Department of Veterans Affairs response to comment received during the 60-Day comment period on OMB Control Number 2900-0418

1. Comment from Reggie Greenwood, received 9/3/2026, posted by VA on 9/4/2026. (VA-2026-VACO-0001-0373; Comment ID VA-2026-VACO-0001-0378; Tracking Number mtm-2rke-4np2):

I support the Department of Veterans Affairs' renewal of OMB Control No. 2900-0418 concerning VAAR provision 852.209-70, Organizational Conflicts of Interest.

VA relies extensively on contractors to support its mission and serve our Nation's Veterans. When Federal taxpayer dollars are involved, VA has a responsibility to ensure that companies competing for contracts disclose actual or potential organizational conflicts of interest that could impair their objectivity, influence contract performance, or create an unfair competitive advantage.

This information collection provides contracting officers with information necessary to identify potential conflicts before Federal funds are committed. Contractors seeking Federal business should be expected to disclose relevant relationships or circumstances that could compromise the integrity of the acquisition process.

I also believe these disclosures must be meaningful rather than simply another administrative requirement. When an actual or potential conflict is identified, contracting officers should receive sufficient information to evaluate the conflict, determine whether it can be effectively mitigated, and document appropriate safeguards. Material nondisclosure or misrepresentation should be taken seriously.

At the same time, VA should minimize unnecessary administrative burdens. The estimated average burden of 60 minutes per respondent appears reasonable given the importance of protecting the integrity of Federal procurement. However, VA should continue using electronic submission, standardized disclosure formats, clear instructions, and existing Government information whenever practicable to prevent unnecessary duplication.

A streamlined electronic process can strengthen accountability while reducing costs for both contractors and VA employees. Contractors should be able to clearly identify the nature of a potential conflict and explain any proposed measures to avoid, neutralize, or mitigate it.

Strong conflict-of-interest requirements also protect responsible contractors. Companies competing fairly for Federal contracts should not be disadvantaged by competitors that fail to disclose relationships or circumstances that provide an improper advantage.

I therefore support renewal of OMB Control No. 2900-0418. I recommend that VA continue requiring meaningful organizational conflict-of-interest disclosures while emphasizing transparency, accountability, fair competition, electronic processing, and the elimination of unnecessary or duplicative paperwork.

Federal contractors entrusted with taxpayer resources should be held to clear standards of integrity and transparency. VA should maintain effective oversight while ensuring that its information requirements remain focused, efficient, and directly related to legitimate procurement needs.

Respectfully submitted,
Reggie

VA Response: VA elects to not change information collection 2900-0418 in response to this comment. The commenter supports the renewal of this information collection; he recommends that VA continue to require meaningful organizational conflict-of-interest disclosures via this information collection. He notes that the estimated average burden of 60 minutes per respondent appears reasonable.