

tycorp1@aol.com  
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To: David C. Childs A-76comments/OMB/EOP@EOP  
cc:  
Subject: Comments

Mr. Childs:

TYCORPS International represents over 17 different providers of services to the healthcare community with an emphasis on facility management operations i.e. grounds, waste management, housekeeping services, laundry operations etc.

We applaud the efforts of your office with regard to the revisions to OMB Circular A-76, we however remain concerned that the Department of Veterans Affairs (VA) continues to hide behind other legislative issues and has formed a legal opinion that A-76 basically does not apply to them and that most of their activities are not considered commercial in nature and are directly related to health care operations (FAIR Act). While NO other government department has made such hypothetical legal decisions for the purpose of not complying with the policy of the President, we raise concerned that this specific department of the government is simply not getting with the program and fails to realize that cost benefits are facing them directly and that redeeming these benefits rest with the ability to comply with this Policy (A-76). The issues of Veterans Preferential hiring for example, as this applies to housekeeping activities (estimated 7,000 FTE in VA) is another example of the VA hiding behind re As this applies to A-76 and the most recent attempt to modify this circular we would suggest that the President require all agencies to comply without regard to specific legislation and that OMB manage the process so that all agencies would comply with the policies of the President i.e. OMB Circular A-76.

Thank You

Ken Tyler  
CEO  
TYCORPS International  
1629 North Wolcott St.  
Chicago, IL. 60622  
773-620-1602 or 773-184-5145

**Ken Tyler**  
**tycorp1@aol.com**