

Regulatory Impact Assessment <i>(Please describe the analysis used in complying with E.O. 562.)</i>	
Evaluation of Alternative Approaches:	
Deregulation	<p>Please explain why regulatory action is necessary:</p> <p>Municipal Veterans Service Officers were recently served with a cease and desist letter for not complying with federal VA accreditation regulations. This revision is necessary to avoid confusion pertaining to compliance with federal law.</p>
Federal Regulation	<p>Are there Federal Regulations that address the same activity? If yes, explain why additional state regulation is necessary:</p> <p>The existing regulation states that Veteran Service Officers will assist veterans in filing VA claims but it is silent regarding compliance with VA regulations for filing claims. This revision ensures compliance with federal regulations at 38 CFR 14.629</p>
Local Standards	<p>Are there local standards that address the same activity? If yes, explain why additional state regulation is necessary:</p> <p>Local standards are to follow the existing regulation. The existing regulation governs municipal Veterans Service Officers and how they operate. The revision provides that EOVS will provide resources to comply with the existing standards.</p>
Sub-Regulations	<p>Is there a less formal rule making authority that would be a viable alternative to regulation? Please explain why or why not:</p> <p>No, the existing regulation is confusing in that it requires Veterans Service Officers to assist veterans with VA claims but is silent as to compliance with federal law. Veterans Service Officers have complained about the lack of clarity in the existing regulation and asked for a resolution within the regulation.</p>
Community Impact:	
Regulated Party	<p>Please describe the businesses, industries and other organizations, including governmental units that will be affected by the regulation:</p> <p>EOVS will have to come up with a training program for Veterans Service Officers to accredit them through the VA.</p>
Citizens	<p>Please explain why the regulation does not unduly and adversely affect Massachusetts citizens and customers of the Commonwealth:</p> <p>This revision is not a burden on citizens but will ensure claims submitted by MA Veteran Service Officers are complete and submitted in accordance to federal law.</p>
Businesses	<p>Please explain the regulation's impact on the competitive environment in Massachusetts. This can include, but is not limited to, increasing job creation, reducing the cost of doing business or improving quality of life for residents :</p> <p>NA, this is a federal benefits program for veterans.</p>
Public Engagement:	

Stakeholders	<p>Please list the stakeholders included by the Agency in the development of the regulation:</p> <p>Massachusetts Veterans Service Officer Association</p> <p>Federal Veterans Administration</p>
Implementation	<p>Please describe the Agency's plan for implementation of the regulation, including any measures to ensure awareness of the regulation among stakeholders; consistent application and predictability for the regulated community:</p> <p>Stakeholder letters will be provided to municipal Veterans Service Officers.</p>

Small Business Impact Statement

(As required by M.G.L. c. 30A §§ 2, 3 & 5)

CMR No: 108 CMR 12

Estimate of the Number of Small Businesses Impacted by the Regulation:

Select Yes or No and Briefly Explain

Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Will small businesses have to create, file, or issue additional reports?
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Will small businesses have to implement additional recordkeeping procedures?
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Will small businesses have to provide additional administrative oversight?
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Will small businesses have to hire additional employees in order to comply with the proposed regulation?
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Does compliance with the regulation require small businesses to hire other professionals (e.g. a lawyer, accountant, engineer, etc.)?
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Does the regulation require small businesses to purchase a product or make any other capital investments in order to comply with the regulation?
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Are performance standards more appropriate than design/operational standards to accomplish the regulatory objective? (Performance standards express requirements in terms of outcomes, giving the regulated party flexibility to achieve regulatory objectives and design/operational standards specify exactly what actions regulated parties must take.)
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Do any other regulations duplicate or conflict with the proposed regulation?
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Does the regulation require small businesses to cooperate with audits, inspections or other regulatory enforcement activities?
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Does the regulation require small businesses to provide educational services to keep up to date with regulatory requirements?
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Is the regulation likely to <i>deter</i> the formation of small businesses in Massachusetts?
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Is the regulation likely to <i>encourage</i> the formation of small businesses in Massachusetts?
Yes	No	Does the regulation provide for less stringent compliance or reporting requirements for small

<input type="checkbox"/>	<input checked="" type="checkbox"/>	businesses?
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Does the regulation establish less stringent schedules or deadlines for compliance or reporting requirements for small businesses?
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Did the agency consolidate or simplify compliance or reporting requirements for small businesses?
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Can performance standards for small businesses replace design or operational standards without hindering delivery of the regulatory objective?
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Are there alternative regulatory methods that would minimize the adverse impact on small businesses?