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Agency Information Collection Activities; Proposals, Submissions, and Approvals: Statement of Person Claiming to Have Stood in Relation of Parent [FR Doc No: 2026-15454; OMB Control No. 2900-0059]

Document: VA-2026-VACO-0001-0339
Comment from Reggie Greenwood on VA-2026-VACO-0001-0307

Submitter Information

Name: Reggie Greenwood
Address:
Tampa, FL, 33612
Email: ReggieMG@icloud.com
Phone: 8137129647

General Comment

Public Comment — OMB Control No. 2900-0059, VA Form 21P-524

I support VBA's need to collect information necessary to determine whether an individual claiming benefits as a parent stood in the required parental relationship to a deceased Veteran. However, continued approval of VA Form 21P-524 should be accompanied by appropriate burden validation, data-quality controls, and modernization.

1. Necessity and Practical Utility
The collection appears necessary where existing government records do not establish a natural or adoptive parental relationship. VBA should ensure that each requested data element has a documented adjudicative purpose and is limited to information actually necessary to establish eligibility. Information already available to VA or another Federal agency should not be repeatedly requested from the claimant when it can lawfully and reliably be obtained through existing records.

2. Accuracy of the Burden Estimate
VBA estimates two hours per response for only 21 respondents annually. Given the relatively high individual burden, VA should explain the methodology supporting the two-hour estimate, including whether it accounts for time spent locating historical records, obtaining supporting statements or documentation, interpreting instructions, and correcting incomplete submissions. Actual completion-time data should be periodically evaluated rather than relying solely on historical estimates.

3. Quality, Utility, and Clarity

VA should use plain-language instructions that clearly explain the legal standard for a qualifying parental relationship, what evidence is required, which information is optional, and what alternative evidence may be submitted when traditional records are unavailable. The form should distinguish required adjudicative information from supplemental information and include examples addressing common claimant circumstances. These measures could reduce incomplete submissions, development letters, and processing delays.

4. Minimizing Respondent Burden Through Technology
VBA should provide a secure electronic submission option with conditional logic, prepopulation of information already held by VA, electronic document upload, save-and-return functionality, and validation checks that identify missing required fields before submission. A paper option should remain available for claimants who cannot reasonably use electronic services. VA should also avoid requiring claimants to resubmit documentation already contained in an accessible VA claims record.

Finally, because this collection involves information concerning family relationships and potentially sensitive personal circumstances, VBA should continue applying data-minimization, access-control, retention, and cybersecurity safeguards appropriate to the information collected.

I recommend continuation of OMB Control No. 2900-0059 provided VBA continues evaluating necessity at the data-element level, validates the two-hour burden estimate with empirical information where practicable, improves instructions and evidentiary guidance, and uses secure technology to reduce unnecessary claimant burden.

VA RESPONSE

Hello,

Thank you for your comments on the 21P 524 form. As we continue our efforts to simplify the application process for survivors, we appreciate the time and thought you put into providing feedback. We remain committed to ensuring our forms are effective, accessible, and modernized. Thank you again for your engagement and support in enhancing this form.