NATIONAL TRAINING CONFERENCE

Day 3
June 20, 2018
Process

- Strong Risk Assessment Process
- Selection of Moderate to High Risk Recipient
- Conduct Compliance Review or Complaint Investigation
- Statutory and/or Regulatory Findings
- Outcome-Voluntary Compliance Agreement, Conciliation Agreement, Settlement Agreement

- Negotiate VCA Terms
  - Specific Provisions and sub-provisions
  - Term
  - Quarterly Reporting Schedule
VOLUNTARY COMPLIANCE AGREEMENTS

VCA Executed & Monitoring

- Effective Date - Regional FHEO Director signs
- Term Limits: 1-10 years
- FHEO provides TA and/or CR training to facilitate compliance
- Quarterly Reporting to FHEO about status of provisions
- Annual Reporting Requirements (SPEARS)
- Conducts Quarterly and Annual Desk Audits (Remote Monitoring) or Onsite Follow-Up Visits
- Issues Reporting Reminders when VCA reports are late
- Tracks in VCA Tracking System
- Closure of VCA/CA or Re-Open Review (Non-compliant)
NJ DCA Voluntary Compliance Agreement/Conciliation Agreement

- Lan Lawsuit against NJ DCA
- VCA/CA Specific Provisions and content negotiated (Hybrid)
- VCA covers $4.9 Billion in CDBG DR Funds (Superstorm Sandy)
- Includes 119 Specific Provisions and sub-provisions
- 13 Section 3 Specific Provisions
- FHEO-negotiated VCA/CA, provided TA and sample Section 3 Plans, Review Quarterly Report Submissions, Review SPEARS Reports
- Formal VCA Close-Out 6 months after last CDBG DR Funds expended—may include On-site Monitoring Visit
Questions?