

Define Administrative Agreements (AA).

- How do you know you have found a proper candidate for an agreement? How long should an AA period be – is three years enough or is it too long?
- Are AA negotiable? Should the Respondent's attorney come up with a compliance plan?
- Can individuals be included – or should we use a Voluntary Exclusion for individuals?
- How are AA administered/implemented?
- How do AA relate to Enforcement Issues?

When should/must an AA be used?

Should an audit be performed prior to entering into the AA to determine if a particular company is a good candidate? Who pays for this?

Can a company graduate early? If so, who makes this decision and what criteria are used?

Can a company fail? If so, what are the consequences? Is debarment the only consequence or can we just extend the AA period?

Does every AA look the same?

Can/should the government use an Ombudsman and/or an outside monitor? Who pays for this?

Can any sized company avail themselves of this remedy?

At what point in the administrative process can the AA be used? Can it be at Show Cause/Suspension or only post-Notice for Proposed Debarment? Can you enter into an AA post-debarment?

What are the advantages of an AA vice voluntary exclusion?

Does a company automatically get to enter into an AA if they want one?

Is this really the path to responsibility? Would it be easier to just debar the company?

Can the government suggest an AA to settle an issue or must the company bring this to our attention?