



CADENCE

COMPLAINT ADJUDICATION, DECISION & ENFORCEMENT

Demonstration & Evaluator's Guide

A working platform for the intake, investigation, and adjudication of USDA program discrimination complaints — built on legal-sufficiency by design, with the Government deciding at every gate.

PREPARED FOR
USDA OASCR · CCRE

BUILT BY
House Strategies Group

AUTHORITY
7 C.F.R. §15 · DR 4330



Operate the live platform — no login, no install
cadence.housestrategiesgroup.com

DEMONSTRATION ENVIRONMENT · ALL CASES, NAMES, AND FIGURES ARE SYNTHETIC · NOT A SYSTEM OF RECORD

The right answer to USDA's real problem

Speed, consistency, legal sufficiency, and provable oversight — inside the inherently-governmental line.

USDA's program-complaint process has long struggled with backlog and timeliness, inconsistent decisions, legally insufficient determinations that draw remands, and a shortage of usable oversight data. The Draft RFQ answers this with a firm-fixed-price, per-deliverable model that pays only for accepted, on-time, quality work. **CADENCE is the operating system for that model** — a method and a platform that compress cycle time and build correctness in, while reserving every decision to the Government.

One governing principle — legal-sufficiency by design

Instead of catching insufficiency at review, CADENCE builds it in during drafting: every finding must cite the record, the correct statutory standard is applied up front, required notices are enforced by template, and prior like-decisions are surfaced before drafting. Fewer remands, fewer revisions, a faster clock — and under FFP, every avoided rework is margin.

PILLAR 01

Intake & Jurisdiction Assistant

Screens DR 4330-002/003 criteria; auto-drafts acceptance / closure / referral letters.

PWS §2.0.1

PILLAR 02

SLA & Lifecycle Engine

Starts the 90/100/115-day clock; flags at-risk cases before the deadline.

PWS §2.0.2 · §5.0

PILLAR 03

Evidence & ROI Builder

Exhibit-keyed record; interview guides; impartial ROI with a no-findings guard.

PWS §2.0.2

PILLAR 04

Legal-Sufficiency & Consistency

Record-cited FAD; 8-point sufficiency check; like-facts consistency scan.

PWS §2.0.3 · §5.0.3

PILLAR 05

Quality & Rework-Prevention

Automated + peer + named human sign-off before the COR ever sees it.

PWS §5.0.2 · §7.8

PILLAR 06

Oversight Analytics

Backlog burn-down, timeliness, outcomes, corrective-action tracking.

PWS §5.0.4

PILLAR 07

Inherently-Governmental Firewall

Drafts, checks, flags — never decides, finalizes, or communicates.

PWS §2.1

Command Center

The live caseload — where every complaint stands.

DEMONSTRATION ENVIRONMENT · SYNTHETIC DATA · NOT A SYSTEM OF RECORD

CADENCE / Overview / Command center Synthetic dataset · 10 cases JH

COMMAND CENTER

Live caseload — where every complaint stands

The portfolio view USDA can't currently produce: every case, its clock, its risk, and its owner — in one place, refreshed continuously.

Active cases

8

+3 this month

On-time rate

94%

→ +11 pts vs legacy

Avg days to deadline

27

→ buffer healthy

Backlog (open)

74

→ -86% YTD

Case portfolio 10 cases - synthetic

CASE	COMPLAINANT	BASES	STAGE	COMPLEXITY	SLA CLOCK	STATUS	OWNER
CCRE-2026-0412 FEATURED	M. Delgado FSA Guaranteed Farm Loan	Title VI ECOA	Investigation	Complex	Day 86/115 · 29d left	At risk	C. Harris
CCRE-2026-0388	R. Okafor Rural Development Sec. 502 Housing	Title VIII Section 504	Investigation	Medium	Day 41/100 · 59d left	On track	C. Harris
CCRE-2026-0401	T. Nakamura SNAP / FNS Retailer	Title VI	Intake	Simple	Day 2/90 · 88d left	On track	B. White
CCRE-2026-0357	J. Whitefeather NRCS EQUIP Cost-Share	Title VI Age Act	Adjudication	Complex	Day 109/115 · 6d left	At risk	C. Quashie
CCRE-	L. Abara	ECOA	Adjudication	Medium	Day 71/100 · 29d left	On track	C.

At-risk — early warning

Flagged days before the deadline (PWS §2.0.2).

- 29 **M. Delgado**
CCRE-2026-0412
Investigation · Complex
- 6 **J. Whitefeather**
CCRE-2026-0357
Adjudication · Complex
- 13 **D. Mbeki**
CCRE-2026-0322
Investigation · Simple

Mitigation plans auto-prompt at the amber threshold.

Live

Built by House Strategies Group

TRY IT

1. Open the platform; it lands on the Command Center.
2. Read the SLA clock column — bars show days elapsed of the 90/100/115-day budget.
3. Open the at-risk panel — rings warn days before a deadline.
4. Watch the activity stream tick in real time.

WHAT IT PROVES

USDA sees, in one place, every case, its clock, its risk, and its owner — the oversight picture the office cannot produce today.

PWS §2.0.2 · §5.0.4

Intake & Jurisdiction

Screen, triage, and draft the determination — in minutes.

CADENCE / Casework · Delgado / Intake

Active case CCRE-2026-0412 · M. Delgado

CLIN 1 INTAKE & JURISDICTION

Intake console — screen, triage, draft

Advisory jurisdictional screening under DR 4330-002/003, auto-drafted determination letters, and the SLA clock that starts the moment a case is accepted.

Complaint received Complex candidate

Case: CCRE-2026-0412

Complainant: Maria Delgado · Beginning farmer · sole proprietor, Delgado Family Produce

Program: FSA Guaranteed Farm Loan Program (assisted)

Respondents: Valley Heritage Bank (FSA-guaranteed lender); FSA County Committee — review of guarantee

Filed / Accepted: Feb 9, 2026 → Feb 17, 2026

Allegation. Complainant alleges that a USDA-guaranteed lender denied her application for a guaranteed operating loan on the basis of national origin, citing English-language loan documents and a requirement not applied to similarly situated applicants, and that the FSA county office failed to act on her request for reasonable assistance.

[Run jurisdictional screening](#)

Government issues the letter

CADENCE prepares the acceptance, partial-acceptance, closure, or referral letter. It is a working document — effective only when an authorized USDA official approves, signs, and issues it.

[Authorized USDA official · PWS §2.1](#)

Intake SLA clocks

PWS §5.0 — workday standards from receipt.

- Triage & RFI** Day 1 ✓
Issued within 3 workdays
- Draft determination** Day 6 ✓
Submitted within 12 workdays
- Finalize draft** Day 9
No later than 21 workdays

Jurisdictional screening ACCEPT

Advisory only — the determination is drafted for Government issuance.

Primary issue: Denial of credit / benefit in a federally assisted program

Primary law: Title VI (national origin) — with ECOA cross-jurisdiction

USDA program: FSA Guaranteed Farm Loan

Authority: 7 C.F.R. §15 et seq. — DR 4330-002 (assisted program)

Routing & cross-refs

- ECOA — FSA Lender Oversight
- Potential FHA overlap screened — N/A (no dwelling)

MFH/HUD MOU documentation supported where a dwelling is

Build by House Strategies Group

TRY IT

1. Open Intake; review the received Delgado complaint.
2. Click “Run jurisdictional screening.”
3. Read the issue / law / program analysis and the ACCEPT determination.
4. Review the auto-drafted acceptance letter — marked DRAFT for Government issuance.

WHAT IT PROVES

Standardized jurisdictional screening under DR 4330-002/003 and a ready-to-issue determination letter that meets the 3 / 12 / 21-workday clocks.

PWS §2.0.1 · §5.0

Investigation Workspace

From evidence to an impartial Report of Investigation.

CADENCE / Casework · Delgado / Investigation

Active case CCRE-2026-0412 · M. Delgado

CLIN 2 INVESTIGATION

Investigation workspace — evidence to ROI

The Investigative Plan, an exhibit-keyed evidence record, generated interview guides and affidavits, and a "Complete & Final" Report of Investigation — impartial, with a hard guard against findings.

ROI deadline

Day 86 / 115

At risk — mitigation ready

Exhibits indexed

7 / 8

EX-07 affidavit pending

Witnesses

4

2 affidavits complete

508 conformance

100%

→ tagged on assembly

Investigative Plan (IP) advisory · no findings

Accepted issues (1) National-origin denial of loan benefit; (2) failure to provide requested assistance

Scope Lender underwriting + FSA county office conduct; comparator review

Key witnesses Complainant; lender loan officer; FSA county director; comparator applicants

Evidence sources Underwriting file; adverse-action notice; correspondence log; program regs

The IP outlines steps only. Per PWS §2.0.2 it **contains no findings or conclusions** — CADENCE blocks conclusion language in IP and ROI fields.

Evidence & exhibit index auto-organized

EXHIBIT	ITEM	TYPE	STATUS
EX-01	Complaint form + narrative (8 pp)	Complainant	in record
EX-02	Loan application & adverse-action notice	Lender record	in record
EX-03	Lender underwriting file (redacted PII)	Lender record	in record
EX-04	FSA county office correspondence log	Agency record	in record
EX-05	Comparator applicant data (similarly situated)	Analysis	in record
EX-06	Affidavit — Complainant	Affidavit	in record
EX-07	Affidavit — Lender loan officer	Affidavit	pending

TRY IT

1. Open Investigation; review the Investigative Plan (advisory, no findings).
2. Scan the exhibit-keyed evidence index — note EX-07 still pending.
3. Review the generated interview guide and affidavit template.
4. Open the ROI builder — the no-findings guard and 508 tagging are visible.

WHAT IT PROVES

A complete, organized, impartial ROI with a hard guard against findings — assembled fast, 508-ready, exhibit-indexed.

PWS §2.0.2

Adjudication Workbench

Propose and check — but never decide.

CADENCE / Casework · Delgado / Adjudication

Active case CCRE-2026-0412 · M. Delgado

CLIN 3 ADJUDICATION

Adjudication workbench — propose, check, never decide

A proposed Final Agency Decision with record-cited findings, a live 8-point legal-sufficiency check, a consistency scan against prior decisions, and a hard stop where USDA decides.

Proposed Final Agency Decision PROPOSED — FOR GOVERNMENT REVIEW

PROPOSED FINAL AGENCY DECISION
USDA · OASCR · CENTER FOR CIVIL RIGHTS ENFORCEMENT · CCRE-2026-0412

I. JURISDICTION

This matter arises under [Title VI of the Civil Rights Act of 1964](#) and [7 C.F.R. Part 15](#). The Department has jurisdiction over the recipient; the complaint was timely filed.

II. ACCEPTED ISSUES

(1) Whether the complainant was denied a benefit of the FSA Guaranteed Farm Loan Program on the basis of national origin; and (2) whether requested assistance was denied.

III. FINDINGS OF FACT

1. The complainant applied on the dates reflected in EX-02. 2. The lender applied an English-language documentation condition (EX-03) not reflected in the files of similarly situated approved applicants (EX-05).

IV. LEGAL STANDARD

Disparate treatment is analyzed under the burden-shifting framework: *prima facie* case — legitimate nondiscriminatory reason — pretext. (See [controlling burden-shift authority](#).)

V. PROPOSED CONCLUSION & REMEDY

The record evidence, if credited by the Department, supports a finding on Issue 1 and a make-whole remedy with lender nondiscrimination training. **This is a recommendation only.**

GOVERNMENT DECISION REQUIRED
All adjudicative authority resides with USDA. CADENCE does not issue, finalize, or communicate any decision or determination to the parties. The proposed FAD is a working draft until an authorized USDA official reviews, approves, signs, and issues it.
[Authorized USDA official · PWS §2.0.3 / §2.1](#)

Legal-sufficiency check 94

- Jurisdiction & authority of USDA delineated**
Assisted program; recipient within Title VI coverage; timeliness confirmed.
[7 C.F.R. §15.1; DR 4330-002 §3](#)
- Each accepted issue addressed**
National-origin denial + failure-to-assist both reached.
[Accepted Issues §1-2](#)
- Findings of fact cite the record**
Every material finding linked to an exhibit citation.
[EX-02, EX-03, EX-05](#)
- Correct legal standard / theory applied**
Prima facie — LNDR — pretext framework stated.
[Disparate treatment — McDonnell-Douglas burden-shift](#)

Build by House Strategies Group

TRY IT

1. Open Adjudication; read the proposed FAD with clickable record citations.
2. Click any underlined authority to see what it cites.
3. Review the 8-point legal-sufficiency check and the sufficiency score.
4. Note the GOVERNMENT DECISION REQUIRED gate — authority stays with USDA.

WHAT IT PROVES

A record-cited proposed FAD with a built-in sufficiency check and consistency scan — fewer remands, equal treatment of like cases, and a firewall the Government never loses.

[PWS §2.0.3](#) · [§5.0.3](#) · [§2.1](#)

Oversight Analytics & Cost Simulator

The data USDA needs — and the FFP economics that make it cheaper.

DEMONSTRATION ENVIRONMENT · SYNTHETIC DATA · NOT A SYSTEM OF RECORD

CADENCE / Assurance / Oversight & analytics

Synthetic dataset · 10 cases JH

Timeliness by complexity

Complexity	On time
Simple (≤90d)	97%
Medium (≤100d)	94%
Complex (≤115d)	91%

Against the 90 / 100 / 115-day ROI standards (PWS \$2.0.2).

Corrective-action tracker

ACTION	FROM FAD	DUE	STATUS
CA-2026-118 Lender nondiscrimination training	FAD-2026-0301	in 22 days	On track
CA-2026-114 Policy revision — language access	FAD-2026-0288	in 9 days	On track
CA-2026-109 Make-whole payment processing	FAD-2026-0270	in 3 days	Monitor
CA-2026-101 County office procedure update	FAD-2026-0255	complete	Closed

Throughput & cost simulator

illustrative · synthetic rates

Move the inputs — see cycle time, backlog clearance, and cost-per-deliverable shift. The same compression that lowers USDA's price protects HSG's margin.

Input	Value
Annual complaint volume	480
% Complex cases	30%
% Medium cases	45%

Remainder are Simple cases. Cycle compression and unit rates are illustrative for demonstration.

Avg cycle — labor only	98 days to decision	Avg cycle — CADENCE	61 → 38% faster
Backlog cleared in	28 months at this throughput	Est. annual efficiency	\$3.3M vs. labor-only baseline

Built by House Strategies Group

TRY IT

1. Open Oversight & Analytics; read the backlog burn-down (CADENCE vs legacy).
2. Review timeliness by complexity and the outcome distribution.
3. Scroll to the Throughput & Cost Simulator.
4. Move the volume and complexity sliders — watch cycle time, backlog clearance, and cost shift.

WHAT IT PROVES

Congressional / OIG-grade reporting, plus a transparent model: the same cycle-time compression that lowers USDA's per-deliverable price protects HSG's margin.

PWS \$5.0.4 · \$6.0

Quality Gate

Nothing reaches the COR unchecked.

DEMONSTRATION ENVIRONMENT · SYNTHETIC DATA · NOT A SYSTEM OF RECORD

CADENCE / Assurance / Quality gate Synthetic dataset · 10 cases JH

QUALITY ASSURANCE

The quality gate — nothing reaches the COR unchecked

A multi-stage pipeline — automated rules, peer review, legal-sufficiency review, and a named human sign-off — before any deliverable is submitted. This is PWS §7.8 "established internal quality control," made operational.

First-pass acceptance 96% → + minor-revisions standard met	Valid complaints / qtr 0 / 2 → within PWS §5.0.2 ceiling	Avg revision cycle 1.4 d → ≤ 3-day standard	Rework cost avoided \$214k → FFP margin protected
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Deliverable QA pipeline

- Automated rules check**
508 tags - citation validity · template conformance · PII scan · 'no-findings' guard on ROIs
CADENCE engine
- Peer investigator review**
Evidence sufficiency, exhibit integrity, impartiality of language
Investigator (HSG)
- Legal-sufficiency review**
Authority, standard, findings-to-record, notices — sufficiency memo generated
CR Attorney (HSG)
- QA lead sign-off**
Named accountable reviewer signs before anything reaches the COR
QA Lead (HSG)
- Government review & issuance**
USDA official reviews, approves, signs, and issues to the parties
USDA / COR

Automated checks (Stage 1)

- 508 accessibility tags present
- Citation validity — statutes & regs resolve
- Template & formatting conformance
- PII / Privacy-Act scan before submission
- 'No-findings' guard on IP & ROI fields
- Required attachments & exhibits attached

Why this is the margin. Under a firm-fixed-price, per-deliverable order, "rework required due to contractor error is performed at no additional cost." Every revision the gate prevents is preserved margin — and keeps HSG under the ≤2-valid-complaints-per-quarter standard.

TRY IT

1. Open Quality Gate; follow the five-stage pipeline.
2. Note Stage 1 automated checks (508, citations, PII, no-findings guard).
3. See the named human sign-off before submission.
4. Review the KPIs: first-pass acceptance, valid complaints, revision cycle.

WHAT IT PROVES

A demonstrable internal QC process (§7.8) that holds revisions to the minor-revision standard and keeps within the ≤2-valid-complaints-per-quarter ceiling.

PWS §5.0.2 · §6.0 · §7.8

Governance Firewall

Where the Government decides — by design.

DEMONSTRATION ENVIRONMENT · SYNTHETIC DATA · NOT A SYSTEM OF RECORD

CADENCE / Governance / Governance firewall Synthetic dataset · 10 cases JH

GOVERNANCE FIREWALL

Where the Government decides

The first question a contracting officer asks of any "AI adjudication" tool is whether it crosses the inherently-governmental line. CADENCE is architected so it cannot. Here is exactly where authority sits.

Three zones, one hard gate

CADENCE — ADVISORY	DECISION GATE	USDA — DECIDES
<ul style="list-style-type: none"> Jurisdictional screening Draft letters, IP, ROI, FAD Evidence organization Legal-sufficiency check Consistency scan Tracking & analytics 	<ul style="list-style-type: none"> Human-in-the-loop required No deliverable advances without a Government action Nothing is communicated to parties by CADENCE Full audit trail of who acted 	<ul style="list-style-type: none"> Accepts / closes complaints Directs investigations Legal-sufficiency determination Signs & issues the FAD Communicates to parties Orders corrective action

No delegation of sovereign authority

CADENCE performs no inherently governmental function — no adjudicatory determinations, no direction of federal employees, no policy decisions, no commitments that bind the Government.

PWS §2.1

Advisory & preparatory only

Drafts produced are working documents for Government consideration — not effective unless and until approved, signed, and issued by authorized USDA officials.

PWS §2.1

Government oversight

USDA sets direction, priorities, and decision criteria, and conducts substantive review of all work products prior to issuance.

PWS §2.1

Decision-point map What CADENCE never does

TRY IT

1. Open Governance Firewall; study the three-zone model.
2. Read the inherently-governmental safeguards (§2.1).
3. Review the decision-point map: what CADENCE does vs what USDA does.
4. Read "What CADENCE never does."

WHAT IT PROVES

The platform is architected so it cannot cross the inherently-governmental line — the first question any CO will ask, answered visually.

PWS §2.1

Security & Architecture

Built for federal data — and to stay out of its way.

DEMONSTRATION ENVIRONMENT · SYNTHETIC DATA · NOT A SYSTEM OF RECORD

CADENCE / Governance / Security & architecture

Synthetic dataset · 10 cases JH

SECURITY & ARCHITECTURE

Built for federal data — and to stay out of its way

CADENCE deploys into USDA's approved environment. It operates as an advisory layer over the record; Government data stays inside the authorized boundary, never on local contractor systems (PWS §4.0, §9.0).

- AWS GovCloud**
FedRAMP-High infrastructure inheritance
- FIPS 140-2**
Encryption in transit & at rest
- Privacy Act**
PII handling per §552a; NDAs + training
- No local storage**
Government records never stored locally or transmitted externally without authorization
- Full audit trail**
Every action, suggestion & access logged
- RBAC + least privilege**
Role-scoped access; COI walls enforced

Data boundary architecture

CADENCE ADVISORY LAYER	AUTHORIZED PIPELINE	USDA SYSTEM OF RECORD
<ul style="list-style-type: none"> Workflow, drafting & QA engine Runs in AWS GovCloud (FedRAMP-High inheritance) Holds no source records — references them 	<ul style="list-style-type: none"> FIPS-encrypted, audited connection Least-privilege, role-scoped access No local copies; no external transmission 	<ul style="list-style-type: none"> Government-approved systems Case files remain within USDA boundary Privacy-Act protected (§552a)

- Confidentiality & privacy** (PWS §9.0)
Personnel sign NDAs and complete security-awareness & Privacy-Act training
- Conflict of interest** (PWS §10.0)
Per-assignment COI screening; potential, perceived & actual conflicts flagged

TRY IT

1. Open Security & Architecture; review the posture tiles.
2. Study the data-boundary diagram (advisory layer / pipeline / USDA record).
3. Read the Privacy-Act and confidentiality commitments (§9.0).
4. Review COI handling (§10.0) and end-to-end traceability.

WHAT IT PROVES

AWS GovCloud inheritance, no local storage of Government records, Privacy-Act handling, and traceable, no-black-box drafting.

PWS §4.0 · §9.0 · §10.0

Every PWS requirement has an owner

CADENCE feature ↔ Draft RFQ SOW clause ↔ who decides.

PWS CLAUSE	REQUIREMENT	CADENCE FEATURE	WHO DECIDES
§2.0.1 Intake	Jurisdictional screening; draft letters	Intake Assistant	Govt issues
§2.0.2 Investigation	IP; evidence; impartial ROI	Evidence & ROI Builder	Investigator drafts
§2.0.2 Timeliness	90/100/115-day clocks; delay notice	SLA Engine	Govt assigns complexity
§2.0.3 Adjudication	Draft FADs; legal-sufficiency review	Legal-Sufficiency Engine	Govt decides & issues
§5.0.3 Sufficiency	Sufficiency review + memo	Checklist + memo	Govt makes final call
§5.0.4 Corrective action	Track actions to closure	Corrective-Action Tracker	Govt owns actions
§5.0.2 / §7.8 Quality	Internal QC; ≤2 complaints/qtr	Quality Gate	HSG QA signs
§2.1 Inherently govt'l	No delegation; advisory only	Governance Firewall	Govt always decides
§4.0 / §9.0 Security	No local storage; Privacy Act	GovCloud architecture	USDA boundary

See it for yourself

Walk the synthetic Delgado case from intake to a proposed decision in about three minutes. Any device, ~60 seconds to the first screen.

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Scan to open it now