LEP: HUD Enforcement

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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
LEP: HUD Enforcement

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