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January 21, 2025

**TO:** The Honorable C.T. Wilson  
Chair, Economic Matters Committee

**FROM:** Adam Spangler  
Legislative Aide, Legislative Affairs, Office of the Attorney General

**RE:** House Bill 267 – Veterans Benefits Matters - Claim Servicers - Prohibitions and Requirements - **Favorable**

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The Maryland Office of the Attorney General requests a favorable report on House Bill 267 - Veterans Benefits Matters - Claim Servicers - Prohibitions and Requirements. This legislation seeks to protect Maryland's Veterans from unscrupulous actors that take advantage of Veterans seeking assistance with benefits and benefits appeals services.

A Veteran Service Organization (VSO) is an organization that has been approved by the Veterans Administration (VA)<sup>1</sup> to provide assistance to Veterans and their families. Veterans who use VSOs or other accredited representatives cannot be charged for help in filing their initial claim. If the veteran subsequently wants to appeal the VA's decision, the VA limits how much the approved representatives can charge.

Unfortunately, there has been an influx of unapproved/unaccredited individuals and businesses that offer to help Veterans submit their initial claims to the VA for a fee. Sometimes calling themselves "medical consultants" or "coaches," unaccredited individuals and businesses advertise their fee-based services to Veterans, suggesting they can provide quick turnaround times on claims and higher benefit checks than a VSO or other authorized representative. Not only are these fees illegal, but the payment terms can leave Veterans with unaffordable bills for extended periods of time.

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<sup>1</sup> 38 C.F.R. §14.628(d) describes the requirements that must be met for recognition.

Of the 280 complaints sent to the VA's Office of General Counsel from 2018 to 2022, 40% were related to unapproved/unaccredited individuals and organizations.<sup>2</sup> Additionally, according to the VA, there is no statistically significant difference in the average number of days it takes any type of filer to complete a rating-related claim. In the current fiscal year, time frames have ranged from 129.7 days to 139.4 days whether veterans make a claim unassisted (which would include those who use unaccredited representatives) or use VSOs, agents, or attorneys.<sup>3</sup>

If an unapproved/unaccredited individual or organization would like to provide these types of services to Veterans, they should have to seek accreditation with the VA before doing so. Regulation in this matter is a widely accepted method of protecting the public from unscrupulous actors.

For the foregoing reasons, the Office of the Attorney General requests a favorable report on House Bill 267.

cc: Delegate Nick Allen  
Economic Matters Committee Members

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<sup>2</sup> Michelle Andrews, *Some private companies charge hefty fees to help veterans with disability claims*, WWW.CBSNEWS.COM (2023), <https://www.cbsnews.com/news/veterans-disability-claims-companies-charge-fees/>.