



SPECIAL REPORT

OFFICE OF THE VETERAN ADVOCATE

Case: 2024-09-003

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ABOUT THE OFFICE OF THE VETERAN ADVOCATE

The Massachusetts Office of the Veteran Advocate (OVA) is an independent state agency, free of any supervision or control by any executive agency, established by the Massachusetts Legislature in 2022, codified in part as M.G.L. Chapter 115B.

The OVA is tasked with safeguarding the wellbeing, dignified treatment, rights, and benefits of veterans in the care of, or receiving services from the Commonwealth. The office ensures these veterans, and their families receive compassionate, timely, and effective services. It plays a crucial role in facilitating access to both federal and state benefits, and in conducting comprehensive investigations to enhance the care and services provided to veterans. A main focus of the agency is to aid and coordinate with local veteran service officers to ensure that veterans receive all available state and federal benefits.

A specific responsibility of the OVA is its investigative and oversight role. Through its statutory mandates, and the Code of Massachusetts Regulations¹, the office may receive complaints and information, initiate audits and investigations, conduct inspections of facilities, and review relevant legislation and regulations. When necessary, the OVA makes policy recommendations to improve service delivery, address gaps in the system, and ensure compliance with existing laws.

When there is evidence of wrongdoing or failure in the provision of services to veterans, the OVA may, through its liaison requirements, refer its audit or investigative findings to the appropriate investigative, prosecutorial, or public agencies

Through these functions, the OVA works to uphold the highest standards of care and support for veterans in Massachusetts. By conducting investigations, audits, inspections, and reviews, the OVA not only holds state agencies and private organizations accountable, but also actively seeks to improve the policies and practices that affect veterans' welfare.

This oversight role is vital to ensuring that veterans receive the dignified treatment, benefits, respect, and protections they have earned and that any systemic issues are promptly corrected.

¹ 123 CMR 2.00

INVESTIGATIVE PURPOSE AND PROCESS

The OVAs enabling statute, M.G.L. c.115B section 2, provides the OVA with authority to investigate and ensure that veterans in the care of the commonwealth or receiving services under the supervision of an executive agency or a constituent agency, in any public or private facility, receive humane and dignified treatment at all times, with full respect for the veterans' personal dignity and right to privacy. This investigative responsibility includes a review of any fatalities, near fatalities, serious bodily harm, emotional injuries, and failure in duty to care.

The OVA is mandated to examine, on a system-wide basis, the care and services that executive and constituent agencies provide veterans. This mission is further defined by the Code of Massachusetts Regulations, 123 CMR 2.00: Investigations, Inspections, Audits, and Reviews.

The investigative purpose of the OVA is to ensure that veterans are protected from mistreatment, neglect, and violations of their rights by holding accountable the agencies and facilities responsible for their care.

This oversight role is vital for maintaining transparency, ensuring compliance with state and federal laws and regulations, and promoting improvements in the quality of services provided to veterans and their families.

The investigative process at OVA is multifaceted and begins with the receipt of complaints or information from veterans, their families, or other concerned parties. Upon receiving a complaint, the OVA is authorized to initiate audits, conduct thorough investigations, and perform inspections of facilities where veterans receive care. This also includes functioning as a liaison with Federal, State, and Local agencies, inspectional services, and public safety entities. The OVA meticulously reviews the circumstances surrounding any complaints or reports of inadequate service delivery, incidents of harm, or potential violations of veterans' rights. This includes analyzing relevant legislation, laws and regulations, policies, and practices to identify gaps or deficiencies in the existing system.

When an investigation reveals evidence of significant failures in care, negligence, or other forms of misconduct, the OVA is empowered to refer its findings to appropriate investigative, prosecutorial, or public agencies. Additionally, the office may recommend policy changes, recommend new legislation, and suggest regulatory amendments to enhance the welfare of veterans in Massachusetts.

Through this comprehensive and proactive approach, the OVA not only addresses individual cases of concern but also seeks systemic improvements to prevent future occurrences, ensuring that veterans receive the care and respect they deserve.

CONFIDENTIALITY

Confidentiality is a fundamental aspect of the Massachusetts Office of the Veteran Advocate's (OVA) investigative, assessment, review, and oversight process, ensuring the protection of personal information and the privacy of those involved in any investigation, inspection, audit, or review.

Massachusetts law mandates strict confidentiality standards for the handling of personal information, including data related to veterans' health, benefits, and services in compliance with applicable privacy laws and regulations. These laws set stringent requirements for how personal information is collected, stored, and disclosed, and violations can result in legal penalties and damage to public trust.

The OVA is required to implement robust data security measures and protocols to prevent unauthorized access, modification, or disclosure of sensitive information. Only personnel with a direct role in the investigative process are granted access to such data, and the sharing of information is strictly limited to what is necessary to fulfill investigative or statutory purposes. Additionally, any third-party agency or entity involved must also adhere to these same confidentiality standards under Massachusetts General Laws and applicable federal statutes.

OVA further maintains internal guidelines to ensure that protected information, such as medical records, financial data, and sensitive case details, is anonymized whenever possible and that redactions are applied to reports before public dissemination. This means that information shared in reports is curated to protect the identities and personal circumstances of individuals unless disclosure is mandated by law.

The OVA's commitment to these practices not only upholds legal obligations but also fosters a safe environment where veterans and their families can report concerns without fear of exposure or retaliation. This approach helps build trust and encourages transparency, which are essential to the success of OVA's mission in serving and advocating for veterans. Moreover, maintaining confidentiality is a cornerstone of ensuring the integrity and credibility of the investigative process, protecting the rights of both veterans and employees involved.

The OVA attempts to limit the release of confidential information, and many protected details are not included in this report.

This report may reference appendices; these appendices may or may not be released with the report due to the nature of the incident, type of information contained in the appendix, due to privacy concerns, or due to applicable laws or regulations.

LEAD INVESTIGATOR

The Massachusetts Office of the Veteran Advocate, Veterans Safety Advisor, Nathan A. Dufault is a certified Massachusetts Emergency Medical Technician and a Pro-Board Certified Firefighter I/II with over 17 years of fire and EMS experience working in a variety of urban, suburban, and rural communities. He is also credentialed as a Fire Prevention Officer, and a Public Fire & Life Safety Educator, along with holding numerous other Fire, EMS, and public safety related certificates, certifications, and credentials.

Dufault is a graduate of the Federal Law Enforcement Training Center in Glynco, GA, and the Veterans Affairs Law Enforcement Training Center in Little Rock, AR. He is also a Certified Professional Criminal Investigator (CPCI), a Certified Cyber Intelligence Investigator (CCII), and POST Certified Police Officer with over 12 years of law enforcement and investigative experience at the private, state, and federal level, conducting criminal, administrative, death, and personnel investigations.

Dufault obtained a Bachelor of Science in Criminal Justice from Roger Williams University and holds a certificate in Death Investigations from Texas A&M University through the Texas Forensic Science Academy.

Dufault is currently finishing a graduate program at the University of New Haven to obtain his Master of Science in Emergency Management & Public Health and is also currently enrolled at the University of Massachusetts – Lowell obtaining a Graduate Certificate in Forensic Criminology.

As the Veteran Safety Advisor, his role is grounded in the statutory authority of M.G.L. c. 115B and guided by the framework of 123 CMR 2.00. This position involves conducting thorough investigations into individual incidents and systemic issues affecting veterans under the care of, or receiving services from, the Commonwealth. By evaluating compliance with policies, regulations, and best practices, the Veterans Safety Advisor identifies critical gaps and recommends corrective actions to safeguard the health, welfare, and safety of veterans. This role emphasizes both responsive and proactive approaches, addressing immediate concerns while examining systemic patterns to drive long-term improvements.

The Veterans Safety Advisor's efforts support the OVA's mission to ensure veterans are treated with dignity and receive compassionate, timely, and effective services, fostering systemic accountability and enhancing overall care standards.

EXECUTIVE SUMMARY

The Massachusetts Office of the Veteran Advocate (OVA) conducted an investigation following a referral from the United States Department of Veterans Affairs Office of the Inspector General (VAOIG). This examination of information focused on potential conflicts of interest and employment violations involving a municipal veterans' services employee who simultaneously held a federal position at the Veterans Affairs Regional Office (VARO) in Boston. Concerns were raised regarding whether this dual employment violated any federal or state laws, regulations, or ethical guidelines, particularly as the individual had been on approved sick leave from their municipal role during their tenure at VARO Boston. The OVA coordinated with multiple agencies, including the Massachusetts Office of the Inspector General (MA OIG) and the Executive Office of Veterans Services (EOVS), to assess the circumstances surrounding the case.

The investigation confirmed that the individual had been employed at VARO Boston for a short period while also listed as an active municipal employee on approved sick leave. The municipal employer terminated the individual for violations related to misrepresentation of sick leave. No evidence was found to indicate that the individual used their federal position to influence veteran-related decisions or improperly leverage their dual roles. However, the case highlighted the importance of employment disclosure requirements, oversight of municipal sick leave policies, and the potential for conflicts of interest in veteran services.

As a result of these findings, the OVA recommends that municipalities review their policies regarding dual employment disclosures, enhance verification procedures for leave requests, and implement public accountability measures to reinforce trust in veteran service agencies. Establishing a standardized reporting mechanism for secondary employment and ensuring that municipal employees, specifically veterans service agents, are current on their required ethics training could help prevent similar incidents in the future.

INTRODUCTION

On October 7, 2024, the Criminal Investigations Division of the United States Department of Veterans Affairs – Office of the Inspector General (VAOIG) requested assistance from the Massachusetts Office of the Veteran Advocate (OVA) – Investigations Division, with a case that involved a “State Employee” and possible employee misconduct.

The allegation was that a Commonwealth of Massachusetts employee, a Veterans Services Officer, (also known as Veterans Services Agent) was also working full time at the VARO Boston as a Veterans Service Representative (VSR). The question raised by VARO Boston staff to VAOIG, was if the employee had broken any Federal or State Laws, Rules, or Regulations. The secondary concern was whether the employee would be able to use either their state position or their federal position to influence the casework of the other, and if it would affect Veterans “in their care”.

VETERANS AFFAIRS REGIONAL OFFICE - BOSTON

The Boston Veterans Affairs Regional Office (VARO Boston) is a critical hub in the Department of Veterans Affairs system, serving veterans, service members, and their families throughout Massachusetts and the New England region. This office is primarily responsible for administering a wide range of VA benefits, including disability compensation, pensions, education and training assistance through programs such as the post-9/11 GI Bill, and vocational rehabilitation and employment services. VARO Boston also supports veterans with housing needs by facilitating access to VA-guaranteed home loans and provides survivor benefits to eligible family members.

In addition to benefits administration, VARO Boston offers comprehensive outreach programs to educate veterans about their entitlements and ensure they have access to the resources they need. The office works collaboratively with state and local agencies, veterans service organizations, and community groups to enhance service delivery and address the unique needs of veterans. As part of its commitment to transparency and efficiency, VARO Boston continually strives to improve its claims processing times and customer service, ensuring veterans receive the benefits and support they have earned in a timely and dignified manner.

VETERANS AFFAIRS OFFICE OF THE INSPECTOR GENERAL

The Department of Veterans Affairs Office of Inspector General² (VA OIG) is an independent oversight entity tasked with ensuring accountability and enhancing the efficiency of the Department of Veterans Affairs (VA) in delivering care and benefits to veterans, their families, and beneficiaries. The VA OIG works to prevent and detect fraud, waste, and abuse within VA programs and operations through rigorous audits, investigations, inspections, and reviews. By identifying systemic issues and

² <https://www.va.gov/oig>

recommending actionable solutions, the VA OIG helps safeguard the integrity and effectiveness of the VA's mission.

A critical division within the VA OIG is the Office of Investigations, which includes the Criminal Investigations Division (CID). This division focuses on investigating criminal activities involving VA programs, personnel, contractors, and beneficiaries. In addition to working to protect taxpayer resources, the CID collaborates with federal, state, and local agencies. The CID plays a vital role in protecting the resources and reputation of the VA and ensuring the wellbeing of veterans.

VETERANS SERVICE REPRESENTATIVE

A Veterans Service Representative (VSR) for the Veterans Benefits Administration (VBA) plays a pivotal role in connecting veterans, service members, and their families with the benefits they have earned. As the frontline professionals within the VBA, VSRs are responsible for managing claims for a wide range of benefits, including disability compensation, pensions, education, and housing assistance. Their work involves reviewing claims, gathering and analyzing evidence, and applying federal laws and regulations to make accurate decisions about benefits eligibility. VSRs serve as advocates for veterans, ensuring that claims are processed efficiently and fairly while maintaining high standards of customer service. By providing clear communication, support, and guidance throughout the claims process, VSRs help to uphold the VBA's mission of delivering timely and comprehensive assistance to the veteran community.

VETERANS SERVICES AGENT

A Veterans' Agent, also known as a Veterans Services Officer (VSO) in Massachusetts, is a municipal official dedicated to assisting veterans and their families in accessing the benefits and services they are entitled to under state and federal law. Operating within the framework of Massachusetts General Laws Chapter 115, Veterans' Agents provide guidance on a range of programs, including financial assistance for eligible veterans, housing support, medical care, education benefits, and burial services. They serve as advocates, navigating the complexities of the benefits system and ensuring veterans receive the support they deserve. Veterans' Agents also work closely with the Massachusetts Executive Office of Veterans' Services (EOVS), local government agencies, and veterans' organizations to address the unique needs of the veteran community. Their role is rooted in compassion and dedication, aimed at enhancing the quality of life and dignity of those who have served.

MASSACHUSETTS EXECUTIVE OFFICE OF VETERANS SERVICES

The Massachusetts Executive Office of Veterans' Services (EOVS) is the state agency dedicated to supporting veterans, service members, and their families across the Commonwealth. Guided by a commitment to honor the service and sacrifice of those who have served, EOVS oversees a comprehensive array of programs and benefits designed to enhance their quality of life. These include select elements of financial assistance, housing support, employment services, education benefits, and access to healthcare. EOVS also administers the Chapter 115 benefits program, which provides direct financial aid to eligible veterans and their dependents. Through partnerships with municipal Veterans' Services Officers (VSOs), state agencies, and nonprofit organizations, EOVS ensures delivery of timely, equitable, and impactful services. In addition, the office plays a vital role in advocacy and outreach, fostering community engagement and developing initiatives to address the evolving needs of the veteran population in Massachusetts.

██████████ VETERANS DISTRICT

The ██████████ Veterans District³ (██████ VD) works independently and in accordance with state laws and regulations to administer benefits from the Massachusetts Department of Veterans Services and the U.S. Veterans Administration to eligible Veterans and their dependents. The ████████ VD includes the five municipalities of ██████████ ██████████, ██████████, ██████████ and ██████████.

This work is performed by the Veterans Service Officer (VSO) under the guidance of the Commissioner of Veterans Services. The VSO assists Veterans by assessing eligibility for benefits, identifying federal, state and local Veterans programs, and providing referrals for employment, training, housing and medical care.

Specific functions include:

- Providing benefit programs to eligible Veterans and their families who are in need.
- Storing discharge information and service records to be used when needed.
- Serving as the contact person for U.S. Department of Veterans Affairs matters including pension claims, compensation for service-connected disabilities, educational benefits, burial benefits, headstones and markers.
- Assisting widows in obtaining Veterans' insurance benefits.

AUTHORITY

Pursuant to Mass. Gen. Laws Ch. 115B sec. 2(ii), (iii), (iv), (v) and (ix), the Veteran Advocate determined this office had jurisdiction to investigate this issue further.

³ <https://██████████.gov/1262/Veterans-Services>

OVA INVOLVEMENT

INITIAL FACT FINDING

The United States Department of Veterans Affairs – Office of the Inspector General informed the OVA that the party in question [REDACTED] had been identified by “the state veterans’ services representative” [REDACTED] (the “reporting party”). VAOIG reported that the reporting party encountered the party in question, a VARO Boston employee, while conducting “her VARO Boston duties and recognized her as a state employee”. VAOIG stated that the reporting party had spoken to VARO Boston staff and identified [REDACTED] to them.

VAOIG stated that the management staff at VARO Boston had reported the identification of the VARO Boston Employee to VAOIG because they were not sure if the VARO Boston Employee had broken any federal or state laws, rules, or regulations. They were also concerned that the employee may be able to use either their state position, or their federal position to influence their other casework, and if it could affect Veterans “in their care”.

VAOIG informed OVA Investigators that upon their initial intake & investigation the VARO Boston employee had not broken any federal laws or regulations, and that was the reason they were referring the case to the OVA.

Upon referral from VA OIG, OVA Investigators reached out the VARO Boston management staff. They advised the OVA that the party in question had resigned from VARO Boston immediately after being identified on August 26, 2024. It was reported that she had only been an employee of VARO Boston for approximately three weeks. Her dates of actual employment for the Veterans Benefits Administration (VARO Boston) were 08/05/2024 – 09/06/2024, (approximately four weeks) during which she was primarily engaged in training.

OVA Investigators were unable to locate any employees of the Commonwealth that matched the party in question’s information as identified by VAOIG through any Commonwealth employee, payroll, or communication systems. Upon further investigation, the party in question was identified as the Director of Veterans Services for the [REDACTED] Veterans District ([REDACTED] VD) and was on the payroll as an employee for the Town of [REDACTED]. This was confirmed by the Director of Human Resources for the Town of [REDACTED].

MUNICIPAL EMPLOYMENT

The party in question was employed by the Town of [REDACTED] as the Director of Veterans Services for the [REDACTED] Veterans District. The Town of [REDACTED] pays for all costs associated with the [REDACTED] Veterans District, who then bills the other district towns for the services.

The party in question was employed by the Town of [REDACTED] as the Director of Veterans Services, from 02/08/2016 until her termination on 09/24/2024 for [REDACTED] human resources policy violations. The Town of [REDACTED] Human Resources provided information that the Director of Veterans Services had been on approved “sick leave” under the Family and Medical Leave Act from 08/12/2024 until 11/03/2024. The party was terminated prior to the completion of their requested “sick leave”. Therefore, the party in question was not on approved sick leave from [REDACTED] VD between August 5, 2024 and August 12, 2024 and during that time she was employed in a full-time status at the VARO Boston.

The human resources director stated that the provided sick leave documentation stated, “fully incapacitated and unable to work”, and the termination was completed under the Town of [REDACTED] Sick Leave Policy “False and fraudulent claims for sick leave allowance or approval of sick pay for other than absence due to personal illness or illness covered under the Family Medical Leave Act are grounds for disciplinary action, including discharge.”

COMMUNICATION WITH EOVS

OVA Investigators contacted the Reporting Party, an EOVS employee, to follow up, and provide additional relevant information, on his report to VARO Boston staff regarding the VARO Boston Employee being identified as a “Massachusetts state employee”. The Reporting Party stated that he observed the person in question at the Boston VARO while he was there dropping off a claim to the Contact Office, and that she was working behind the desk. He stated that he knew her as a “local VSO in the community”. He also clarified that “She is not an employee of the Commonwealth of MA.”

MASSACHUSETTS INSPECTOR GENERAL

OVA Investigators conferred with Investigative Staff from the Massachusetts Office of the Inspector General to discuss the circumstances surrounding the Veterans Services Director’s simultaneous employment with both a municipality of the Commonwealth, and the Veterans Benefits Administration (VARO Boston).

Upon discussion the Massachusetts OIG declined further investigation or case intake of the referral because she was no longer employed by either agency.

CONCLUSION

Due to the short tenure of the employee at VARO Boston, and the fact that they were still “in training”, it is not believed that the individual could have used their federal position to influence any decisions related to veterans who they had interacted with, or provided services to, as a Veterans Service Agent for the [REDACTED] Veterans District. This was further enforced by the information gathered from the Town of [REDACTED] Human Resources Department stating that the employee had been on “sick leave” and not performing their duties as the Veterans Services Agent or Director of Veterans Services for many weeks, at the time of her simultaneous employment with the VARO.

OVA Investigators would like to recognize the quick response of the Town of [REDACTED] in resolving the conflict of interest that arose from the party in question’s misrepresentation of medical leave, and subsequent secondary employment. OVA Investigators also appreciate the cooperation of the Criminal Investigations Division of the VA OIG, the Town of [REDACTED] Department of Human Resources, and VARO Boston management staff. The OVA would especially like to commend the EOVS employee who recognized the conflict and provided their assistance during this investigation.

FINDINGS

FINDING 1:

Potential Conflict of Interest: Massachusetts General Law prohibits municipal employees from accepting additional paid employment if the responsibilities of the second job are incompatible with their municipal duties. In this case, while the party in question was employed by a municipality as the Director of Veterans Services, she simultaneously held a position at the Veterans Affairs Regional Office (VARO) in Boston. Although she was on approved Family and Medical Leave Act (FMLA) sick leave from her municipal role during a large portion of her federal employment, this dual full-time employment could present a conflict of interest, especially if the duties of both positions were incompatible or if one role could influence the other.

FINDING 2:

Alleged Misrepresentation of Sick Leave: While on approved FMLA sick leave from a municipality, during which the employee provided documentation that she was "fully incapacitated and unable to work," she commenced employment at VARO Boston. This action suggests a misrepresentation of her medical condition to her municipal employer, which is inconsistent with allowable purposes for leave. As a result of this misrepresentation of sick leave, the municipality's Human Resources Department terminated her for violations related to their established sick leave policies.

FINDING 3:

Risk of Erosion of Public Trust: Cases involving misrepresentation of sick leave, undisclosed dual employment, and conflicts of interest in veteran services could undermine public trust in municipal and veterans' services offices. The perception that public employees may improperly benefit from dual roles could harm confidence in municipal and state veteran services, potentially discouraging veterans from seeking assistance or benefits. Public trust is critical for the effective operation of veteran service programs, and even the appearance of ethical concerns can damage institutional credibility, making transparency and accountability essential in maintaining the integrity of these programs.

FINDING 4:

Inadequate Continuity of Operations for Veteran Services: The extended absence of the Veterans Services Director from the Veterans District left the veterans of the municipalities without an identifiable or accessible, Veterans Services Agent (VSA), as no alternative point of contact was publicly identified to ensure continued service delivery. This was evidenced by no out-of-office message, or email forwarding to a different employee. Also, some of the municipalities participating in the Veterans District failed to update the district point of contact on their respective websites. The lack of a publicly available alternative point of contact may have impacted the ability of veterans and their families to access essential benefits and support. Additionally, reliance on a

single individual to manage veteran services without a documented succession plan or alternative support structure presents a systemic risk to service continuity.

RECOMMENDATIONS

RECOMMENDATION 1:

Policy Review and Training: Municipalities should conduct comprehensive reviews of their policies regarding outside employment and sick leave to ensure clarity, understanding, and compliance with state laws. It is advisable to ensure municipal employees are current on their annual training on the conflict of interest law, which addresses issues related to multiple job holdings and financial interests.

RECOMMENDATION 2:

Enhanced Monitoring and Reporting Mechanisms: To detect and prevent potential abuse of sick leave, municipalities should regularly evaluate their monitoring mechanisms. This should include requiring detailed medical documentation for extended leave periods and implementing a system for reporting and investigating suspected fraud, as occurred here. Employees should be informed about the consequences of fraudulent activities, including disciplinary actions and potential legal ramifications. Additionally, municipalities should provide clear guidelines on reporting suspected fraud to the appropriate authorities.

RECOMMENDATION 3:

Strengthening Public Accountability and Transparency Measures: To address concerns over public trust, municipal veteran service agencies should implement regular public reporting mechanisms detailing employment practices, conflict of interest disclosures, and compliance audits. Additionally, conducting public forums to engage with the veteran community and gather feedback on service delivery can foster trust and ensure that services align with veterans' needs and expectations. Municipalities should also consider developing an anonymous reporting system for community members to raise concerns about ethical practices, ensuring that potential conflicts of interest are promptly addressed and resolved.

RECOMMENDATION 4:

Developing a Continuity of Operations Plan (COOP) for Veteran Services: To prevent disruptions in veteran services due to prolonged staff absences, municipalities and Veterans Services Districts should establish and publicize a Continuity of Operations Plans (COOP) that ensures uninterrupted access to benefits and support. This plan should publicly designate backup personnel, formalize inter-agency agreements with neighboring municipalities, the Massachusetts Executive Office of Veterans' Services (EOVS), or the Massachusetts Office of the Veteran Advocate for temporary coverage, and implement a public notification system directing veterans to alternate points of contact. Timely and accurate information posted on websites and in other media is also a key component to a COOP.

RECOMMENDATION 5:

Utilize this report as a case study to educate municipal veterans services agents: The findings and recommendations presented herein may help veterans' services agents (VSAs), municipalities, and veterans services districts to understand and address any potential conflicts of interest due to overlapping and incompatible dual employment. By leveraging this report as an educational resource, municipalities may enhance their ability to navigate similar challenges in the future, ensuring informed decision-making, timely action, and improved advocacy for veterans. Additionally, incorporating these insights into training programs can strengthen policies and practices, ultimately preventing similar situations from occurring.