

2017 President's Budget
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, 2015, there were 78 permanent full-time employees, comprising 21 in Virginia and 57 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>2014 Actual</u>		<u>2015 Actual</u>		<u>2016 Enacted</u>		<u>2017 Estimate</u>	
	Amount	SYs	Amount	SYs	Amount	SYs	Amount	SYs
Salaries and Expenses:								
Discretionary Appropriations.....	\$12,841	82	\$13,317	78	\$13,317	87	\$13,481	87
Rescission.....	-	-	-	-	-	-	-	-
Sequestration.....	-	-	-	-	-	-	-	-
Transfers Out.....	-40	-	-	-	-	-	-	-
Total Available.....	12,801	82	13,317	78	13,317	87	13,481	87
Lapsing Balances.....	-17	-	-68	-	-	-	-	-
Total Obligations, NAD.....	12,784	82	13,249	78	13,317	87	13,481	87

Permanent Positions by Grade and Staff Year Summary

Item	<u>2014 Actual</u>			<u>2015 Actual</u>			<u>2016 Enacted</u>			<u>2017 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	4	6	2	4	6	2	6	8	2	6	8
GS-13.....	12	46	58	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	3	5	2	3	5	2	3	5	2	3	5
GS-8.....	1	-	1	1	-	1	1	-	1	1	-	1
GS-7.....	-	1	1	-	1	1	-	3	3	-	3	3
GS-6.....	1	6	7	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.....	-	10	10	-	14	14	-	-	-	-	-	-
Total, Perm. Full-Time												
Employment EOY.....	25	57	82	25	53	78	24	63	87	24	63	87
Staff Year Est.....	24	58	82	24	54	78	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~~] \$13,481,000.

Lead-Off Tabular Statement

Budget Estimate, 2017.....	\$13,481,000
2016 Enacted	<u>13,317,000</u>
Change in Appropriation	<u>+164,000</u>

Summary of Increases and Decreases

(Dollars in thousands)

Program	2014 Actual	2015 Change	2016 Change	2017 Change	2017 Estimate
Discretionary Appropriations:					
National Appeals Division.....	\$12,841	+\$476	-	+\$164	\$13,481

Project Statement

Adjusted Appropriations Detail and Staff Years (SYs)

(Dollars in thousands)

Program	2014 Actual		2015 Actual		2016 Enacted		Inc. or Dec.		2017 Estimate	
	Amount	SYs	Amount	SYs	Amount	SYs	Amount	SYs	Amount	SYs
Discretionary Appropriations:										
National Appeals Division.....	\$12,841	82	\$13,317	78	\$13,317	87	+\$164 (1)	-	\$13,481	87
Rescissions, Transfers, and Seq. (Net)....	-	-	-	-	-	-	-	-	-	-
Total Appropriation.....	12,841	82	13,317	78	13,317	87	+164	-	13,481	87
Transfers Out:										
WCF.....	-40	-	-	-	-	-	-	-	-	-
Total Available.....	12,801	82	13,317	78	13,317	87	+164	-	13,481	87
Lapsing Balances.....	-17	-	-68	-	-	-	-	-	-	-
Total Obligations.....	12,784	82	13,249	78	13,317	87	+164	-	13,481	87

NATIONAL APPEALS DIVISION

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

Program	<u>2014 Actual</u>		<u>2015 Actual</u>		<u>2016 Enacted</u>		<u>Inc. or Dec.</u>		<u>2017 Estimate</u>		
	Amount	SYs	Amount	SYs	Amount	SYs	Amount	SYs	Amount	SYs	
Discretionary Obligations:											
National Appeals Division.....	\$12,784	82	\$13,249	78	\$13,317	87	+\$164	(1)	-	\$13,481	87
Total Obligations.....	12,784	82	13,249	78	13,317	87	164	-	-	13,481	87
Lapsing Balances.....	17	-	68	-	-	-	-	-	-	-	-
Total Available.....	12,801	82	13,317	78	13,317	87	+164	-	-	13,481	87
Transfers Out to WCF.....	40	-	-	-	-	-	-	-	-	-	-
Total Appropriation.....	12,841	82	13,317	78	13,317	87	+164	-	-	13,481	87

Justification of Increases and Decreases

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 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.

- (1) An increase of \$164,000 for NAD (\$13,317,000 and 87 staff years available in 2016).

The funding change is requested for the following items:

- a) An increase of \$164,000 for pay costs (\$34,000 to annualize the 2016 pay increase and \$130,000 for the 2017 pay increase.)

The proposed funding level is needed to cover pay and benefit cost increases for existing staff. This increase will ensure that NAD can attract, recruit, and retain qualified employees that can carry out its statutory responsibilities and provide excellent appeal services to USDA participants, farmers, and ranchers. A continued emphasis on high quality employees contributes to responsive, fair and quality decision-making, which is a cornerstone of NAD's strategic planning.

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Geographic Breakdown of Obligations and Staff Years

(Dollars in thousands and Staff Years (SYs))

State/Territory	2014 Actual		2015 Actual		2016 Enacted		2017 Estimate	
	Amount	SYs	Amount	SYs	Amount	SYs	Amount	SYs
Alabama.....	-	-	\$111	1	\$103	1	\$104	1
Arkansas.....	\$110	1	110	1	110	1	111	1
California.....	246	2	127	1	130	1	131	1
Colorado.....	1,120	8	1,120	9	930	9	938	9
Connecticut.....	148	1	-	0	150	1	151	1
Florida.....	238	2	115	1	240	2	242	2
Georgia.....	266	2	266	2	268	2	270	2
Indiana.....	1,149	8	1,259	9	1,200	10	1,220	10
Iowa.....	135	1	135	1	135	1	136	1
Louisiana.....	135	1	135	1	136	1	137	1
Maryland.....	124	1	124	1	126	1	127	1
Michigan.....	110	1	110	1	111	1	112	1
Minnesota.....	142	1	142	1	145	1	146	1
Mississippi.....	114	1	114	1	115	1	116	1
Missouri.....	134	1	264	2	237	2	239	2
Nebraska.....	117	1	117	1	118	1	119	1
New York.....	127	1	127	1	129	1	130	1
North Carolina.....	238	2	238	2	240	2	242	2
North Dakota.....	238	2	238	2	240	2	242	2
Ohio.....	117	1	117	1	118	1	119	1
Oklahoma.....	269	2	269	2	264	2	266	2
Oregon.....	128	1	128	1	142	1	143	1
Pennsylvania.....	112	1	-	0	113	1	114	1
South Carolina.....	134	1	134	1	134	1	135	1
Tennessee.....	1,021	10	1,021	10	1,100	10	1,120	10
Texas.....	364	3	264	2	366	3	369	3
Virginia.....	5,493	24	6,209	21	5,963	25	6,131	25
Washington.....	134	1	134	1	134	1	135	1
Wisconsin.....	121	1	121	1	120	1	121	1
Obligations.....	12,784	82	13,249	78	13,317	87	13,481	87
Lapsing Balances.....	17	-	68	-	-	-	-	-
Total, Available.....	12,801	82	13,317	78	13,317	87	13,481	87

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Classification by Objects

(Dollars in thousands)

	2014	2015	2016	2017
	<u>Actual</u>	<u>Actual</u>	<u>Enacted</u>	<u>Estimate</u>
Personnel Compensation:				
Alexandria, VA.....	\$2,376	\$2,344	\$2,583	\$2,628
Field.....	5,609	5,525	6,095	6,201
11 Total personnel compensation.....	7,985	7,869	8,678	8,829
12 Personal benefits.....	2,233	2,334	2,464	2,512
13.0 Benefits for former personnel.....	1	-	-	-
Total, personnel comp. and benefits.....	10,219	10,203	11,142	11,341
Other Objects:				
21.0 Travel and transportation of persons.....	251	320	277	277
22.0 Transportation of things.....	30	34	20	20
23.1 Rental payments to GSA.....	-	500	505	511
23.2 Rental payments to others.....	81	78	70	70
23.3 Communications, utilities, and misc. charges.....	396	338	290	317
24.0 Printing and reproduction.....	10	10	7	10
25.1 Advisory and assistance services.....	1,328	1,223	878	821
25.2 Other services from non-Federal sources.....	50	141	35	35
25.3 Other purchases of goods and services				
from Federal sources.....	250	238	66	52
26.0 Supplies and materials.....	107	141	25	25
31.0 Equipment.....	62	23	2	2
Total, Other Objects.....	2,565	3,046	2,175	2,140
99.9 Total, new obligations.....	12,784	13,249	13,317	13,481
DHS Building Security Payments (included in 25.3).....	-	\$34	\$34	\$35
Position Data:				
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	13.3	13.3	13.3

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Shared Funding Projects
(Dollars in thousands)

	2014	2015	2016	2017
	<u>Actual</u>	<u>Actual</u>	<u>Estimate</u>	<u>Estimate</u>
Working Capital Fund:				
Administration:				
Beltsville Service Center.....	\$5	\$9	\$13	\$7
Mail and Reproduction Management.....	4	4	9	9
Procurement Operations.....	42	11	13	13
Integrated Procurement System.....	7	7	7	7
HR Enterprise System Management.....	-	-	1	1
Subtotal.....	58	31	43	37
Communications:				
Creative Media and Broadcast Center.....	-	3	1	1
Finance and Management:				
NFC/USDA.....	81	115	207	215
Internal Control Support Services.....	-	-	-	13
Financial Systems.....	43	53	55	57
Subtotal.....	124	168	262	285
Information Technology:				
Client Technology Service.....	268	297	407	414
NITC/USDA.....	19	7	139	142
Telecommunications Services.....	27	28	48	27
Subtotal.....	314	332	594	583
Correspondence Management.....	4	3	3	3
Total, Working Capital Fund.....	500	537	903	909
Department-Wide Reimbursable Programs:				
1890's USDA Initiatives.....	3	2	3	3
Classified National Security Information.....	-	1	1	1
Continuity of Operations Planning.....	2	2	2	2
Identity and Access Management 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	2	2	2
Medical Services.....	1	-	-	-
People's Garden.....	1	1	1	1
Personnel and Document Security.....	1	1	1	1
Preauthorizing Funding.....	3	3	3	3
Retirement Porcessor Web Application.....	-	1	1	1
Sign Language Interpreter Services.....	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
E-Gov:				
Enterprise Human Resources Intigration.....	2	2	2	2
E-Training.....	2	2	2	-
Integrated Acquisition Environment - Loans and Grants.....	2	2	-	-
Integrated Acquisition Environment.....	1	1	1	-
E-Rulemaking.....	1	1	-	-
Geospatial.....	-	-	6	13
Total, E-Gov.....	8	8	11	15
Agency Total.....	535	572	942	952

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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. NAD issues expeditious determinations that reflect a thorough consideration of factual information and applied legal reasoning.

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. The Administrative Judges also make decisions about attorney fees under the Equal Access to Justice Act.

Reviews. On petition, in a second-level appeal, the NAD Director reviews Administrative Judge Appeal Determinations. This second –level review may include Administrative Judge decisions about attorney fees under the Equal Access to Justice Act. Further, the NAD Director may grant equitable relief to the same extent as such authority is provided to the Secretary.

Selected Examples of Recent Progress:

In Fiscal Year 2015, NAD—

- Processed 2,267 cases filed with NAD;
- Issued 82 determinations when appellants challenged the agency view that a decision was not appealable. Outcome was favorable to appellants in 76 percent of the cases;
- Conducted 846 in-person or telephonic hearings, and reviews of the record;
- Issued 1,786 determinations, of which 1,631 were issued by Hearing Officers and 155 were issued by the NAD Director. Outcome was favorable to appellants in 51 percent of the cases. In 30 Review Determinations, appellants were granted equitable relief;
- Increased transparency of the USDA appeals process by publishing more than 1,040 determinations on the NAD website in 2015; approximately 17,650 have been published on the NAD web site (http://www.nad.usda.gov/public_search.html) since the program began. Appealability decisions are now posted on the web site; more than 1,130 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 11,900 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 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;

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- 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 customers, and increases transparency of NAD decision-making to the public. More than 299 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 24 outreach activities including the 10th Immigrant and Minorities Farmers Conference. These activities included attending farm shows, conventions, and conferences; conducting agency training; and meeting with rural colleges and organizations.

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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 1: *Assist rural communities to create prosperity so they are self- sustaining, repopulating, and economically thriving.*

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

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

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Key Performance Measures

Annual Performance Goals, Indicators, and Trends	Actual				Target	Actual	Result	Estimate/Target	Target
	2011	2012	2013	2014	2015		2016	2017	
Percentage of hearings held and determinations issued within applicable timeframes.	85%	85%	85%	85%	85%	87%	Met	85%	85%
Determinations found to be 1.0 standard deviation of excellence according to group evaluations.	100%	100%	100%	100%	100%	100%	Met	100%	100%
<u>Allowable Data Range for Met</u> Target is considered met if actual is within 5% of target.									
<u>Assessment of Performance Data</u>									
<u>Data source</u> – The data was collected and reported by NAD’s Electronic Case Management System. The system collects and reports data in real time; there are business rules established to ensure data entry standards produce reliable and valid results. Further, NAD has quality management procedures to ensure data accuracy.									
<u>Completeness of Data</u> – Complete and Final									
<u>Reliability of Data</u> – There are no identified material inadequacies. The data standard is developed to align with NAD statutory rules and regulations and is certified by the NAD program manager.									
<u>Quality of Data</u> – The data is generally regarded as being very accurate. Data input comes from four NAD office locations, and the system has built in business rules to compel timely and accurate data input. NAD has routine quality checks of the data and conducts continuous training of administrative personnel who update the database.									

Selected Past Accomplishments toward Achievement of the Key Outcomes:

Hearing, 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; and
- 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 2017 Proposed Resource Level:

Hearings, Appeals, and Reviews:

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

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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; and
- NAD will continue partnerships with other Federal agencies for best practices in achieving excellence in its written products.

Strategic Goal Funding Matrix
(Dollars in thousands)

<u>Program/ Program Items</u>	<u>2014</u> <u>Actual</u>	<u>2015</u> <u>Actual</u>	<u>2016</u> <u>Enacted</u>	<u>Increase</u> <u>or</u> <u>Decrease</u>	<u>2016</u> <u>Estimate</u>
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Department Strategic Goal: Assist rural communities to create prosperity so they are self sustaining, repopulating, and economically thriving.

Strategic Objective 2: Increase agricultural oportunities by ensuring a robust safety net, creating new markets, and supporting a competitive agricultural system.

National Appeals Division.....	\$12,801	\$13,317	+\$13,317	+\$164	\$13,481
Staff Years.....	82	78	87	-	87

NATIONAL APPEALS DIVISION

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	2014 Actual	2015 Actual	2016 Enacted	2017 Estimate
<u>National Appeals Division</u>				
Administrative costs (direct).....	\$10,219	\$10,203	\$11,142	\$11,341
Indirect costs.....	2,565	3,046	2,175	2,140
Total Costs.....	12,784	13,249	13,317	13,481
FTEs.....	82	78	87	87
Performance Measure:				
Percentage of hearings held and determinations issued within applicable timeframe.				
Measure.....	85%	85%	85%	85%
Cost per measure (unit cost).....	\$6,392	\$6,624	\$6,658	\$6,740
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).....	\$6,392	\$6,625	\$6,659	\$6,741
Total Costs, All Strategic Goals..	82	13,249	13,317	13,481
Total FTEs, All Strategic Goals...	82	78	87	87