

Comment from Government Member Nadine N. Mancini on Improving Timeliness in Agency Adjudication
November 7, 2023

Preamble, Lines 52-53 – revise to “agencies and Congress” instead of “Congress and agencies” given that the Congress piece is now at the very end

Rec. 4, line 98 – believe appraisal should be plural (“...administrative law judges, who are not subject to appraisals,...”)

Rec. 4.f, line 109 – believe “other” was added at the last meeting but on clean read, not sure it’s necessary

Rec. 12, line 150 – add a comma after “efficiently”

Rec. 15.f, line 181 – delete the comma after “broadly”

Rec. 16, line 185 – revise to “Agencies should enhance communication between components involved in **their** adjudication **systems**...”

Rec. 21, line 205 – delete “and” after “conduct”

Rec. 23, line 214 – revise to “**As early as possible and at key points throughout the adjudication process,** agencies should provide self-represented parties with plain-language materials...”

Rec. 23, line 215 – not sure “their right” is correct in terms of how the APA views representation (believe this was discussed at the last meeting?), so perhaps replace “right” with “ability”?

Rec. 24 – revise to “Agencies should publicly identify those case management priorities and **procedures; that have been** adopted to improve **timeliness; and** may result in parties’ cases...”

Rec. 25, line 221 – revise to “publicly disclose” instead of “disclose publicly”

Rec. 26, line 230 – again, believe appraisal should be plural