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From: Cristiano Varriale <christian@varritech.com>

Sent: Saturday, June 13, 2026 4:01 PM

To: Suggs, A. - OWCP

Subject: Varritech Inc. — Comments on DOL OWCP Earnings/Dual Benefits/Dependents/Third Party RFI (FR 2026-09835, Due July 17)

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Ms. Suggs,

Varritech Inc. (small business, New York, NY) submits comments on the DOL OWCP Request for Information on Earnings, Dual Benefits, Dependents and Third Party Settlement (Federal Register 2026-09835, due July 17, 2026).

The OWCP information-collection scope (earnings cross-verification, dual-benefit reconciliation, dependent status, third-party settlement) is a near-perfect agentic-AI workload — high-volume, multi-source, requires longitudinal reconciliation, demands HITL escalation before adverse claim action.

Direct mapping to OWCP information-collection burden reduction:

• OpenClaw multi-agent orchestration — 62 automated white-collar roles, 500+ integrations. Direct fit: cross-reference claimant-reported earnings against IRS/SSA data feeds (where permitted), classify dual-benefit overlap patterns, flag third-party-settlement candidates, and escalate exceptions to OWCP claims examiners with audit-grade evidence.

• Iceberg + pgvector + Claude pipeline — unstructured extraction at scale (claim narratives, medical records, third-party settlement documents). Reference: Plentiful (4.7M visits, 65% support-ticket reduction via document/ticket triage).

• Multi-LLM consensus + adversarial cross-check — verification primitive that reduces false-positive rate when AI-derived flags affect beneficiary claims.

• Audit log + prompt provenance — every AI-touched decision has tamper-evident chain of custody for IG / appeals / due-process review.

• HITL escalation rails — preserves OWCP claims-examiner authority on every beneficiary-impacting action.

Direct commentary on the RFI scope (burden reduction):

1. Claimant-reported income-event reconciliation is currently form-based. Agentic AI can ingest claimant narratives and prefill / cross-verify against authorized data sources, dramatically reducing claimant paperwork burden.

2. Dual-benefit-overlap detection is a longitudinal data-fusion problem. Multi-agent orchestration handles the heterogeneity of agency record systems without forcing data centralization.

3. Production audit trail is essential when AI-derived recommendations affect benefit determinations — every claim impact decision needs full reasoning provenance for appeal.

Past performance: Quinn ($5M MRR, 10M+ users), Plentiful (4.7M visits, AI triage at scale), OpenClaw, C-BOT (P95 < 800ms).

Security posture: FedRAMP Moderate pathway via AWS GovCloud; FISMA Moderate / NIST 800-53 rev 5; KMS envelope; TLS 1.3; Okta SAML/OIDC.

HIPAA-aligned (BAA-ready) patterns for medical-records intake.

SAM.gov UEI registration in progress (est. 2-3 weeks). NAICS: 541511, 541512, 518210, 541715.

Available for capability brief or full written submission ahead of July 17.

— Cristiano Varriale

Founder & CTO, Varritech Inc.

christian@varritech.com | +1 (646) 506-6961

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