

**United States Small Business Administration
Office of Hearings and Appeals**

VSBC Appeal of:

Compliant Systems Consulting,

Appellant

SBA No. VSBC-448-A

Decided: November 14, 2025

ORDER REMANDING APPEAL

On September 8, 2025, Compliant Systems Consulting (Appellant) appealed the removal of its Veteran-Owned Small Business (VOSB) component of its application to the Veteran Small Business Certification (VetCert) Program to the U.S. Small Business Administration (SBA) Office of Hearings and Appeals (OHA).

Upon review, this appeal is REMANDED for further review. VetCert removed Appellant's VOSB certification request on the basis that the U.S. Department of Veterans Affairs (VA) was unable to validate the Veteran status of Appellant's President — Susan Fields — given that the DD214 provided to VA by SBA reflected that the period of service was only for training purposes.

On September 29, 2025, Appellant provided a clarifying addendum as part of its response to the Case File provided by VetCert. While not disputing the contents of the Case File itself, Appellant sought to clarify citations on line 11c of Appellant's DD Form 256A and their relevance to Ms. Fields' discharge status. Appellant contends that AR 635-200, Para 13-5b (3) and SPN 46A were applied during a training period, that the Army ultimately issued an honorable discharge which affirmed retention of all veteran benefits, and that all governing agencies have affirmed Appellant's veteran status.

Appellant notes that SBA's denial appeared to rely on a manual review conducted by the Department of Veterans Affairs which cited 38 U.S.C. § 101(21) which excludes “active duty for training” from the statutory definition of active duty. Appellant contends that — while this exclusion is accurate in general — it does not apply to Appellant's particular case. Appellant contends that Appellant's DD Form 256A affirms that Ms. Fields was formally discharged under honorable conditions, that she was enrolled as an enlisted service member to be a Russian interpreter for the Army, and that she was discharged before the end of basic training, under honorable conditions due to unusual circumstances. Appellant contends that Ms. Fields' separation was administrative, and that it was not based on any condition that would disqualify Appellant from any formal veteran recognition. Appellant finally contends that the VA's issuance

of a Veteran Status Card, which was provided in the appeal, affirms recognition of Ms. Fields' service.

13 CFR § 125.11 provides:

- Veteran has the meaning given the term in 38 U.S.C. 101(2). A Reservist or member of the National Guard called to Federal active duty or disabled from a disease or injury incurred or aggravated in line of duty or while in training status also qualify as a veteran.

38 U.S.C. § 101(2) provides:

- The term “veteran” means a person who served in the active military, naval, or air service, and who was discharged or released therefrom under conditions other than dishonorable.

38 U.S.C. § 101(21) provides:

- The term “active duty” means — (A) full-time duty in the Armed Forces, other than active duty for training.

Appellant's claims warrant further review and consideration as to their underlying merits. Accordingly, this appeal is REMANDED to VetCert for further review. This is the final decision of the U.S. Small Business Administration. 13 C.F.R. § 134.1112(d).

CHRISTOPHER HOLLEMAN
Administrative Judge