

LEP: HUD Enforcement

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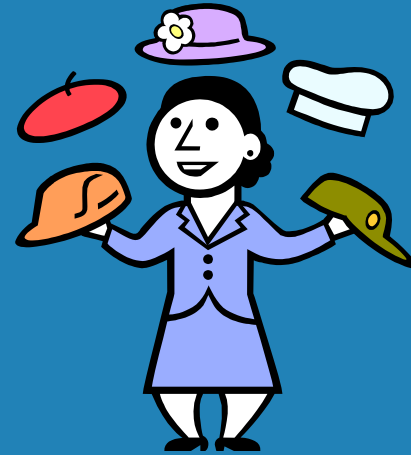
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FHEO Roles

1. Education & Outreach
2. Enforcement
3. HUD Programs



FOUR STEPS

1. Unconscious Noncompliance
2. Conscious Noncompliance
3. Conscious Compliance
4. Unconscious Compliance



LEP: HUD Enforcement

Complaint Driven

HUD-Initiated Actions



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National Origin Provisions:

Fair Housing Act (Title VIII)

**Title VI of Civil Rights
Act of 1964**



FHEO Response to Complaints

- **Investigation**
- **Conciliation/Voluntary Resolution**
- **Findings/Determination**



Types of HUD-Initiated Actions

- **Title VI Monitoring Reviews**
- **Title VI Compliance Reviews**
- **Title VIII Secretary Initiated Investigations/Complaints**



HUD-Initiated Actions:

Risk Analysis

- Selection of recipients
- Level of action
- On-Site/Remote monitoring



HUD-Initiated Actions Common Steps

- **Data Requests**
- **Interviews**
- **Conciliation/Voluntary Resolution**
- **Findings vs. Concerns**



HUD-Initiated Actions

Addressing Monitoring Findings

- Training & technical assistance followed by deadlines for taking required actions



HUD-Initiated Actions

Compliance Review Voluntary Compliance Agreements

- "Just Do It" VCA**
- Process VCA**
- Implementation & Monitoring**



“WHEN BAD THINGS HAPPEN”

Title VIII

- Charge of Discrimination**
- Administrative or Judicial Enforcement**



“WHEN BAD THINGS HAPPEN”

Title VI

- Termination of assistance after an administrative hearing**
- Referral to DOJ**



“WHEN BAD THINGS HAPPEN”

May be ineligible for future competitive funding: Civil Rights Threshold

- Outstanding Letter of Findings of Noncompliance**
- Pending Charge of Discrimination**



GOAL OF ENFORCEMENT

Conscious Compliance

Unconscious Compliance

