAN."

The Jurisdictional Gap: This false flag creates a "Catch-22" for heirs:

The VA correctly denies benefits because the individual is not a veteran.

Pension Funds utilize the "Veteran" tag to administratively redirect the heir back to the VA, claiming "The VA handles survivor benefits for veterans."

The Result: Total denial of the 60-month guaranteed pension payment and life insurance proceeds (e.g., the \$115,000 John Hancock policy), while the assets are retained in a shadow float.

III. DATA INTEGRITY AND THE 5^5 IDENTITY MODEL

The current "Request for Certificate of Veteran Status" lacks a mandatory cross-reconciliation with the Social Security Administration's (SSA) Death Master File (DMF). My audit of the 574-prefix Alaska SSNs reveals that the enterprise utilizes the "Veteran" flag to "mask" deceased participants, keeping them administratively "alive" in housing and benefit databases to extract federal subsidies.

The 98.8% statistical match validated by the GAO (Report 26-108811) proves that the misuse of SSNs—including the attachment of false veteran statuses—is a primary driver of the identity fragmentation crisis.

IV. PROPOSED CORRECTIVE MEASURES

I demand that the following integrity protocols be integrated into OMB 2900-0745:

Mandatory Biological Verification: Any request for a Certificate of Veteran Status

must be cross-referenced against the SSA DMF daily updates (implemented April 1, 2025) to ensure "Veteran Status" is not being assigned to deceased non-veterans to facilitate asset conversion.

Fiduciary Disclosure: The VA must require any third-party plan administrator or financial institution (e.g., OEFCU or WPAS, Inc.) to disclose the source of the "Veteran" flag if it is used to deny an ERISA-governed survivor claim.

Audit of 574-Prefix Records: An immediate audit of all 574-prefix Alaska SSNs within the VA/FHA ecosystem is required to identify the "Shadow Heirs" (e.g., "Robert E. Smith" or "Nicole Smith") paired with legitimate worker identities.

V. CONCLUSION

The Certificate of Veteran Status is being weaponized as a tool for "Administrative Erasure." Until the VA addresses the contamination of its status flags by ERISA-governed RICO enterprises, the information collection remains a facilitator of financial crime.

I request that this disclosure be shared with the VA Office of Inspector General and integrated into the active multi-agency investigation (GAO COMP-25-008559).

VA Response

To Whom it May Concern,

Thank you for your comment. VA acknowledges the concerns raised; however, the information collection for OMB Control Number 2900-0745 is limited to gathering information necessary to determine an applicant's eligibility for a possible reduced downpayment when obtaining a loan insured under the provisions of Section 203(b)(2) or 220(d)(a) of the National Housing Act as amended.

While the issues raised are outside the scope of this information collection, your feedback is appreciated and will be shared with the appropriate VA offices for awareness. The comment also references external entities, including the Government Accountability Office, FinCEN, and the VA Office of Inspector General; however, the Paperwork Reduction Act (PRA) process is limited to evaluating the necessity and burden of information collections and does not provide a mechanism to investigate, adjudicate, or resolve individual claims.

No changes have been made to the information collection as a result of this comment. The feedback has been reviewed and considered as part of this renewal. Your comment will be included in the official record of public comments during the 30- day notice.

A 30-Day Federal Register Notice for the collection published on Thursday, May 7, 2026. The 30-Day FRN citation is 91 FRN 24964.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Decisions to provide any payment or gift to respondents do not apply.

10. Describe any assurance of privacy, to the extent permitted by law, provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Loan Guaranty Home, Condominium and Manufactured Home Loan Applicant Records, Specially Adapted Housing Applicant Records, and Vendee Loan Applicant Records - VA (55VA26) are contained in the Privacy Act notice published in the Federal Register on September 15, 2023.

11. Provide additional justification for any questions of a sensitive nature (Information that, with a reasonable degree of medical certainty, is likely to have a serious adverse effect on an individual's mental or physical health if revealed to him or her), such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private; include specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No questions of a sensitive nature are contained on the form.

12. Estimate of the hour burden of the collection:

Estimate of Information Collection Burden

- a. Number of Respondents is estimated at 10 per year.
- b. Frequency of response is one time
- c. Annual Burden Hours are 2 hours.
- d. The estimated completion time for the paper form is 10 minutes.
- e. VA cannot make further assumptions about the population of respondents because of the variability of factors such as the educational background and wage potential of respondents. Therefore, VBA used the mortgage industry loan officers' cost to estimate the respondents' costs associated with completing the information collection. The respondent population is composed of Lenders/Appraisers on behalf of Veterans. The 10 minutes has been determined by lenders to be an average time spent to report the information requested and no wide variance is likely.

The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data, the median weekly earnings of full-time wage and salary workers \$1,654.00. Assuming a forty (40)

hour work week, the mean hourly wage is \$41.35 based on the BLS wage code – “13-2072 Loan Officers. This information was taken from the following website: (<https://data.bls.gov/oes/#/industry/000000>, May 2024).

Legally, respondents may not pay a person or business for assistance in completing the information collection and a person or business may not accept payment for assisting a respondent in completing the information collection. Therefore, there are no expected overhead costs for completing the information collection. VBA estimates the total cost to all respondents to be an estimated \$82.70 (2 hours x \$41.35 per hour).

The estimated cost to the Federal government is \$82.70

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

This submission does not involve any recordkeeping costs.

14. Estimated Annualized Cost to the Federal Government

There are no printing costs. VA Form 26-8261a can be downloaded from the VA website.

Grade	Step	Burden Time (Minutes)	Fraction of Hour	Hourly Rate	Cost Per Response	Total Responses	Total
11	6	4	0.06	\$47.77	\$2.86	10	\$28.60
Overhead at 100% Salary							
12	6	2	0.03	\$57.25	\$1.71	10	\$17.10
Overhead at 100% Salary							
13	6	1	0.016	\$68.08	\$1.08	10	\$10.80
Overhead at 100% Salary							
Processing / Analyzing Costs							\$56.50
Printing and Production Cost							\$0.00
Total Cost to Government							\$56.50

Note: The hourly wage information above is based on the hourly 2025 General Schedule (Base) Pay. This rate does not include any locality adjustment as applicable.

15. Explain the reason for any burden hour changes since the last submission.

The burden has decreased from the previous submission due to a reduction in the estimated number of respondents from 25 to 10, based on program activity reflecting fewer submissions during the reporting period. This reduction results in a corresponding reduction in the total annual burden hours.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Information collection is not for tabulation or publication use.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We are not seeking approval to omit the expiration date for OMB approval.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB 83-I.

There is no exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

1. The Veterans Benefits Administration does not collect information employing statistical methods.