

2016 Explanatory Notes  
National Appeals Division

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## NATIONAL APPEALS DIVISION

### Purpose Statement

The National Appeals Division (NAD) was established by the Secretary of Agriculture on October 20, 1994, by Secretary's Memorandum 1010-1, pursuant to the Federal Crop Insurance and Reform and Department of Agriculture Reorganization Act of 1994, Public Law No. 103-354. The Act consolidated the appellate functions and staff of several USDA agencies to provide for independent hearings and reviews of adverse agency decisions.

The mission of NAD is to conduct fair and impartial administrative appeal hearings and reviews of adverse decisions issued by the Farm Service Agency, Risk Management Agency, Natural Resources Conservation Service, Rural Business-Cooperative Service, Rural Housing Service, and the Rural Utilities Service. The Secretary of Agriculture may also assign administrative appeals arising from decisions of other parts of USDA to NAD. In carrying out its statutory authority, NAD hears from farmers, ranchers, and other program participants about their disputes with USDA agencies through a fair and impartial administrative hearings and appeals process. NAD issues determinations that reflect a thorough consideration of factual information and applied legal reasoning.

NAD Headquarters is located in Alexandria, Virginia. NAD administers its appeals system through three regional offices located in Memphis, Tennessee; Indianapolis, Indiana; and Lakewood, Colorado. The Administrative Judges are located in 57 field locations throughout the United States and operate out of leased office space or home offices. As of September 30, 2014, there were 82 permanent full-time employees, comprising of 24 in Virginia and 58 in the field.

NAD did not have any Office of Inspector General or Government Accountability Office evaluation reports during the past year.

NATIONAL APPEALS DIVISION

Available Funds and Staff Years (SYs)  
(Dollars in thousands)

Item	<u>2013 Actual</u>		<u>2014 Actual</u>		<u>2015 Enacted</u>		<u>2016 Estimate</u>	
	Amount	SYs	Amount	SYs	Amount	SYs	Amount	SYs
Salaries and Expenses:								
Discretionary Appropriations.....	\$14,225	87	\$12,841	82	\$13,317	87	\$13,566	87
Rescission.....	-385	-	-	-	-	-	-	-
Sequestration.....	-646	-	-	-	-	-	-	-
Transfers Out.....	-	-	-40	-	-	-	-	-
Total Available.....	13,194	87	12,801	82	13,317	87	13,566	87
Lapsing Balances.....	-206	-	-17	-	-	-	-	-
Total Obligations, NAD.....	12,988	87	12,784	82	13,317	87	13,566	87

Permanent Positions by Grade and Staff Year Summary

Item	<u>2013 Actual</u>			<u>2014 Actual</u>			<u>2015 Enacted</u>			<u>2016 Estimate</u>		
	V.A.	Field	Total	V.A.	Field	Total	V.A.	Field	Total	V.A.	Field	Total
SES.....	1	-	1	1	-	1	1	-	1	1	-	1
GS-15.....	3	3	6	3	3	6	3	3	6	3	3	6
GS-14.....	2	5	7	2	4	6	2	6	8	2	6	8
GS-13.....	12	48	60	12	46	58	11	40	51	11	40	51
GS-12.....	2	-	2	2	-	2	2	-	2	2	-	2
GS-11.....	-	3	3	-	3	3	-	3	3	-	3	3
GS-10.....	1	-	1	1	-	1	1	-	1	1	-	1
GS-9.....	2	2	4	2	3	5	2	3	5	2	3	5
GS-8.....	1	1	2	1	-	1	1	-	1	1	-	1
GS-7.....	-	-	-	-	1	1	-	3	3	-	3	3
GS-6.....	1	4	5	1	6	7	1	5	6	1	5	6
GS-5.....	-	1	1	-	1	1	-	-	-	-	-	-
Total Perm.												
Positions.....	25	67	92	25	67	92	24	63	87	24	63	87
Unfilled, EOY.....	-	8	8	-	10	10	-	-	-	-	-	-
Total, Perm. Full-Time												
Employment EOY.....	25	59	84	25	57	82	24	63	87	24	63	87
Staff Year Est.....	25	62	87	24	58	82	24	60	87	24	63	87

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The estimates include appropriation language for this item as follows (new language underscored; deleted matter enclosed in brackets):

Salaries and Expenses:

For necessary expenses of the National Appeals Division, [\$13,317,000] \$13,566,000.

Lead-Off Tabular Statement

Budget Estimate, 2016.....	\$13,566,000
2015 Enacted .....	<u>13,317,000</u>
Change in Appropriation .....	<u>+249,000</u>

Summary of Increases and Decreases

(Dollars in thousands)

Program	2013 Actual	2014 Change	2015 Change	2016 Change	2016 Estimate
Discretionary Appropriations:					
National Appeals Division.....	\$13,194	-\$353	+\$476	+\$249	\$13,566

Adjusted Appropriations Detail and Staff Years (SYs)

(Dollars in thousands)

Program	2013 Actual		2014 Actual		2015 Enacted		Inc. or Dec.		2016 Estimate	
	Amount	SYs	Amount	SYs	Amount	SYs	Amount	SYs	Amount	SYs
Discretionary Appropriations:										
National Appeals Division.....	\$13,194	87	\$12,841	82	\$13,317	87	+\$249 (1)	-	\$13,566	87
Rescissions, Transfers, and Seq. (Net)....	1,031	-	-	-	-	-	-	-	-	-
Total Appropriation.....	14,225	87	12,841	82	13,317	87	+249	-	13,566	87
Transfers Out:										
WCF.....	-	-	-40	-	-	-	-	-	-	-
Rescission.....	-385	-	-	-	-	-	-	-	-	-
Sequestration.....	-646	-	-	-	-	-	-	-	-	-
Total Available.....	13,194	87	12,801	82	13,317	87	+249	-	13,566	87
Lapsing Balances.....	-206	-	-17	-	-	-	-	-	-	-
Total Obligations.....	12,988	87	12,784	82	13,317	87	+249	-	13,566	87

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Project Statement  
Obligations Detail and Staff Years (SYs)  
(Dollars in thousands)

Program	2013 Actual		2014 Actual		2015 Enacted		Inc. or Dec.		2016 Estimate		
	Amount	SYs	Amount	SYs	Amount	SYs	Amount	SYs	Amount	SYs	
Discretionary Obligations:											
National Appeals Division.....	\$12,988	87	\$12,784	82	\$13,317	87	+\$249	(1)	-	\$13,566	87
Total Obligations.....	12,988	87	12,784	82	13,317	87	249	-	-	13,566	87
Lapsing Balances.....	206	-	17	-	-	-	-	-	-	-	-
Total Available.....	13,194	87	12,801	82	13,317	87	+249	-	-	13,566	87
Transfers Out to WCF.....	-	-	40	-	-	-	-	-	-	-	-
Rescission.....	385	-	-	-	-	-	-	-	-	-	-
Sequestration.....	646	-	-	-	-	-	-	-	-	-	-
Total Appropriation.....	14,225	87	12,841	82	13,317	87	+249	-	-	13,566	87

Justification of Increases and Decreases

- (1) An increase of \$249,000 for NAD (\$13,317,000 and 87 staff years available in 2015).

The base funds will continue to support the mission of NAD to conduct fair and impartial administrative appeal hearings and reviews of adverse decisions, issued by certain agencies within the USDA, and to issue determinations in an expeditious manner that reflect a thorough consideration of factual information that reach a proper conclusion. In addition to the activities and functions specifically described in the budget request, current year and budget year base funds will be used to carry out activities and functions consistent with the full range of authorities and activities delegated to the office. In addition to Departmental Administration funding used for human resources operational services, current year and budget year base funds will also be used to support expedited and enhanced classification, staffing and processing efforts.

The funding change is requested for the following items:

- a) An increase of \$136,000 for pay costs (\$27,000 for annualization of the fiscal year 2015 pay raise and \$109,000 for the anticipated fiscal year 2016 pay raise.)

The proposed funding level is needed to cover pay and benefit cost increases for existing staff. This increase will ensure that NAD can carry out its statutory responsibilities in a timely manner.

- b) An increase of \$113,000 for general operating expenses.

The additional funds will be used to continue the current level of administrative appeal services to ensure that the conduct of Hearings and written Appeal and Director Review Determinations meet statutory requirements for timelines. The additional funds will also support the maintenance of telecommunications for Administrative Judges and continue the operations, licenses, and maintenance support for an electronic case tracking system that ensures appeals are processed timely and responsively for rural participants, farmers, and ranchers.

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Geographic Breakdown of Obligations and Staff Years  
(Dollars in thousands and Staff Years (SYs))

State/Territory	2013 Actual		2014 Actual		2015 Enacted		2016 Estimate	
	Amount	SYs	Amount	SYs	Amount	SYs	Amount	SYs
Alabama.....	-	-	-	-	\$103	1	\$104	1
Arkansas.....	\$106	1	\$110	1	110	1	111	1
California.....	260	2	246	2	130	1	131	1
Colorado.....	1,100	9	1,120	8	930	9	938	9
Connecticut.....	146	1	148	1	150	1	151	1
Florida.....	232	2	238	2	240	2	242	2
Georgia.....	264	2	266	2	268	2	270	2
Idaho.....	133	1	-	0	-	0	-	0
Indiana.....	1,079	9	1,149	8	1,200	10	1,220	10
Iowa.....	-	-	135	1	135	1	136	1
Louisiana.....	133	1	135	1	136	1	137	1
Maryland.....	118	1	124	1	126	1	127	1
Massachusetts.....	-	-	-	-	-	0	-	0
Michigan.....	105	1	110	1	111	1	112	1
Minnesota.....	140	1	142	1	145	1	146	1
Mississippi.....	109	1	114	1	115	1	116	1
Missouri.....	133	1	134	1	237	2	239	2
Montana.....	133	1	-	0	-	0	-	0
Nebraska.....	116	1	117	1	118	1	119	1
New York.....	126	1	127	1	129	1	130	1
North Carolina.....	236	2	238	2	240	2	242	2
North Dakota.....	116	1	238	2	240	2	242	2
Ohio.....	115	1	117	1	118	1	119	1
Oklahoma.....	266	2	269	2	264	2	266	2
Oregon.....	126	1	128	1	142	1	143	1
Pennsylvania.....	107	1	112	1	113	1	114	1
South Carolina.....	133	1	134	1	134	1	135	1
Tennessee.....	1,412	11	1,021	10	1,100	10	1,120	10
Texas.....	322	3	364	3	366	3	369	3
Vermont.....	132	1	-	0	-	0	-	0
Virginia.....	5,338	25	5,493	24	5,963	25	6,131	25
Washington.....	133	1	134	1	134	1	135	1
Wisconsin.....	119	1	121	1	120	1	121	1
Obligations.....	12,988	87	12,784	82	13,317	87	13,566	87
Lapsing Balances.....	206	-	17	-	-	-	-	-
Total, Available.....	13,194	87	12,801	82	13,317	87	13,566	87

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Classification by Objects  
(Dollars in thousands)

	2013	2014	2015	2016
	<u>Actual</u>	<u>Actual</u>	<u>Enacted</u>	<u>Estimate</u>
<b>Personnel Compensation:</b>				
Alexandria, VA.....	\$2,492	\$2,376	\$2,583	\$2,628
Field.....	5,882	5,609	6,095	6,201
11 Total personnel compensation.....	8,374	7,985	8,678	8,829
12 Personal benefits.....	2,315	2,233	2,464	2,512
13.0 Benefits for former personnel.....	-	1	-	-
Total, personnel comp. and benefits.....	10,689	10,219	11,142	11,341
<b>Other Objects:</b>				
21.0 Travel and transportation of persons.....	242	251	251	251
22.0 Transportation of things.....	34	30	25	25
23.1 Rental payments to GSA.....	-	-	452	452
23.2 Rental payments to others.....	81	81	81	81
23.3 Communications, utilities, and misc. charges.....	424	396	346	359
24.0 Printing and reproduction.....	23	10	10	10
25.1 Advisory and assistance services.....	877	1,328	900	895
25.2 Other services from non-Federal sources.....	121	50	50	50
25.3 Other purchases of goods and services from Federal sources.....	299	250	33	50
26.0 Supplies and materials.....	119	107	25	50
31.0 Equipment.....	79	62	2	2
Total, Other Objects.....	2,299	2,565	2,175	2,225
99.9 Total, new obligations.....	12,988	12,784	13,317	13,566
<b>Position Data:</b>				
Average Salary (dollars), SES Position.....	\$165,300	\$165,300	\$165,300	\$165,300
Average Salary (dollars), GS Position.....	\$92,001	\$92,001	\$95,919	\$96,878
Average Grade, GS Position.....	13.2	13.2	13.3	13.3

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Shared Funding Projects  
(Dollars in thousands)

	2013	2014	2015	2016
	<u>Actual</u>	<u>Actual</u>	<u>Estimate</u>	<u>Estimate</u>
<b>Working Capital Fund:</b>				
Administration:				
Beltsville Service Center.....	\$9	\$5	\$10	\$5
Mail and Reproduction Management.....	5	4	5	5
Procurement Operations.....	42	42	10	13
Integrated Procurement System.....	7	7	7	7
Subtotal.....	63	58	32	30
Communications:				
Creative Media and Broadcast Center.....	-	-	2	2
Finance and Management:				
NFC/USDA.....	126	66	191	184
Controller Operations.....	45	27	36	37
Financial Systems.....	18	17	17	17
Subtotal.....	189	110	244	238
Information Technology:				
NITC/USDA.....	8	19	138	139
Telecommunications Services.....	408	295	288	281
Subtotal.....	416	314	426	420
Correspondence Management.....	4	4	3	2
Total, Working Capital Fund.....	672	486	707	692
<b>Department-Wide Reimbursable Programs:</b>				
1890's USDA Initiatives.....	2	3	3	3
Classified National Security Information.....	-	-	1	1
Continuity of Operations Planning.....	2	2	2	2
E-GOV Initiatives HSPD-12.....	6	6	6	6
Emergency Operations Center.....	2	2	2	2
Hispanic-Serving Institutions National Program.....	2	2	2	2
Human Resources Transformation (inc. Diversity Council).....	1	1	2	2
Medical Services.....	1	1	-	-
People's Garden.....	1	1	1	1
Personnel and Document Security.....	1	1	1	1
Pre-authorizing Funding.....	3	3	3	3
Retirement Porcessor Web Application.....	-	-	1	1
Sign Language Interpreter Services.....	2	1	-	-
TARGET Center.....	1	1	1	1
USDA 1994 Program.....	1	1	1	1
Virtual University.....	2	2	2	2
Total, Department-Wide Reimbursable Programs.....	27	27	28	28
<b>E-Gov:</b>				
Enterprise Human Resources Intigration.....	2	2	2	2
E-Training.....	2	2	2	2
Integrated Acquisition Environment - Loans and Grants.....	1	2	2	2
Integrated Acquisition Environment.....	1	1	1	1
E-Rulemaking.....		1	1	-
Total, E-Gov.....	6	8	8	7
Agency Total.....	705	521	743	727

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### Status of Programs

The mission of the National Appeals Division (NAD) is to conduct fair and impartial administrative appeal hearings and reviews of adverse decisions issued by the Farm Service Agency, Risk Management Agency, Natural Resources Conservation Service, Rural Business-Cooperative Service, Rural Housing Service, and the Rural Utilities Service. The Secretary of Agriculture may also assign to NAD jurisdiction to hear administrative appeals arising from decisions of other parts of USDA. In carrying out its statutory authority, NAD hears from farmers, ranchers, and other program participants about their disputes with USDA agencies through a fair and impartial administrative hearings and appeals process.

#### Current Activities:

Appealability Determinations. When an agency notifies a participant that it does not believe an administrative decision is appealable, that participant may request that the NAD Director review that determination. The Director reviews hundreds of these decisions annually, and issues final determinations as to whether the agency decision is appealable to NAD.

Pre-Hearing Conferences. NAD conducts pre-hearing conferences to identify and/or narrow the issues in the appeal and help parties understand the evidence they need to present at the hearing. Pre-hearing conferences increase the efficiency and fairness of the appeal process by ensuring that all parties are properly prepared for the hearing.

Hearings. In the first-level appeals process, NAD Administrative Judges conduct impartial administrative hearings and issue determinations that reflect a thorough consideration of factual and legal information.

Reviews. On petition, in a second-level appeal, the NAD Director reviews the Administrative Judge Appeal Determinations. Further, the Administrative Judges and the NAD Director make decisions about attorney fees under the Equal Access to Justice Act.

#### Selected Examples of Recent Progress:

In Fiscal Year 2014, NAD—

- Processed 1,094 cases filed with NAD;
- Issued 90 determinations when appellants challenged the agency view that a decision was not appealable. Outcome was favorable to appellants in 74 percent of the cases;
- Conducted 732 in-person or telephonic hearings, and reviews of the record;
- Issued 1,597 determinations, of which 1,366 were issued by Administrative Judges and 231 were issued by the NAD Director. Outcome was favorable to appellants in 37 percent of the cases;
- Increased transparency of the USDA appeals process by publishing more than 998 determinations on the NAD website in 2014; approximately 16,748 have been published on the NAD web site ([http://www.nad.usda.gov/public\\_search.html](http://www.nad.usda.gov/public_search.html)) since the program began. Appealability decisions are now posted on the web site; more than 1,040 of those determinations have been made since May 2008;
- Improved access to hearing audio recordings for quality processes and streamlining customer service and increased access to over 11,300 digital recordings of pre-hearings and hearings for employee access and management review. When parties request audio recordings, NAD now provides CDs or MP3 audio files via email or other electronic means;
- Through supervisory or peer review, all draft determinations were reviewed and feedback was provided according to the NAD quality control standards; conducted a high stakes writing evaluation session and linked it to the NAD awards program; NAD writing standards have been validated by the Educational Testing Service, and are described in a peer-reviewed article that shows that the use of holistic evaluation of writing increases the quality of NAD decisions;
- Increased the cost-effectiveness and capability of the case tracking system which captures increasing amounts of data about cases and performance measurements, implements increased electronic delivery services to

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customers, and increases transparency of NAD decision-making to the public. More than 160 eFile requests have been processed since NAD introduced the option to electronically file requests in February 2013; and

- Aligned the NAD Outreach campaign (*Face to Face Fairness*) with the USDA Strike Force initiative and continued to demonstrate to producers the fairness of the USDA appeals system by conducting 30 outreach activities. These activities included attending farm shows, conventions, and conferences; conducting agency training; and meeting with rural colleges and organizations. NAD was a sponsor of the 9<sup>th</sup> Immigrant and Minorities Farmers Conference.

NATIONAL APPEALS DIVISION

Summary of Budget and Performance  
Statement of Department Goals and Objectives

Section 272 of the Federal Crop Insurance Reform and Department of Agricultural Reorganization Act of 1994, Pub. Law No. 103-254, requires the Secretary of Agriculture to establish and maintain the National Appeals Division (NAD). The Act consolidated the appellate functions and staff of several USDA agencies to provide for independent hearings and reviews of adverse agency decisions. NAD hears appeals involving program decisions of the Farm Service Agency, Risk Management Agency, Natural Resources Conservation Service, Rural Business-Cooperative Service, Rural Housing Service, and the Rural Utilities Service. The Secretary of Agriculture may also assign to NAD additional jurisdiction to hear administrative appeals arising from decisions of other parts of USDA.

NAD has one strategic goal and two strategic objectives that contribute to one of the Secretary’s Strategic Goals and one Agency Priority Goal.

**USDA Strategic Goal:** Assist rural communities to create prosperity so they are self sustaining, repopulating, and economically thriving.

**USDA Strategic Objective:** Increase agricultural opportunities by ensuring a robust safety net, creating new markets, and supporting a competitive agricultural system (Objective 1.2).

Agency Strategic Goal	Agency Objectives	Programs that Contribute	Key Outcomes
Issue timely and well-written determinations that correctly interpret applicable regulations.	Conduct hearings and issue quality determinations within applicable statutorily- mandated timeframes.	Hearings Appeals Reviews	Conducts timely hearings and delivers timely determinations
	Evaluate the quality of all hearing and review determinations based upon established and quantified NAD writing standards through peer review or writing assessment exercises.	Planning, Training, and Quality Control	Correct, fair, and readable determinations; reaching the right decision for the right reason

Key Performance Measures and Targets:

Performance Measure	2010 Actual	2011 Actual	2012 Actual	2013 Actual	2014 Actual	2015 Target	2016 Target
Percentage of hearings held and determinations issued within applicable timeframes.	85%	85%	85%	85%	85%	85%	85%
Cost (thousands)	\$7,200	\$6,986	\$6,388	\$6,494	\$6,392	\$6,658	\$6,783
Determinations found to be within 1.0 standard deviation of excellence according to group evaluations.	100%	100%	100%	100%	100%	100%	100%
Cost (thousands)	\$7,200	\$6,986	\$6,388	\$6,494	\$6,392	\$6,659	\$6,783

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Selected Past Accomplishments toward Achievement of the Key Outcomes:

Hearings, Appeals, and Reviews:

- 95% of Hearings, Appeals, and Reviews met the timeliness standard.

Planning, Training, and Quality Control

- 100% of Review Determinations (349) were peer reviewed with quality control processes based upon NAD Holistic Evaluation Writing Standards.
- 100% of Hearing Determinations went through a supervisory peer review process during the drafting phase, based upon NAD’s holistic evaluation writing standards.
- There was an end of the year writing evaluation session that was linked to end of FY 2013 performance awards. All adjudicators submitted their best writing and a calibrated evaluation committee evaluated and provided feedback to writers on their products.
- NAD was identified by the Internal Revenue Service and the Veterans Affairs (VA) as a best practice for improving writing and establishing an evaluation system. Work with the VA continues.

Selected Accomplishments Expected at the 2016 Proposed Resource Level:

Hearings, Appeals, and Reviews:

- A minimum of 85% of Hearings, Appeals, and Reviews will meet the timeliness standard.

Planning, Training, and Quality Control:

- 100% of Review Determinations will be reviewed with quality control processes based upon NAD Holistic Evaluation Writing Standards.
- 100% of Hearing Determinations will undergo a supervisory peer review process during the drafting phase, based upon NAD’s holistic evaluation writing standards.
- NAD will conduct writing evaluation sessions that are linked to end to performance awards.
- NAD will continue partnerships with other Federal agencies for best practices in achieving excellence in its written products.

Strategic Goal and Objectives Funding Matrix

(Dollars in thousands)

<u>Program / Program Items</u>	<u>2013 Actual</u>	<u>2014 Actual</u>	<u>2015 Enacted</u>	<u>Increase or Decrease</u>	<u>2016 Estimate</u>
<b>Department Strategic Goal:</b> Assist rural communities to create prosperity so they are self sustaining, repopulating, and economically thriving.					
<b>Strategic Objective 2:</b> Increase agricultural oportunities by ensuring a robust safety net, creating new markets, and supporting a competitive agricultural system.					
National Appeals Division.....	\$13,194	\$12,784	\$13,317	+\$249	\$13,566
Staff Years.....	87	82	87	-	87

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Full Cost by Department Strategic Goal

(Dollars in thousands)

**Department Strategic Goal: Assist rural communities to create prosperity so they are self sustaining, repopulating, and economically thriving.**

Program / Program Items	2013 Actual	2014 Actual	2015 Enacted	2016 Estimate
<u>National Appeals Division</u>				
Administrative costs (direct).....	\$10,689	\$10,219	\$11,042	\$11,337
Indirect costs.....	2,299	2,565	2,275	2,229
Total Costs.....	12,988	12,784	13,317	13,566
FTEs.....	87	82	87	87
Performance Measure:				
Percentage of hearings held and determinations issued within applicable timeframe.				
Measure.....	85%	85%	85%	85%
Cost per measure (unit cost).....	\$6,494	\$6,392	\$6,658	\$6,783
Performance Measure:				
Determinations found to be within 1.0 standard deviation of excellence according to group evaluations.				
Measure.....	100%	100%	100%	100%
Cost per measure (unit cost).....	\$6,494	\$6,392	\$6,659	\$6,783
Total Costs, All Strategic Goals..	12,988	12,784	13,317	13,566
Total FTEs, All Strategic Goals...	87	82	87	87