

COMPLIANCE COMMITTEE MINUTES
Tuesday, January 14, 2025
2:00 – 3:00 PM ET

PRESENT	Steven Bullard Daniel Dunham Laura Kacer John "Don" Kaminar Michael Price Douglas Ragland Shelley Joan Weiss	Kentucky Commissioner Virginia Commissioner Designee Iowa Commissioner Arkansas Commissioner Michigan Commissioner Alabama Commissioner Wisconsin Commissioner	Chair
EXCUSED	Brooke Huntington Will Jones Ray Shaw	Indiana Commissioner Oklahoma Commissioner Montana Commissioner	
STAFF	Cherise Imai Lindsey Dablow Allie Thomas	Executive Director Training & Operations Associate Operations Coordinator	
GUEST	Cierra Manuel	Blue Star Families	Ex-officio

ITEM 1 – CALL TO ORDER

1. The meeting was called to order at 2:02 PM ET by Compliance Chair Steven Bullard (KY).

ITEM 2 – ROLL CALL

2. Training and Operations Associate Lindsey Dablow conducted roll call. A quorum was established. Ms. Cierra Manuel attended the meeting on behalf of Ex-officio Representative Tom Porter of Blue Star Families (BSF).

ITEM 3 – APPROVAL OF THE AGENDA

3. **Commissioner Shelley Joan Weiss (WI) motioned to approve the agenda. Commissioner Douglas Ragland (AL) seconded the motion, which carried.**

ITEM 4 – APPROVAL OF THE MINUTES

4. **Commissioner Weiss motioned to approve the minutes from September 10, 2024, as presented. Commissioner Designee Daniel Dunham (VA) seconded the motion. Motion carried.**

ITEM 5 – REPORTS

5. **Executive Committee (EXCOM)** – Chair Bullard reported the EXCOM met on December 18 and 19, 2024. Reports included national office training and activities, the 2024 Annual Business Meeting (ABM) cost analysis, and the fiscal year (FY) 2025 budget and expenditures. The EXCOM was updated on two cases that were referred from the national office to the appropriate Commissioner regarding course placement and graduation and receipt of official student records. Chair Bullard informed the committee that an inquiry was received from the Tennessee Commissioner regarding a conflict of interest in relation to ex-officio members serving on Commission standing committees. The

inquiry was forwarded to general counsel to draft a legal advisory, which would be released to the Commission once approved by the EXCOM.

ITEM 6 – OLD BUSINESS

6. **FY24 State Compliance** – Chair Bullard reviewed the FY24 State Compliance and Coordination infographic with the committee to address outstanding items from the previous fiscal year. The Chair reminded members that, prior to the annual reporting deadline, Alaska and Indiana requested and were granted an extension to facilitate their state council meeting after the June 30, 2024, deadline. Chair Bullard noted that both Commissioners were within one year of their appointment and had communicated their intent to host their state council meetings before the end of their first year as directed by Compact Rules, Chapter 800.

7. Chair Bullard informed the members that Vermont Commissioner Rene Sanchez had been contacted on multiple occasions regarding Vermont's failure to hold a state council and submit an End-of-Year Report but, as of the meeting date, had not responded. Commissioner Laura Kacer (IA) asked if the Chair or Executive Director (ED) Cherise Imai knew of a barrier that prohibited the Commissioner from responding. ED Imai responded that due to the lack of communication, she was unaware of any barriers.

8. **Commissioner Kaminar motioned to refer Vermont to the EXCOM for further action under Compact Rule 700, SEC. 7.105. Commissioner Michael Price (MI) seconded the motion. The motion carried.**

9. **FY25 State Compliance** – Chair Bullard presented the FY25 State Compliance infographic. The first deadline for FY25 was January 31, 2025, for Commissioners to submit their Code of Conduct (COC) and Conflict of Interest (COI) forms. As of the Compliance meeting, forty-eight states had submitted the required forms. The national office emailed reminders to the three outstanding states. However, the Commissioners had until Friday, January 31st, to complete the online forms.

ITEM 7 – NEW BUSINESS

10. **Strategic Plan: Compliance Committee Tasks** – Chair Bullard stated the Commission was in the third and final year of the Strategic Plan and reviewed the tasks assigned to the Committee for 2025.

11. **Proposed Change to Compliance Infographic** – Chair Bullard reported comments related to the State Compliance infographic were received. Commissioners expressed confusion over the use of the term “outstanding.” Some Commissioners applied the most widely used definition of “outstanding” to mean “exceptionally good,” while the intent was to signify an item was “remaining to be done.” The Chair explained the other comment stated the use of red for outstanding items led to a misconception that having outstanding items was “bad” rather than an indication that the deadline had not yet passed; therefore, those items were not yet due. The committee determined it would use “pending” for items where the deadline had not passed and would use the color white for those blocks. Red would be used when a state failed to submit the required items and the deadline had passed.

12. **Compliance Memorandum Regarding Reporting Deadlines** – Chair Bullard reviewed the committee's Compliance Memorandum Regarding Reporting Deadlines, which is released annually in January as a reminder to members of the Commission's annual deadlines.

13. **Commissioner Weiss motioned to approve the Compliance Memo Regarding Reporting Deadlines. Commissioner Kaminar seconded the motion. The motion carried.**

14. **Amendments to COC and COI Deadlines** – Chair Bullard proposed a change to the submission deadline of the Code of Conduct (COC) and Conflict of Interest (COI) forms from January 31st to June 30th to coincide with the remaining Commission end-of-year reporting deadlines. The change would take effect in FY26. The members agreed that having all items have the same deadline would make it easier for states to remember and submit the documentation in a timely manner.

15. **Commissioner Designee Dunham motioned to change the COC and COI deadline from January 31 to June 30, effective in FY26. Commissioner Weiss seconded the motion. The motion carried.**

16. **Member State Responsibilities and Compliance** – Training and Operations Associate Lindsey Dablow reviewed the Compliance Cost Analysis document outlining the Finance survey results from the ABM related to enacting a noncompliance fee and the total costs of compliance activities for FY24. She noted nine states had more than one compliance item outstanding at the end of FY24, and five states were consistently non-compliant from 2022 to 2024. The Commission's total expenses to address compliance issues in FY24 were estimated to be \$7,988.69.

17. ED Imai introduced a policy from the Interstate Compact for Adult Offender Supervision (ICAOS) outlining a penalty-based fee structure applied to noncompliant states' dues to reinforce payment of the ICAOS' annual dues by the deadline. The policy listed steps the ICAOS would take if a state were non-compliant with the dues schedule on a 30-, 90-, and 120-day basis, including accrual rates for interest on the unpaid dues up to a certain percentage.

18. Commissioner Designee Dunham asked if there was an exact cost for services provided by general counsel. ED Imai responded that the contracted rate for general counsel was \$200 per hour, charged in 15-minute increments. Commissioner Douglas Ragland (AL) asked if there was an explanation for why states were consistently late with payments. ED Imai stated typically late payments were a matter of the Commissioner not forwarding the invoice to the correct payment authority or processing the paperwork in time.

19. Chair Bullard noted that adopting a similar enforcement policy would only affect the states that were repeatedly noncompliant and stated the next step would be to make a recommendation to the Finance Committee for their consideration. Commissioner Designee Dunham stated that codifying enforcement and aligning percentages would be good, and it would show states that the Commission was attempting to recoup costs spent on compliance issues. The Committee will make a recommendation to the Finance Committee following the March committee meeting.

ITEM 8 – OTHER BUSINESS AND ANNOUNCEMENTS

20. **Items for the Executive Committee (EXCOM)** – There were no items for the EXCOM.

21. **Compact 101 Training** – Chair Bullard introduced the 2025 Compact 101 Training schedule graphic and encouraged members to promote the sessions and the training portal, MIC3Training.net, to their State Council and stakeholders.

22. **Month of the Military Child (MOTMC) Toolkit** – Chair Bullard announced the Communications & Outreach Committee met on January 8, 2025, and approved updates to the MOTMC Toolkit for release. The members were encouraged to promote the Toolkit and spread awareness in preparation for April.

ITEM 9 – ADJOURNMENT

23. With no further business, Chair Bullard adjourned the meeting at 2:59 PM ET. The next meeting would be held on March 11, 2025.