

Comment from Special Counsel Jeffrey S. Lubbers on *Improving Timeliness in Agency Adjudication*  
October 16, 2023

My suggestions:

On line 43, the two values of “due process and procedural fairness” seem to cover the same thing. How about the value of consistency? Other possible values—accountability, transparency, program integrity, equal opportunity for all parties.

On line 93, add “or may not” after “may” so it reads “State expressly whether affected persons may *or may not* enforce the time limit through judicial action.” You would want Congress to state its view either way.

Jeff Lubbers