



NAHO NEWS

*...benefitting hearing officials
and the individuals they serve...*

NATIONAL ASSOCIATION OF HEARING OFFICIALS

NOVEMBER 2017

NAHO BOARD ADOPTS CHANGES FOR CERTIFICATION

JOSEPH RUBENSTEIN, Chair, Certification Revisions Committee

At its mid-year meeting in April, the NAHO Board approved revisions to the process for certification and recertification, designed to add value to the credential. Following approval, the Board solicited comments on the revisions from members. At its September, 2017, meeting in Washington, D.C., the Board discussed the feedback from members and adopted changes to the revisions. Some parts of the revised process will take effect on January 1, 2018, and some will take effect on January 1, 2019.

The following requirements will apply to all applications for recertification filed on and after January 1, 2018:

A. Educational Requirements. If the applicant has attended a NAHO training conference in the three year period preceding the calendar year in which they apply they will receive credit for 16.5 hours of education and will be required to complete an additional 3.50 hours of mandatory, elective, or specialized courses to fulfill the educational requirement for recertification. If the

applicant has not attended a NAHO training conference in the three year period preceding the calendar year in which they apply, they will be required to take 10 hours of mandatory courses, 5 hours of elective courses, and 5 hours of specialized courses to fulfill the educational requirements for recertification.

B. Interview. After the Certification Committee determines the applicant has satisfied the educational requirements for recertification, a member of the Certification Committee will interview the applicant by telephone. The purpose of the interview is to determine that conducting hearings is a significant part of the applicant's job and that the applicant has a working knowledge of how to address situations which routinely arise during a hearing. Following the interview, the Committee will forward the application and its recommendation to the Board for final action. Applicants who do not pass the interview will be required to complete additional coursework before their application is forwarded to the Board.

C. Fees. The fee for recertification will be \$40.00 if the applicant has attended a NAHO conference within the 3-year period prior to the year in which they apply for recertification and \$100.00 if they have not attended a conference during that time. The fee is payable with the application and is not refundable.

The following changes will apply to all applications for certification and recertification filed on and after January 1, 2019:

A. Requirement to Attend Practicum. All applicants for certification and recertification will be required to attend a practicum consisting of a mock hearing presented by NAHO in addition to fulfilling all other requirements for certification. Applicants can attend the practicum in-person at NAHO's annual training conference or they can watch a video replay online at the NAHO website.

B. Educational Requirements and Requirement for an Interview. Applicants for certification will be required to meet the educational and

Continued on page 2...

IN THIS ISSUE

NAHO Board Adopts Changes for Certification	1-2
What Judges Know	2
President's Post.....	3
From the Editor.....	4
Due Process In School Discipline Hearings.....	4
Member Spotlight, Rikki Harris....	5
Dealing with Difficult Pro Se Parties.....	5
Annual Awards And Honorable Mentions	6
Annual Membership Meeting Minutes.....	7, 11
Ask the Board	8
2017 Washington DC Conference: Productive & Pleasurable....	8, 11, 12
Eric Moody Memorial Scholarship	9
Ruling on Objections.....	9-10-11
Members Attain Certification or Recertification	10
NAHO Board Elections.....	10

NEWSLETTER CREDITS

Editor: Bonny M. Fetch (ND)

Assistant Editor: Kayla Adams (TX)

Layout / Design:

Wendy Moen, Design Dimension
www.DesignAZ.net
www.facebook.com/DesignDimension

WHAT JUDGES KNOW

Opening keynote address by Judge Andre Davis

Summarized by Toni Boone (OR)

NAHO's opening keynote speaker was Judge Andre Davis, former United States Circuit Judge of the U.S. Court of Appeals for the Fourth Circuit. He was formerly a United States District Judge and was first nominated for a seat on the U.S. Court of Appeals, Fourth Circuit, in 2000. He was renominated to the Fourth Circuit and confirmed by the Senate in 2009. Judge Davis recently retired from the bench to become the City Solicitor for the City of Baltimore.

Judge Davis opened his address by acknowledging that his audience consisted of administrative adjudicators who were the "heavy lifters" of the judiciary, working in every aspect of society and carrying very heavy caseloads.

He emphasized that judges know they need to be wholly neutral and impartial fact-finders, despite each judge's individual background and personal history. He provided, as an example, former U.S. Supreme Court Chief Justice Earl Warren, who was the son of a homicide victim. He characterized Judge Warren as a "law and order judge" but also a judge who "understood the rights our Constitution and statutes afford" and who joined landmark opinions on the Fourth, Fifth and Eighth Amendments to the Constitution.

Judge Davis spoke of a judge's knowledge of the importance of judicial independence but added that it is equally important to *appear* to be judicially independent—to maintain

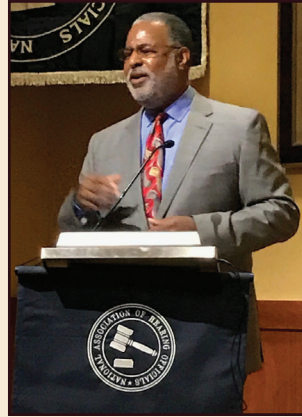
unquestioned integrity.

He also said that judges know that they have to be accountable for the decisions they make. He noted that criticism is a part of judicial accountability but that unjust criticism exists and is often the result of ignorance of what we do as judges, adding that it is important for us to educate the public about the nature of our work.

Judge Davis expressed that judges know that they have to give up their First Amendment rights to some extent because, once we become judges, it becomes inappropriate to make statements expressing our political points of view.

In addition, he said that judges know that their judicial decisions will receive criticism and, as a result, we should be doubly sure that our decisions are thoughtful, informed and well-meaning. He noted that it is a mistake for any judge to forget that we are all burdened by racism, ageism and other bias "isms" and that we "owe the public a consciousness of who we are, where we've been and what we believe." Judge Davis said that his favorite phrase or slogan is: "Don't believe everything you think." He reminded us that "there's so much stuff in our heads"—news, fake news, alternative facts, etc.—and "just because it's in our heads doesn't mean it's correct."

Judge Davis then pointed out that judges know we must discard many old beliefs and old traditions, such as the myth that a person who does not make eye contact is not a cred-



Judge Andre Davis

ible witness. He reminded us that we all have subconscious biases of which we must be aware and that there are "no quick and easy answers to the challenges that the people who come before us are caught up in" and that they are entitled to equal justice.

Judge Davis also reminded us that we, as judges, know that the actions of the government are sometimes inimical to the work of providing justice. We must follow the law in making our decisions and the law may not be or may not seem just, but we must follow it nonetheless.

Judge Davis then stated that judges all know that judging is hard, like "going uphill on a skateboard"—that the work of a judge involves the pressure of heavy caseloads, impolite lawyers and pro se litigants and the injustice of the law itself.

Finally, Judge Davis said that judges know that the "fight for safety, decency, dignity, equality and justice goes on" and we, as judges, have a unique privilege to be in a position where we can impact that fight. ⚖️

NAHO BOARD ADOPTS CHANGES FOR CERTIFICATION

continued from page 1

interview requirements as members applying for recertification on and after January 1, 2018.

C. Option for Certification or Recertification by Examination.

Applicants for certification or recertification will have the option of being certified or recertified by written examination. The examination will be in addition to and not in place of any other requirements for certification or recertification. The examination will consist of 5 essay questions designed by the Certification Committee to test the applicant's knowledge of basic legal concepts and principals which apply to the conduct of administrative hearings. Applicants must get a passing grade on at least three of the five questions to be certified by examination. Applicants who get a passing grade on at least four of the five questions will be certified with honors. Applicants who get a passing grade on all five questions will be certified with highest honors. The test will be pass-fail and will be graded by the Certification Committee. The Certification Committee's grading of tests will be final and not subject to appeal to or review by the Board. Members who certify or recertify by test will receive a certificate stating "Certified by Examination." If the applicant passes examination with honors or highest honors their certificate will read "Certified by Examination with Honors," "Certified by Examination with Highest Honors," "Recertified by Examination with Honors," or "Recertified by Examination with Highest Honors." NAHO will publish articles explaining the process for becoming certified and recertified by examination on its website prior to implementing the process on January 1, 2019. ⚖️

THE PRESIDENT'S POST

WHY DO WE NEED ANNUAL CONFERENCES?

Janice Deshais (CT)

Well, another yearly conference has come and gone. As is the case with every conference I have attended, I come back to work refreshed by the classes I have taken, revitalized by the energy of inspiring speakers and faculty, and restored by my reconnection with friends and acquaintances who renew my spirit and inspire me in my work as a hearing officer and as NAHO President.

It occurs to me that this is exactly why NAHO needs to continue its tradition of offering annual professional development conferences. Not for me alone, but for all of us who are "in the trenches" working day to day to provide due process to people who don't always appreciate the right to be heard when they are losing their benefits or having their license revoked. Although we understand, it is easy for us as hearing officers to get frustrated and discouraged.

We all know that NAHO conferences provide high quality, intensive training, and are a forum for discussing new ideas and relevant issues in administrative law. As important and valuable as these paybacks are, sometimes the most valuable benefit of attending a conference is the support and renewed motivation and ideas gained from others who are all involved with or support administrative hearings. Who among us has not appreciated that reinforcement, especially during challenges we often confront?

NAHO is dedicated to continuing its mission to provide training conferences. But, it is getting challenging to afford to hold our annual three-day event. NAHO does not "make money" on a conference; it hopes that revenue and expenses balance. This was the case for this year and the several years past, but there were many months of uncertainty that this would be the case this

year. NAHO simply could not continue to provide conferences if expenses outweighed revenues on a regular basis.

NAHO's income comes mainly from registration fees. And, the fees we get are, of course, directly impacted by numbers of attendees at a conference. Attendance was impacted this year by cuts in state and federal training budgets. This is a trend we hope will not continue.

A development that is likely to continue is increased costs. Over the years we have seen a rise in the cost for hotel accommodations (even with a per diem rate), especially in the destination cities that attendees like to visit for conferences. Hotel rates for "audio-visual" equipment for presentations, food for events, and even the cost of coffee in the mornings are unbelievable. NAHO tries to keep registration fees reasonable and affordable, but even with our best efforts to keep costs in check, we have had to raise fees to cover these costs.

So what are we doing about all this? We want to keep conferences coming. We are working to keep costs down for NAHO and you.

Every year, NAHO keeps expenses as "bare bones" as possible while preserving the high quality of its conferences. Thanks to the efforts of conference planner and Vice President Toni Boone (OR) and the cooperation of NAHO Board members, we have cut travel costs by engaging more faculty from the host state region and called on Board members and others who have experience and expertise to teach. We are asking Board members, faculty and host state agencies or organizations to provide "in kind" assistance in the form of equipment or other resources. We are also working with hotels to organize conferences in such a way to reduce

costs for room use for classes and events. Our chief event negotiator, NAHO Secretary Jo Murphy (TN), has managed to cut – and then cut more – food and beverage costs while still making sure the hotel provides good food at a reasonable price. We have also solicited vendors over the past few years to purchase a table during the conference to provide goods and services that may be of interest to attendees.

As we have announced, NAHO will try to hold conferences in the west, east and central parts of the country on a rotating basis. We also try to hold a conference in an area where there are groups of potential attendees who could drive to a conference. We hope this will keep travel costs down for segments of attendees each year. (Since the conference was in the east this year, we will hold it in San Diego next year and, for 2019, we are actively exploring a site somewhere in Texas.) We are also exploring the idea of conducting our conferences in cities that might be less obvious "destinations," but that are nice places for a conference -- at a cheaper rate. Options such as changing the length or format of our conferences are possible, but, for now, NAHO hopes it can continue to provide the same type of conferences as it has over the years.

NAHO is also enhancing the training it makes available for NAHO members who cannot attend conferences in person. Its library offerings are being improved and updated. More online learning is part of this service, and something I am sure will be welcomed by members. Our Speakers Bureau is an option for members who want to bring NAHO training to their agency. For just the cost of travel expenses, NAHO will provide experienced faculty to teach at your agency. This is a great way to provide group training at a reasonable cost.



Janice Deshais (CT)

What can you do? First, encourage people you know to join NAHO. Our membership fees are reasonable and there are benefits for members. NAHO also gains from having a strong membership base. Second, there is another option that you may be able to consider. NAHO is a non-profit 501 (c) (3) organization and can accept donations to support its work. Your tax deductible donation will enable us to bring you high quality meaningful annual conferences and enhance the resources NAHO can provide to you. See www.naho.org for more information.

I am confident NAHO will continue to do what it does so well and provide its members and others who want to receive high quality training with the annual conferences. I believe conferences are important offerings for members and others who benefit from all a conference can provide. I am also certain that NAHO will continue to expand all its training options for its members.

I know I benefit from attending a conference, do you? Let's work together to keep NAHO as a valuable resource for all its members. Feel free to drop me a note with your thoughts and ideas at Janice.deshais@naho.org. 📧

*My best to all
for a wonderful
holiday season!*

FROM THE EDITOR

Combining a Well-Worn Path With a New Direction

Bonny Fetch, ND
Past-President, Editor



Bonny Fetch (ND)

Having missed the conference in Portland last year, it was especially nice to be able to attend this year's conference in Washington DC. The annual conference offers so many things, top-notch training, high-caliber keynote speakers, a forum to commune with fellow hearing officers, a chance to get away from the pressure of everyday routine, and a little leisure time. I hope those of you who attended this year had time to experience some of the many wonderful things our nation's capital has to offer.

Personally, this year was a great experience for me and it renewed my enthusiasm for NAHO and for the conference. First and foremost, I very much enjoyed seeing so many colleagues I have known over the years in connection with NAHO. The ability to network in person with colleagues has always been one of the mainstays of holding an annual conference. Learning from one another, no matter what the profession, is an invaluable opportunity. And there are always new and interesting people to meet. This year did not disappoint. I did meet some very interesting people and look forward to the next conference where we can catch up.

There were so many excellent training sessions on the program this year. Toni Boone, Jo Murphy, Jan Deshais, and everyone else responsible for bringing it all together deserve commendation for a job well done! In addition to the familiar format of the conference, the planners this year introduced a new format of having one-hour sessions with more offerings, which went over well.

I was pleased to be able to participate as a presenter. Paul Keeper and I presented two sessions. It was especially gratifying as Paul is someone I very much enjoy working with. One of the sessions we presented was a mock prehearing

conference and mock hearing practicum. It was challenging to cover so much in an hour. It really tested our ability to keep on task, but we did it. It was not only a good learning experience, for our audience and for us, but it was fun. Sometimes time constraints force us to be more efficient and productive, as there is no time to waste, and that was certainly true in this case.

I was also pleased and excited to introduce something new, "Yoga at Your Desk." Yoga is a wonderful stress-reliever, something that hearing officials greatly need. Many people think of yoga as strictly the poses which are so often pictured. Yoga is so much more than that. At the very least, yoga comprises breathing techniques, poses, and meditation/relaxation. If you were unable to attend the conference, or not able to attend the yoga sessions, my materials can be found on the NAHO website under the conference materials. Maybe it will inspire you to attend next year.

I reported in the January newsletter that I was in training to become a yoga instructor. I completed the 13-month program in yoga study and teacher training and graduated October 21. I can now add the credentials RYT (Registered Yoga Teacher) to my resume. I have been teaching regularly since November 2016, and, along with two partners, co-founded the first yoga conference in North Dakota, which was held in October. Thanks to NAHO, I have had extensive conference planning experience! Who says retirement can't be new beginnings? Ah, but that might be fodder for a whole new article.

I wish you the very happiest Holiday Season with family and friends and a healthy New Year. 🙏

DUE PROCESS IN SCHOOL DISCIPLINE HEARINGS

Linda Snow, TX

This year NAHO welcomed Ben Brauer, Ed.D. and Buzz Williams from Maryland as presenters for school discipline hearing officials.

Dr. Brauer and Mr. Williams reviewed basic due process requirements:

- **Notice of charges** - to notify the student and their parents of the issue(s) to be addressed.
- **Opportunity to be heard** - to explain the student and their parents have the right to present their side of the issue(s) to be addressed.
- **Fundamental fairness** - to ensure no perception of bias occurs in the hearing process.

School discipline hearings involve different stakeholders than most administrative law hearings. Of course the student and their parents are included in the hearing process, but additional participants may consist of advocates, school administrators, and attorneys for both sides.

As in all administrative law hearings, school discipline due process comes down to whether the school administration followed the established processes for the incident. School discipline hearing officers work for the school board and are subject to pressure from board members to make a decision in the school's favor. However, the school discipline hearing official must present the demeanor of an unbiased, independent hearing officer who follows the simple and logical steps of due process.

The overall school discipline hearing process comes down to two sides. The "pro-principal" side wants strong discipline in schools, and the "pro-student" side wants to ensure the student receives an education. In every hearing, the presiding official must determine whether the transgression meets the criteria for a low-level, moderate-level, or high-level infraction. Based on this determination, the specific discipline can range from one day of after school detention to 90-days of online instruction for the student. In addition, the decided transgression level may require developing an individual education plan (IEP) for the student.

Another issue discussed during the training included possible movement from school discipline hearings to the student being arrested and entering the prison system. These issues involve strong emotions on both sides and places the hearing official in the position of possibly removing a student from school for a period of time. (Maryland does not allow the permanent removal of a student from school.)

Overall, the course stressed due process and the unbiased fair hearing as part of the student's right to be heard. 🙏

MEMBER SPOTLIGHT

This issue we asked featured members several questions. We received one response. Here are the questions. *What agency do you work for? What is your job title? Describe what type of hearings you do or how your job is related to hearings. What difficulties are associated with your job? How long have you been a NAHO member? Have you attended NAHO conferences? Has NAHO helped you with the difficulties you indicated in your job? Is there anything you would like to see NAHO do which would be of more help to you as a member?*



Rikki Harris

I work as a Hearing Officer III for the South Carolina Department of Social Services (DSS) Office of Administrative Hearings.

The bulk of my caseload involves SNAP (food stamps) /TANF (welfare) fraud cases. With these cases, the Department must establish by a *clear and convincing* evidence standard that the Respondent intentionally misrepresented some pertinent information, such as their income and/or their household composition, in order to deceive the government and receive additional

governmental assistance. The cases are telephonic hearings; however, at the Respondent's request, we can hold the hearings via video conference. For the most part, Respondents do not attend these hearings and, pursuant to federal law, the administrative hearing is conducted in their absence. However, if they do attend, they are often *pro se* litigants.

I also conduct fair hearings in which a SNAP/TANF recipient appeals either (1) the Department's determination of how much SNAP/TANF benefits he/she qualifies for, assuming he/she qualifies for any; or (2) they appeal the Department's over-issuance amount due to fraud or agency error. These hearings too are conducted over the telephone. After the hearing, I, along with a Fair Hearing Committee, review the case record and the hearing testimony and determine whether or not the Department properly calculated the Petitioner's SNAP/TANF benefits.

Additionally, approximately twice a month, I conduct Special Fair Hearings. Special Fair Hearings usually involve appeals due to a

child care facility's licensure revocation and/or suspension, appeals involving a foster care or adoption application denial, or appeals involving an out-of-home abuse and neglect case (OHAN). These hearings are conducted face-to-face. The Department is represented by an attorney and, in most cases, the appellant is also represented by an attorney.

Often times, as a hearing officer, I encounter a *pro se* litigant who is belligerent and unruly. Their hostile attitude can be contributed to multiple factors, such as, he/she is frustrated with the bureaucratic procedure involved in resolving their situation or he/she does not know the law pertaining to their particular situation. In these situations, I have learned that it is important to be patient and thoroughly listen and explain the law applicable to the case.

I joined NAHO in August 2017. I recently attended the NAHO conference in Washington D.C. in September 2017. At the NAHO conference, there was a wonderful presenter who helped provide strategies in dealing with difficult

Petitioners, particularly, anti-government litigates. At the end of the presentation, the presenter had the class tell their horror stories as hearing officers and, as a class, we determined the best way to handle combative behavior in order to conduct a fair, impartial hearing.

I also enjoyed the class discussing the use of interpreters. I have only had one case currently that involved an interpreter but I thought the class provided excellent instructions on how to properly incorporate an interpreter in a telephonic hearing. Additionally, the NAHO conference had two classes entitled Yoga at Your Desk, and honestly, I do some of the moves daily to help reduce stress.

If possible, I would love NAHO to re-create a hearing with a difficult *pro se* litigant and have the class discuss the proper means to handle such a client. Also, I would love to know what is the best explanation to give to an appellant regarding their responsibility to pay back an over-issuance amount due to agency error. It is always heart-breaking to tell underprivileged clients that they owe \$1,000 or more because the Department made a mistake. 🙏

DEALING WITH DIFFICULT PRO SE PARTIES

Linda Snow, TX

Managing appeals involving difficult *pro se* parties is never easy. However, Joseph Rubenstein presented tips on how to best handle these hearing participants.

The tips included:

- Establishing and maintaining control of the hearing from the beginning
- Making a solid record of your interactions with the difficult parties
- Responding to threats and personal attacks
- Delay tactics by requesting numerous continuances
- Handling evasive witnesses

- Dealing with sovereign citizens

The session outline provided specific actions the hearing officer could use in each of these instances and more.

Once finished reviewing the instructional material, Mr. Rubenstein pulled in help from some of NAHO's not quite ready for primetime mock hearing players. Peter Halbach served as the judge for a difficult *pro se* party played by Linda Snow, who was present to fight a ticket for not stopping at a stop sign. Mr. Halbach handled each question raised by Ms. Snow, using tactics described in the reviewed material.

Next, Mr. Halbach presided over a hearing with Paul Keeper playing a sovereign citizen. Mr. Keeper presented his self-created identification and argued that Mr. Halbach had no authority over him. In addition, Mr. Keeper presented his case using out-of-context bible quotes, and threatened to place a lien on Mr. Halbach's property and sue Mr. Halbach in another jurisdiction. Using the techniques discussed, Mr. Halbach created a full hearing record to the extent possible.

The participants enjoyed the two mock hearings, and provided positive feedback of the session as a whole. 🙏



Linda Snow

ANNUAL AWARDS AND HONORABLE MENTIONS

Janice B. Deshais (CT)

I was pleased to present the awards for service to NAHO at the Tuesday evening awards Banquet at this year's Conference. This is truly one of my favorite responsibilities as President.

Outstanding Service Award Kayla Adams, TX

The Outstanding Service Award is awarded to someone who consistently contributes above and beyond what is expected and someone who has made a lasting contribution to NAHO. This year's recipient is Kayla Adams of Texas.

Not only does Kayla carry out her duties as the Southwest Region representative, she took on and managed our membership process after the untimely death of our membership chairman Eric Moody early this year. As the interim membership committee chair, she had to become proficient in a new database, catch up on pending applications, and restart the process that had been suspended when Eric died. Kayla is also Assistant Editor of the NAHO newsletter, which is an important part of our communications. And, not as constant but as important, Kayla always agrees to take on the crucial but often tedious job of taking Board meeting minutes when our secretary is absent, and usually on short notice.

Kayla has consistently gone "above and beyond" and her efforts have made a lasting contribution to NAHO. I was pleased to present her with this award.

Special Assistance Award Joseph Rubenstein, MN

The Special Assistance Award is given to an individual to recognize their assistance in a specific area and to distinguish unique work they have performed for NAHO. This year's award is given to Joseph Rubenstein of Minnesota.

Joe has taken on many tasks for NAHO over the years as a Board member, Central Region Representative, committee member, 2013 Conference host state promoter and contributor, recruiter of new talent for NAHO, and someone who never fails to ask if he can help, an offer that is always welcome and appreciated.

This year, Joe provided truly distinctive support on a project of great importance to NAHO when he agreed to chair a committee to analyze possible revisions to an important NAHO program. This committee was to consider the ways in which NAHO could possibly develop and implement revisions to its certification program by adding online testing as a requirement for that

credential.

Joe kept his committee on track, organized the moving target of ideas, and developed a plan of how the process would actually work, including how the online testing requirement would be incorporated into the certification application process. And, as this idea continues to be refined, Joe has agreed to continue his work even though his term as Central Region Representative has expired.

This is truly distinctive assistance worthy of recognition. I was proud to award the 2017 Special Assistance Award to Joe Rubenstein of Minnesota.

President's Award Toni Boone, OR

The President's Award is given to someone who has provided special assistance, mentoring, or support to the President. The person who provides this for me is Vice President Toni Boone of Oregon. Toni is also a source of help for the Board and a fount of knowledge and training for everyone who is part of the administrative hearings profession.

Toni takes on more than her share of projects and makes sure a job is done and done right. Toni is someone we can rely on to be an important contributor to a project or decision; she is often the person who can sort out all the options when the Board needs to decide what path to take.

Toni is a constant advocate of the administrative process and has been an exceptional teacher to thousands of students who have benefited from her courses at NAHO, at the NJC, at state and federal agencies, and at countless other forums throughout the nation. Her expertise has allowed our conference curriculum to improve every year.

Toni works tirelessly to herd all the cats that are necessary to manage the complicated, multifaceted planning, organization, and administration of an annual conference. Suffice it to say, without her, the DC Conference would not have happened. I was pleased to present the 2017 President's Award to Toni Boone.

Bill Kane Board of Directors' Award Eric G. Moody, ID

The final award is selected by the Board and named for one of NAHO's past presidents. The Bill Kane Board of Directors' Award recognizes someone who has made distinct and invaluable contributions to NAHO. This year's award was presented posthumously to a man whose contri-

butions to NAHO were both unique and valued, Eric G. Moody of Idaho.

Eric was the regional representative for the Western Region and was chair of the membership committee, which is one of our most essential committees. He carried on the important task of maintaining the membership database and managing the membership process for new and renewing memberships. Eric served on several other NAHO committees and was one of those people we all could count on to do his part. His contributions to a conference were behind-the-scenes but essential to its success. Eric stuffed registration folders, staffed the registration desk, monitored classes, sold NAHO merchandise and, especially when we started needing more and more "AV" equipment for classes, made sure that equipment found its way into the right classrooms. In short, Eric did what had to be done without fanfare or attention. Eric was always a great source of support to me and the work we were all doing to sustain NAHO.

Everyone who knew Eric will miss his smile and slightly goofy sense of humor. Eric's contributions were unique and invaluable and I was honored to award him the commemorative clock as a symbol of this Award. (Dave Baumann from the Idaho DOT, a co-worker of Eric, accepted on his behalf and carried the award back to Idaho for Eric's wife, Kim, and son, Geoffrey.)

Honorable Mentions Linda Snow, TX, and Bobbie Marshall, TX

These two women provide essential help to NAHO and its members and I must also recognize their contributions. NAHO could not function without them.

I first thank NAHO treasurer Linda Snow of Texas. Conference attendees know Linda as a great instructor and tireless seller/enthusiast for NAHO merchandise. Behind the scenes, Linda is an important part of NAHO. As treasurer, Linda has "electrified" our records, which has simplified budgeting, created more transparent record-keeping, and made expenses and income easier to track. Besides providing good humor and support to NAHO in general, as manager of NAHO's finances, Linda provides a service that is essential to NAHO's financial stability.

I also thank Bobbie Marshall of Texas. Bobbie has pushed NAHO into the world of social media. Anyone who has friended us on Facebook or followed us on Twitter will recognize Bobbie deserves thanks for her posts and tweets which are full of useful, and fun, information. During the Conference, Bobbie posted updates of activities and provided short videos of speakers and classes. This is a great addition to NAHO's efforts to inform its members and others about NAHO and its services. Thank you Bobbie! 🐾

ANNUAL MEMBERSHIP MEETING MINUTES

Minutes by Bobbie Marshall (TX)

CALL TO ORDER- Janice Deshais (CT) President Deshais called the meeting to order at 8:36 AM local time.

She began the meeting by noting the death of Eric Moody in December of 2016. Eric was the Western Region Representative and Membership Committee Chairman. She announced that the NAHO conference scholarship will be renamed in his honor as the Eric Moody Memorial Scholarship.

WELCOME FROM THE PRESIDENT- Janice Deshais (CT)

Jan also reminded attendees about certifying Conference attendance. She explained that all attendees will receive an email after the Conference with a Conference evaluation and a certificate of attendance. After the evaluation is completed, the certificate will be able to be downloaded. In addition, the email will include the master attendance list and class attendance rosters.

Approval of the Minutes from September 13, 2016, Annual Meeting- Jo Murphy (TN)

Since the minutes had not been distributed to the membership before the meeting, Mick Gillette (OR) moved that they be distributed to the membership and that this meeting be recessed and reconvened at a later time to accept them. Peter Halbach (ND) seconded this motion, and it carried.

(The minutes were subsequently posted on the NAHO website.)

President's Report- Janice Deshais (CT)

Jan reported that NAHO continues to work to fulfill its "Action Plan."

1. Improve NAHO's "public face"
 - a. The NAHO website has been revised and improved to be more user friendly- more accessible resources for members and others who visit the site.
 - b. Social Media- Bobbie Marshall (TX) has developed NAHO's presence on social media. NAHO's social media is providing faster news, more information, networking, and some fun to NAHO members and others.
2. Improving Services to Members
 - a. Improvements have been made to the NAHO library
 - b. Enhancements to the requirements for certification and re-certification which will increase the value of NAHO credentials

3. Plans for 2018 include:
 - a. Expand website information
 - b. Increase library offerings
 - c. Require re-certification changes
 - d. Establish membership sections; categorized by work performed by members to enhance communications and networking opportunities.
 - e. Broaden membership recruitment efforts
 - f. Grow reputation for quality and professional development

Vice President's Report- Toni Boone (OR)

Toni discussed the details of the 2017 Conference. There were 104 attendees, and many were walk-in registrants. Toni noted that this was a difficult conference to obtain advance registrations. Even though there are many administrative adjudicators in DC (one of the reasons the site was selected for the conference), training budgets have been impacted by the new administration, and that resulted in an increase in the number of one-day attendees. Many agencies could afford one day, or attendees paid their own costs. Toni noted that four registrants from the Virgin Islands and two from Florida could not attend due to hurricanes.

Toni also noted some improvements that have been implemented at the 2017 Conference. Forty-two hours of instruction will be provided in one-hour classes and class start and end times have been "standardized."

Toni discussed the upcoming 2018 Conference which will be hosted at the Marriott Marquis San Diego Marina Hotel. More information will be coming soon.

Toni discussed future conference sites- possible sites for 2019 include San Antonio, Des Moines, Fort Worth, Pittsburgh and Louisville.

Treasurer's Report- Linda Snow (TX)

Linda reported that in September 2016, NAHO had \$69,539.33 in its account, and, as of August 2017, this amount was \$71,513.20. She attributed the stability in the treasury to cost savings that have been implemented, such as cutting back on Board travel expenses.

REPORTS FROM THE STANDING COMMITTEES

Nominations/Election - Gregory "Ozzie" Ozzment (FL)

Ozzie outlined the election process and an-

nounced the elected members of the NAHO Board.

2018 - 2019 Board Members:

President - Janice Deshais (CT)
 Vice- President - Toni Boone (OR)
 Secretary - Jo Murphy (TN)
 Treasurer - Linda Snow (TX)
 Northeast Region Representative - Clayton Mansfield (PA)
 Southeast Region Representative - Samantha Simpkins (FL)
 Central Region Representative - Kelly Vargo (MN)
 Southwest Region Representative - Kayla Adams (TX)
 Mountain Region Representative - Sarah Huber (ND)
 Western Region Representative - Karen Gorman (CA)

The following members of the Board serve ex officio -

Immediate Past President - Norman Patenaude (NH)

At-large member - Bobbie Marshall (TX)

By-Laws and Resolutions- Peter Halbach (ND)

Two amendments to the By-laws were proposed. The first would allow the Board to make non-substantive changes to the By-laws without amendments under specified and special circumstances, and the second would clarify that members of the Nominating Committee cannot be running for election or re-election. Norm Patenaude (NH) moved the approval of both amendments and Bonny Fetch (ND) seconded. There was no opposition, and the membership approved the motions.

Membership- Kayla Adams (TX)

There are currently 304 active NAHO members. Renewals are due by January 1, 2018. Dues will be \$50 for one year and \$115 for 3 years. If 5 or more are applying for membership at the same time, the cost is \$40 per person. NAHO no longer offers a discount for 25 or more members. Kayla noted that PayPal is the easiest way to pay for membership.

Certification- Jimmy Stokes (GA)

In 2017, 26 NAHO members were initially certified or had their certification renewed.

Task Force Report

Certification- Joe Rubenstein (MN)

Joe outlined the timeline for changes to certification requirements, particularly changes to re-certification starting in January 2018 and certification in January 2019. He described the proposed testing process and noted that a test preparation class could be offered at next year's conference. He noted that details of these changes will be announced in upcoming editions of the newsletter and in emails to the membership as this process proceeds.

Continued on page 11...

ASK THE BOARD

Several members submitted some very insightful questions.

Q *John Gray, Olympia, WA*
“My question is based on an article on page 9 of the January 2017 Newsletter, which was very interesting to me. What are the improvements that are being made to certification and re-certification for CHOs and CALJs?”

A Very timely question John. Joe Rubenstein wrote an article on the certification changes in this issue. *-Editor*

Ronald Truss

Q “I would like to get more involved. I am a retired Court Administrator and Chief Magistrate in Birmingham, AL, and Jefferson County.”

A The Board welcomes anyone who would like to get involved! You don't have to be a Board member to serve on a committee, help with a conference, or lend your time and experience for any one of a number of NAHO projects. Send an email to me at Janice.deshais@naho.org and I will be happy to share more complete information as to how you can get involved. *-Jan Deshais*

Carl Hobbs, Washington, DC.

Q “I would like to ask the Board if they would be willing to share their stories on how they ascended to their current positions. Specifically, their career paths, and advice to younger attorneys who aspire to judgeships (or other roles in the ‘hearing official’ field) later in their careers.”

A This is an interesting and terrific question! We will feature the stories of several Board members in our next newsletter! *-Jan Deshais*

Toyya Williams, Columbia, SC

Q “I have always considered newspaper articles to be hearsay. I would love to hear your take on whether newspaper articles are admissible as evidence in administrative proceedings and whether they qualify as ‘hearsay.’”

A This is a great question, but it is a legal issue and more appropriate to present in a feature article rather than a question for the Board members. Look for the answer in a feature article in the next issue. *-Editor* ↗



2017 WASHINGTON DC CONFERENCE: PRODUCTIVE AND PLEASURABLE

Toni Boone, OR

NAHO held its first conference in 1987 in Merrimack, New Hampshire. Some 30 years later, NAHO is stronger than ever, still growing, and strives, each year, to present a conference that is relevant and enjoyable. Based on the observations of the attendees and the comments in the evaluations, the 2017 conference met those goals.

Despite recent extreme federal budget cuts which made it difficult to impossible for federal administrative adjudicators to attend, there were 116 attendees at this year's conference, including a number of one-day and half-day attendees. They enjoyed virtually perfect weather—mild temperatures and sunny skies prevailed during the entire conference.

Planning for this year's conference began in earnest with the selection of the faculty and the creation of the curriculum. Some of our usual faculty members were unable to participate this year, such as Professor Greg Ogden who was teaching in Europe for the semester. About 80% of the topics selected for this year's training program came directly from last year's post-conference survey, which requested more classes that were specific to a particular type of hearing. As those classes were created, new faculty volunteered to lead those sessions. Based on comments of the participants and post-session evaluations, many of our new faculty members presented some very informative classes.

Some of the highlights of the conference,

according to the attendees, were: the opening keynote address by U.S. Court of Appeals Judge Andre Davis, a summary of which is included in this newsletter, a number of mock hearings including some very realistic portrayals of Sovereign Citizens and contentious parties, and an interactive class on “Yoga at Your Desk.”



Toni Boone (OR)

Most of our attendees took advantage of being in our nation's capital by visiting nearby museums and historical landmarks with the favorite destination being the nearby Ford's Theater where President Lincoln was assassinated. Others spent much of their time networking and socializing with colleagues over breakfast or during “happy hour.”

However successful the Washington DC conference is deemed, the NAHO Board hopes that it is surpassed by the 2018 conference which will take place September 9th–12th at the Marriott Marquis San Diego Marina. At this waterfront Marriott, conference attendees will easily transi-

Continued on page 11...





ERIC MOODY MEMORIAL SCHOLARSHIP

The annual NAHO scholarship has been renamed in honor of the late Eric G. Moody of Idaho. The Eric Moody Memorial Scholarship will be awarded to NAHO members to assist with the cost of the annual conference registration fee. Eric was a great supporter of NAHO conferences so it is fitting that this scholarship be renamed in his memory. As a Board member, Eric provided invaluable support for every conference that was essential to their success. As chairman of the Membership Committee, Eric also had a special affinity for NAHO members and NAHO's support for them. The Eric Moody Memorial Scholarship will become a lasting tribute to Eric and all he meant to NAHO.

RULING ON OBJECTIONS

by Jim Gerl



Jim Gerl

Editor's Note: This article was first run in the August 2016 issue of NAHO News. Since there is so much interest in this topic, it is being printed again in this issue.

INTRODUCTION

One of the many things that hearing officers do is to rule on objections. One of the courses that I teach at the extremely valuable NAHO annual conferences is "Ruling on Objections." We rule on serious objections, ridiculous objections, valid objections and absurd objections. We get objections based upon relevance, hearsay, lack of foundation, and form of the question. Most people just see us ruling by saying "sustained," or "overruled." But much more is involved.

For most of us, the formal court rules of evidence do not apply. Administrative agencies which do adjudicatory hearings rarely apply the formal court rules of evidence. Generally, evidence is admissible in an administrative hearing if it is relevant to the issues presented, it is reasonably reliable and it is not privileged. For example, the federal administrative procedure act provides as follows: "Any ... evidence may be received, but the agency... shall provide for the exclusion of irrelevant, immaterial or unduly repetitious evidence. A(n order) ... may not be...issued except on consideration of the whole record ... and supported by ... reliable, probative and substantial evidence... A party is entitled to present his or her case or defense by oral or documentary evidence, to submit rebuttal evidence and to conduct such cross-examination as may be required for a full and fair disclosure of the facts..." 5 U.S.C. Section 556(d). Although the evidentiary standards of

the federal administrative procedure act are not binding upon the non-federal hearing officer, they provide an illustration of the type of rules of evidence generally applicable in an adjudicatory administrative hearing.

Some state agencies follow the state Administrative Procedure Act for basic procedures. Other agencies have adopted a hearing officer manual or guide. See for example, Texas Workforce agency's Hearing Officer Handbook, which is found on their website at http://www.twc.state.tx.us/ui/appl/app_man1.html, and the state of Alaska Hearing Officer's Manual, http://www.law.state.ak.us/pdf/manuals/hearing_officer.pdf. Even where such manuals or procedure statutes exist, however, there will be many situations which the hearing officer must address that are not covered by the manual. It is within these areas that the hearing officer must exercise discretion.

The *reason* why the administrative hearing officer is vested with substantial discretion in ruling upon objections is that discretion "... is indispensable whenever individuality is needed... The administrative process allows discretion in order to take care of the need for *individualized justice*..." *Old Abe Co. v. New Mexico Mining Comm.* 908 P.2d 776, 121 N.M. 83 (NM S.Ct. 12/11/95). In other words, discretion permits the hearing officer to rule fairly upon a particular objection based upon the facts and circumstances of the case. The hearing officer utilizes his or her discretion to ensure that rulings on objections are fair and just given the situation presented.

The good news here is that because we are granted wide discretion in ruling on objections, a hearing officer's rulings regarding the admission or exclusion of evidence will not be disturbed upon review by a court unless there has been an **abuse of discretion**. *M. J. Ontario, Inc. v. Daley* 861 N.E.2d 1161 (Ill. App. Ct. 1/10/07). A reviewing court will not overturn an evidentiary ruling by a hearing officer unless it affects the fairness of the proceedings or the correctness of the decision. *Gadsden State Bank v. Department of Banking, et al* 369 So.2d 375 (Fla.Ct.App. 3/27/79). Evidentiary findings made at an administrative hearing will not be reversed unless clearly wrong. *Loyal Order of Moose Lodge No. 120 v. State*

Tax Commission No. 32842 S.E.2d (WVa S.Ct. 7/14/06). See, *Bar-Av v. Psychology Examining Board* 728 N.W.2d 722, 735 (Wisc. Ct. App. 10/11/05); *Austin Chevrolet, Inc v. Motor Vehicle Bd.* 212 S.W.2d 425 (Tex.Ct.App. 2006); *Owen City Bd of Commrs v. Indiana Dept. of Workforce Development* 861 N.E.2d 1282 (Indiana Ct. App. 3/1/07).

BEST PRACTICES

It is important to explain to the parties and attorneys at the outset of a hearing, or earlier, that the formal rules of evidence do not apply. A more detailed explanation, in plain language, is necessary if a party does not have legal representation. It is also important to be reasonably consistent throughout the hearing with your rulings on objections. Firm and decisive rulings by the hearing officer are critical.

In ruling on objections and motions that are raised during the hearing, be decisive. Allow each party to address an objection briefly, unless you direct otherwise, on a particular objection you want help with, and then rule firmly. Do not permit attorneys or pro se parties to argue with you after you have ruled. If difficult lawyers contest your rulings after you have made them, simply state, "Your comments are noted for the record. Please proceed."

Some attorneys will ask you to "take it for what it's worth," after you have excluded "it." I never do this. If the proponent of an exhibit cannot explain clearly how it is relevant, it's not worth anything. In any event, it is important to be decisive in ruling and to stick by your rulings once you have ruled. Otherwise overly aggressive lawyers will consume an unreasonable amount of hearing time contesting your rulings or trying to make you doubt yourself.

A hearing officer is not required to explain his or her rulings on objections or motions (unless, of course, your state has a rule, regulation, policy, or manual to the contrary). Unlike your decision, which is required to have findings of fact and conclusions of law and should include an explanation of your reasoning, your rulings

Continued on page 10...

NAHO BOARD ELECTION

Gregory L. Ozment, Chair

This year the Nominating Committee assembled a slate of NAHO Board candidates for the next two year term for 2018 – 2019. The election results were certified by the Nominating Committee and presented to the Board prior to the 2017 Conference. The results were presented at the Annual Membership Meeting during the Conference on September 12, 2017. The results are listed below.

2018 – 2019

Board Election Results

PRESIDENT

Janice Deshais (CT)

VICE-PRESIDENT

Toni Boone (OR)

SECRETARY

Jo Murphy (TN)

TREASURER

Linda Snow (TX)

NORTHEAST REPRESENTATIVE

Clayton Mansfield (PA)

SOUTHEAST REPRESENTATIVE

Samantha Simpkins (FL)

CENTRAL REPRESENTATIVE

Kelly Vargo (MN)

SOUTHWEST REPRESENTATIVE

Kayla Adams (TX)

MOUNTAIN REPRESENTATIVE

Sarah Huber (ND)

WESTERN REPRESENTATIVE

Karen Gorman (CA)

The Nominating Committee encourages members to be involved in committees and Board positions as their input would benefit the overall success of the organization. We wish to thank all who ran during this last election cycle and to all who exercised their privilege to vote for the leadership of NAHO. 🗳️

MEMBERS ATTAIN CERTIFICATION OR RECERTIFICATION

Jimmy Stokes, GA

The National Association of Hearing Officials presented 26 certification or recertification certificates to members at the NAHO Annual Conference on September 12 in Washington, DC.

The NAHO Board of Directors approved initial certification as a Certified Hearing Officer (CHO) for Richard Byrd, Jr., Darlene Davis, Mary Dempsey, Felecia Ford, Dijaria Henderson-Greene, James Huntley, LaShawn James, Dr. Jeanine McCannon, Alice Newton, Monisola Ogunfiditimi-Tamba, Tracia Rountree, Pamela Smith, Colleen Ulrich, and Suzanne Windsor.

Rebecca Ophus received a Certified Administrative Law Judge (CALJ) certificate. Veteran NAHO members who received recertification certificates for Certified Administrative Law Judge were Norman Patenaude and Pilar Vaile.

Nine NAHO members were recertified as Certified Hearing Officers (CHO). Included in the nine were: Janice Deshais, Kayla Adams, Jim Gerl, Karen Gorman, Peter Halbach, Rodney Moorehead, Iris W. Olulenu, Diana F. Ragsdale, and Dr. Jimmy Stokes.

The certification process for NAHO members is detailed on the NAHO website, www.naho.org, and is administered by the NAHO Certification Committee which consists of Richard Murrell, Tennessee, Dr. Ben Brauer, Maryland, Robert Pullen-Miles, California, Michelle Guilfoyle-Douglass, Florida, and Dr. Jimmy C. Stokes, Georgia. 🗳️

RULING ON OBJECTIONS

continued from page 9

during the hearing require no explanation. Of course, if explaining a ruling, particularly early on when the lawyers are unsure of the rules of evidence, etc., will help the lawyers or parties understand how to proceed for the remainder of the hearing, then by all means explain the ruling.

Evidence comes in two primary forms: the testimony of witnesses and exhibits, which are generally documents or tangible things. Only evidence that is admitted by the hearing officer at the hearing may be considered by the hearing officer in deciding the case.

The most important rule of evidence for administrative hearings is relevance. By requiring the lawyers and pro se parties to stick to the issues presented and to only present evidence which tends to prove or disprove facts related to the issues, the amount of time the hearing takes is greatly shortened. If a hearing officer is lax about the concept of relevance, a two-day hearing can be inadvertently converted into a two-week hearing. Even in the absence of an objection, the hearing officer should require an explanation of where a line of questioning is leading if a lawyer or witness seems to be off track. One caution about relevance - be careful not to exclude evidence you may need for your decision, including facts concerning relief issues.

The reliability of any particular piece of evidence, like so many evidentiary issues, is a judgment call. Privileges are matters where confidentiality of the evidence is protected by law. Privilege questions are legal issues, and where unsure, a hearing officer should seek legal advice.

In cases where you do exclude one or more exhibits, it is a good idea to place the exhibit in a sealed envelope and mark the exhibit number and “not admitted” on

the envelope. You may then place the sealed envelope with the admitted exhibits so that a reviewing body or court may be able to consider the evidence without the necessity for a remand in the event that the court disagrees with your conclusion as to admissibility. See, *In Re Student with a Disability* 102 LRP 1774 (SEA WV 2000).

Where a lawyer keeps raising the same, or a substantially similar, objection repeatedly, it is advisable to note a continuing objection for the record so that the lawyer does not have to keep interrupting the testimony.

Don't let an objection get you angry or disrupt your judicial temperament. Many times a lawyer will raise an objection to preserve a point for appeal. But even if a lawyer or litigant is trying to get you mad, don't take the bait. You are an impartial hearing officer.

On cross-examination, the hearing officer should allow the attorney or pro se party wide latitude. Because cross-examination is generally an important component of due process, see *Goldberg v. Kelly* 397 U.S. 254 (1970), and because fairness requires that a party to a hearing be allowed to reasonably present his case, severe limits on cross-examination are met with disfavor by reviewing courts.

Every witness testifying during an administrative hearing is entitled to respect. Some lawyers get “in the face of” a witness or stand too close or hover over a witness. A hearing officer should not permit any such mistreatment of a witness. See, *In Re Student with a Disability* 102 LRP 1866 (SEA WV 1997).

It is very helpful if, during the hearing, the hearing officer maintains a list of witnesses, an exhibit log and takes other notes, especially charts concerning which pieces of evidence either support or negate each element of each issue in the case. The witness list

Continued on page 11...

RULING ON OBJECTIONS

continued from page 10

should include the correct spelling of the name of every witness and a notation as to the date and time (or at least am vs. pm) that the testimony began. Witness notes should also include credibility factors for each witness as he or she testifies.

An exhibit log should specify each exhibit number (or letter) and a brief description of each exhibit. A code should be used to designate whether the exhibit was offered and/or admitted into evidence. Whenever an offered exhibit is not admitted into evidence, the hearing officer should make a notation as to the reason why the exhibit was

excluded. Parties should be directed to submit exhibits in a three ring binder and to bring copies for the hearing officer, their opponent and the witness. Once the hearing is over, the copy for the witness can be given to the court reporter.

The hearing officer should also keep a “scorecard,” which will make writing the decision much easier. By “scorecard,” I mean that there should be a set of notes that specifies which pieces of testimony or exhibits concern each element of each issue in the case. This can either be included in the hearing officer’s contemporaneous hearing notes or on a separate pad of paper. Using multiple colors of ink to code different types of notes is a useful tool. For example, black ink could signify regular notes, blue ink could be used to note possible areas where the hearing officer

might want to ask a question, and red ink could designate important testimony or exhibits to be highlighted.

Hearing officers who handle a high volume of cases might find the above-mentioned witness lists, exhibit logs and scorecards particularly useful. Where the hearing officer must keep track of multiple hearings involving the same or similar issues, such note-taking shortcuts can be particularly helpful when writing the decision.

CONCLUSION

When ruling on an objection, the hearing officer should rule firmly and fairly, applying the appropriate administrative rules of evidence, and then move on with the hearing. This is an important part of our jobs. ⚖️

ANNUAL MEMBERSHIP MEETING MINUTES

continued from page 7

AD HOC COMMITTEE REPORTS

Library- Clayton Mansfield (PA)

Clayton reviewed some improvements that have been made to this service, such as library cards and enhanced videos. He noted that the committee hopes to produce training videos and he needs help in the form of production managers, hosts, participants, interviewers and interviewees, lecturers and more. He invited attendees to volunteer.

Communications/Technology

Website- Clayton Mansfield (PA)

Wild Apricot, the contractor assisting with NAHO’s website, is helping to develop improvements to the membership directory by adding regions and other information.

Newsletter- Bonny Fetch (ND), Kayla Adams (TX)

The committee’s current goal is to produce 3 newsletters per year. The focus of the newsletter is not solely the Conference, and articles feature member spotlights, an “ask the board” column, and other feature articles.

Scholarship- Norman Patenaude (NH)

Norm announced that NAHO scholarship, now to be called the Eric Moody Memorial Scholarship, had been awarded to BJ Grayes of Pennsylvania. The winners of the drawing for the NJC Scholarships were Cindy Antrim and Colleen Ulrich, both from Georgia.

Merchandising -Toni Boone (OR)

Toni reported that the sales of the NAHO merchandise were going very well.

Speakers’ Bureau -Toni Boone (OR)

Attendees were advised to contact a Board member for information if they are interested in having an instructor speak or teach at their agencies.

Recess

The meeting was recessed, pending reconvening for consideration of 2016 meeting minutes.

Adjournment

The meeting was reconvened at the Awards Banquet on September 12. Mick Gillette moved that the minutes be approved; Cindy Antrim (GA) seconded. The motion carried. Linda Snow moved that the meeting be adjourned, Brian Ford (PA) seconded, and the meeting was adjourned.

NEXT ANNUAL MEMBERSHIP MEETING

September 11, 2018, San Diego, California ⚖️

2017 WASHINGTON DC CONFERENCE: PRODUCTIVE AND PLEASURABLE

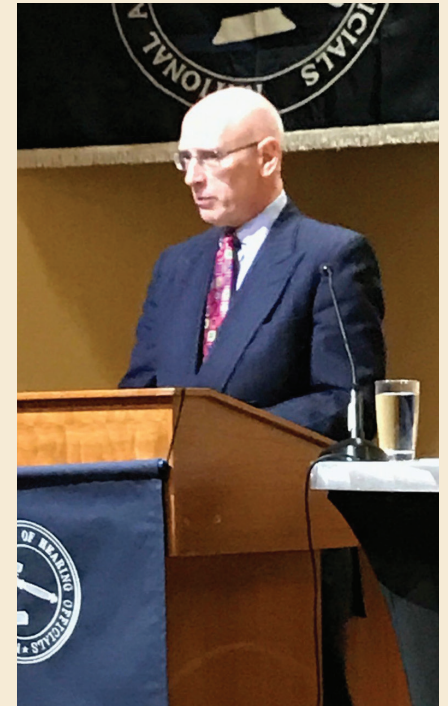
continued from page 8

tion from “classroom mode” to resort-style relaxation. Adjacent to the San Diego Convention Center and steps from the popular Gaslamp Quarter, our host hotel is at the center of many popular attractions including Balboa Park, the San Diego Zoo, Seaport Village, SeaWorld San Diego and Legoland California. The hotel features four restaurants, its own Starbucks, a resort-style pool with cabanas and a bar, a spa and a state-of-the-art fitness center. Attendees will be able to relax at the end of the day with breathtaking views of San Diego Bay.

We hope you attended this year’s conference and found it enjoyable and of benefit to your work. If you were unable to attend Conference 2017, be sure and mark your calendars for Conference 2018, September 9th–12th in San Diego. From all indications, NAHO’s 2018 conference promises to provide a unique opportunity for informative instruction in all things related to administrative adjudication as well as the getaway you’ve been craving. ⚖️

*Enjoy More
Conference Photos
on Page 12*

*Daniel M. Freeman,
J.D., delivered the
luncheon address,
‘Knuckleheads I Have
Known: Judicial
Impeachments.’*



CANDIDS FROM THE 2017 WASHINGTON DC CONFERENCE

