

Comment from Jennifer Kelly-Kennedy, Designated Alternate for Government Member Daniel Cohen, on *Nonlawyer Assistance and Representation*
October 28, 2024

On page 2 of the draft (lines 26-32): Recommend including text (either as a footnote or sentence) which acknowledges that federal agency regulations are derived from statutes and a reminder for agencies to look at their enabling statutes for the proper scope of lawyer / non-lawyer representation of clients in administration adjudication.