

Comment from Liaison Representative H. Alexander Manuel on *Quality Assurance Systems in Agency Adjudication*
November 2, 2021

Dear Colleagues:

I appreciate the opportunity to review the updated draft of the *Quality Assurance Systems in Agency Adjudication* Recommendation. The Proposed Recommendation is superbly crafted in my view, and I have few suggestions to make. I regret not being able to participate this afternoon, but forward the following comments:

- Preamble: If there is a way to appropriately insert the notion of compliance with procedural due process requirements I think that would be helpful in reminding readers of the overarching consideration with administrative adjudication.
- Footnote 4: legal and ethical. Judges must take ethical concerns into consideration in every decision.
- Para. 4(c): same (add ethical)
- Para. 6: line 66, add compliance with the agency's diversity and inclusion goals.
- Para. 10: Important provision! These illustrations are very-much needed. Ostensibly benign language by managers can be inappropriate, e.g., "this case needs to come out the right way," or "this could cost the agency a fortune." I admire the Committee's efforts to provide specific guidance on this important issue.
- Para. 11(d): Could benefit from an "e.g.," or illustration

Many thanks to the Committee for this important work.

Best,
Judge Manuel