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A Federal Program Exists That Servicers Need Not Offer Until November.

A brief on servicing conduct and the reachability gap in the VA Partial Claim Program.

15,000+
veteran families have already lost their homes, per Sen. Blumenthal, SVAC, May 20, 2026. No published retroactive remedy

90,000
more are in foreclosure right now, per ICE Mortgage Technology data via NPR

160,000+
families impacted in total, and climbing

The finding, in one paragraph. Congress created the VA Partial Claim Program in July 2025 with a three-condition eligibility test. When VA issued the final policy on June 1, 2026, the handbook listed **ten** qualifying criteria. **Seven of the ten appear nowhere in the statute.** Two of those seven were added *after* the public comment window closed. Removing them requires no new legislation, only the same discretion VA used to add them.

What Happened

A protection was removed, then a second one, and the replacement still is not reachable.

In 2020, federal agencies told mortgage servicers in writing that paused CARES Act payments would be repaid over time and that a lump sum would not be required. The tool that made that possible, the COVID-19 Veterans Assistance Partial Claim Payment program, expired by regulation on **October 28, 2022** `[38 CFR 36.4809(c)]`. Nothing replaced it until VASP launched on **May 31, 2024**. VA then rescinded the Home Retention Waterfall effective **May 1, 2025**, on roughly one week of notice `[Circular 26-25-2]`.

Congress responded unanimously in both chambers. H.R. 1815 was signed **July 30, 2025**, creating the Partial Claim Program at 38 U.S.C. § 3737. VA issued the final implementing policy **June 1, 2026**, said the program was "available and live" on **June 15, 2026**, and set full servicer implementation at "no later than 180 days from the date the final policy is published," which is **November 28, 2026** `[Transmittal Change 14]`.

That gap is the current harm. A family in foreclosure between June and November 2026 has a program that legally exists and a servicer that is not yet required to offer it. This is not our characterization: the National Consumer Law Center and Military.com independently identified the same gap within days of launch.

The Precedent Is the Department's Own

VA has protected this exact window before, twice, and said in writing why.

Facing the same launch-to-readiness gap in 2023, VA was "strongly encouraging a foreclosure moratorium on all VA-guaranteed loans through May 31, 2024," and placed VASP availability in March 2024 [Circular 26-23-25]. VASP slipped to May 31, 2024. VA extended the protection through December 31, 2024 and said servicers "must have it fully implemented by October 1, 2024" [Circular 26-24-12]. The stated purpose was to give servicers time.

Thirteen months of protection in 2024. In 2026, with a comparable window disclosed in advance, none. **The question is narrow and answerable: what factual or legal difference between 2024 and 2026 supports protection then and none now?**

Servicing and Consumer-Protection Asks

This is a mortgage servicing problem as much as a veterans problem.

These families are not asking for debt forgiveness. They are asking to resume paying a mortgage they can afford, using a tool Congress created for that circumstance. What is failing is the servicing layer.

1. **Ask whether VA-guaranteed borrowers are receiving RESPA-compliant loss-mitigation evaluations.** Regulation X, 12 CFR 1024.41, governs acknowledgement, evaluation and denial notice whatever the guaranty program. Subsection (g) addresses dual tracking, which this cohort reports.

2. **Ask why servicers are not required to offer the program until November 28, 2026** while foreclosure timelines continue to run. In 2024 VA covered the equivalent window with a targeted moratorium, for that stated reason.

3. **Ask whether servicers are declining Homeowner Assistance Fund and charitable grant funds.** A refused payment is not a missed payment. Cohort families report both, including an approved HAF grant of roughly $30,000 a servicer would not accept.

Sources. 38 U.S.C. § 3737 (Pub. L. 119-31) · 38 C.F.R. § 36.4809(c) and 86 FR 28708 · VA Servicer Handbook M26-4 ch. 22, June 2026 final and February 2026 draft · M26-4 Transmittal Change 14 · VBA Circulars 26-23-25, 26-24-12, 26-25-2 · SVAC hearing, May 20, 2026 · NCLC, NPR and Military.com, 2026 · CBO Publication 61402. **The full record**, claim by claim with the timeline and primary-source images, is available on request.

Veterans Foreclosure Crisis is a veteran and family led group of veterans, spouses, caregivers and family members directly affected by the VA foreclosure crisis, organizing with others in the fight. Compiled by **Leann Ledford**, spouse and caregiver to a disabled Marine veteran with two Afghanistan deployments; 2022 Elizabeth Dole Foundation Caregiver Fellow, MSW Graduate Student, WA Certified Victim Advocate.

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