PUBLIC SUBMISSION

As of: 9/28/26, 3:36 PM
Received: September 28, 2026
Status: Posted
Posted: September 28, 2026
Tracking No. mul-hixm-75xw
Comments Due: September 29, 2026
Submission Type: Web

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-0001-0406
Comment from The Green Beret Foundation on VA-2026-VACO-0001-0305

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General Comment

Q1:

Yes, but VA should limit collection to information reasonably necessary to establish an organization's capability to provide competent, sustainable representation.

VA needs information about organizational structure, qualified personnel, training and oversight, financial resources, and operational capacity. However, current requirements appear to combine necessary information with granular information that may assume an organization already has a fully developed claims-representation operation.

This creates a potential circularity: an organization cannot perform regulated preparation, presentation, and prosecution of VA claims until recognized, yet some requirements appear to contemplate infrastructure already in operation. VA should distinguish between information demonstrating that an organization can provide competent representation, information demonstrating a credible plan and infrastructure to do so, and information that can only reasonably exist after recognition.

For example, a sustainable five-year organizational and funding plan may provide more meaningful evidence of long-term capability than requiring a new organization to produce historical operational information it could not reasonably possess.

Q2:

No. The estimated five hours per respondent substantially understates the likely burden.

Organizations must determine what VA is requesting, identify where information exists, determine

whether it is available in usable form, identify responsible personnel, develop information that does not yet exist, and coordinate, validate, reconcile, and compile the response.

Some requested information must be developed rather than retrieved. It may require organizations to develop plans, establish processes, convene stakeholders, make decisions, and document them.

For an established organization with multiple stakeholders, a more realistic estimate could be 20–30 hours, depending on complexity.

Q3:

VA should show organizations what successful compliance looks like.

VA could establish a clear progression:

Build: Identify the information, policies, processes, training, staffing, oversight, and financial information an organization should develop and collect.
Demonstrate: Provide a defined period or benchmarks to demonstrate those systems function.
Apply: Submit standardized information demonstrating applicable requirements have been met.

Examples, standardized definitions, sample documentation, and meaningful benchmarks would improve consistency and usefulness. Standards need not be lowered; they should be understandable. New organizations should not be expected to produce historical information that could not reasonably exist before recognition.

Q4:

VA should expand its existing Accredited Representative Portal into a comprehensive accredited-representative workflow and compliance system.

The system should show accreditation status, outstanding requirements, training, expiration/renewal dates, submitted documents, required actions, review status, and deadlines.

It should provide secure submission of sensitive information rather than fragmented email communications. If VA expects representatives to protect Veterans' PII, the accreditation and compliance process should likewise provide secure transmission of representatives' sensitive information.

The system should include automated reminders and a compliance calendar for required training and certifications, with secure verification and permanent records.

The principle should be: Collect information once, securely, and reuse it wherever legally and operationally appropriate.

The system should ultimately support accredited representation itself, including establishment of representation, claims and evidence submission, confirmation of receipt, status tracking, appropriate claimant-record access, and VA correspondence.

Technology should not merely turn paperwork into electronic paperwork. It should eliminate duplicate data entry, reduce fragmented communication, and provide a clear workflow.

Conclusion:

VA has a legitimate responsibility to ensure organizations providing representation can do so competently and sustainably. That objective can be better served by collecting only necessary information, accurately

measuring burden, clearly demonstrating successful compliance, and using technology to create a secure, transparent, representative-centered workflow.

The goal should be to maintain a meaningful standard for competent representation while making the path to meeting that standard clear, reasonable, secure, and administratively sustainable.