

**VIETNAM VETERANS OF AMERICA
VETERANS BENEFITS PROGRAM POLICIES**



**Approved by the VVA National Board of Directors
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SECTION I. GENERAL

A. Organizational Responsibility. As a veterans service organization (VSO), Vietnam Veterans of America (VVA) has an obligation to provide veterans and dependents representation for benefits sought under Title 38 U.S.C. The responsibility of providing effective veterans benefits representation is shared by the National, State and Chapter levels of VVA. To ensure the delivery of meaningful representation to veterans and their families, these policies have been enacted to provide consistency and structure for representation at all levels within VVA.

B. Levels of Representation. Within VVA the following levels of representation to veterans and their families are recognized and defined:

1. National Level Representation: VVA, Inc. will maintain a Veterans Benefits Program (VBP). In such a configuration it is the desire of the Board of Directors to remove VVA's veterans benefits representation from the internal political activities of the State and Chapter levels of the organization.

VVA Director of the VBP will have operational responsibility for VVA veterans benefits representation performed by employees, volunteers, attorneys, contractors, law clerks and interns of the National office. This shall include, but is not limited to, individual case representation at the Appeals Management Center, Board of Veterans Appeals, Court of Appeals for Veterans Claims, regional offices serving the Washington, D.C. area, and discharge review boards and boards for the correction of military records. Representation shall also include broad impact litigation in other federal courts as well. Activities of the VBP shall also include advocacy and publications. In conjunction with VVA's Government Relations Department, VVA VBP may also engage in legislative advocacy.

Oversight responsibility for the operation of VVA VBP will be with the VVA Veterans Benefits Committee (See Section III). The term Director, Veterans Benefits Program, will also apply to any individual that is functioning as the acting or interim Director as appointed by the President VVA.

2. State and Local Level Representation: VVA State Councils and chapters (operating a service officer program independently of a State Council where there is no state council service officer program), subject to approval by the VVA Veterans Benefits Committee, may engage in an ongoing program of veterans benefits representation.

(a) Such activity will be under the operational control of VVA VBP Director; and, shall be focused on providing full-time representation by an accredited VVA Service Officer at the VA Regional Office level, to the

maximum extent possible. Oversight responsibility for state level representation shall be with the VVA Veterans Benefits Committee.

(b) State Councils or Chapters (operating a service officer program independently of a State Council where there is no state council service officer program) with more than one Service Officer shall recommend to the Director, VBP, the appointment of a Chief Service Officer for their state. Recommendations shall be approved or disapproved by the Veterans Benefits Committee. The nominee, SCP, or the Director, VBP, may appeal the Veterans Benefits Committee's decision to the National Board of Directors. The VBP Director may approve temporary recommendations in the interim period before a Committee vote. The Committee's decision to approve or disapprove the nomination of a Chief Service Officer may be appealed to the Board of Directors

(c) The State Council, or Chapter (operating a service officer program independently of a State Council where there is no state council service officer program) through its own Veterans Benefits Committee, will provide day-to-day oversight over the operation of the organization's service officer program. Every reasonable attempt must be made to resolve problems locally. Any problem should be presented to the Director, VBP if a local resolution cannot be reached or is not immediately forthcoming. The State Council or Chapter (operating a service officer program independently of a State Council where there is no state council service officer program) may not deviate from the policies contained herein; however, it may impose more stringent guidelines as approved by the Director, VBP. Any guidelines imposed by the State Council or Chapter are subject to approval by the Veterans Benefits Committee.

(d) Each State Council or Chapter (operating a service officer program independently of a State Council where there is no state council service officer program) with a representation program will produce a written plan with job descriptions for the Service Officers volunteering services to or employed by the State Council or Chapters within that state. These written documents must be approved by the Director, VVA VBP.

C. Quality of Representation. The VVA Board of Directors desires that VVA's veterans benefits representation be characterized by quality service to those who are most in need and who are least able to assist themselves. In veterans benefits representation, VVA VBP Director, VVA Veterans Benefits Committee, State Councils and Chapters, shall focus on providing the maximum amount of quality service possible within the limitations of available resources. At all service levels, providing quality representation for as many clients as possible; not just the quantity of clients seen, shall be the goal and standard by which we operate our veterans' benefits representation.

SECTION II. INDIVIDUAL VETERANS REPRESENTATION POLICY

A. Clients' Responsibility. VVA desires to ensure that veterans and their families receive every needed benefit and service to which they are lawfully entitled. Yet, not unlike other classes of citizens, veterans must assume the basic responsibility of providing for their own health and welfare. Consistent with this fundamental responsibility is the need for veterans to become active participants in the process of seeking benefits and services to which they or their families may be entitled.

B. Types of Service. In many cases, the process required to secure a needed benefit or service, can be easily initiated and successfully concluded by the client with minimal assistance from a trained service professional or volunteer. In other cases the process is complex and requires direct representation by trained personnel to enhance the possibility of success in obtaining the needed benefit or service. Accordingly, within VVA the following types of individual service are recognized and defined.

1. Assistance: Whenever possible and deemed to be consistent with the best interest of the client, the emphasis of VVA's veterans' benefits representation shall be placed on assistance. In this context, "assistance" means that VVA's Service Officers will actively work to encourage and empower veterans to help themselves. To facilitate such an assistance program at all levels of the service structure, VVA VBP will provide guidelines, training, and materials that advocate self-help for routine requests for benefits and services. This emphasis on self-help shall not be misconstrued in such a manner as to deny service to an individual who, without intervention, could not apply for a needed benefit or service to which they are lawfully entitled.

2. Direct Representation: To maximize the use of available resources, direct service to individual clients by VVA VBP attorneys and Service Officers may be provided within the following guidelines:

(a) VVA VBP limits its representation of claimants before the Board of Veterans' Appeals, discharge review boards, and the boards for the correction of military records, and by the VVA employees or volunteers acting on behalf of VVA in any VA regional office claim. It should be noted that these guidelines have no effect on case selection by VVA accredited Service Officers who are state or county employees, as they are bound by existing local laws and regulations. However, appeals from their cases, if sent to VVA National Office, will be governed by these policies. A "limitation of representation" agreement shall be signed by the claimant at the time a paper VA Form 21-22 is accepted.

(b) The claimants represented shall be mainly Vietnam era veterans or their families. VVA's official dates of the Vietnam era are **February 28,**

1961 through May 7, 1975. As resources permit, VVA Service Officers may also represent other veterans and their families.

- (a) Claims by VVA members will be given priority, all other factors being equal. However, no one will be denied representation solely because they are not a member of the VVA.
- (b) VVA's resources should be utilized to maximize the return to its claimants.
- (c) Quality representation, of cases that best utilize lawyer or lawyer supervised representation, will not be sacrificed by attempting to provide service for all. Frivolous claims will not be filed or pursued by VVA Service Officers. A frivolous claim is one that asserts either (a) a factual contention that lacks evidentiary support or (b) a legal contention that is not warranted by either existing law or by a reasoned argument for extending, modifying, or reversing existing law or for establishing new law. A VVA Service Officer who is not an attorney may not assert a legal contention not warranted by existing law without approval by the Director, VVA Veterans Benefits Program. The request for approval must state the argument for extending, modifying, or reversing existing law or for establishing new law and state why the argument is not frivolous. The Director may approve or disapprove assertion of the contention or may delegate this authority to any attorney. If assertion of the contention is disapproved, the VVA Service Officer upon being informed of the disapproval may not thereafter assert it and, if it already has been asserted, must promptly withdraw it. The Veterans Benefits Committee or the Director, VVA VBP, may propose that a particular class of claims with a wide impact on veterans benefits claimants make reasonable arguments for extending, modifying, or reversing existing law or establishing new law. The Director, VVA VBP, must approve of this designation.
- (d) Fraudulent claims will not be filed. Fraudulent claims are claims that intentionally use false information. If a VVA Service Officer discovers that a claimant is asserting a fraudulent claim, he or she must revoke power-of-attorney by following the guidelines in 38 C.F.R. § 14.632. Upon receiving evidence that a service officer knowingly filed or assisted in filing a fraudulent claim, the Director VBP will initiate revocation procedures.
- (e) Because VVA VBP is utilizing lawyer or lawyer-supervised counsel in its National Office, it will give priority to those cases where lawyer skills will enhance the case presentations. Cases of precedential or symbolic value and which are significant to VVA's members should be emphasized.

C. Service Officers' Responsibilities

1. Communication

Accredited service officers are expected to communicate with veterans and claimants we represent, as part of providing quality representation. The following communication guidelines, based in part on the model rules of professional conduct for attorneys, will help service officers represent clients and avoid unfavorable consequences.

A service officer will:

- a) Explain a matter to the extent reasonably necessary to permit the client to make informed decisions regarding the representation. A service officer will require a client to submit a signed statement in order to withdraw a pending claim or appeal.
- b) Keep the client reasonably informed about the status of the matter and promptly comply with reasonable requests for information. A service officer who is incapacitated may fulfill this duty by providing the client with contact information for another accredited VVA service officer or Director, VVA VBP.
- c) Consult with the client about any limitation on the service officer's conduct (such as the prohibition on filing frivolous or fraudulent claims) when the service officer suspects that the client expects assistance not permitted by VA regulations or other law, or is beyond the scope of the service officer's duties.
- d) Inform Director, VVA VBP, and sponsoring VVA State Council (or VVA Chapter) when his or her contact information changes, or if the service officer becomes a federal government employee or an accredited VA Agent, licensed attorney, or licensed insurance agent, or retires from service officer work. Failure to inform Director, VVA VBP, may result in automatic revocation of service officer accreditation due to abandonment, and does not require formal revocation procedures.

2. Representation Agreements and Revocations

Service officers will request that the claimant complete and sign an appointment of VVA as power of attorney when representing a claimant through VVA. Service officers may inform claimants about general steps of the claims process but will not give specific advice on a claim before obtaining an appointment of VVA as power of attorney. Service officers will receive authorization from the claimant to view health information and military records without limitation, otherwise appointment of VVA as representative will not occur or continue.

Service officers may at times need to revoke a representation agreement with a claimant. VA regulations in Title 38, Parts 14 and 20, must be followed when revoking a representation agreement, which include sending a letter to the Veteran and VA. A copy of this letter must also be sent to the Department of Veterans Affairs Regional Office (or

office handling the claim, if on appeal) and the Director, VVA VBP.

3. Document Retention

Secure electronic transmission and storage is the preferred method of handling client claims information. Protected health information will not be transmitted to any individuals other than the Department of Veterans Affairs or accredited VVA service officers. Client-provided information and any information relevant to the client's claim will be returned to the claimant, next-of-kin, or VA upon request.

It is strongly suggested that client-provided information or service department records relevant to veteran's benefits be scanned and transmitted electronically to VA and returned to the claimant. It is also suggested that client-provided information and service department records be transmitted to VA or returned to the client when no longer useful to the VSO rather than shredding or other disposal methods.

Office files not related to specific claims for veterans' benefits such as business cards, personal cards from clients, blank forms, training materials, internal documents and the like may be disposed of at will, subject to document retention procedures imposed by other federal or state law and any applicable VVA organizational policies.

SECTION III. VVA VETERANS BENEFITS COMMITTEE

A. Purpose. It is the desire of the VVA Board of Directors that VVA's veterans benefits representation be overseen and coordinated by a small committee of the Board whose members, if possible, have had practical experience in claim advocacy. VVA Service Officers who are members of the National Board of Directors may serve on the Veterans Benefits Committee. This Committee shall be referred to as the "VVA Veterans Benefits Committee" and its members shall be appointed by the President subject to confirmation by the Board. The Committee shall maintain a standing sub-committee called the "Service Officer Grievance Sub-Committee," which shall comprise at least (3) committee members. Sub-committee membership and its chairmanship shall be appointed by the Chairman of the Committee. The Chairman may not serve on the Sub-committee. Should a VVA Service Officer become the subject of a complaint under Section VI of these "policies," the VVA Service Officer will not be part of the decision making process.

In general, the Committee shall have oversight responsibility for all VVA veterans benefits representation, and coordinate with the VVA National Committees (as applicable) and the VVA National Board of Directors to define or further refine VVA positions on issues of concern to veterans and their families. A member of the Committee must recuse himself or herself from any Committee vote, procedure or process that would present an actual conflict of interest or the appearance of a conflict of interest. If recusal is not voluntary, Committee members shall be bound by the decision of the Committee Chairman concerning conflict of interest and disqualification from participation. Furthermore, any member of the Committee who simultaneously holds office as a VVA State Council President, whose state is, or was, or will be in receipt of VVA Service Officer Program grant funding within 180 days of the date of the vote, must abstain from voting on any issue concerning the administration and allocation of the

funding process. Moreover, members of the Committee must abstain from voting on Veterans Benefits Program policies in the presence of an actual or potential conflict of interest.

B. Functions. On behalf of the VVA Board of Directors, the VVA Veterans Benefits Committee will perform the following functions:

1. Allocation of VVA Resources. The Veterans Benefits Program Committee shall ensure that available resources are allocated in a manner that provides for the continuance and expansion of VVA veterans benefits representation. The committees shall be governed by the following principles in regard to the allocation of resources.

(a) The allocation of resources for the operation of VVA VBP at the National level is subject to the budget approved by the National Board of Directors.

(b) The Veterans Benefits Committee, via a review made by the Grants Review Sub-Committee, will allocate resources through the Veterans Benefits Grants for VVA State Council and VVA Chapter funding of service officer programs.

(c) Priority in funding VVA veterans benefits representation at the state and chapter levels shall be given to those State Councils or Chapters who, in addition to need, have also demonstrated a willingness and ability to commit local resources in a cooperative venture.

(d) Funding of VVA veterans benefits representation at the state and chapter levels shall not be authorized if such activities can be subsidized with non-VVA funds, or if there is a reasonable expectation that the State Council or Chapter can secure such funds on their own or with VVA National assistance.

2. Litigation. Litigation undertaken in VVA's name, whether as a plaintiff or as an amicus, must be reviewed by the Director, VVA Veterans Benefits Program, endorsed by a majority of the Veteran's Benefits Committee and approved by the Board of Directors.

3. Confirmation of State Agency Recognition. Approve or disapprove the recognition of state Veterans Affairs agencies that seek to engage veterans' benefits representation on behalf of VVA (see Section IV).

4. Confirmation of Appointments. Confirm or reject the appointment of individuals seeking recognition as a VVA Chief Service Officer (see Section V).

5. Revocations. Perform specific functions in regard to the revocation of accreditation of individuals or agencies authorized to engage in veterans' benefits representation on behalf of VVA (see Section VI).

SECTION IV. VVA VETERANS BENEFITS PROGRAM

A. Purpose. VVA shall maintain an aggressive judicial review program to enforce or otherwise secure the rights of veterans and their families. In this endeavor, VVA Veterans Benefits Program shall focus on affecting maximum impact to assist the greatest number of Vietnam era veterans and shall monitor the quality of VVA veterans benefits representation at all levels of the organization. As indicated in Section I of this document, VVA VBP shall have three primary responsibilities:

1. Representation Guidelines. VVA VBP's quality-oriented individual case representation, consistent with the provisions of Section II of this document, and within the limitations of available resources shall continue to focus on the quality representation of as many clients as possible. In providing quality individual case representation, the Director, VVA Veterans Benefits Program shall be guided by the following:

- (a) Give priority in individual case representation to those cases referred from a VVA Service Officer who has worked on the case.
- (b) Whenever practical, either assist VVA Service Officers in the representation of cases before the traveling panels of the Board of Veterans Appeals, or assist service officers in the preparation of cases for presentation before the Board of Veterans Appeals in Washington, D.C.
- (c) Whenever practical, retain private attorneys to handle Board of Veterans Appeals cases on behalf of VVA VBP.
- (d) In all areas of VVA VBP's responsibility stress quality representation over quantity representation.
- (f) Require all VVA National, State Council, and Chapter service programs to use case management software approved by VVA National to track veterans claims.
- (g) All VVA accredited service officers must obtain a VA PIV badge and establish and keep current a VA Stakeholder Enterprise Portal (SEP) account. This necessary for service officers to be able to view veterans claims online.
- (h) Comply with the VBP document retention policy which is covered as a separate document.

2. Litigation Guidelines. VVA VBP's highly effective litigation shall continue, since it has continuing potential to effect a positive change in the arena of veterans affairs; therefore, the Director, VVA Veterans Benefits Program shall be guided by the following:

(a) Seek to correct, through the judicial process, misinterpretations of existing law to assure executive branch compliance with legislative will or intent.

(b) VVA VBP's litigation should continue to engage in strategic class action or individual litigation of a potential precedential nature.

3. Publication Guidelines. VVA VBP's highly successful advocacy publications shall be continued. Subject to the availability of resources, the Director, VVA Veterans Benefits Program shall be guided by the following:

(a) Consistent with these policies, VVA VBP may create, produce or otherwise publish and disseminate materials concerning, or in support of, VVA's veterans benefits representation.

(b) The expansion of training programs now offered by VVA VBP is encouraged.

B. Legislative and Agency Advocacy. As directed by the President of VVA, VVA VBP may engage in legislative and agency advocacy. Such activities shall be determined by the overall needs of the organization and shall be in cooperation with ongoing legislative or agency work by the VVA.

C. Recognition of State/County Agencies. VVA VBP should avail itself by using, where practical and consistent with established programs, the individual state Department of Veterans Affairs, or similar county agencies to expand its veterans benefits representation. The Director, VVA VBP shall coordinate such expansions with local VVA activities and may recognize such agencies to perform veterans benefits representation on behalf of the VVA. Such recognition of state agencies is subject to confirmation by the VVA Veterans Benefits Committee.

D. Recommendation for Funding. The Director, VVA Veterans Benefits Program will identify and make recommendations, *through* the VVA Veterans Benefits Committee to the Board's Finance Committee, concerning the funding needed for nationally subsidized Service Officers or private attorneys at various locations throughout the country and other limited locations outside of the country.

E. Control of Service Officers. VVA Service Officers, without regard to the source of their income, are considered to be under the operational control of the VVA Director, Veterans Benefits Program in regard to all VVA veterans' benefits representation. This

includes enforcement of 38 C.F.R. and VBP Policies pertaining to Service Officer accreditation and conduct.

SECTION V. VVA VETERANS BENEFITS PROGRAM PERSONNEL

A. VVA Service Officers. The following levels of accredited VVA Service Officers are recognized and defined.

1. VVA Director, Veterans Benefits Program. This individual, a full-time employee of VVA National Headquarters and is a licensed attorney in any U.S. State, District, or Territory), is charged with the overall responsibility of supervising VVA's veterans' benefits representation. The VVA Director, Veterans Benefits Program, is additionally designated with overall responsibility concerning Service Officer accreditation and professional conduct.

2. VVA Chief Service Officer. If possible, these individuals shall be full-time service officers who serve as the primary link between VVA state level veterans representation activities, in their respective states, and VVA VBP. Such individuals will be nominated by the State Council President, subject to approval by the VVA Veterans Benefits Committee, as outlined in Section I above. This service officer will be charged with the overall operation of claims activity at VA Regional Office(s) in his or her state. VVA Chief Service Officers are authorized to recommend accreditation of individuals to the Director, Veterans Benefits Program. Either personally, or through delegation to assistants, VVA Chief Service Officers are responsible for coordinating veterans' benefits representation in their respective state.

3. VVA Assistant Chief Service Officers. These individuals shall be full-time service officers primarily engaged in assisting VVA Chief Service Officers in the performance of their duties. Such individuals may be appointed by their respective VVA Chief Service Officers with approval of the Director, VVA Veterans Benefits Program and State Council or Chapter (operating a service officer program independently of a State Council where there is no state council service officer program).

4. VVA Service Officer. An accredited VVA Service Officer may be an employee of VVA, a State Council or a Chapter; a state or a county-employed Service Officer who is dually accredited with VVA; a dually accredited Service Officer with another organization through a Memorandum of Agreement or Memorandum of Understanding, or a volunteer. The individual must satisfy VA and VVA accreditation eligibility requirements and possess a working knowledge of VA benefits and health-care related laws, regulations and procedures. VVA will not accredit an individual who is already accredited with VA as an agent, and will revoke accreditation if an individual later becomes accredited with VA as an agent. Service officers represent clients under a VVA power-of-attorney in the prosecution of claims and decision review officer appeals before the VA regional offices, including: client intake, case evaluation and assessment,

evidentiary development, preparation and presentation of written claims for benefits, customer service and oral advocacy when necessary, and representation for appeals. Service Officers must maintain compliance with the provisions of the VVA Veterans Benefits Program Policies, as well as all agreements and requirements of any employing VVA entity. Service Officers must also maintain compliance with all current requirements as prescribed by the VA. Service Officers must also maintain compliance with any future accreditation requirements as imposed by the VA as they become effective.

B. Volunteer Lawyers. VVA recognizes the value of introducing volunteer lawyers into all levels of the veterans benefits and service system. Such advocates will serve to increase the effectiveness of VVA's veterans benefits representation not only through cost savings but also by continuously adding new ideas and vigor to the delivery of benefits and service to veterans and their families. VVA VBP will recruit a panel of volunteer attorneys to handle claim matters on a pro bono basis and will assist individual State Councils and Chapters in creating such panels.

C. Contract Attorneys. For various reasons and purposes the VVA VBP finds it necessary to engage the services of contract attorneys. Unless otherwise authorized in writing, contract attorneys shall be under the supervision and operational control of the Director, Veterans Benefits Program.

D. Dual Representation with Other Organizations. In the interest of fostering and maintaining strategic alliances the VBP may dually accredit Service Officers with other organizations. One such example is United Spinal Association. In the event a VVA accredited Service Officer becomes dually accredited with VVA and another organization, such as United Spinal Association, that individual must adhere to these policies whether acting under a VVA power-of-attorney or a power-of-attorney of another organization.

E. Requirements for Admission to VVA Basic Service Officer Training. In order to ensure the continued quality and reputation of VVA's Veterans Benefits Program, the essential requirements for admission to the training course are as follows:

- ❖ Dedication to helping disabled veterans and their dependents.
- ❖ Organizational skills, responsibility and trustworthiness.
- ❖ Sufficient support from their respective VVA State Council or chapter to establish and maintain an effective and efficient service officer's office.
- ❖ Sufficient unpressured time to be able provide high quality representation

There are also certain legal requirements for accreditation as a service officer. The candidate must: 1) be a member in good standing of VVA; *or* 2) be a paid employee of a VVA State Council or chapter and working not less than 1000 hours annually; *or* 3) be an employee of a county or state veterans service agency and working not less than 1000 hours annually; *or* 4) be a dually accredited Service Officer through a Memorandum of Agreement or Memorandum of Understanding between VVA and another service

organization *and* 5) must *not* be employed by any civil or military department or agency of the Federal government. *See* 38 C.F.R. § 14.629. In addition, VVA must be able to certify to the VA that the candidate is a person of good character and reputation. *See* 38 C.F.R. § 14.629(a)(1). These criteria must be kept in mind, since applicants who do not meet them cannot be accredited as a VVA service officer. The VA Office of the General Counsel (which administers the VA accreditation program) also has a policy of requiring clarifying information where the applicant is a veteran who has less than an honorable discharge from active military service (e.g., a general discharge, even if under honorable conditions, dishonorable discharge, etc.). Remember, the VA has the discretion not to accredit anyone, even if the individual is nominated by a veterans service organization.

In our experience, applicants who want to attend training so that they may learn how to prosecute their *own* claims for benefits generally do not serve as VVA service officers either very well or very long. Moreover, if an applicant is currently receiving VA benefits (100% IU) or Social Security Disability Insurance (SSDI) benefits on the basis of individual unemployability, or for a substantial psychiatric disability, accreditation and employment as a service officer may be considered as evidence to demonstrate that his or her condition has improved. Such evidence may therefore serve as the basis for a VA rating reduction or for the severance of VA or Social Security benefits. Accreditation of such individuals will be on a case by case basis, and requires a majority vote the full VBP Committee. Finally, due to recent unfortunate experiences, and to reduce chapter, State Council and VVA liability, applicants who currently suffer from a service-connected psychiatric disorder rated 50% or higher may not be eligible for training. This criterion is not an automatic basis for ineligibility. Eligibility in all cases is determined on an individual basis, and requires a majority vote of the full VBP Committee. Eligibility for training may be granted with the understanding that accreditation thereafter may be conditioned, for a period of time, on supervision by an attorney or chief service officer. In these situations, deference will generally be given to the discretion of the nominating State Council's or chapter's assessment of a candidate's fitness for training, accreditation and working as a VVA accredited service officer. The National Veterans Benefits Program, however, reserves the right to review such assessments. The VBP Director may appeal VBP Committee accreditation decisions to the VVA Board of Directors.

Nominees for training *must* be approved and sponsored by the VVA state council or chapter (if operating a service officer program independently of a State Council where there is no state council service officer program) for the state in which the trainee resides, *and* for the state in which the trainee will be handling claims (if different from the state of residence). Nominees that will be sponsored by a VVA chapter must have the approval of its respective state council to send the student for training. Please note that there is a part of the training application for the appropriate state council president to complete. Nominees for training from chapters not part of a State Council, such as chapters located in the Philippines or Guam, must obtain approval from their respective VVA District Director.

VVA members in all leadership positions, whether at the chapter, state, or national levels, are encouraged to observe VVA's basic or advanced training courses and thereby learn

more about veteran's benefits; however such members shall not be accredited unless they complete all necessary requirements and follow VVA manual provisions. VVA members who are not accredited service officers and wish to access the online VVA service officer trainings will have to first pass NVLSP's basic course on veterans' benefits.

New applicants for VVA accreditation who are not employed by a county or state government, or who do not have a valid identification card (flash card or PIV card) issued by the U.S. Department of Veterans Affairs must pass a criminal background check and a credit report check. The cost of the criminal background and credit checks will be the responsibility of the applicant, but may be reimbursed by the sponsoring National Office, State Council or Chapter if the applicant passes the background and credit check if funds are available. Any crimes of dishonesty, violent crimes, or crime involving moral turpitude will bar any applicant for accreditation. Felonies are a bar to accreditation. Misdemeanors may be considered on a case by case basis. A credit report showing severe financial stress or financial irresponsibility of personal finances is also a bar for accreditation. In cases where the applicant has a criminal history or severe negative credit report a majority vote of the full VBP Committee is required for accreditation. The VBP Director may appeal VBP Committee accreditation decisions to the VVA Board of Directors.

SECTION VI. REVOCATION

A. Proper Conduct. It is the desire of the Board of Directors that VVA's veterans' benefits representation be conducted in an environment of honesty and integrity. VVA recognition of individuals or agencies to perform veterans' benefits representation on behalf of VVA, is a privilege of immense responsibility. Those authorized to engage in such activities are to do so lawfully, professionally, ethically and in a manner that does not discredit VVA. The following procedures are established to revoke the privileges of VVA Service Officers, State or County agencies.

B. Revocation Responsibility. The VVA Director, Veterans Benefits Program, and the Service Officer Grievance Sub-committee, are charged with oversight responsibility, unless otherwise indicated in this section, in the revocation of privileges for individual VVA Service Officers or recognized agencies or individuals. Individuals that are dually accredited with another organization under a Memorandum of Understanding or Memorandum of Agreement may be subject to additional procedures as outlined in the applicable Agreement.

C. Revocation of Service Officers' Accreditation. The following shall apply to VVA Service Officers:

1. The grounds for termination promulgated in 38 C.F.R. § 14.633(c) are also grounds for revocation of VVA accreditation. These due process procedures are applicable to revocations in such situations.

2. If a Service Officer becomes a Federal employee, he or she, must cease working as a Service Officer to avoid violating 18 U.S.C. Section 205 (Federal conflict of interest statute). Upon notification of Federal employment the Service Officer's accreditation will be cancelled.
3. The Failure of a VVA Service Officer to respond to VVA Director, Veterans Benefits Program requests for reports may result in the immediate revocation of accreditation. The Director, VVA Veterans Benefits Program shall immediately notify the appropriate VVA State Council President (or Chapter President in states with no State Council) 30 days prior to such revocation.
4. Any unlawful, unprofessional, or unethical act done in the course of representation of a client or potential client; any ground for initial denial of accreditation; failure to adhere to 38 C.F.R. § 14.633 or VVA VBP standards of professional competence contained in this manual; or other conduct that brings discredit upon VVA may be grounds for revocation of accreditation. The due process procedures are applicable to suspensions or revocations in such situations.
5. If a sponsoring State Council or Chapter loses confidence in its sponsored VVA Service Officer, it may notify the VVA Service Officer of the reasons in writing why they request revocation of accreditation. Copies of all such correspondence will be sent to the Director, VVA Veterans Benefits Program, who shall conduct the appropriate investigation. The due process procedures are applicable unless otherwise indicated, to revocations in such situations.
 - (a) The VVA Director, Veterans Benefits Program will seek to effect reconciliation if appropriate but will normally accede to the desires of the sponsoring VVA State Council.
 - (b) Under unusual circumstances or if the VVA Service Officer resigns from a sponsored position, the VVA Director, Veterans Benefits Program may continue the service officer's accreditation. Such an act must be reported to the VVA Veterans Benefits Committee. The due process procedures are not applicable in such situations. This is to prevent a service officer the ability to resign to avoid the revocation process.
 - (c) The sponsoring VVA unit will be responsible for sending the revoked or resigned VVA Service Officer's casework to the Director, Veterans Benefits Program, if that work is not assumed by another VVA accredited service officer.
6. A VVA Service Officer whose accreditation has been revoked and who has not submitted a timely appeal, if applicable, or whose appeal has been finally denied, must preserve and upon request promptly deliver to the VVA Director, Veterans Benefits Program, or a person designated by the Director, all documents (in

whatever form, paper, computer file, or other medium) pertaining to the Service Officer's VVA clients.

7. (a) Failure or refusal to use Case Management Software (CMS) to develop, submit, and track veterans claims under VVA Power of Attorney (POA) may be grounds for revocation of service officer accreditation.

(b) Use of VVA's CMS is preferred. However, other CMS may suffice as long as the service officer provides the Director, VVA VBP, with claims data (preferably in a data file that can be imported into VVA's CMS), or if the claims data file transfer is not technically feasible, then the service officer must provide monthly claims reports that are producible from the service officer's CMS. Furthermore, if technically feasible, the service officer's chapter or State Council will provide VVA National with at least one license so VVA's appeals attorneys may access the service officer's CMS.

D. Service Officer's Appeals of Revocation. If applicable, the following due process procedures shall be used for revocation of privileges for VVA Service Officers. There shall be the right to only one appeal. There is no appeal right except those described below.

1. Upon being informed of an act or acts justifying revocation of accreditation, the Director, VVA Veterans Benefits Program shall conduct an investigation and present his or her findings and recommendations to the Sub-Committee. If the Sub-Committee finds revocation is warranted, the Sub-Committee Chairman shall instruct the Director to send a letter to the VVA Service Officer who allegedly committed the act(s), revoking their VVA accreditation. Such a letter must be sent by certified mail; return receipt requested and must inform the recipient of their right to appeal the revocation. Failure of the recipient to sign for this letter sent by certified mail voids any right to appeal. The Service Officer is then required to return all clients' or potential clients' records to the Director, VVA Veterans Benefits Program, or his or her designee. Members of the Sub-Committee shall be prohibited from participating in the appellate review process delineated below.

2. The VVA Service Officer may contest the ground(s) for revocation of accreditation by submitting a written appeal to the Director, Veterans Benefits Program, which must *be received no later than 30 days after receipt of the notification of the revocation*. Such an appeal must be mailed by certified mail; return receipt requested. Any appeal mailed in any other manner if not received by the deadline by the Director, Veterans Benefits Program, for any reason, will be deemed to not have been timely received.

3. Upon receipt of a timely appeal, the VVA Veterans Benefits Committee shall take the following actions:

- (a) The Service Representative Grievance Sub-Committee, appointed by the Veterans Benefits Committee Chair, will perform an evidentiary review investigating further if necessary, and will make recommendations to the Committee as to what action, denial or reinstatement, should be taken with respect to the appeal.
- (b) The sub-Committee member may grant a personal appearance hearing to the revoked Service Officer with the right to cross-examine available witness(es) or such other requested procedures as deemed appropriate and reasonable by the Committee member under the circumstances.
- (c) The Committee member's decision not to grant a personal appearance may be appealed to the full Committee, which will resolve the issue by majority vote. Reasonable expenses incurred as a result of such appeals, as determined by the VVA VBP, may be borne by VVA VBP if approved by the Committee majority. Otherwise, the VVA Service Officer must tender the costs, to be reimbursed if there is no adverse action taken.
- (d) The Committee, excluding members of the sub-committee, will then vote by majority as to what action, denial or reinstatement, should be taken with respect to the appeal.

E. Revocations of State or County Veterans Agencies. If applicable, the following shall apply to recognized state and county agencies:

1. The grounds for termination of recognition promulgated in 38 C.F.R. Section 14.633(c), are also grounds for revocation of VVA accreditation. The due process procedures are applicable to revocations in such situations.
2. Any unlawful, unprofessional or unethical act done in the course of representing a client; failure to adhere to VVA VBP standards of professional competence; or other conduct that brings discredit upon VVA may be grounds for revocation of accreditation. The due process procedures are applicable to revocations in such situations.
3. The recognition of a state or county agency may be revoked without cause by the VVA Veterans Benefits Committee, if such recognition is deemed to be in conflict with other VVA veterans benefits representation. The due process procedures are not applicable to revocations in such situations.
4. Prior to such a revocation, the state council president will be notified by the Director, VVA Veterans Benefits Program.

5. An agency the accreditation of which has been revoked and that has not submitted a timely appeal, if applicable, or the appeal of which has been finally denied, must preserve and upon request promptly deliver to the VVA Director, Veterans Benefits Program, or a person designated by the Director, a copy all documents (in whatever form, paper, computer file, or other medium) pertaining to the agency's VVA clients.

F. State or County Veterans Agencies' Appeals of Revocation. The following due process procedures shall be used for revocations of state and county agencies. There shall be the right to only one appeal. There is no appeal right except those described below.

1. Upon being informed of an act or acts justifying revocation of accreditation, the Director, VVA Veterans Benefits Program shall conduct an investigation and, if he/she, finds it necessary, shall send a letter to the agency, revoking their VVA accreditation. Such a letter must be sent by certified mail, return receipt requested, and must inform the recipient of their right to appeal the revocation. The Director, Veterans Benefits Program will coordinate with the director of the agency for the proper disposition of all VVA clients' records.

2. The agency may contest the ground(s) for revocation of accreditation by submitting a written appeal to the Director, VVA Veterans Benefits Program, ***which must be received no later than 30 days after they received the notification of revocation.*** Such an appeal will then be referred to the VVA Veterans Benefits Committee. Such an appeal must be mailed by certified mail; return receipt requested. Any appeal mailed in any other manner if not received by the deadline by the Director, Veterans Benefits Program, for any reason, will be deemed to not have been timely received.

3. Upon receiving the appeal, the VVA Veterans Benefits Committee shall take the following action:

(a) A member of the Committee will perform an evidentiary review, investigating further if necessary, and will make a recommendation to the committee as to what action (denial or reinstatement) should be taken with respect to the appeal.

(b) The committee member may grant a personal appearance hearing with the right to cross-examine available witness(es) or such other requested procedures as deemed appropriate and reasonable by the member under the circumstances.

(c) The Committee member's decision not to grant a personal appearance may be appealed to the full Committee, which will resolve the issue by majority vote. Expenses incurred as a result of such appeals may be borne

by VVA VBP if approved by the Committee member or the Committee majority, as deemed appropriate. Otherwise, the agency must tender the costs, to be reimbursed if there is no adverse action taken.

(c) The Committee will then vote by majority as to what action (denial or reinstatement) should be taken with respect to the appeal.

(d) If the revocation of the agency's recognition is upheld by the Committee the agency may appeal the Committee decision to the VVA Board of Directors. The Board, after advice from the VVA Veterans Benefits Committee, may authorize such action deemed appropriate.

G. Non-Exclusion of Other Action. Action taken under this Section shall not preclude other action under the VVA Code of Disciplinary Procedure.

SECTION VII. SUSPENSION

A. Proper Conduct. It is the desire of the Board of Directors that VVA's veterans' benefits representation be conducted in an environment of honesty and integrity. VVA recognition of individuals or agencies to perform veterans' benefits representation on behalf of VVA, is a privilege of immense responsibility. Those authorized to engage in such activities are to do so lawfully, professionally, ethically and in a manner that does not discredit VVA. The following procedures are established to suspend the privileges of VVA Service Officers and State or County agencies.

B. Suspension Responsibility. The VVA Director, Veterans Benefits Program is charged with operational control, and the Veterans Benefits Program Committee is charged with oversight responsibility, unless otherwise indicated in this section, in the suspension of privileges for individual VVA Service Officers or recognized agencies or individuals. Individuals that are dually accredited with another organization under a Memorandum of Understanding or Memorandum of Agreement may be subject to additional procedures as outlined in the applicable Agreement.

C. Suspension of Service Officers' Accreditation. In certain circumstances a Service Officer's accreditation may be suspended by VVA VBP for a period of up to 90 days. A suspension may be appropriate where a Service Officer has committed or is committing an act which is not sufficient enough to warrant a revocation, yet is serious enough that remedial measures may be necessary. A suspension may also be invoked during, or to allow for, a thorough investigation. During a suspension remedial measures may also be imposed in the event a Service Officer requires additional training or counseling.

A suspension may be invoked by the Director, Veterans Benefits Program upon the receipt of credible evidence that a Service Officer is engaging in, or possibly engaging in, acts that may discredit VVA or possibly jeopardize a clients claim or appeal. Upon receipt of credible evidence the Director, Veterans Benefits Program will consult with the Chairman, Veterans Benefits Committee.

Once a suspension is initiated, the suspended Service Officer and the sponsoring State Council President or Chapter President shall be notified in writing by certified mail, return receipt requested, of the reason/s for the suspension and the length of the suspension. Failure of the service officer to sign for certified mail will result in automatic revocation of the service officer's accreditation with no further action required.

A suspended Service Officer must comply with the instructions of the Director, Veterans Benefits Program, regarding access to documents and information concerning the Service Officer's VVA clients, to facilitate their representation by another Service Officer during the period of the suspension.

D. Service Officers' Appeals of Suspension. As a suspension is of a short duration and of a fixed time there shall be no right to appeal a suspension. During the course of a suspension, if warranted, a revocation may also be initiated. After investigation, a suspension may be lifted and the service officer reinstated; corrective action required with a period of evaluation; or revocation procedures instituted.

E. Suspension of State or County Veterans Agencies. The suspension procedures for State or County Veterans Agencies shall be the same as the policies set forth above for accredited Service Officers. During the course of a suspension, if warranted, a revocation may also be initiated. After investigation, a suspension may be lifted and the service officer reinstated; corrective action required with a period of evaluation; or revocation procedures instituted. In the suspension of a State or County Veteran Service Officer the sponsoring agency shall also be notified of the suspension by certified mail, return receipt requested.

F. State or County Veterans Agencies' Appeals of Suspension. As a suspension is of a short duration and of a fixed time there shall be no right to appeal a suspension. Should it come to light that the suspension was unnecessary or if the situation has been rectified a suspension may be lifted and the Service Officer fully reinstated. During the course of a suspension, if warranted, a revocation may also be initiated.

G. Non-Exclusion of Other Action. Action taken under this Section shall not preclude other action under the VVA Code of Disciplinary Procedure.

SECTION VIII. RESTRICTIONS

A. Membership Solicitation. At all levels of the VVA service structure, solicitation of membership in VVA by Service Officers of persons for whom VVA holds power of attorney or who are asking to be represented by VVA is strictly prohibited. However, Service Officers may place VVA promotional literature (including membership brochures) in an area accessible to clients or potential clients.

B. Contribution Solicitation. VVA Service Officers may not accept fees, contributions or gifts from clients in exchange for services rendered. VVA Service Officers may not loan money or things of value, or borrow money or things of value from VVA clients. The solicitation by Service Officers of contributions to VVA, Inc., a VVA State Council or VVA Chapter, from clients before, during, or after the rendering of representation is strictly prohibited. If they receive unsolicited contributions to VVA, Inc., a VVA State Council or VVA Chapter from clients, the following will apply:

1. Gifts of this nature are considered to be restricted donations. Their acceptance from the donor shall be based on the understanding that the funds will be used to further VVA's veterans benefits representation.
2. VVA, Inc., State Councils and Chapters must use such contributions solely for veterans benefits representation.
3. Within 14 days of receipt, the Service Officer shall transfer the funds to VVA, Inc. (National Office); State Council or Chapter as appropriate.
4. When the donor directs that the funds will be used by the State Council or Chapter, within 14 days of receipt of such funds, the State Council or Chapter shall inform the Director, VVA Veterans Benefits Program, in writing of the following:
 - (a) Amount of the contribution.
 - (b) The circumstances under which the gift was made.
 - (c) The State Council's or Chapter's proposal for use of funds.
5. If funds are specifically directed to the National Veterans Benefits Program, the Use of Restricted Donations Policy will apply and approval from the Finance Committee is needed to use the funds.

C. Client Confidentiality. The purpose of this policy is to assure all protected information is safeguarded from unauthorized access or use. Protected information can be written, oral or electronic.

1. Definitions:

Client Information – This category of information includes data that has been collected on any individual, or provided by any individual, who uses, or intends to use, the services offered by any individual affiliated with the VVA VBP.

Demographic Information – Data used to describe the basic elements of an individual’s vital statistics, (i.e. address, birth date, telephone number, VA claims number, Social Security Number, Service Number, etc.)

Veteran/Client Information – Any data that has been received, collected, processed, or stored in any form regarding the past, present or future health status for individuals who have or intended to use services offered by the VVA VBP.

The term “protected information” includes a multitude of information known as a result of representing or potentially representing a veteran or a veteran’s family member. All categories of client information – including, but not limited to the health, demographic or financial information of the client’s family, friends, co-workers, or own self – are privileged and confidential. Specific limitations are in place to control access to, and use or communication of, these types of information.

Access to information is restricted to those with an authorized need-to-know, including the Director, VVA Veterans Benefits Program, and persons designated by the Director. Accessing information from verbal, written, or electronic sources is authorized only to the extent that the information is required to fulfill one’s work-related responsibilities. Once an authorized individual has gained access to protected information, its further use and disclosure is also strictly limited. Communication of information to other authorized individuals is made only in secured environments in order to avoid other intentional or other unintentional release of information to unauthorized individuals.

Supporting policies and procedures must be in place in every office handling VVA veterans benefits representation to physically limit access to information based upon security codes, passwords and lockable storage throughout all applicable offices. As outlined in these specific policies and procedures, sharing of passwords and security codes is expressly prohibited.

Employees, volunteers and clients, or other concerned parties are encouraged to report any real or perceived risks to information privacy to the appropriate individual or the Director, Veterans Benefits Program.

Under no circumstances will a VVA Service Officer give access to clients’ files, (or information contained therein) to any unauthorized individual without obtaining prior written consent of the client. The unauthorized disclosure of the contents of a client’s file to third parties, conveyed either in writing or verbally, is strictly prohibited. However, the routine transfer of documents or communication of information among the

appropriate professionals, for the express purpose of service to the client, shall not be deemed to be in conflict with the preceding prohibition.

Intentional or negligent failure to keep information private and secure as required by this document is a ground for sanctions deemed appropriate by the Director, Veterans Benefits Program and/or Chair, VBC.

Additional information and training may be provided by various VA regional offices. Requests for information and training may be directed to the regional office security officer or director.

D. Use of VA facilities. Under no circumstances, either formally or informally, will a VVA accredited service officer solicit from any VA facility space of a VVA veterans benefits service office without obtaining prior written consent from the Director, Veterans Benefits Program. The ongoing use of VA office space, telephone service, mail service, or other services to facilitate the representation of clients by VVA Service Officers requires the prior written approval of the Director, VVA Veterans Benefits Program.

E. Unauthorized Use of Titles. The use of titles, indicating that an individual is a VVA Service Officer, Chief Service Officer, or Assistant Chief Service Officer, is strictly limited to those individuals who have been so recognized by VVA VBP. No VVA member may imply they are authorized to represent or advise veterans or family members without appropriate accreditation through the Veterans Benefits Program.

The unauthorized use of these titles by VVA members is prohibited and may be cause for action under the VVA Code of Disciplinary Procedure.

F. Publications. The publication of VVA veterans' benefits materials, originating at the state or chapter levels, is restricted. To ensure uniformity of content and accuracy, VVA VBP will review all such materials prior to publication and dissemination.

G. Service Officer Business Card. A standardized business card shall be used by VVA Service Officers. The format attached to these policies shall be followed:

1. VVA National Logo in upper left corner;
2. State or Chapter Logo in upper right corner, whichever is sponsoring the Service Officer;
3. Under name, the title "**Service Officer**" or "Accredited Service Officer" will be the only title used (*except for the title "Chief Service Officer, state of xx, as appropriate*). **NO OTHER WORDING IS AUTHORIZED;**
4. Address where the Service Officer will be available to see clients in the lower left hand corner (office hours, if applicable, below it); and
5. Office phone or phone number where the Service Officer can be reached in the lower right corner (with optional home phone, if different, below). The Veterans Service Officer may not list any other titles, degrees or awards on the card without the permission of the VVA VBP.

H. Sample Service Officer Business Card

Front of Card

National Logo	State or Chapter Logo
Vietnam Veterans of America, Inc. <u>NAME</u> Service Officer (if authorized, Chief Service Officer, State of XX)	
Address	Office Phone
Office Hours (optional)	Home Phone (optional)

Back of Card

You have appointed the Vietnam Veterans of America, Inc. as your accredited representative with the U.S. Department of Veterans Affairs to present your claim and to assist you in any of our dealings with that agency. This service is furnished WITHOUT ANY CHARGE. Upon receipt of any correspondence from the U.S. Department of Veterans Affairs about your case, you should contact this office IMMEDIATELY.

Veteran's Name _____
SSN# _____
VA File # _____
Date of Power of Attorney _____

CARRY THIS CARD WITH YOU AT ALL TIMES OR KEEP WITH YOUR CLAIMS PAPERS

Section IX. Certificate of Completion

Upon attending VVA Service Officer Basic Training and successfully completing the written examination (or upon viewing the online basic training course and completing the online examination) to become a Service Officer, a Certificate of Completion will be awarded to those who become active VVA Service Officers.

Section X. Continuing Education

A. VVA Service Officers who are not an employee of a state or county veterans agency are required to take and pass the Service Officer test every two years or attend training every two years to maintain their accreditation.

B. The following types of training would be sufficient to maintain accreditation:

1. VVA Service Officer School
2. Other VVA advanced training session; or
3. Any other training deemed appropriate by the Director, VVA Veterans Benefits Program

Section XI. Quarterly Reporting

A. All VVA accredited service officers, regardless of their employer or volunteer status, are required to submit to their respective State Council (or chapter if acting as a State Council), and to the Director, VVA Veterans Benefits Program a quarterly report in a format prescribed by VVA VBP.

B. If a VVA Service Officer fails to file two (2) consecutive Quarterly Reports within the time limits (45 days after the end of each quarter), his or her accreditation will be subject to revocation.

XII. Incorporation by Reference

All VBP personnel must abide by the policies and procedures as provided in this document. This document incorporates by reference the VVA Constitution and VVA Disciplinary Policy. All VBP personnel must also adhere to the policies and procedures as provided in these publications. Additionally, all VBP personnel *must* also adhere to and comply with all local, state and Federal laws including equal employment, anti-discrimination and sexual harassment laws, rules and regulations. The VVA policies regarding these issues are as follows:

A. Policy of Equal Employment Opportunity. It is the general policy of the VVA to provide equal employment opportunity to all employees and volunteers and applicants for employment and volunteer opportunities. The VVA prohibits any unlawful discrimination against any employee or volunteer on the basis of race, sex, creed, color, religion, national or ethnic origin, citizenship status, political affiliation, age, disability, marital status or family responsibilities or sexual orientation. The prohibition of unlawful discrimination includes all decisions affecting hiring, promotion, termination, compensation or benefits.

B. Anti-Discrimination Policy. Any employee or volunteer who believes that he/she has been the victim of discrimination, harassment, or offensive communications related

to race, creed, color, religion, national or ethnic origin, citizenship status, political affiliation, age, disability, marital status or family responsibility or sexual orientation should report the matter at once to the Director, Veterans Benefits Program. The Director, Veterans Benefits Program will conduct (or have conducted) a prompt investigation of all such complaints, which will be conducted in as much of a confidential manner as possible. If the complaint concerns the Director, Veterans Benefits Program, an individual may contact the Chairmen of the Benefits Committee. There will be no retaliation or reprisal against any employee for making such report or for filing any discrimination charge with any federal, state or local agency. Any individual who is found, after appropriate investigation, to have violated any of the VVA anti-discrimination policies will be subject to appropriate disciplinary action.

C. Sexual Harassment Policy. All individuals involved in, or under the supervision of, the VBP have a responsibility to maintain an environment free of any form of harassment, including sexual harassment. No employee or supervisor is to threaten or insinuate, either explicitly or implicitly, that an employee's or volunteer's refusal to submit to sexual advances will adversely affect his or her employment or career advancement. In addition, no individual is to favor in any way an applicant, client, employee or veteran because that person has performed or shown a willingness to perform sexual favors for the supervisor. Other sexually harassing conduct in the workplace, whether by supervisors or nonsupervisory personnel, is also prohibited. Such conduct includes any abusive or degrading verbal or physical conduct or contact of an offensive nature, and any conduct that has the purpose or effect of interfering with any employee's work performance or creating an intimidating, hostile, or offensive work environment.

XIII. Acknowledgment of Policies

I have received a copy of the VVA Veterans Benefits Program Policies and agree to be bound by them. If I am a dually-accredited service officer, I agree to be bound by the VVA Veterans Benefits Program Policies unless the Memorandum of Understanding between my veterans organization and VVA expressly supersedes a policy.

Signed: _____

Dated: _____

END OF DOCUMENT