PUBLIC SUBMISSION

As of: 8/19/26, 11:39 AM
Received: August 18, 2026
Status: Posted
Posted: August 19, 2026
Tracking No. msz-h1kt-7qwe
Comments Due: September 29, 2026
Submission Type: API

Docket: VA-2026-VACO-0001
Notices

Comment On: VA-2026-VACO-0001-0305
Agency Information Collection Activities; Proposals, Submissions, and Approvals: Requirements for Recognition as a VA Accredited Organization [FR Doc No: 2026-15452; OMB Control No. 2900-0850]

Document: VA-2026-VACO-0001-0349
Comment from Reggie Greenwood on VA-2026-VACO-0001-0305

Submitter Information

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

General Comment

Public Comment — OMB Control No. 2900-0850, Requirements for Recognition as a VA Accredited Organization

I submit the following comments regarding the Department of Veterans Affairs (VA), Office of General Counsel (OGC), proposed extension of OMB Control No. 2900-0850.

1. Necessity and Practical Utility

The collection serves a legitimate and necessary governmental function. VA must have sufficient information to determine whether an organization satisfies the requirements for recognition under 38 U.S.C. § 5902 and 38 CFR § 14.628 and is capable of providing competent, responsible, and sustained representation to VA claimants. However, consistent with the Paperwork Reduction Act, OGC should periodically verify that every requested data element has a defined adjudicative or oversight purpose and eliminate information that is duplicative, obsolete, or obtainable from authoritative government sources.

2. Accuracy of the Burden Estimate

OGC estimates 10 respondents annually at five hours each, for a total annual burden of 50 hours. A five-hour average is significant and should be supported by empirical data or a documented methodology identifying the activities included in that estimate, such as reviewing regulatory requirements, assembling organizational records, obtaining certifications, preparing supporting documentation, and submitting the application. Burden estimates should also account for variation among nonprofit organizations and state,

local, and tribal governmental entities. OGC should consider validating the estimate through applicant completion-time data or structured feedback from recent applicants.

3. Quality, Utility, and Clarity

OGC should ensure that application instructions clearly distinguish mandatory information from optional or supplemental material and explain the regulatory purpose of each significant information requirement. Providing standardized definitions, document checklists, examples of acceptable supporting evidence, and clear criteria for determining whether an application is complete would reduce ambiguity and improve consistency. Applicants should also receive specific deficiency notices identifying missing or inadequate information rather than generalized requests for supplementation.

4. Minimization of Respondent Burden and Use of Information Technology

VA should maximize electronic submission and structured data collection. An electronic system should permit applicants to save partially completed applications, upload supporting documents, validate required fields before submission, receive confirmation of receipt, and track application status. Where legally and technically permissible, information already maintained by VA or another authoritative government source should be prepopulated, reused, or independently verified rather than repeatedly requested from applicants.

OGC should also evaluate whether information requirements can be risk-based or tailored so that applicants are not required to submit documentation unnecessary to determining compliance with 38 CFR § 14.628. Electronic records should be collected according to data-minimization principles and protected through appropriate access controls, retention schedules, and cybersecurity safeguards.

I support continuation of this collection because competent representation is important to the integrity of the VA benefits system. However, OGC should use this extension as an opportunity to validate its burden assumptions, improve transparency and standardization, expand electronic processing, and ensure that the collection obtains only information demonstrably necessary to determine eligibility for VA recognition.