

**Application for Accreditation as Service Organization Representative  
Comments on Information Collection  
April 2026**

OMB Control No. 2900-0018

**Commenter 1:** On January 30, 2026, a recognized state veterans service organization (VSO).

**Suggestion 1:** As a state agency managing accredited service officers it would be nice to have a form that allowed us to suspend a VSOs accreditation for a defined period while we worked through any investigations.

**OGC Response:** VA appreciates the commenter's suggestion. In accordance with 38 C.F.R. § 14.633(a), accreditation may be suspended or cancelled by VA at the request of an organization, this would include the circumstances contemplated by the commenter. VA does not require a reason for the request except under the limited circumstances discussed in the response to the next suggestion.

**Suggestion 2:** It would also be nice if there was a block on a suspension form that allowed us to revoke accreditation with some check boxes like "no longer employed", "Deceased" or a few other categories that would help the process move more efficiently.

**OGC Response:** VA appreciates the commenter's suggestion. However, VA does not currently collect this information. The collection of information associated with 38 C.F.R. § 14.633(a), is not linked to a specific VA form. Moreover, § 14.633(a), only requires an organization requesting the suspension or cancellation of a representative's accreditation to inform VA of the specific reason for the request if it is based on misconduct or incompetence or if the representative resigns to avoid suspension or cancellation of accreditation based upon misconduct or incompetence. No changes are being made in response to this suggestion.

**Commenter 2:** On February 12, 2026, the same state VSO stated: We face frequent confusion over the correct answer to the first item under 7D. "Relationship to Organization." Applicants frequently select "yes" when asked if they are a "member in good standing of the organization" shown in item 7A." For our purposes as a state office of military and veterans affairs that accredits veteran service officers at no expense to applicants the correct answer is "no." An explanation on the form explaining what is meant by "membership" would help alleviate that confusion.

**OGC Response:** VA appreciates the commenter's feedback. The commenter correctly notes that for accreditation as a representative of a recognized state organization, the correct answer is always "no." Although, VA is declining to make any changes to VA Form 21 based on this suggestion at this time, VA will add an FAQ to our webpage that will help clarify box 7D. In addition, efforts within VA are underway to acquire electronic submission capability for the VA Form 21 and that may include simplification of responses to the form, such as auto-populating "no" for non-membership organizations.

**Commenter 3:** On March 8, 2025, a private company, stated:

[Our company] is a software platform used by VA-accredited attorneys, agents, and Veterans Service Organizations (VSOs) to analyze claim files, structure evidence, and prepare VA disability benefit submissions. Our customers collectively assist thousands of veterans navigating the disability benefits process each year.

Based on our work with accredited advocates across the country, we support the continued collection of information necessary to maintain the integrity of the accreditation system. Ensuring that representatives are properly vetted and accountable is essential to protecting veterans and maintaining trust in the VA benefits process.

At the same time, we believe there are opportunities to reduce administrative burden and improve the efficiency of accreditation and oversight activities.

First, the current claims ecosystem remains highly manual. Accreditation reviews, claims preparation, and supporting documentation frequently involve large volumes of unstructured records and repetitive administrative tasks. This increases workload for advocates and contributes to downstream processing delays across the broader VA system.

Second, advances in information technology now make it possible to structure and analyze these records in ways that significantly reduce administrative workload. Tools that automatically organize claim documentation, extract relevant information from large records, and standardize data inputs can reduce the time advocates spend on preparation while improving the consistency and completeness of submissions.

Third, structured data collection and automation can help agencies such as the Office of General Counsel better understand workload, improve oversight, and identify process bottlenecks earlier. Modern data workflows make it easier to measure burden, monitor activity across accredited representatives, and ensure that regulatory objectives are met without increasing administrative overhead. These same approaches can also help improve the quality and structure of information submitted with claims, which may reduce downstream processing delays across the VA benefits system.

As a technology provider working directly with VA-accredited representatives, we regularly observe the operational challenges created by manual documentation review, unstructured records, and fragmented workflows. Platforms that structure claims data and supporting evidence at the point of submission can meaningfully reduce administrative burden for advocates while improving the quality and consistency of information received by the Department. We would welcome the opportunity to share practical insights from the field if the Department continues exploring technology-enabled approaches to improving these processes.

The VA benefits system serves millions of veterans and their families. Efforts to streamline administrative processes while preserving safeguards for claimants will ultimately help both advocates and the Department better fulfill that mission.

We appreciate the opportunity to provide comments and would welcome continued dialogue with the Department on ways technology can responsibly support these objectives.

**OGC Response:** Although the comment appears to be primarily directed to the VA benefits claims system generally rather than this limited collection of information specifically, VA, nevertheless, appreciates the commenter's observations and agrees that technology-enabled approaches may support enhanced information collection and reduced administrative burden. At this time, VA is making no change based on this comment. However, efforts within VA are underway to acquire electronic submission capability for the VA Form 21.

**Commenter 4:** On March 30, 2026, an individual stated: I oppose ALL oil drilling and seabed mining along the California coast. Potential offshore oil and gas leasing across Northern, Central, and Southern California waters poses environmental, economic, and community impacts. There are major risks including oil spills, impacts to marine ecosystems, and economic harm to fisheries, tourism, and coastal businesses that rely on a healthy ocean. There are potential impacts to protected and ecologically important areas such as the Monterey Bay National Marine Sanctuary. Many environmental and economic risks (especially oil spills) cannot be fully mitigated once drilling occurs. Offshore drilling is unnecessary and poses unacceptable risks to coastal ecosystems and economies; BOEM should prioritize protecting ocean resources and coastal communities.

**OGC response:** This comment does not pertain to information collected under OMB Control No. 2900-0018 and is thus beyond the scope of the Department's request for comments.