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Received Date : 10/18/2024 05:35 PM

Comments Received :

The VHA MS VTP is in violation of 38 CFR 0.

The director of VTP and VTP leadership, are knowingly, and purposely, in violation of 38 USC 111 and 44 USC 3501 et.seq.

It is illegal to "defer to the CFR". Regulations are secondary to laws and cannot contradict them.

The VTP written regulation 38 CFR 70 Subpart A is, and has been, in conflict with 38 USC 111 since July 30, 2008 when VHA adopted the final rule.