

OFFICE OF THE VETERAN ADVOCATE

“Understanding Massachusetts’ Municipal Veterans Service Officer”

Fiscal Year 2025



November 2025

The Commonwealth of Massachusetts
Robert Notch, Veteran Advocate

CHAPTER 115B, Section 2: There shall be an office of the veteran advocate, which shall be independent of any supervision or control by any executive agency. The office shall:

- (i) ensure that veterans in the care of the commonwealth or receiving services under the supervision of an executive 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;
- (ii) ensure that veterans in the care of the commonwealth or receiving services under the supervision of an executive agency in any public or private facility receive timely, safe, and effective services;
- (iii) aid and coordinate with local veterans' service officers to ensure veterans receive all available state and federal benefits;
- (iv) examine, on a system-wide basis, the care and services that executive agencies provide veterans;
- (v) advise the public and those at the highest levels of state government about how the commonwealth may improve its services to and for veterans and their families;
- (vi) develop internal procedures appropriate for the effective performance of the office's duties;
- (vii) act as a liaison to all state agencies providing services to veterans to ensure each veteran receives necessary services and care;
- (viii) assist in developing procedures for the executive agencies to best serve the veteran community;
- (ix) act as a liaison to the United States Department of Veterans Affairs and all other relevant federal agencies to advocate on behalf of the veterans of the commonwealth; and
- (x) investigate incidents where a veteran suffered a fatality, near fatality or serious bodily or emotional injury while receiving services from an executive agency, or circumstances which result in a reasonable belief that an executive agency or a constituent agency failed in its duty to care for a veteran and, as a result, the veteran was at imminent risk of, or suffered serious bodily or emotional injury or death.
- (xi) report annually to the governor, the senate president, the speaker of the house of representatives, the senate and the house committees on ways and means, and the joint committee on veterans and federal affairs on the activities of the office, including, but not limited to,
 - a) an analysis of the delivery of services to veterans and recommendations for changes in agency procedures which would enable the commonwealth to better provide services to and for veterans and their families and
 - b) priorities for implementation of those changes to services.

CHAPTER 115B, Section 4: ... The report shall be made public on the website of the veteran advocate.

Table of Contents

EXECUTIVE SUMMARY	i
PREFACE.....	iii
INTRODUCTION	1
A Select History of 250+ Years	1
The Massachusetts Veteran Service Officers	2
Officer Appointments	3
Officer Certification and Accreditation Training	4
EOVS Certification	4
Federal VA Accreditation	6
Job Responsibilities and Scope of Work	9
Chapter 115 Financial Aid Applications.....	10
U.S. Department of Veterans Affairs	12
Additional Job Responsibilities.....	16
Compensation & Opportunity.....	18
The Veteran Service Officers’ Work Environments	18
Single Municipalities - 141	18
Contiguous Municipalities (“Clusters”) – 13	18
Veteran Service Districts - 31	20
A Systemic Overview.....	23
Hours of Operation	24
Location	26
Quantifiable Elements	27
CONCLUSION	29

Appendices

Appendix A

A-1 – Social Security Disability Application

A-2 – Supplemental Nutrition Assistance Program (SNAP)

A-3 – Common Housing Application for Massachusetts Programs (CHAMP)

A-4 – Transitional Aid to Families with Dependent Children (TAFDC)

A-5 – Emergency Aid to the Elderly, Disabled, and Children (EAEDC)

Appendix B – VA Form 21

Appendix C – EOVS VS1 Document

Appendix D – VA Service-Connected Disability Compensation Claims Application

Appendix E – A Guide for Establishing Veterans’ Service Districts Under Chapter 115

Appendix F – Veteran Service Districts Map Legend

Appendix G – Taxpayer’s Guide to Local Property Tax Exemptions – Veterans



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EXECUTIVE SUMMARY

Massachusetts has a uniquely strong and historic commitment to its veterans, rooted in more than 250 years of continuous support. Central to this system are the Commonwealth’s municipally based **Veterans’ Service Officers (VSOs)** — the frontline personnel responsible for connecting veterans and their families to essential state and federal benefits. Unlike most states, which begin support at the county or regional level, Massachusetts delivers this support locally through its 247 veteran service offices, serving 351 municipalities.

Key Items

1. A Historic System Facing Modern Demands

Massachusetts’ veteran support system dates to the colonial era and was formalized in statute beginning with the Soldiers’ Relief Act (1888) and Chapter 115 (1946). More than six generations of veterans have been served by municipal Veteran Service Officers. Over the past decade, legislation such as the VALOR Acts, BRAVE Act, and 2024 HERO Act have expanded veteran benefits — significantly increasing VSO responsibilities.

2. Flexible Local Capacity and Structure

- Cities must appoint a VSO, while towns may choose to appoint a VSO.
- VSOs may be full or part-time employees. Part-time VSOs may work as few as 10 hours per week.
- Towns may rely on “clusters” or districts to provide a level of support at reduced cost. This sharing of a VSO limits local availability to the veteran or family member.
- While nearly all communities have VSO access, vacancies, sometimes lasting a year or more, may leave veterans without timely support.

3. State Certification and Federal Accreditation

VSOs are required to obtain state certification within six months of appointment, including proficiency not only in Chapter 115 benefits but in related federal and state assistance programs.

Federal accreditation requires officers to work at least 1,000 hours annually, a requirement that many part-time VSOs may not meet. The Veteran Service Office’s ability to fully assist veterans relies on its VSO’s accreditation, which is necessary to handle

federal claims. Limited access to federal benefits may reduce federal revenue due to veterans and potentially increase reliance on the state-funded Chapter 115 program.

4. Complex and Expanding Workload

VSOs manage an extensive portfolio that includes:

- Determining eligibility and administering Chapter 115 financial assistance,
- Filing and managing federal disability and pension claims,
- Coordinating funding for healthcare, mental health, housing, and emergency assistance,
- Conducting burial and graves duties,
- Managing municipal budgets, records, and compliance,
- Conducting community outreach and advising local officials.

5. Administrative and Fiscal Pressures on Municipalities

Municipalities pay 100% of Chapter 115 benefits upfront and receive 75% reimbursement, typically issued quarterly for the prior year's costs. If a VSO is not state-certified, reimbursement drops to 50% until certification is obtained. Delays or errors in Chapter 115 applications can delay benefits to veterans and increase municipal financial exposure.

6. Workforce Challenges

Many VSOs report, and the OVA confirmed:

- High turnover,
- Widely disparate compensation,
- Limited career pathways, and
- Difficulty meeting the demands of increasingly complex benefit programs.

Conclusion

Massachusetts' commitment to veterans is historic and noteworthy, but the system supporting that commitment may be improved. This understanding of the municipal VSO system provides a foundation to examine where improvements can be made. The Office of the Veteran Advocate encourages stakeholders to gain an understanding of the laws, regulations, and policies that direct the work of VSOs. From there, we can all collaborate to develop recommendations and pathways for service improvements.

PREFACE

This document is produced as part of the effort to fulfill the Office of the Veteran Advocate's (OVA) statutory responsibilities under Massachusetts General Law Chapter 115B Section 2. The law outlines ten elements along with a requirement to report annually. A vital responsibility, and unique to Massachusetts, is the obligation to "aid and coordinate with veteran service officers to ensure that veterans receive all available state and federal benefits."¹ Additionally, OVA is statutorily responsible to "examine on a system-wide basis the care and services that executive agencies provide veterans." This document endeavors to advise legislators, appointed officials, and those who employ Veteran Service Officers (VSOs) in the Commonwealth of the current status of those officers and the work environments in which they operate.

Firmly believing in the value of Massachusetts' "local" VSOs, the OVA sought to gain a deeper understanding of the officers' community, laws, regulations, and policies that guide their work. The Office began by reviewing the Massachusetts General Laws (M.G.L. Ch. 115), the current Commonwealth of Massachusetts Regulations (108 C.M.R.), directives from the Executive Office of Veterans' Services, and other public resources. Additionally, the Office spoke with VSOs across the Commonwealth to collect and verify operational information. The OVA did not gather the individual municipality directives, policies, or training requirements that VSO employees must also follow.

We offer the following observations about Veteran Service Officers, who are the bedrock veteran support system unique to the Commonwealth: the role and challenges of the veteran service officers and the context in which they work.



The Office of the Veteran Advocate (OVA) was established following the tragic deaths of 77 veterans in the early months of the COVID-19 pandemic at the Holyoke Soldiers' Home in 2020.² In 2022, the Commonwealth of Massachusetts passed "An Act relative to the governance, structure, and care of veterans at the Commonwealth's veterans' homes," which introduced significant organizational and governance changes. This legislation led to the creation of the Office of the Veteran Advocate (OVA), an independent oversight office that is not subject to control or supervision by any executive office

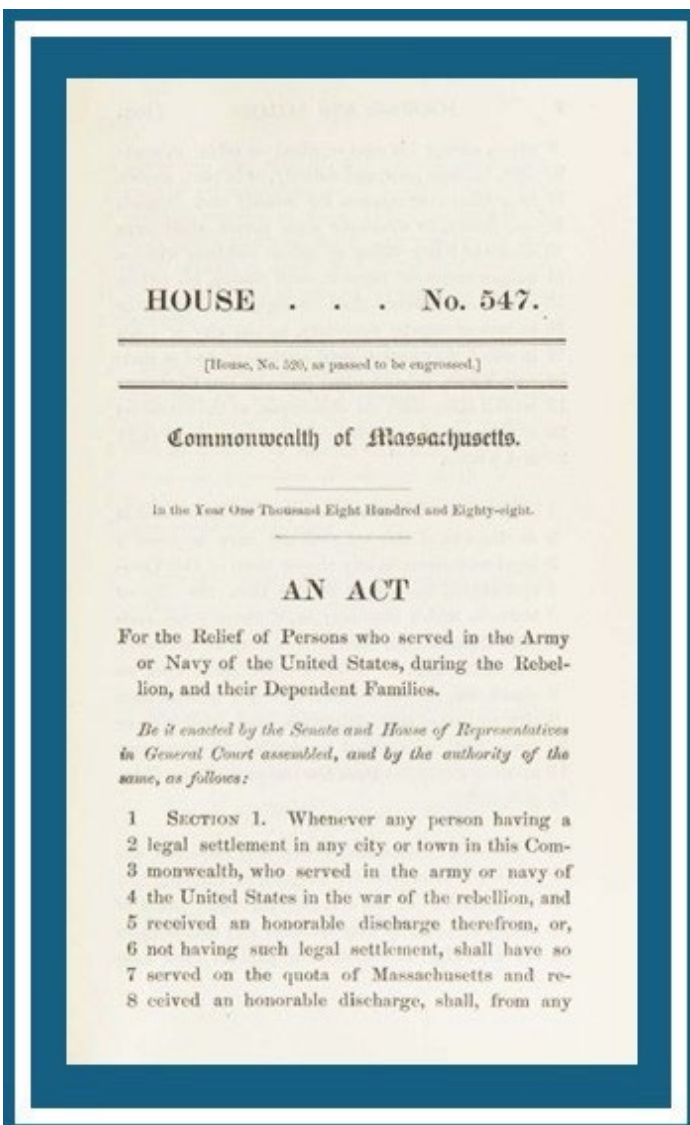
¹ M.G.L. Ch. 115B §2(iii)

INTRODUCTION

In Massachusetts, VSOs serve as the primary support link for veterans and their families within the Commonwealth. This role is based at the municipal level rather than being organized county-wide or regionally, as in other states. Supporting and serving veterans at the local level has been an essential part of Massachusetts' military support system since colonial times.

A Select History of 250+ Years

Massachusetts' veteran service and support began during the French and Indian War (1754-1763) in the Massachusetts Bay Colony. The Commonwealth maintained that tradition of



support after the Revolutionary War. From that initial commitment to its service members, the Commonwealth of Massachusetts ensured that no individual who served this state and nation with honor during periods of war or other conflicts would ever have to rely on public welfare for assistance.

In 1861, at the start of the Civil War, the Massachusetts legislature formalized aid to veterans by enacting Massachusetts General Law Chapter 115, which established the Department of Veterans' Services and the offices of Directors of Veterans Services, Burial Agents, and Graves Officers in every city and town.

The Soldiers' Relief Law (HB 547) was passed on May 29, 1888, by the 109th session of the Massachusetts General Court.³ At that time, cities and towns were authorized to raise and appropriate funds to fulfill this commitment, with their investment subject to case-by-case

³ M.G.L. Ch 438, [Acts and resolves passed by the General Court : Massachusetts : Free Download, Borrow, and Streaming : Internet Archive](#) last accessed 9/17/2025

review and approval by the Commonwealth. The expenses incurred for the veteran's and his family's benefit were to be reimbursed by the state treasury.

World War II led to the creation of the Office of the Commissioner of Veterans' Services in 1945.⁴ In 1946, Chapter 115 was reorganized to serve as the foundation for veterans' benefits and services.⁵ More recently, Massachusetts enacted the Veterans' Access, Livelihood, Opportunity and Resources (VALOR) Act I in 2012⁶, the Valor Act II in 2014⁷, and the Veterans Benefits, Rights, Appreciation, Validation and Enforcement (BRAVE) Act in 2018⁸, among others. In 2023, the Legislature elevated the Department of Veteran Services to the cabinet level, establishing it as the Executive Office of Veterans' Services (EOVS). At the same time, the Legislature created the Office of the Veteran Advocate, in part, to assist and coordinate with local VSOs, ensuring eligible veterans receive federal and state benefits, and to liaise with federal and state agencies to advocate for and support these veterans.

The Massachusetts Veteran Service Officers

Fortunately for veterans of the Commonwealth and their families, Massachusetts is distinguished by its network of municipally based VSOs that serve each community's veterans and their families. These dedicated providers and advocates have in-depth knowledge of the benefits and services available to veterans at the local, state, and federal levels. They offer direct access to benefits, referrals to support systems, and organize community-building events, acting as pillars of the Massachusetts veteran support system.

VSOs are all veterans, as required by law,⁹ employed on a full- or part-time basis by a single municipality, a group of municipalities we have labeled "Clusters," or a contiguous group of municipalities that includes a city, collectively forming a Veteran Service District. While the common understanding across the Commonwealth is that every municipality employs a VSO, this is not accurate. However, nearly every municipality has some form of VSO support, unless the municipality or district experiences a vacancy – sometimes lasting more than a year.

⁴Massachusetts State Library, 1946, House Bill 1874 accessed 9/15/2025.

⁵ Ibid.

⁶ "An Act Relative to Veterans' Access, Livelihood, Opportunity and Resources", Chapter 108 of the Acts of 2012.

⁷ "An Act Relative to Veterans' Allowances, Labor, Outreach and Recognition", Chapter 62 of the Acts of 2014.

⁸ "An Act Relative to Veterans' Benefits, Rights, Appreciation, Validation and Enforcement", Chapter 218 of the Acts of 2018.

⁹ M.G.L. Ch. 115 § 1

Officer Appointments

Massachusetts law outlines a municipality's responsibilities to its veteran residents based on whether it is a city or a town. Massachusetts' 50 cities, except for Boston, are required to appoint a VSO for a three-year renewable term.¹⁰ Towns, of which there are 301,¹¹ may choose to appoint a VSO, but are not legally obligated to do so.¹² The director, assistant, or deputy director of the department of veteran services is "appointed in a city by the mayor, with the approval of the city council, and in a town by the selectmen."¹³

Currently, 14 municipalities operate with city forms of government but, for historical reasons, continue to identify as towns: Agawam, Amherst, Barnstable, Braintree, Bridgewater, East Longmeadow, Franklin, North Attleborough, Palmer, Randolph, Southbridge, West Springfield, Weymouth, and Winthrop.¹⁴ This information is important because, according to M.G.L. Ch. 115 §10, Veteran Service Districts are limited by law to include only one city.¹⁵ This duality allows these 14 municipalities, which, for historic reasons, label themselves as towns, to join districts where another city is already present. Four of the municipalities are in districts containing at least one other city, with one of them in a district containing eight (8) other cities.

The community's population determines whether a municipality can have a part-time VSO or must have a full-time VSO. Regulations specify that municipalities with populations exceeding 12,000 must convert any part-time VSO position to full-time upon the departure of the current part-time incumbent. Due to some confusion in the community about the full-time versus part-time requirement, we provide the following specific text from 108 C.M.R.12.03:

Requirements of St. 1972, c. 471 for Full-time Veterans' Agents -

Notwithstanding any provision of the law to the contrary, any city or town having a population over 12,000 and having a part-time veterans' agent or part-time director or veterans' services shall, at the end of term of such agent or director, whether by resignation, retirement or otherwise, either join a veterans' service district in manner provided by M.G.L. c. 115 § 10, or appoint a full-time veterans'

¹⁰ M.G.L. Ch. 115 § 3

¹¹ Secretary of the Commonwealth of Massachusetts. (n.d.), "City and Town Governments," [City and Town Incorporation and Settlement Dates](#)

¹² M.G.L. Ch. 115 § 3

¹³ M.G.L. Ch. 115 § 10

¹⁴ *Historical Community Names*, Secretary of the Commonwealth of Massachusetts. <https://www.sec.state.ma.us/divisions/cis/historical/archaic-names.htm> Last accessed 9/15/2025

¹⁵ M.G.L. Ch. 115 § 10

agent or director of veterans' services. These provisions shall not apply to any city or town so long as the incumbent of the office of part-time veterans' agent or part-time director of veterans' services holds such office by reappointment.

There are currently no regulations establishing a minimum number of hours that a part-time officer must work. Some reported working as few as 10 hours per week, or 520 hours per year.

Although the duties of a Veteran's Officer are numerous and varied, in towns staffed by part-time VSOs, the town clerk may be responsible for accepting applications for Chapter 115 veterans' benefits, assisting applicants, and forwarding submissions to the Veteran Officer.¹⁶ While the town clerk's support assists with Chapter 115 benefits, it does not replace a VSO, who, according to both Massachusetts law and regulations, should advise and assist with obtaining federal veterans' benefits and is required to complete training for state certification. However, federal law restricts anyone other than an officer accredited by the U.S. Department of Veterans Affairs or the applicant from handling any part of the federal benefits application process.

Officer Certification and Accreditation Training

Both the Commonwealth and federal governments have specific, separate, and distinct training and testing requirements that must be met to administer their respective benefits. When these requirements are fulfilled, officers are "certified" by EOVS for state benefits and *may* also be "accredited" by the U.S. Department of Veterans Affairs to process federal disability benefits applications.

EOVS Certification

To administer Chapter 115 benefits, Massachusetts law requires VSOs to complete training and obtain certification from the Executive Office of Veterans Services within six months of their appointment. EOVS provides this training in person annually in October. VSOs unable to attend the October training and certification are offered online training and certification through the EOVS Learning Management System.



¹⁶ M.G.L. Ch. 115 § 3

By law, the content of the certification training is subject to approval by the MVSOA and the Massachusetts Municipal Association (MMA).¹⁷ According to Massachusetts regulations, the testing required to obtain EOVS certification necessary to administer Ch. 115 benefits includes:

veterans' benefits contained in M.G.L. Ch. 115, regulations contained in 108 C.M.R., and directives by the Secretary, as well as federal and local benefits, including employment, education, health care, including treatment for a substance use disorder, retirement and other veterans' benefits, and alternative resources, including those partially or wholly subsidized by the federal government, such as Medicaid, Supplemental Security Income and Social Security Disability benefits and federal pension and compensation entitlements.¹⁸

The applicant may be exempt from Part 2 of the EOVS certification exam, the contents of which are not detailed in the regulations, if they are a VA-accredited representative of a national service organization¹⁹ (e.g., American Legion, VFW, DAV, etc.).²⁰ Finally, after initial certification, VSOs must participate in annual training sessions and pass a recertification exam every three years.

¹⁷ M.G.L. Ch. 115 § 3B(a)

¹⁸ 108 C.M.R. 14.03(1)(a)

¹⁹ Recognized National Service Organization Exemption List:
<https://www.va.gov/ogc/apps/accreditation/accredvso.asp>

²⁰ 108 C.M.R. 14.03(1)(b)

Applicants who have not obtained VA accreditation are required to complete Part 2 of the exam. Finally, the Secretary reserves the right, if petitioned by the appointing authority, to exempt a VSO from taking the examination.²¹

Recognized National Service Organization Exemption List	
African American PTSD Association	National Association of County Veteran Service Officers
American Legion	National Law School Veterans Clinic Consortium
American Red Cross	National Montford Point Marine Association
American Veterans	National Veterans Legal Services Program
Armed Forces Services Corporation	National Veterans Organization of America
Army and Navy Union, USA	Navajo Nation Veterans Association
Blinded Veterans Association	Navy Mutual Aid Association
Catholic War Veterans of the USA	Paralyzed Veterans of America
Dale K. Graham Veterans Foundation	Polish Legion of American Veterans
Disabled American Veterans	Swords to Plowshares, Veterans Rights Organization
Fleet Reserve Association	The Retired Enlisted Association
Gold Star Wives of America, Inc	United Spanish War Veterans of the United States
Green Beret Foundation	United Spinal Association
Italian American War Veterans	Veterans of Foreign Wars
Jewish War Veterans	Veterans of the Vietnam War & the Veterans Coalition
Legion of Valor of the United States	Veterans of World War 1
Marine Corps League	Veterans' Voice of America
Military Officers Association of America	Vietnam Veterans of America
National Association of Black Veterans	Wounded Warrior Project

Eligibility for veterans to receive Chapter 115 assistance is conditioned upon applicants first exploring all other available financial aid options they qualify for before applying for Chapter 115. As a result, VSO certification requires a basic understanding not only of Chapter 115 benefits but also of other public assistance programs, including but not limited to Social Security, Supplemental Nutrition Assistance Program (SNAP), Common Housing Application for Massachusetts Programs (CHAMP), Transitional Assistance to Families with Dependent Children (TAFDC), and Emergency Assistance for the Elderly, Disabled, and Children (EAEDC). The application forms for each program are included in Appendices A-1 through A-5.



Federal VA Accreditation

Officer accreditation by the U.S. Department of Veterans Affairs is divided into three categories: Service Organization Representatives, Officers, and Attorneys. For this analysis, OVA examined only the U.S. Department of Veterans Affairs' requirements for accrediting service organization representatives, as applicable to the Commonwealth's VSOs. Federal regulations state that "a recognized organization ... file

²¹ M.G.L. Ch. 115 § 3B(a)

with the Office of the General Counsel, VA Form 21.” (Appendix B) Form 21 filed by the “recognized organization” certifies that the VSO (referred to as a VSO Representative by VA) meets the following criteria.

(1) Is of good character and reputation and has demonstrated an ability to represent claimants before the VA;

(2) Is either a member in good standing or a paid employee of such organization working for it not less than 1,000 hours annually; is accredited and functioning as a representative of another recognized organization; or, in the case of a county veterans' service officer or tribal veterans' service officer recommended by a recognized State organization, meets the following criteria:

(i) Is a paid employee of the county or tribal government working for it not less than 1,000 hours annually;

(ii) Has successfully completed a course of training and an examination which have been approved by the appropriate District Chief Counsel; and

(iii) Will receive either regular supervision and monitoring or annual training to assure continued qualification as a representative in the claim process; and

(3) Is not employed in any civil or military department or agency of the United States.²²

VA accredited representatives receive instruction on the essential requirements for a successful claim in accordance with Veterans Benefits Administration (VBA) claim processing procedures through TRIP. Detailed information about VA’s TRIP online course is available here: [Training, Responsibility, Involvement, and Preparation of Claims \(TRIP\) Training User Guidance and Requirements](https://www.knowva.ebenefits.va.gov/system/templates/selfservice/va_ssnew/help/customer/locale/en-US/portal/554400000001018/content/554400000070172/Section-B-Training-Responsibility-Involvement-and-Preparation-of-Claims-TRIP-Training-User-Guidance-and-Requirements#2).²³ Briefly, the course is “designed to help improve both our service to Veterans and the timeliness of claims processing through a nationwide partnership between VA and all accredited Veterans Service Officers (VSOs) and VA-accredited attorney representatives and claims officers.”²⁴

There are challenges posed by the current federal regulatory language, 38 CFR § 14.629, including the requirement that a prospective VSO representative be paid to work at least 1,000 hours annually – essentially no less than 20 hours per week. EOVS's efforts to expand

²² 38 CFR §14.629

²³ U.S. Dept. of Veterans Affairs, “Section B. Training, Responsibility, Involvement and Preparation of Claims (TRIP) Training User Guidance and Requirements”, https://www.knowva.ebenefits.va.gov/system/templates/selfservice/va_ssnew/help/customer/locale/en-US/portal/554400000001018/content/554400000070172/Section-B-Training-Responsibility-Involvement-and-Preparation-of-Claims-TRIP-Training-User-Guidance-and-Requirements#2, last updated May 2, 2025, last accessed 9/15/2025.

²⁴ Ibid.

the network of federally accredited VSOs are ongoing and valuable. However, some part-time officers, working as few as 10 hours per week, do not meet the requirements to become federally accredited VSOs. In these cases, municipalities may rely on additional support for veterans seeking federal VA benefits, provided by neighboring VSOs or National Service Officers who are members of the National Veteran Service Organizations listed on page 11, as well as by agents and attorneys fully accredited by the VA.

VA's accreditation process for Service Organization Representatives connects applicants who complete VA-approved training and testing with the organization that trains them and submits the VA Form 21 required by VA. As of August 2025, VA's Accreditation Search for VSO Representatives indicated that there are 209 accredited Service Organization Representatives in Massachusetts, many of whom are approved and accredited by multiple organizations. An analysis of listed email addresses indicates that there are:

- **171** accredited representatives with municipal email addresses,
- **12** accredited representatives with veteran service organization (VSO) email addresses from corresponding organizations,
- **6** with VA email addresses from varying Veteran Service Organizations, and
- **18** with no email addresses from varying Veteran Service Organizations.

According to the VA's Office of the General Counsel,²⁵ accredited officers can only submit completed veteran benefit applications through the organization or organizations with which they are accredited. Officers affiliated with more than one organization may submit veteran benefit applications through any one of those organizations. OVA found that several representatives on the list are no longer employed by or affiliated with the organizations they are aligned with, raising unanswered questions about the accuracy of changes in officers' status and the organizations reporting to VA.

²⁵ Telephone Conversation between K. Watson, OVA Staff, and M. Alphonso, Esq., VA OGC Staff, August 14, 2025.

ORGANIZATION	Count
American Legion (AL)	4
Disabled American Veterans (DAV)	7
Executive Office of Veteran Services (EOVS)	108
Fleet Reserve Association (FRA)	2
National Association of County Veteran Service Officers (NACVSO)	26
Paralyzed Veterans of America (PVA)	2
Veterans of Foreign Wars (VFW)	7
Vietnam Veterans of America (VVA) / Veterans Voice	13
VVA / NACVSO / Veterans Voice	1
DAV / EOVS / NACVSO	2
EOVS / NACVSO	34
EOVS / VVA / Veterans Voice	3
TOTAL - August 2025	209

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Job Responsibilities and Scope of Work

In general, Massachusetts VSOs are responsible for educating veterans on the services and benefits available to them, including both state and federal veterans' benefits. VSOs administer Massachusetts' Chapter 115 benefits, a means-tested, state-funded public assistance program for veterans and their dependents. VSOs are responsible for making eligibility determinations for Chapter 115 benefits, submitting applications to the Executive Office of Veterans Services (EOVS) for payment authorization, providing funds to eligible veterans or their dependents, assisting in seeking reimbursement for those funds from EOVS, and conducting interim recertifications to confirm continued eligibility.

In addition, VSOs must be familiar with the extensive list of federal veterans' benefits. If accredited by the VA, they are also responsible for helping veterans and their families apply for these benefits. VSOs also serve as graves officers, conduct community outreach, and plan community events.

Chapter 115 Financial Aid Applications

Eligibility Determination

To determine if a veteran or their dependents are eligible for Chapter 115 benefits, a VSO must collect numerous documents from an applicant. Massachusetts' financial assistance program states that only the amount necessary to provide the veteran or dependent with adequate relief or support will be paid.²⁶ Because Massachusetts law requires applicants to pursue all other available resources, applicants receiving benefits from other aid sources may receive reduced financial assistance or may be denied benefits altogether. Currently, VA Disability Compensation, Social Security, Massachusetts' Department of Transitional Assistance support, Housing and Urban Development - Veterans Affairs Supportive Housing (HUD-VASH), or other housing benefits, as well as Dependency and Indemnity Compensation (DIC) benefits for spouses may negatively impact Chapter 115 financial support.

Several pieces of legislation have been introduced in the 194th General Court (2025-2026) to exempt certain types of financial support from eligibility calculations. Currently, Chapter 115 financial benefits are available to veterans whose income is 200% or less of the HHS federal poverty level.²⁷ Note that this HHS federal poverty level dollar amount is not adjusted for the Massachusetts cost of living. In contrast, the Office of Management and Budget increases federal workers' pay by 32.58% to compensate for the high cost of living in Massachusetts.²⁸ Benefits are not paid to anyone who can support themselves or who receives income from any source that is sufficient for support before applying for Chapter 115 benefits.

To determine eligibility, all Veterans Service Officers must evaluate each applicant's needs and qualifications. Verification of eligibility may involve collecting documents that verify the applicant's:

- Name

²⁶ M.G.L. Ch. 115 § 5

²⁷ Income that is not considered in this calculation is SNAP benefits. Information retrieved from EOVS Desktop Budget Chart, July 1, 2023, to June 30, 2024. Update dated 05/23/2023.

²⁸ U.S. Office of Personnel Management, "Pay & Leave, Salary & Wages, Salary Table 2025 – BOS", <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/25Tables/html/BOS.aspx>, last accessed 9/15/2025.

- Residency
- Military service or relationship to an eligible veteran
- Dependents
- Income
- Assets and liabilities
- Employment status

Occasionally, helping a veteran or their dependents locate these documents can be a time-consuming task.

Application Process

All information is collected to complete the VS 1 form (Appendix C), the Commonwealth's official application for veteran financial assistance benefits.²⁹ All the information, including verbal and written communications, reports, and records provided by applicants to the VSO is considered confidential. Disclosure of this information is only authorized if:

- The disclosure is made for the benefit of the veteran
- The disclosure is reasonably necessary to assist the veteran
- Under a lawful order.³⁰

Once the VSO completes the application, it is submitted to an EOVS authorizer. The authorizer reviews the submission for completeness and certifies the appropriate support level based on the annual budget released by EOVS. The time it takes to determine the support level varies widely, from nearly immediate to over three months, depending on the completeness of the application upon submission (such as during the mid-year recertification period), the capacity of the EOVS, experience level, and competency of the authorizer, and the strength of the relationships between the VSO and the authorizer.

After receiving approval from EOVS, the local VSO is responsible for processing authorized payments to veterans and their families using the city or town budget. Some municipalities allow their VSO to issue payments before EOVS approval if the municipality agrees to accept the financial risk of disapproval. If the EOVS authorizer denies the application, the reimbursement will not be issued. Benefits are typically paid to veterans monthly, and VSOs currently disburse payments via check or direct deposit. Recipients must verify their financial

²⁹ Executive Office of Veterans' Services. (n.d.). VS 1 Document.

³⁰ M.G.L. Ch. 115 §33(f)

status twice a year and promptly inform their VSO of any changes in their economic or employment situation.

Disbursements and Reimbursements

Although the municipality initially pays 100% of all approved claims, it is reimbursed by the Executive Office of Veterans Services at 75% of the total approved expenses.³¹ While verification of benefits is currently prepared monthly, M.G.L. requires the Commonwealth to reimburse annually. EOVS is responsible for issuing reimbursement payments and currently issues payments quarterly for expenses incurred by the municipality in the same quarter of the prior calendar year. Legislation has been introduced since the 191st session of the General Court (2019-2020) to shorten reimbursement intervals, but it has not yet been passed. If a VSO makes a payment to a veteran who is later deemed ineligible, the municipality has two options: 1) cover the unreimbursed cost, or 2) seek repayment from the recipient. More detailed and municipality-specific information on Chapter 115 benefits and federal payouts is available on [OVA's Chapter 115 Tool](#).³²

Additionally, if a VSO does not meet the Commonwealth's VSO certification requirements, EOVS must reduce that municipality's reimbursement rate from 75 percent to 50 percent until the VSO certification requirements are met.³³ Any withheld reimbursements due to non-compliance with the VSO certification requirements are placed in a trust account and credited toward future reimbursements once compliance is achieved.

U.S. Department of Veterans Affairs

Benefits

As previously stated, VSOs are also responsible for assisting veterans with accessing federal veteran benefits from the U.S. Department of Veterans Affairs (VA). Benefits that the VA provides can vary based on a veteran's experiences in the military, including:

- if they were wounded
- if they have an honorable discharge,
- if they were active duty or part of the reserve component,

³¹ 108 C.M.R. 13.02(3)

³² Office of the Veteran Advocate, "Chapter 115 Tool", <https://bit.ly/4oj4yQn>, last accessed 9/16/2025. This Tool provides data on Ch. 115 claims by municipality, benefit type, and recipient type, distinguishing between approved and disapproved claims.

³³ M.G.L. Ch. 115 § 3B and M.G.L. Ch. 115 §6

- if they were deployed to a combat theater,
- if they were exposed to a harmful substance.

VA benefits also consider the veteran's financial situation, age, employment, and housing status. There are too many programs to list here that cover these areas. Here, we focus on the four most commonly accessed federal benefits. VSOs are expected to be knowledgeable about these and other VA programs and to help veterans in their communities apply for these benefits.

1. **Service-Connected Disability Benefits** - A veteran can apply or file a claim for what is called Service-Connected Disability Compensation. This benefit provides a monthly monetary payment. It is calculated based on a percentage rating assigned by the VA for enduring injuries, illnesses, or wounds incurred or worsened by the veteran's service. This is the most commonly used benefit by veterans. It is also the most complex and challenging benefit to apply for.
2. **VA Healthcare** - Veterans can access medical and mental health services through the VA. This is managed by a subgroup within the U.S. Department of Veterans Affairs, called the Veteran Health Administration (VHA). VA hospitals, Vet Centers, and Community Outpatient Clinics are the main locations where eligible veterans can apply for and receive healthcare.
3. **VA Education Benefits** - Education benefits are the third most popular veterans' benefit. The VA offers several programs to help veterans return to school or pursue additional vocational training. The most used of these is the Post 9/11 GI Bill program, which provides veterans with up to 48 months of fully paid education along with a monthly stipend.
4. Veterans can utilize a **VA-certified home loan**. This allows a veteran to purchase a home with a smaller down payment and no requirement for Private Mortgage Insurance (PMI).³⁴

In addition to the benefits listed above, the U.S. Department of Veterans Affairs provides the following benefits to eligible veterans.

³⁴ U. S. Dept. of Veterans Affairs, "2025-Federal-Benefits-for-Veterans-Dependents-and-Survivors," <https://department.va.gov/wp-content/uploads/2024/12/2025-Federal-Benefits-for-Veterans-Dependents-and-Survivors.pdf>

Additional VA Benefits⁴⁴	Description	Eligibility
Non-Service-Connected Pension	Income support for basic living expenses, long-term care, assisted living	Low-income veterans with wartime service
Housing Benefits*	housing search assistance, vouchers, adaptation assistance	Program specific criteria
Burial Benefits	Burial expense support, survivor benefits	Variable
Life Insurance	Veterans Affairs Life Insurance, Veterans' Group Life Insurance, Veterans' Mortgage Life Insurance	Program specific criteria
Veteran-owned Business Support	SBA's Veterans Business Outreach Centers, SBA's Veteran Small Business Certification, SBA loan programs for funding	51% ownership, program specific criteria

*** As well as the previously mentioned VA home loans**

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There is a great deal of complexity and nuance associated with these benefits and the other programs offered by the U.S. Department of Veterans Affairs. A VSO must learn about these systems, become adept at managing the bureaucracy, and develop contacts and processes to aid veterans in securing their federal benefits.

Application Process for Federal Disability Claims

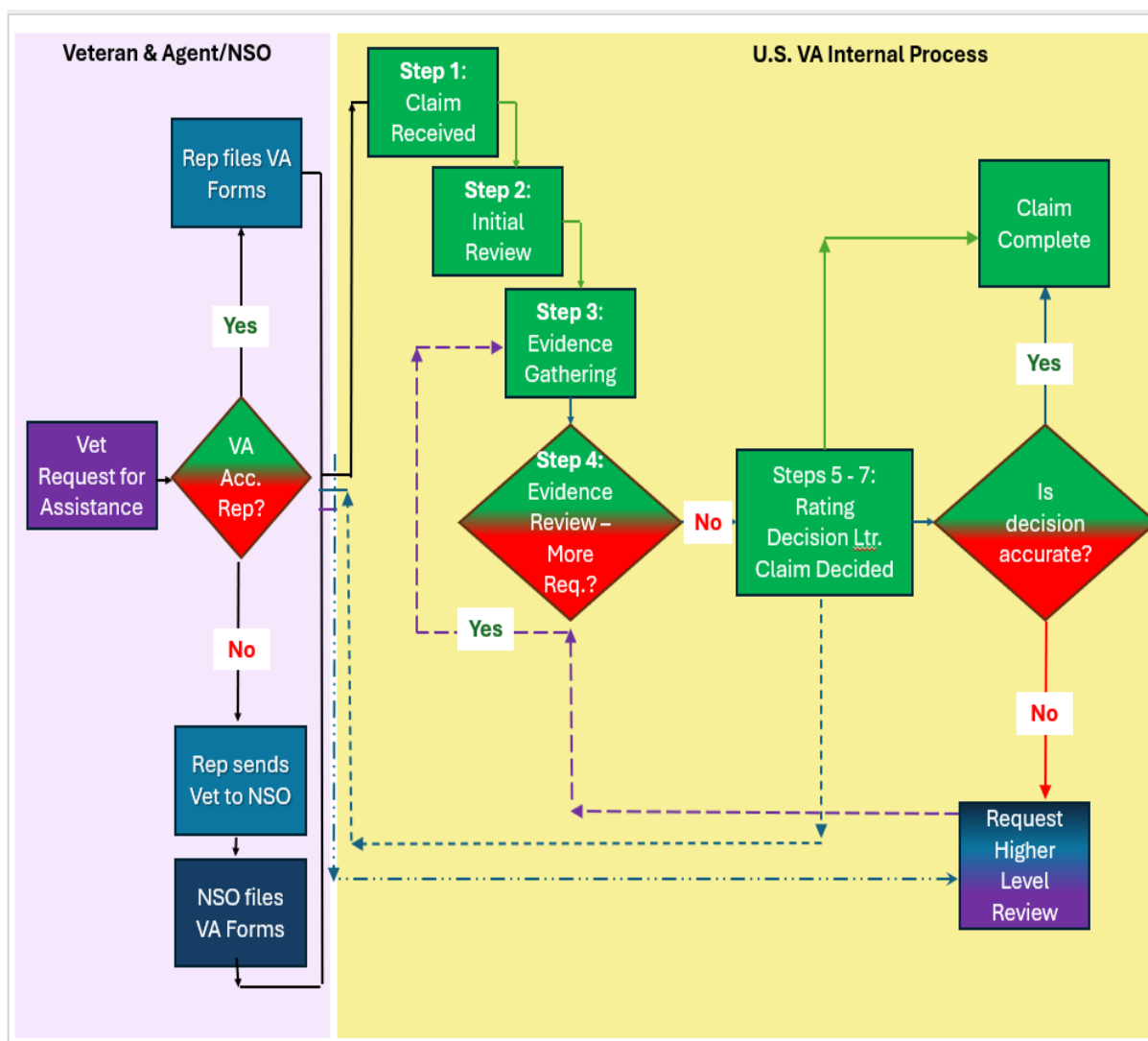
Only those accredited by the VA may assist veterans with their VA claims, including the packaging of the required supporting documents shared in Appendix D.³⁵

Documentation required to complete the federal application may include:

- DD214 – the document verifying military service and discharge status
- Service treatment records documenting any injuries, illnesses, or medical conditions

³⁵ U.S. Dept. of Veterans Affairs – Office of the General Counsel, “VA accredited representative FAQs”, <https://www.va.gov/resources/va-accredited-representative-faqs/>, last accessed 9/15/2025.

- Medical evidence, including medical records, doctors' reports, test results, and any other evidence supporting the disability claim
- Buddy or lay statements from individuals who can attest to the disability, its onset, severity, and how it impacts the veteran's life
- Compensation and Pension medical exam as required by VA
- Federal and state records, which may include Social Security Administration records, other relevant medical records, or personnel records from other federal or state sources
- Dependency records for spouses or children (if applicable)
- Other documentation if required to support a claim, including photos, videos, etc.



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Additional Job Responsibilities

In addition to helping veterans, their surviving spouses, and dependents file Chapter 115 claims and apply for federal benefits, the responsibilities of the VSO are diverse and require broad knowledge of benefits and services across various federal and state agencies. VSOs may also serve as a municipality's burial officer, graves officer, donated funds manager, and event planner to enhance outreach. Massachusetts regulations also mandate VSOs to maintain copies of current booklets and printed materials about veterans' legal rights.

Following the passage of the HERO Act, the updated regulations now require that behavioral health treatment plans eligible for reimbursement must be “reviewed by the recipient’s Veterans’ Service Officer.”³⁶ This requirement mandates that each municipal VSO collect all relevant documentation before forwarding it to an authorizer for approval of the mental and behavioral health benefit. This responsibility may present complex issues related to privacy and competency, requiring veteran officers to possess not only basic medical literacy but also the ability to interpret and assess mental health treatment plans — an area that may be outside their formal training or professional expertise.

Additionally, the 2024 passage of the HERO Act increased the VSO workload by adding new benefits, such as mental health and dental care, changing eligibility requirements, and raising tax credit incentives for employers.

In summary, a VSO is expected to:

- Obtain required state certification and attend ongoing training programs
- Acquire and maintain comprehensive knowledge of all federal, state, and local benefits
- Analyze financial documentation to determine eligibility for benefits and conduct required investigations, including:
 - Banking Statements
 - Paystubs
 - Electronic banking transactions
 - 401K and any other investment accounts
- Make appropriate referrals and assist with applications for:
 - U.S. Department of Veterans Affairs Compensation and Pension
 - Employment and Certifications
 - Tax Exemptions
 - Annuities and Bonuses

³⁶ 108 C.M.R. 10.22

- Burials
 - Rent
- Moving and transportation support
 - Utilities
 - Food Insecurity
 - Daily Living Expenses
 - Unemployment
 - Emergency Home Repairs
 - Catastrophe
- Serve as an employment counsellor and affect appropriate referrals
- Understand and interpret medical records, including behavioral health and dental documentation, to determine allowable reimbursements
- Maintain comprehensive case files and submit required reports
- Maintain the security and confidentiality of all personal and financial records
- Administer a local budget and submit annual financial reports to municipal leadership
- Respond to emergency needs such as housing insecurity, food assistance, or other urgent support
- Conduct outreach efforts within the local veteran community
- Advise local elected officials and advocate on behalf of veterans within the municipality.

Local duties directly linked to their roles as VSOs may also include:

- Planning Veteran Events
- Managing Staff
- Managing a donated funds account
- Publishing Reports
- Advertising
- Social Media Management

Finally, subject to the Secretary's approval, a municipality can assign non-veteran business to VSOs if they can handle veteran business during designated hours. While full-time VSOs are not permitted to hold any other full-time position within the municipality,³⁷ discussions during this analysis revealed that some VSOs serve in multiple roles in their municipality.

³⁷ 08 CMR 12.04(1)

Compensation & Opportunity

OVA has not collected officers or municipality-specific compensation data; however, full-time salaries are reportedly between \$40K and over \$100K annually. Full-time VSOs usually receive a municipal benefits package, while part-time VSOs may not. Currently, there is no defined “career path” and limited growth opportunities within the Officers community. Occasionally, there are opportunities for financial advancement if nearby municipalities offer higher pay. A VSO may sometimes find opportunities in EOVS, nonprofit organizations, or other state and federal agencies seeking veteran or subject matter expertise, such as in employment, counseling, or other benefits administration. While a more detailed analysis of the demands on VSOs would be beneficial, the broader officer community faces high turnover rates that occasionally leave positions vacant for extended periods. Additionally, as mentioned earlier, the time it takes for a newly appointed VSO to complete training, get certified, and adjust to the role often results in service delays and gaps.

The Veteran Service Officers’ Work Environments³⁸

The service communities where VSOs work range from a single municipality to a group of neighboring ones, and eventually to a group that includes a city, forming a Veteran Service District (VSD). Although VSOs serve 99 percent of the Commonwealth, the distribution of the 246 offices results in noticeable distance and accessibility issues in western and central Massachusetts.

Single Municipalities – 141

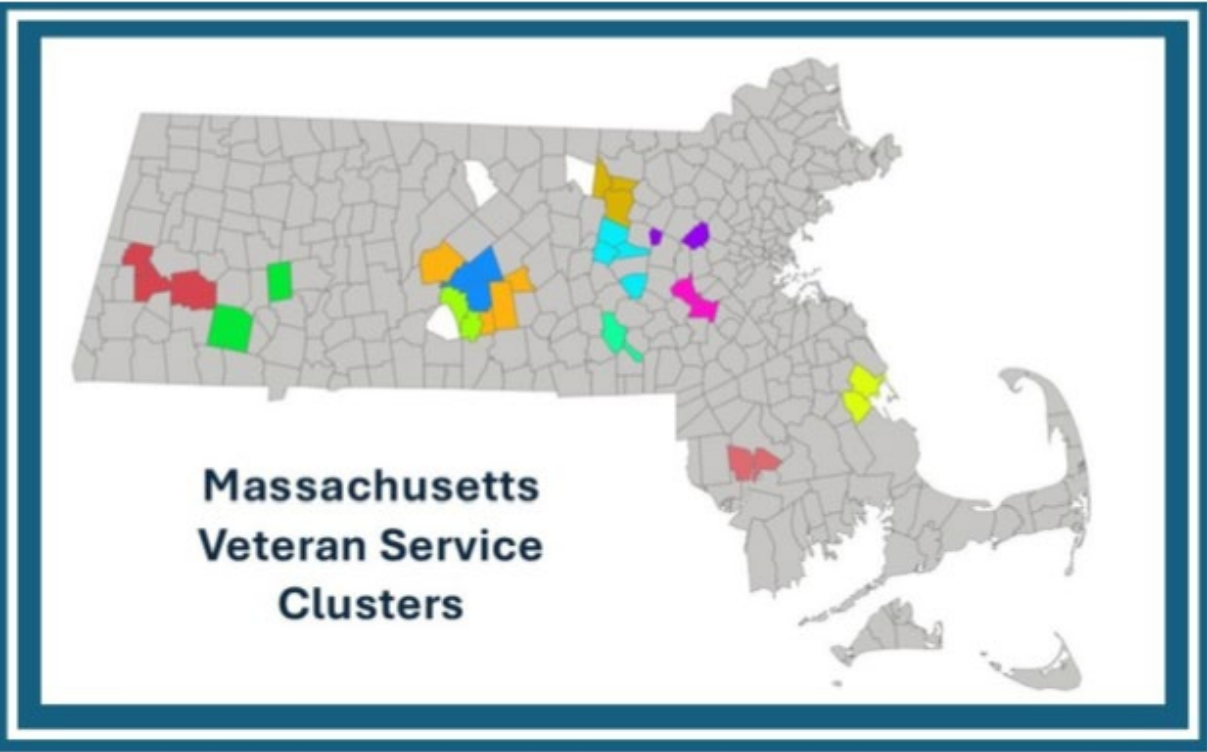
While the number of VSOs working in individual municipalities varies as municipalities form alliances or split from other groups, there are currently 141 single municipalities where the VSO is employed by only one municipality. That officer’s duties, performance, and pay are controlled solely by the municipality’s governing body.

Contiguous Municipalities (“Clusters”) – 13

Massachusetts lawmakers understand that some municipalities are either too small or lack sufficient financial resources to fully fund a VSO. As a result, Massachusetts law allows municipalities to work together by pooling their resources to jointly hire a VSO. Specifically, two or more neighboring towns can, through a vote by their boards of selectmen, appoint a

³⁸ The count and geographic location of Single Municipalities, Clusters, and Veteran Service Districts were accurate as of November 2024 based on a survey of veteran service officers’ information as listed on municipal websites.

shared VSO and agree to split the costs of compensation among themselves. To clarify, these entities that are neither single nor districts will be called “Clusters.”



map: E. Pawlak, OVA, map data: official municipal websites, created with Power BI

Color Code	Municipality	Population	Color Code	Municipality	Population
Cyan	Berlin, Massachusetts	3,158	Orange	Ayer, Massachusetts	8,479
	Bolton, Massachusetts	5,665		Harvard, Massachusetts	6,851
	Hudson, Massachusetts	20,092		Shirley, Massachusetts	7,431
	Southborough, Massachusetts	10,450	Green	Hopedale, Massachusetts	6,017
Red	Becket, Massachusetts	1,931		Upton, Massachusetts	8,000
	Lee, Massachusetts	5,788	Magenta	Dover, Massachusetts	5,923
	Lenox, Massachusetts	5,095		Natick, Massachusetts	37,006
Yellow	Brookfield, Massachusetts	3,439	Purple	Lincoln, Massachusetts	7,014
	West Brookfield, Massachusetts	3,833		Maynard, Massachusetts	10,748
Blue	New Braintree, Massachusetts	996	Pink	Berkley, Massachusetts	6,764
	North Brookfield, Massachusetts	4,735		Dighton, Massachusetts	8,101
	Oakham, Massachusetts	1,851	Light Yellow	Duxbury, Massachusetts	16,090
Light Green	Blandford, Massachusetts	1,215		Kingston, Massachusetts	13,708
	Westhampton, Massachusetts	1,622	Dark Orange	Hardwick, Massachusetts	2,667
White	Lunenburg, Massachusetts	11,782		Paxton, Massachusetts	5,004
	Templeton, Massachusetts	8,149		East Brookfield, Massachusetts	2,224
	Warren, Massachusetts	4,975		Spencer, Massachusetts	11,992

image: K. Watson, OVA, source: U.S. Census Bureau, [City and Town Population Totals: 2020-2024](#), created with Excel

Current laws and regulations do not limit the number of contiguous towns that can form a shared relationship—heretofore referred to as a “Cluster”—although they require the towns to be “adjoining” or “contiguous.” Of the thirteen municipal groups currently sharing a VSO, six Clusters include more than two towns, and nine towns do not share a physical border with the rest of their Cluster. The regulations also specify that a city seeking shared services can only be included in a district that contains no other city; however, this restriction is not always enforced. While the managing authority, or employer of record, for a single-municipality VSO is the town council or board of selectmen, the governing authority for a shared VSO is determined by an agreement among the contiguous towns.

Veteran Service Districts – 31

Unlike both the single and “cluster” municipality models, Veteran Service Districts are under the “general direction of the secretary, and they shall be physically located independently of, and separate and apart from, any other public or private agency, board, bureau, social agency, or society except a department or agency disbursing aid or relief or veterans’ ‘benefits’”.³⁹

In April 2011, the Secretary of the Department of Veterans’ Services (then part of the Executive Office of Health and Human Services) issued a directive titled “A Guide for Establishing Veterans’ Service Districts Under Chapter 115” (Appendix E). The Guide was developed through studies conducted by the Department of Veterans Services and the Massachusetts Municipal Association’s Massachusetts Regionalization Advisory Commission.⁴⁰ This directive provides guidance and clarity to municipalities on creating districts, along with expanded information regarding Chapter 115 and 108 C.M.R.

Although municipalities can vote to create a district, they must first obtain approval from the Secretary of Veterans’ Services or their designee to be officially recognized as a Veteran Service District.⁴¹

The approval request, outlined in 108 C.M.R. Section 12.02, requires:

- Names of each municipality seeking to form a district
- Population of each municipality
- Job titles of each person to be employed
- Location of the central office for the district
- Location of satellite office(s), if any

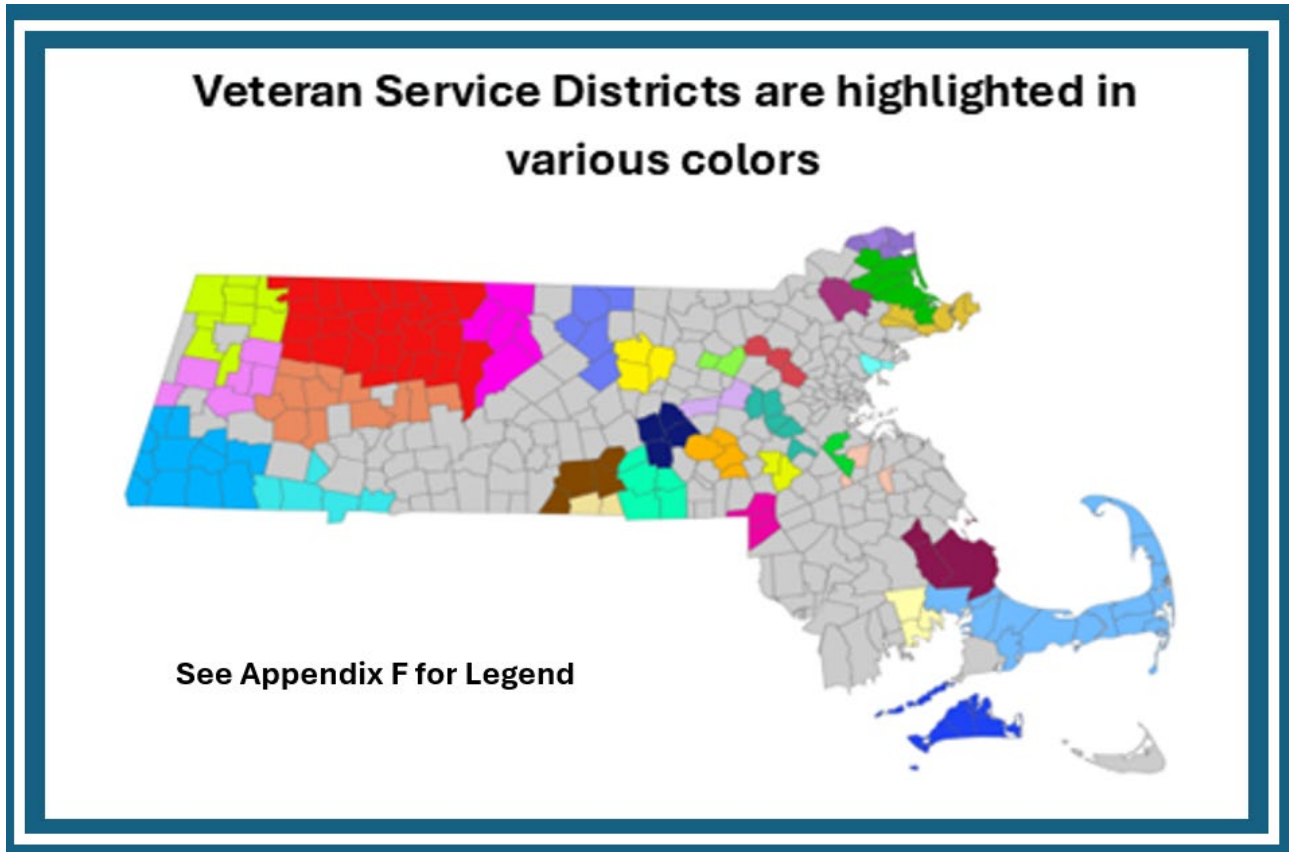
³⁹ M.G.L. Ch. 115 §14

⁴⁰ Mass. Municipal Association, “Report of the Regionalization Advisory Commission”, <https://www.mma.org/resource/report-of-the-regionalization-advisory-commission/>, last accessed 9/15/2025.

⁴¹ 108 C.M.R. §12.02

- Hours of operation for the office(s)

Veteran Service Districts are initially approved for a one-year term and then must reapply every two years.⁴²



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Once established, the district must create a Department of Veterans Services to assist and advise veterans, including managing benefits.⁴³ Municipalities choosing to form a district are required to create a veteran service district board⁴⁴ that is subject to the general supervision of the Secretary of EOVS.

One of the requirements in the Guide includes staffing recommendations for the district. The officer in charge of a district, the Director of Veterans' Services (DVS), Deputy Director, and

⁴² Dept. of Veterans Services presentation to Mass. Municipal Association, "Guidelines for Establishing Veterans' Services Districts Under Chapter 115 & Training and Certification of Veterans' Services Officers", https://www.mma.org/wp-content/uploads/2018/07/guideline_veterans_services_0.pdf, last accessed 9/16/2025.

⁴³ CH. 115 § 10 and 108 C.M.R.12.04

⁴⁴ M.G.L. 115 § 11

Assistant Director must be veterans appointed by the mayor in a city with the approval of the city council, or in a town by the selectmen, along with any assistant or deputy director appointed.⁴⁵ In some cases, VSOs serve in more than one municipality, both within and outside of formal officers-sharing agreements. Currently, many districts are not fully staffed according to the recommendations outlined in the Guide.

As reported in “A Guide for Establishing Veterans’ Services Districts under Chapter 115,” Secretary Coleman Nee wrote:

Naturally, the driving concern for municipalities seeking approval from the Secretary to form veterans’ services districts is the desire to consolidate local veterans’ services to conserve costs and achieve administrative efficiencies. However, because the Secretary is charged under law with the general direction and oversight of veterans’ services districts, the overarching concern is that cities and towns seeking to form a district must demonstrate that the veterans’ benefits and services to be provided to veterans and dependents residing in the prospective district shall not be diminished.

With this key consideration in mind, the Secretary’s working committee carefully contemplated the issue of adequate personnel staffing levels relative to the aggregate population of proposed veterans’ services districts. To ensure the robust delivery of information, advice, and assistance to veterans and their dependents residing in a proposed district, the Secretary has established minimum personnel staffing requirements and guidelines to be considered in determining the appropriate ratio of veterans’ services personnel and support staff to the aggregate population of the prospective district.⁴⁶

⁴⁵ M.G.L. Ch. 115 §10

⁴⁶ See Appendix F

MINIMUM PERSONNEL STAFFING REQUIREMENTS AND GUIDELINES FOR VETERANS' SERVICES DISTRICTS								
Aggregate Population of Municipalities Comprising Veterans' Services District	Full-Time Director of Veterans' Services District	Part-Time Director of Veterans' Services District	Full-Time Deputy Director or Assistant Director of Veterans' Services District	Part-Time Deputy Director or Assistant Director of Veterans' Services District	Full-Time Veterans' Agents	Part-Time Veterans' Agents	Full-Time Clerical Staff	Part-Time Clerical Staff
700,001 and Over	1	0	Optional	Optional	Ad Hoc	Ad Hoc	Ad Hoc	Ad Hoc
550,001 to 700,000	1	0	Optional	Optional	3	2	4	Optional
480,001 to 550,000	1	0	Optional	Optional	3	2	3	1
410,001 to 480,000	1	0	Optional	Optional	3	2	3	Optional
340,001 to 410,000	1	0	Optional	Optional	2	2	3	Optional
270,001 to 340,000	1	0	Optional	Optional	2	1	3	1
210,001 to 270,000	1	0	Optional	Optional	2	1	3	Optional
150,001 to 210,000	1	0	Optional	Optional	2	Optional	3	Optional
120,001 to 150,000	1	0	Optional	Optional	1	1	2	1
100,001 to 120,000	1	0	Optional	Optional	1	1	2	Optional
90,501 to 100,000	1	0	Optional	Optional	1	Optional	2	1
70,001 to 90,500	1	0	Optional	Optional	1	Optional	2	Optional
61,001 to 70,000	1	0	Optional	Optional	1	Optional	1	1
55,001 to 61,000	1	0	Optional	Optional	1	Optional	1	Optional
35,001 to 55,000	1	0	Optional	Optional	Optional	1	1	Optional
20,001 to 35,000	1	0	Optional	Optional	Optional	Optional	1	Optional
15,501 to 20,000	1	0	Optional	Optional	Optional	Optional	Optional	1
12,000 to 15,500	1	0	Optional	Optional	Optional	Optional	Optional	Optional
1 to 11,999	Optional	1	Optional	Optional	Optional	Optional	Optional	Optional

A Guide for Establishing Veterans' Services Districts under Chapter 115 • 11

Produced by the Department of Veteran Services, 2011

The Guide, which applies only to Veteran Service Districts, outlines recommended staffing levels. While OVA is working to gather more comprehensive staffing data, there are currently no similar guidelines for staffing of individual municipalities or clusters. Other data sources would better support OVA's efforts, including more accurate mapping of veteran locations and demand. Accessing this data, however, has been challenging. This situation may improve in the future because, as of January 2025, the VSO community has received “aid and support” from four Regional Liaisons employed by OVA, partly to address the needs of this critical workforce. This collaboration is proving helpful and could lead to increased information sharing.

A Systemic Overview

The effectiveness and value of the community-based veteran service officers system relies on a myriad of factors. The goal is to ensure the right people are well-trained, certified, and accredited, working within a system designed to meet the needs of veterans and their families. The previous discussion covered the appointment process, training, certification, accreditation, and the various working environments where VSOs operate. Among the factors

influencing the level of service provided to veterans and their families in Massachusetts are hours of operation and office locations. Some of these factors can be measured, although such measurement only captures a small part of the overall value of Massachusetts' Veteran Service Officers.

Hours of Operation

Clicking on this [hyperlink](#)⁴⁷ will display the reported opening and closing hours from 6:00 a.m. to 8:00 p.m. for the Commonwealth's veteran service offices.⁴⁸ Created as an internal-to-OVA tool developed for analytical purposes, it provides an interactive visualization of the operating hours of Veteran Service offices as of November 2024. It is important to note that only Veteran Service Districts have a specified requirement for operating hours. The regulatory requirement for district office hour of operation states they must operate during the municipality's "standard business hours," but does not establish the number of hours the office must manage daily.⁴⁹

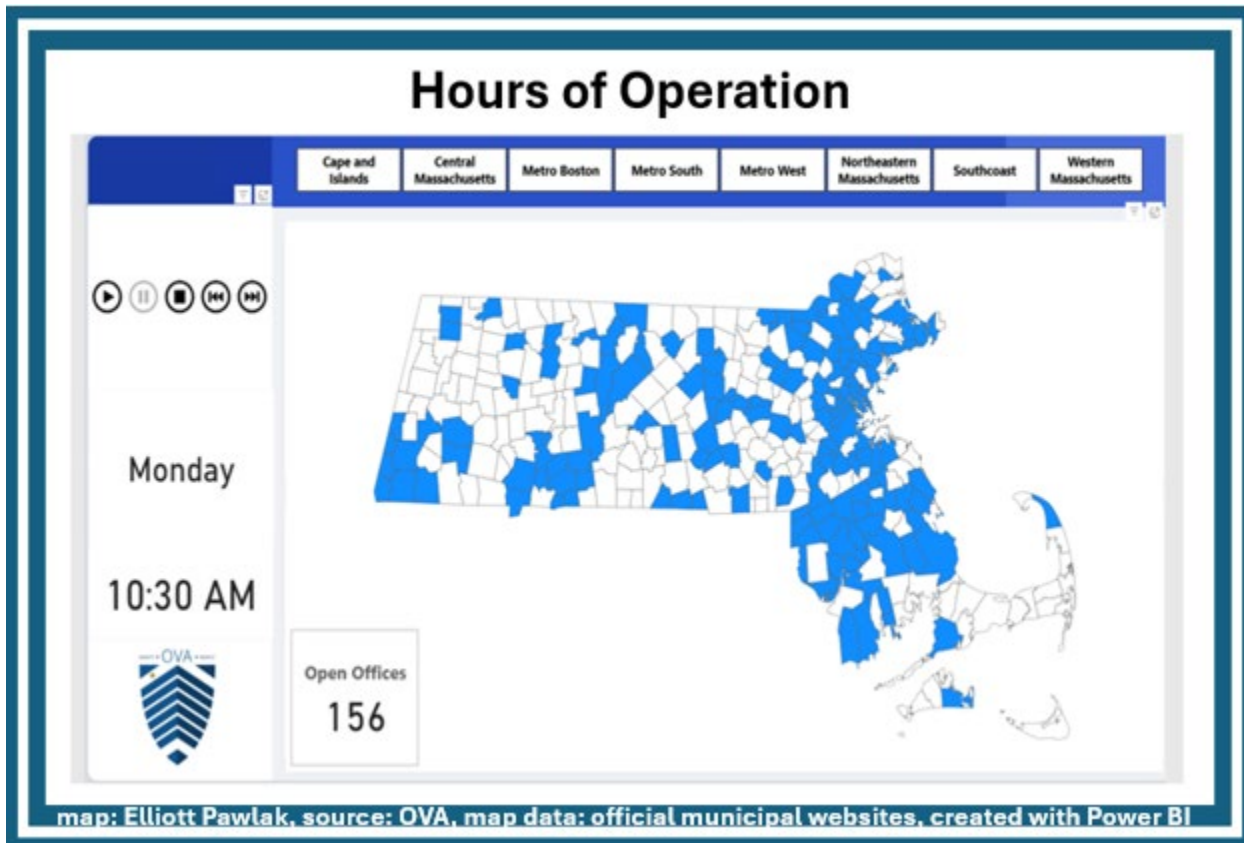
The service hours map can be filtered by the eight geographic regions:

- Cape and Islands
- Central Massachusetts
- Metro Boston
- Metro South
- Metro West
- Northeastern
- Southeastern
- Western

⁴⁷ Office of the Veteran Advocate, "VSO Offices' Hours of Operation Map", <https://bit.ly/43Nqn35> last accessed 9/16/2025.

⁴⁸ Accurate as of November 2024 and only includes walk-in hours. Operating hours have subsequently changed and are not reflected here.

⁴⁹ 108 C.M.R. 12.01(4)



A review of the automated Hours of Operation map shows that, on average, 47 percent of the offices are open during regular business hours, and 5 percent offer services after 5:00 p.m. Analyzing office hours listed on municipal and district websites reveals that about 67 percent of veteran service offices are open at the same time. At the time the tool was developed, peak availability occurred on Tuesdays from 10:00 a.m. to 11:30 a.m. and Thursdays from 11:00 a.m. to 11:30 a.m., with up to 164 offices open during these times.⁵⁰

The office hours may result from statewide conformity to the regulatory requirement that district veteran service offices operate during their municipality's standard business hours. After the COVID-19 pandemic, many offices transitioned to an appointment-only system, allowing some VSOs to serve multiple municipalities by scheduling appointments within specific hours. Sometimes, the total hours for these appointments exceed the typical 40-hour workweek. Similarly, some veteran service districts rotate in-person office hours among the municipalities they serve, often choosing schedules based on factors like service volume and each municipality's financial contribution to the district.⁵¹

⁵⁰ Ibid.

⁵¹ 108 C.M.R. 12.01(3)

Location

Although 99 percent of the Commonwealth's municipalities are served by at least one VSO, the physical distribution of the 246 municipal veteran service offices creates geographic separation requiring travel in western and central Massachusetts. Moderate gaps are also present in parts of Cape Cod and southern Massachusetts. The concentration of offices around major urban centers, such as Boston, Worcester, and Springfield likely correlates to the higher population densities in these areas.

The map below shows *only* those offices operating during regular business hours.⁵² Software limitations prevent OVA from accurately showing offices with limited service hours.



map: E. Pawlak, OVA, map data: official municipal websites, created with Power BI

⁵² Accurate as of November 2024

Quantifiable Elements

First and foremost, the value of committed Veteran Service Officers cannot be quantified. It is the depth and breadth of their knowledge, the strength of their commitment, and the lived experience that each VSO shares with their veteran clients and families. That said, the following elements of VSO work can be quantified.

As of April 2025, in the Commonwealth's 351 municipalities:

- There are **246** veteran services offices employing
- **186** state-certified VSOs, and
- **174** U.S. Department of Veterans Affairs accredited VSOs⁵³
- Supported by **4** National Service Officers employed at EOVS.
- Maintain **33** Veterans Service Districts serving 179 municipalities,
- **30** towns in **11** separate Clusters, each of which shares a single VSO,
- Leaving **141** municipalities with the single VSO

Using the NCVAS estimate of the Massachusetts 2025 veteran population of 255,345, the ratio of veterans to state-certified VSOs is **1:1380**. The ratio of veterans to federally accredited VSOs, as of August 2025, is **1:1468**.

OVA's analysis of [Massachusetts Veteran Benefits](#) data⁵⁴ — including Chapter 115 financial support, annuities, and property tax exemptions provided by the Executive Office of Veterans Services in 2024 — shows that between June 30, 2023, and June 20, 2024, VSOs, EOVS, and municipalities:

- Served an active case count of **4,765 cases**
- Provided **\$37.28M** in Ch. 115 direct veteran financial support
- Disbursed **\$38.788M** on 19,394 Annuities
 - 75.29% Males
 - 23.11% Female
 - 1.59% Not Specified
- Awarded **35,897** [property tax exemptions](#)⁵⁵ worth **\$32.94M**.

⁵³ This number increased dramatically between January 2025 (43 federally accredited VSOs) and August 2025 (209 federally accredited VSOs) according to the VA Office of General Counsel's Accredited VSO Representative Search function found at <https://www.va.gov/ogc/apps/accreditation/>.

⁵⁴ Office of the Veteran Advocate, "**Veterans' Benefits Analysis Tool**": <https://bit.ly/4oj4yQn>

⁵⁵ See Appendix G

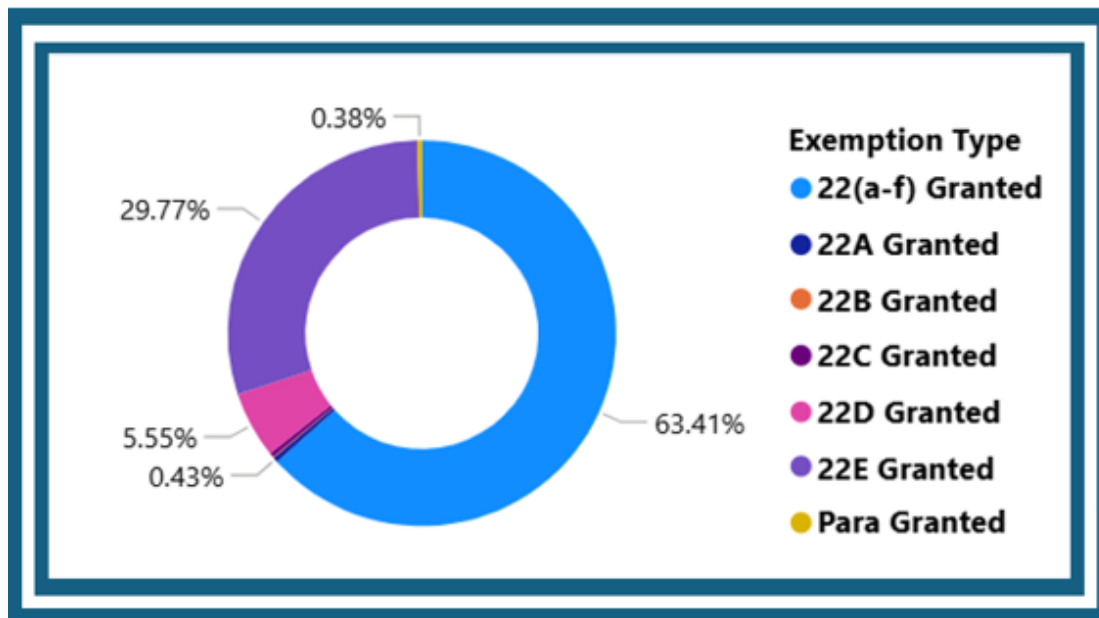


image: E. Pawlak, OVA, image data : created with Power Bi

Abridged TAXPAYER'S GUIDE TO LOCAL PROPERTY TAX EXEMPTIONS VETERANS Clauses 22, 22A, 22B, 22C, 22D, 22E, 22F, 22H	
INTRODUCTION	
Cities and towns may give property tax exemptions to some individuals as defined by state law. Clauses 22, 22A, 22B, 22C, 22D, 22E, 22F and 22H provide exemptions to some veterans, their spouses who own the domicile and their surviving spouses, and some surviving parents and spouses of active-duty military personnel who died during or due to military service.	
WHO IS ELIGIBLE AND EXEMPTION AMOUNTS	
Clause 22 - \$400	1. Service-connected disability of 10% or more. 2. Purple Heart recipients. 3. Gold Star Parents 4. Spouses
Clause 22A - \$750	1. Loss or permanent loss of use of one foot or one hand or one eye, or Congressional Medal of Honor, Distinguished Service Cross, Navy Cross or Air Force Cross. 2. Prisoners of war. 3. Spouses
Clause 22B - \$1,250	1. Loss or permanent loss of use of both feet, both hands or both eyes. 2. Spouses
Clause 22C - \$1,500	1. Total disability... and ... "specially adapted housing" 2. Spouses
Clause 22D - Full	Surviving spouses of missing in action OR died as a proximate result of injuries sustained or illnesses contracted during active-duty service.
Clause 22E - \$1,000	1. Service-connected disability of 100%. 2. Spouses
Clause 22F - Full	1. Paraplegics, or 100% disability for service-connected blindness. 2. Spouses
Clause 22H - Full	If the legislative body of your city or town has voted, subject to local charter, to accept Clause 22H... missing in action OR died as a proximate result of injuries sustained or illnesses contracted during active-duty service.

CONCLUSION

The roles of local VSOs are complex. They require extensive experience and expertise in both state and federal veterans' benefits and services, as well as knowledge of other non-veteran-specific state assistance programs. To fully comply with Massachusetts General Law and its regulations, their positions require them to obtain state certification through EOVS and encourage federal VA accreditation. They must collaborate with their local municipalities, state agencies, federal agencies, nonprofits, and, in some cases, multiple municipalities simultaneously, especially if they are part of a Cluster or District and working in concert with the Executive Office of Veterans' Services. They serve in a role with many stakeholders, diverse client needs, and varying community support.

Describing the role of the Veteran Service Officers (VSO) as it currently appears is the first step in our evaluation process. The next step is to analyze and work collaboratively with stakeholders to develop areas for improvement and feasible recommendations aimed at strengthening the role and supporting the individuals who serve as Massachusetts' top veteran resource.

The Commonwealth's dedication to its veterans is clear. It is the capacity of the system and the expectations of the Veteran Service Officers that need further analysis. Veterans serving veterans within their communities and building personal relationships is the ideal model. Ensuring that these veteran service providers and advocates have the necessary aid and support to succeed is the goal of the Office of the Veteran Advocate.