

GAO Highlights

Highlights of [GAO-25-107211](#), a report to congressional requesters

Why GAO Did This Study

Representatives accredited by VA's ADF program serve an important role in helping veterans or their families apply for VA benefits. Accredited representatives must be of good character and meet other requirements established in federal law and regulations. GAO was asked to review VA's ADF program.

This report examines (1) VA policies for ensuring representatives are knowledgeable and have good character, (2) how the ADF program addresses complaints against representatives and unaccredited individuals, and (3) the extent to which VA has addressed ADF program challenges.

GAO reviewed ADF policies for reviewing applications and addressing complaints. GAO also reviewed nongeneralizable samples of applications and complaints from fiscal year 2023. Further, GAO identified challenges that ADF faces by reviewing VA documents and interviewing VA officials and selected stakeholders familiar with the ADF program, such as veteran service organizations. GAO assessed the ADF program's plans to address challenges against GAO-identified sound planning practices.

What GAO Recommends

GAO is making two recommendations to VA to develop and use plans for ADF program initiatives that identify necessary activities and timelines, resources needed, risks, and a process to monitor progress.

VA did not provide comments.

View [GAO-25-107211](#). For more information, contact Elizabeth H. Curda at (202) 512-7215 or EWISInquiry@gao.gov.

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VETERANS BENEFITS

More Thorough Planning Needed to Help Better Protect Veterans Assisted by Representatives

What GAO Found

The Department of Veterans Affairs' (VA) Accreditation, Discipline, and Fees (ADF) program accredits representatives who help veterans file claims for VA benefits. A key responsibility for ADF staff is reviewing accreditation applications. The ADF program has policies that help staff carry out program responsibilities, such as ensuring representatives are knowledgeable and have good character. For example, it has policies on when to obtain more information if an applicant has a criminal history and how to consider this information when making approval decisions. GAO reviewed a nongeneralizable sample of 35 applications approved in fiscal year 2023 and found that staff generally followed VA's policies.

ADF staff also address complaints; however, staff responses depend on whether the subject of the complaint is accredited. Accredited representatives are subject to VA oversight, and ADF staff follow procedures to determine if a program violation occurred and what actions, if any, should be taken. In contrast, ADF officials told GAO they have limited options regarding complaints about unaccredited individuals because VA lacks enforcement authority over them. (Legislation had been proposed to impose criminal penalties in certain circumstances.) ADF officials said they investigate complaints received, issue a "cease-and-desist" letter if warranted, and can refer the complaint to state or federal law enforcement if the unaccredited individual may have committed crimes. In GAO's nongeneralizable sample of 10 complaints against accredited and unaccredited individuals, ADF staff generally followed program procedures.

VA is addressing ADF program challenges, but its efforts do not fully apply sound planning practices that could help ensure success. Initiatives and other actions to address key challenges that VA and outside stakeholders have identified include:

- **Training requirements.** VA has issued a proposed rule that would increase the frequency of required training hours to ensure representatives are better qualified to provide representation.
- **Deterrence of unaccredited individuals.** VA is educating veterans about the safeguards tied to using accredited representatives.
- **Insufficient IT System Capabilities:** VA is developing a new IT system to allow staff to track program performance and automate routine tasks.
- **Lacking sufficient workforce resources.** VA developed a strategic plan and is analyzing workforce needs to help ADF staff carry out program responsibilities in a timely manner.

However, VA has not fully developed plans that detail how it will implement and monitor these program initiatives, contrary to sound planning practices identified in prior GAO work. Specifically, ADF plans do not fully identify specific activities, timelines, or resources needed to complete each of the initiatives. Officials also have not assessed the risks that could affect their plans, or established how they will monitor and report performance. Fully applying these practices will help ensure the success of ADF program initiatives and ensure veterans receive responsible and qualified representation on their VA benefit claims.