### Enforcement Mechanisms Timeline Comparison

**1623 Susp. — Suspensions**

**1606 LR — Limited Reductions in Funding (August 8 FNPRM)**

**1606 Term. — Terminations**

**1630 — Disallowed Costs**

<table>
<thead>
<tr>
<th>Section</th>
<th>1623 Susp.</th>
<th>1606 LR</th>
<th>1630</th>
<th>1606 Term.</th>
</tr>
</thead>
<tbody>
<tr>
<td>§1623 Susp.</td>
<td>10</td>
<td><img src="image" alt="" /> 11 Days</td>
<td>40</td>
<td><img src="image" alt="" /> 80 Days</td>
</tr>
<tr>
<td><img src="image" alt="" /> LSC can implement the suspension at any time on or after day 11.</td>
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<tr>
<td>§1606 LR</td>
<td>10</td>
<td>20</td>
<td>30</td>
<td>40</td>
</tr>
<tr>
<td><img src="image" alt="" /> All timelines presume the maximum amount of allowed time for each time period and the use of the full process.</td>
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<tr>
<td>§1630</td>
<td>10</td>
<td>20</td>
<td>30</td>
<td>40</td>
</tr>
<tr>
<td><img src="image" alt="" /> Business days are converted to calendar days by adding the maximum number of weekend days, but no additions are made for holidays, which could increase the times by a few days.</td>
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<tr>
<td>§1606 Term.</td>
<td>10</td>
<td>20</td>
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<td>40</td>
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</tbody>
</table>

If funds are suspended on day 11, then they are released on day 41 (unless it is an audit-related suspension).
LSC issues a written notice to the recipient making a preliminary determination. If the recipient does not request review, the determination becomes final.

Within 15 days of an informal conference, LSC may modify, withdraw, or affirm preliminary determination in writing, if the recipient does not request further process this decision will be final.

LSC will notify the recipient within 5 days of the date and time of the informal conference.

LSC has 10 days after receipt of a request for a hearing to notify the recipient of date and time of hearing.

LSC must schedule the hearing at the earliest appropriate date, but no later than 30 days after required notice. This timeline presumes a one-day hearing.

The recipient has 15 days from receipt of the written determination after an informal conference to request a hearing.

For termination and debarment hearings, the hearing officer must issue a written recommendation within 20 days after conclusion of hearing.

LSC has 10 days after receipt of a request for a hearing to notify the recipient of date and time of hearing.

After 10 days, the recipient or LSC may seek review by the President, otherwise the decision of the hearing officer will be final.

Not later than 30 days after receipt of request for review, the President may adopt, modify or reverse the recommended decision.

Day 175 is the earliest date a termination can be imposed, presuming the recipient exhausts all avenues of appeal, the informal conference occurs after 10 days, and the hearing only lasts one day.
§1623: SUSPENSION PROCEDURES

LSC makes a proposed determination that financial assistance to a recipient should be suspended and notifies the recipient in writing.

If the recipient requests an informal meeting with LSC, the meeting shall occur within 5 days of receipt of request. This timeline presumes a one-day hearing.

The recipient may request an informal meeting with LSC within 5 days of receiving suspension notice.

Without regard to request for informal meeting, the recipient may submit written materials in opposition to proposed suspension within 10 days.

After review of materials submitted, LSC can make a final determination to suspend, which will be promptly transmitted to the recipient and will become effective when received by the recipient.

Note: LSC is not required to make a final determination within a given time frame and suspension may not be effective immediately.

For non-audit suspensions, the funds are released to the recipient after 30 days.

LSC may at any time rescind or modify the terms of the final determination to suspend, the total time of suspension cannot exceed 30 days unless LSC and the recipient agree to a continuation of suspension for up to 60 days.

If the suspension is audit related, then the recipient's funds may be suspended until an acceptable audit is completed.

Day 11 is the earliest possible action presuming the recipient exhausts all avenues of appeal.

Note: LSC is not required to make a final determination within a given time frame and suspension may not be effective immediately.
If LSC management determines there is a basis for disallowing a questioned cost, it shall provide notice to the recipient of its intent to disallow the cost.

Within 30 days of receiving notice, the recipient may respond with written evidence and argument. If the recipient does not respond, LSC management will issue a decision based on the information available to it.

Day 90 is the earliest possible action (for amounts under $2,500) presuming the recipient exhausts all avenues of appeal.

If the recipient appeals, the President (or designee) shall adopt, modify, or reverse management’s decision to disallow the cost. The decision of the President (or designee) will be final.

Within 60 days of receiving the recipient’s written response, LSC management will issue a decision. If management decides to allow the cost, final action occurs when LSC issues the decision. If the amount disallowed does not exceed $2,500, this decision will become final.

If the amount disallowed exceeds $2,500, the recipient may appeal in writing to the LSC President within 30 days. If the recipient chooses not to appeal the decision, it will become final.

Day 90 is the earliest possible action (for amounts exceeding $2,500) presuming the recipient exhausts all avenues of appeal.

Day 150 is the earliest possible action (for amounts exceeding $2,500) presuming the recipient exhausts all avenues of appeal.
§1606: LIMITED REDUCTIONS IN FUNDING (Proposed in the August 8 FNPRM)

LSC issues written notice to the recipient making a **preliminary determination**. If the recipient does not request review, the determination becomes **final**.

Within 5 business days of receipt of request, LSC will notify the recipient of the date and time of **informal conference**.

After 10 days, the recipient or LSC may seek review by the President. If there is no request for review, then the decision will be **final**.

**Day 80** is the earliest possible action presuming the recipient exhausts all avenues of appeal and the informal conference occurs after 10 days.

Not later than 30 days after receipt of request for review, the President may adopt, modify or reverse the recommended decision. This decision will be **final** upon receipt by the recipient.

Within 10 business days, the recipient may submit written materials in opposition to the preliminary determination or request an informal conference.

The **informal conference** can be held at any date. **This timeline presumes 10 days between the notice and the conference**.

Within 15 days of an informal conference, LSC may **modify, withdraw, or affirm the preliminary determination in writing**, if the recipient does not request further process this decision will be **final**.

This timeline presumes 10 days between the notice and the conference.