LSC

2016 Applicant Informational Session

Standard RFP – May 12, 2015

Welcome and Introductions

- **Reggie Haley, Ronké Hughes, Joyce McGee, Grayce Wiggins and Nancy Glickman**
  Office of Program Performance (OPP)

- **Mark Freedman**
  Office of Legal Affairs (OLA)

- **Megan Lacchini and Shanda Gottlieb**
  Office of Compliance and Enforcement (OCE)

- **Peter Larsen**
  Office of Information Technology (OIT)

Who Should Attend this Webinar?

- **New *and* returning applicants**
- **Any staff member involved in preparing the application**
- **Programs applying for a Competitive LSC Grant for 2016 that did <u>not</u> receive an LSC Program Quality Visit (PQV) in 2013, 2014 or early 2015**
    - For programs that have received PQV visits in 2015, only programs that have already received a draft report
- **This presentation is NOT for**
    - Any program applying for a Competitive LSC Grant that had a PQV in 2013, 2014 or 2015 and has received a report
    - Renewal Applicants
    - Those applying to TIG, the Bono Innovation Fund, or other grant programs

Not sure? Send an email to competition@lsc.gov

Agenda

- Overview of the LSC competitive grants process
- LSC's expectations for responses to the RFP
- Discussion of each of the four Performance Areas
- Discussion of the Fiscal Application section
- Discussion of Subgrants
- Discussion of LSC Regulations and Grant Assurances
- Demonstration of online application system

- *Submit questions at any time*
- Send questions through the chat window

Total estimated duration: 75 minutes

Reminders

- *Recommended:* have 2016 **<u>Standard RFP Narrative Instruction</u>** available
  - grants.lsc.gov/resources/application-documents

- 5-minute break around 2:30
- The session will be recorded and will be posted on the LSC and LSC Grants websites
- Complete the AIS Evaluation Survey after the conference
- Send questions through the chat feature
- Technical issues with this webinar? Email haleyr@lsc.gov

Overview:
Application Process, Materials, Resources and Key Deadlines

Purpose of LSC Basic Field Grants

- Encourage the effective and economical delivery of high quality legal services to eligible clients;
- Provide opportunities for qualified attorneys and entities to compete for grants to deliver legal services to eligible clients;
- Encourage ongoing improvement of performance by recipients in providing legal services to eligible clients;
- Preserve local control over resource allocation and program priorities; and
- Minimize disruptions in the delivery of legal services to eligible clients within a service area during a transition to a new provider.

See 45 C.F.R. § 1634

Evaluation and Awards

- LSC evaluates proposed delivery systems
  - LSC Performance Criteria
  - ABA Standards for the Provision of Civil Legal Aid

- LSC awards funds to applicants that demonstrate the best capacity to deliver effective and efficient high-quality legal services

Eligible Applicants

- Current recipients
- Other non-profit organizations that have as a purpose the furnishing of legal assistance to eligible clients
- Private attorneys, groups of attorneys or law firms
- State or local governments
- Substate regional planning and coordination agencies

See 45 C.F.R. § 1634 and page 8 of RFP Narrative Instruction

Application Timeline

- Submit the Application – **June 1, 2015**
  - Entire application must be complete and submitted at one time
- Certification (Form I) – **August, 2015**
- LSC publishes the list of qualified applicants – **October, 2015**
- Grant decisions made – **December, 2015**
- Grant awards made – **January, 2016**

Responding to the RFP Inquiries

Responding to RFP Inquiries

- The RFP Inquiries follow the format and structure of the LSC Performance Criteria.
- Inquiries are based on the criteria in the four Performance Areas.
- New applicants that have not previously received a grant from LSC must respond to each RFP inquiry, unless otherwise indicated.

The Four Performance Areas

Performance Area	Percentage Weight	Number of RFP Inquiries *	Number of RFP Charts
1	18%	9	4
2	20%	8	3
3	35%	19	10
4	27%	20	3

* some inquiries have sub-parts

This excludes the Fiscal Application Inquiries

Navigating the Automated RFP

Main

Applicant Information

RFP Inquiries and Chart

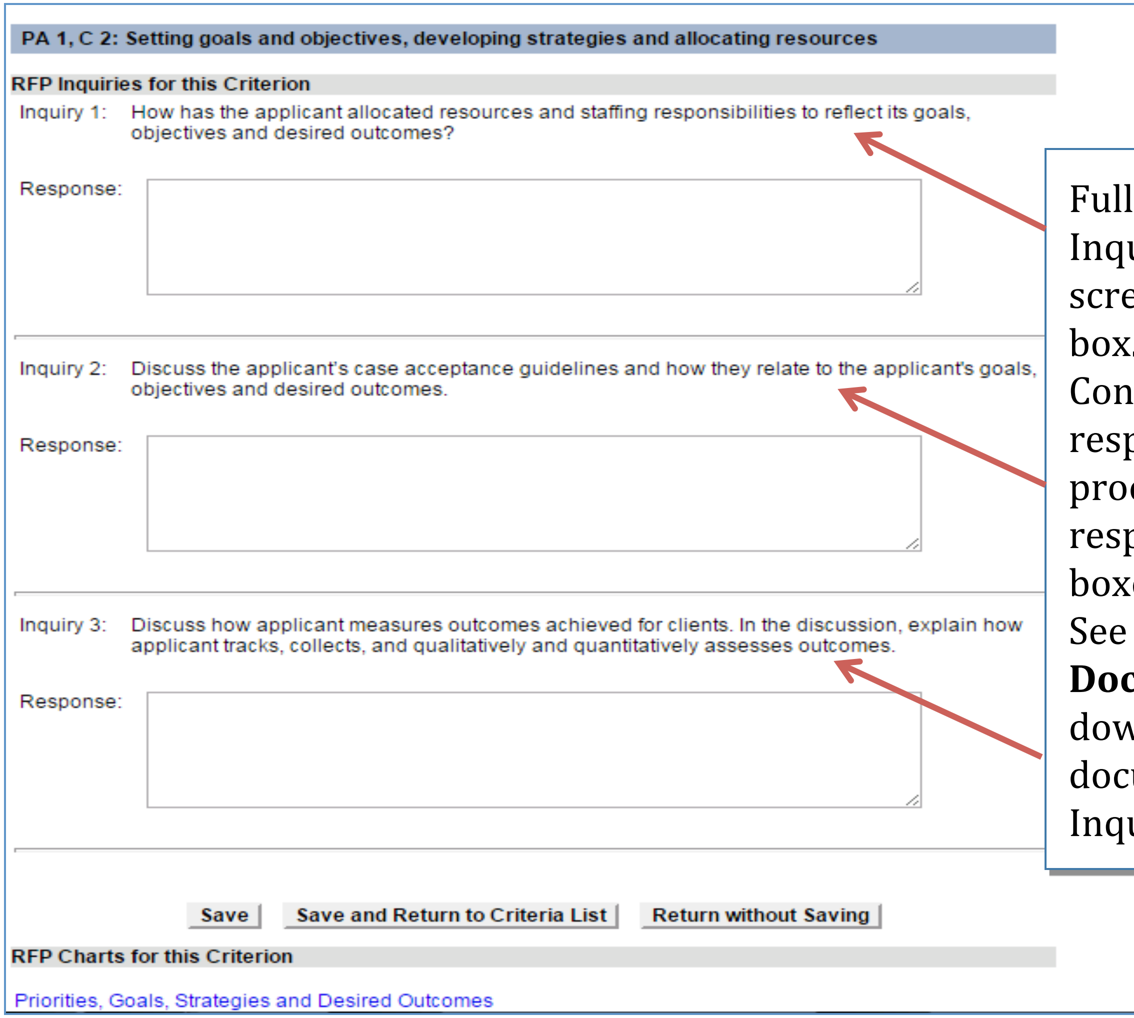
Project and Subgrant Information

Budget (Form D)

Criteria

PA	C	Criterion
1	1	Periodic comprehensive assessment and ongoing consideration of the most pressing legal needs
1	2	Setting goals and objectives, developing strategies and allocating resources
1	4	Evaluation and adjustment
2	1	Dignity and sensitivity
2	2 and 3	Engagement with low-income population & Access and utilization by the low income population
3	1a	Legal Representation - Applicant's capacity to carry out its work
3	1b	Legal Representation - Applicant systems, approaches, and techniques used in representation
3	1c	Legal Representation - Legal representation and resources
3	2	Private attorney involvement
3	3	Other program services to the eligible client population
3	4	Other program activities on behalf of the eligible client population
4	1	Board governance
4	2	Leadership
4	3	Overall management and administration
4	4	Financial administration
4	5	Human resources administration
4	6	Internal communication
4	7	General resource development and maintenance
4	9	Participation in an integrated legal services delivery system

Navigating the Automated RFP



PA 1, C 2: Setting goals and objectives, developing strategies and allocating resources

RFP Inquiries for this Criterion

Inquiry 1: How has the applicant allocated resources and staffing responsibilities to reflect its goals, objectives and desired outcomes?

Response:

Inquiry 2: Discuss the applicant's case acceptance guidelines and how they relate to the applicant's goals, objectives and desired outcomes.

Response:

Inquiry 3: Discuss how applicant measures outcomes achieved for clients. In the discussion, explain how applicant tracks, collects, and qualitatively and quantitatively assesses outcomes.

Response:

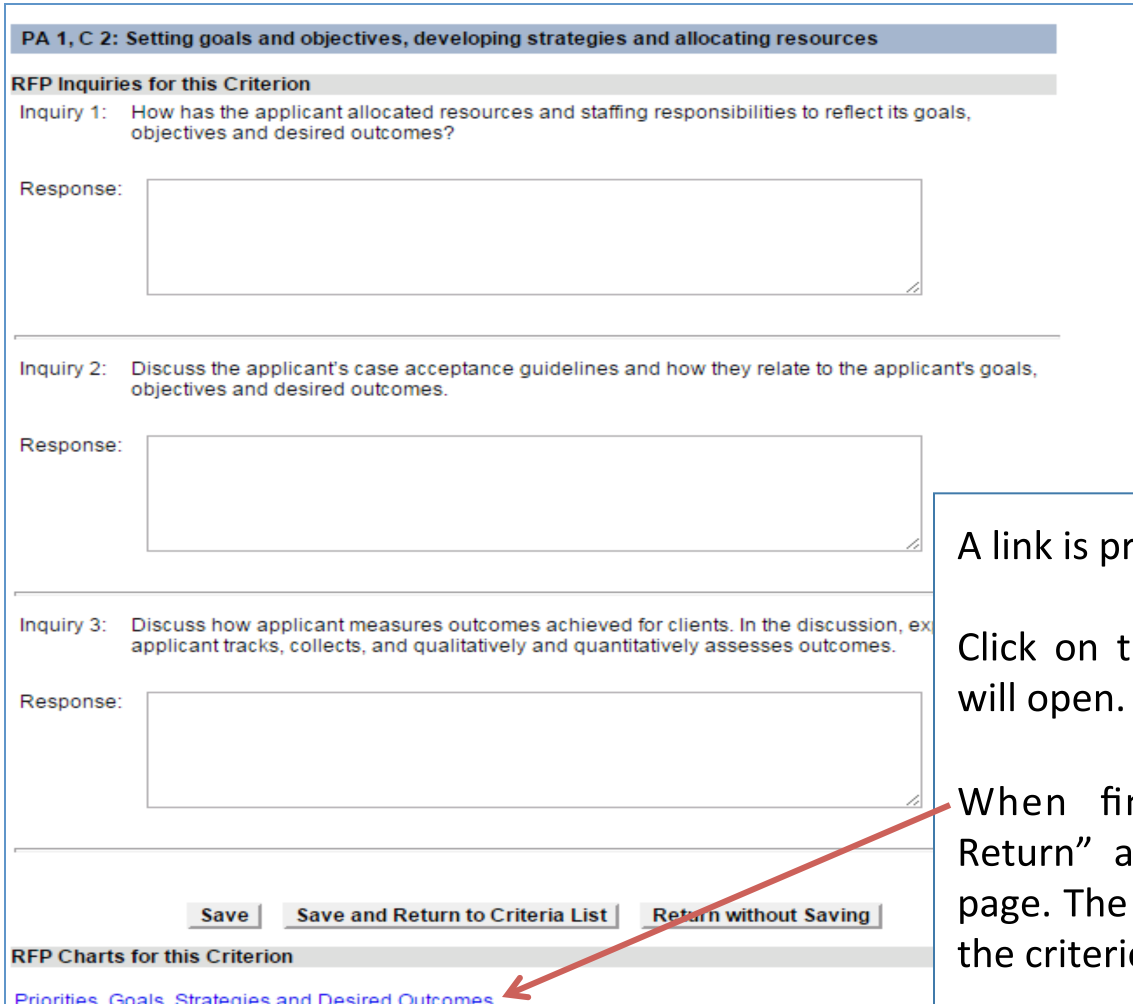
Save | Save and Return to Criteria List | Return without Saving

RFP Charts for this Criterion

Priorities, Goals, Strategies and Desired Outcomes

Full text of each RFP Inquiry is displayed on screen, followed by a text box.
Consider drafting responses using a word processor and copying responses into the text boxes.
See the **Application Documents** page to download a Word document of the RFP Inquiries.

Navigating the Automated RFP


PA 1, C 2: Setting goals and objectives, developing strategies and allocating resources

RFP Inquiries for this Criterion

Inquiry 1: How has the applicant allocated resources and staffing responsibilities to reflect its goals, objectives and desired outcomes?

Response:

Inquiry 2: Discuss the applicant's case acceptance guidelines and how they relate to the applicant's goals, objectives and desired outcomes.

Response:

Inquiry 3: Discuss how applicant measures outcomes achieved for clients. In the discussion, ex applicant tracks, collects, and qualitatively and quantitatively assesses outcomes.

Response:

Save | Save and Return to Criteria List | Return without Saving

RFP Charts for this Criterion

Priorities, Goals, Strategies and Desired Outcomes

A link is provided for each RFP chart.

Click on the link and the chart page will open.

When finished, click “Save and Return” at the bottom of the chart page. The system will redirect back to the criterion page.

Applying for Multiple Service Areas

- In responding to the RFP Inquiries for each service area (e.g. migrant or Native American) specifically describe the service delivery system for that service area.

- In some instances, the response may be the same for two or more service areas.
  - Enter a response for the service area receiving the largest grant
  - For the additional service area(s), applicant may state:

Applicant services and activities are the same for this service area as for the service area receiving the largest grant. *When using this option, make sure the services and activities are really the same. Any differences should be indicated.*

LSC’s Expectations for Responses to the RFP

Grant-Writing Best Practices

- Answer the questions asked
- Be specific in your responses
- Avoid vague, incomplete, or exaggerated answers
- Don’t bury responses in unnecessary detail
- Be accurate
- Make sure responses are consistent throughout
- Proofread for grammar, spelling and punctuation

LSC's Funding Decisions

Based on

- Programmatic quality
- Appropriate fiscal oversight
- Regulatory compliance

Evidenced in

- Grant application
- Grantee reports to LSC
- Visit findings
- Other sources (e.g. other funders, websites)

For Grant Applications that Raise Concerns

- LSC will request supplemental information for non-responsive or incomplete applications
- Capability assessment visit could be required
- Special Grant Conditions may be attached
- Less than 3-year funding may be awarded
- Service area may be re-competed
- Funding may be denied

Performance Area 1

Overview of Performance Area 1

- Assigned weight of 18 %
- Nine Inquiries (some with subparts)
- Four Charts
- Roadmap of Program

Performance Area 1 - Topics

- Legal Needs Assessment
- Priorities, Goals, Strategies, and Desired Outcomes
- Implementation, Evaluation and Adjustment (*i.e.*, Strategic Plan)

Needs Assessment

- Recent: When was last assessment conducted?
- Periodic: How often are needs assessments conducted?
- Ongoing: What approaches are taken to determine needs between assessments?
- Comprehensive: Is the assessment incorporating data, using emerging technology, and including input from the appropriate community groups?

Priorities, Goals, Strategies & Desired Outcomes

- Clear, well-defined
- Significant, appropriate, and achievable
- Prior desired outcomes are met

Implementation, Evaluation, and Adjustment (i.e., Strategic Plan)

- Strategic plan
  - Current
  - Client-centered
  - Developed with key stakeholder input
  - Addresses short- and long-term sustainability
  - Resources are appropriately allocated
  - Includes timelines for accomplishing goals
  - Includes mechanism for evaluating progress

Understanding Priorities, Goals, Strategies and Desired Outcomes

Priorities

A simple statement of the work to be undertaken.

"Preservation of the Home."

Goals

A broad statement of results intended to achieve.

"Maintain low-income tenants in habitable, decent, safe, affordable housing."

Understanding Priorities, Goals, Strategies and Desired Outcomes

Strategies

- Activities to pursue to achieve the goal.
  - Case strategy: *"Legal Representation in Eviction cases."*
  - Other Service strategy: *"Community education sessions on tenants' rights."*

Desired Outcomes

- Tangible results achieved for clients from the legal services provided.
  - *"Prevent evictions for families in 300 cases."*

Former Chart for Priorities, Goals, Strategies, and Desired Outcomes

- The Applicant Priorities, Goals, Strategies, and Desired Outcomes outline shown here was previously included in the Proposal Narrative.

- The format has changed, but the instructions are the same.

EXAMPLE

Priorities

"Housing" or "Maintaining the stock of decent, affordable housing"

A. Goals

1. Maintain the stock of rental housing for low-income persons
2. Improve the condition of rental housing for low-income persons
3. Ensure that the laws protecting tenancies for low-income persons are exercised and enforced

B. Strategies

1. **Cases**
   - Eviction cases (other than non-payment of rent)
   - Habitability cases
   - Other meritorious housing cases to the extent resources allow
2. **Other services**
   - Produce and distribute pamphlets on landlord/tenant law, public housing tenants rights and security deposit law (this material is available from a statewide website)
   - Do community education session on landlord/tenant rights
   - Work with Sheriffs' departments on handling of "self-help evictions"
   - Work with local FmHA office to improve enforcement of tenant rights in FmHA rental property

C. Desired outcomes

1. 50 private tenant and 10 public housing tenant families are successful in retaining their residences through cases undertaken
2. The conditions of 25 rental apartments/houses are improved by cases handled
3. The Sheriffs' departments enforce the state law prohibiting self-help evictions by landlords
4. The FmHA office assures that landlords follow the proper administrative steps before going to court in eviction proceedings
5. The pamphlets listed above are produced and distributed effectively to reach the client-eligible population in this service area (e.g., the existence of the website and the ways to access the website are generally known in the client community)
6. The landlord/tenant law community education session is given in each of the service area's counties with sufficient publicity, where interested members of the client-eligible population would have the opportunity to attend and learn from it

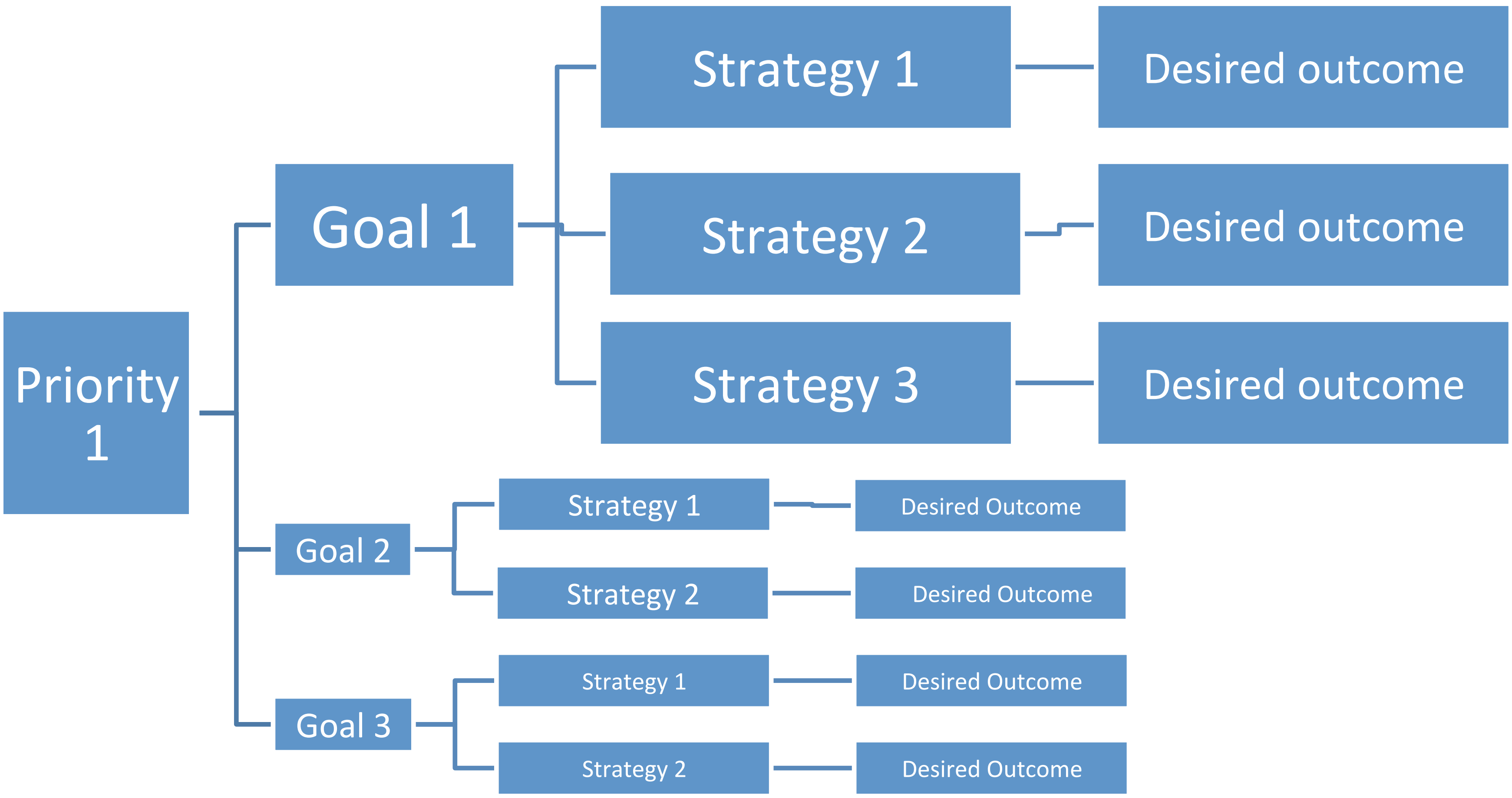
Current Chart for Priorities, Goals, Strategies, and Desired Outcomes

Legal Services Corporation	
Submit Application	

Priorities, Goals, Strategies and Desired Outcomes:

Item Type	Item Name	Desired Outcome
Priority:	Maintaining the stock of decent affordable housing	
Goal:	Maintain the stock of rental housing for low-income persons	
Strategy (Cases):	Eviction cases (other than the non-payment of rent)	50 private tenant and 10 public housing tenant families are successful in retaining their residences through cases undertaken
Strategy (Other Services):	Produce and distribute pamphlets and landlord/tenant law, public housing tenants rights, and security deposit law	
Strategy (Other Services):	Work with Sheriff's departments on handling of "self-help" evictions	The Sheriffs departments enforce state law prohibiting self-help evictions by landlords
Goal:	Improve the conditions of rental housing for low-income persons	
Strategy (Cases):	Habitability Cases	The condition of 25 rental apartments/ houses are improved by cases handled

Priorities, Goals, Strategies, and Desired Outcomes Chart



Performance Area 2

Performance Area 2

- Focuses on the core values and tenets for *creating* and *maintaining* effective client relations.

- Weight – 20%

Performance Area 2

Effective intake systems incorporate the LSC Performance Criteria

- Accessible
- Engaged
- Coordinated
- Flexible &
- Streamlined
- Skilled Staff
- Continuously Evaluated

Performance Area 2

Criterion 1 . Dignity and sensitivity.

- **Overview**
  - Fully describe your intake system.
  - Be specific.
  - Discuss planned changes.
  - Highlight unique components or approaches.

- **Staffing**
  - Address day-to-day *and* global oversight.

- **Evaluation**
  - Discuss *all* methods.

Performance Area 2

Criterion 1 . Dignity and sensitivity.

- **RFP Charts**
  - Intake System Technology
  - Intake Methods: Percent & Time Elapsed

Performance Area 2

Criterion 2. Engagement with the low-income population &
Criterion 3. Access and utilization by the low-income population

- **Office Locations**
  - Provide details about parking, public transportation, proximity to client communities, other relevant offices, and resources.
- **Staff Diversity**
  - Recruitment strategies (all staff levels)
  - Retention efforts
  - Leadership development
  - Mentor Programs
  - Promotion opportunities

Performance Area 2

Criterion 2. Engagement with the low-income population &
Criterion 3. Access and utilization by the low-income population

- **RFP Chart**
  - LEP Plan and Components

Performance Area 3

Performance Area 3

- There have been a number of changes in this section over the last three years.
- Paint a picture of your program’s legal representation.
- The application is not viewed in a vacuum.
- PA 3 has the most weight in the RFP.

Performance Area 3

Criterion 1. Legal representation.

- Capacity to carry out work
  - Whether you have an advocacy staff that matches the mission and vision of your program.
- Systems, Approaches, Techniques
  - Whether you can present evidence of sound legal work and advocacy management and supervision policies, procedures and systems
- Overall Advocacy Goals for next year
  - Are there any particular areas of emphasis?
- Accomplishments
  - Whether the outcomes provide significant and lasting benefits to clients
- Evaluation
  - Whether you evaluate your effectiveness and make changes where appropriate

Performance Area 3

Criterion 2. Private attorney involvement.

- The Revised 45 C.F. R. Part 1614
  - The new regulation is now incorporated throughout this section
- Mechanisms for Involvement in Legal Delivery
  - What is available for all categories (attorneys, law students, other professionals) in service delivery
- Identification and Oversight
  - How do you determine what cases are suitable for referral
  - What systems are in place to provide appropriate oversight of referred cases
- Partnerships
  - What partnerships have you developed to recruit volunteers and otherwise improve pro bono
- Effect of Revised Regulation
  - Successes and/or changes since November 2014
- Major Challenges to PAI Project
  - What are they and how you intend to meet them
- PAI Accomplishments
  - BOTH for clients and to your PAI component

Performance Area 3

Criterion 3. Other program services to the eligible client population.

- Community legal education
  - Whether you employ a wide variety of methods to educate the community on matters within your priority areas
- Assistance for pro se litigants
  - Whether you provide a range of pro se assistance strategies for clearly defined target groups

Performance Area 3

Criterion 4. Other program activities on behalf of the eligible client population.

- Involvement with Justice and Advocacy Community
    - Whether you can demonstrate an array of collaborative efforts that have had or will have a beneficial impact on the client community

Performance Area 3

RFP Charts

- Training
- Legal Work Management
- Casehandling Protocols
- Case Development Activities
- Accomplishments for Clients (Excluding PAI)
- Private Attorney Involvement
- Methods Used to Recruit Private Attorneys
- Methods Used to Retain Private Attorney Volunteers
- Accomplishments for Clients through PAI
- Involvement with Justice and Advocacy Community

Performance Area 4

Performance Area 4

Effectiveness of governance, leadership and administration

- Effective leadership and management is key to program success
- Strong leadership and internal operations
  - increase the likelihood of effective services
  - decrease the risk that effective program services will be adversely affected by organizational problems
- Weight: 27%

In Performance Area 4, LSC Examines…

- Extent of collaboration between leadership and management to achieve the mission
- Processes for management/ admin functions, e.g.
  - Financial management
  - Human Resources
  - Compliance
  - Resource Development
  - Technology

Performance Area 4

- Other relevant information for this Performance Area:

  - IRS Form 990
  - Organizational chart
  - Technology Plan
  - Resumes of key organizational leaders
  - Staffing information

Performance Area 4

Criterion 1: Board Governance.

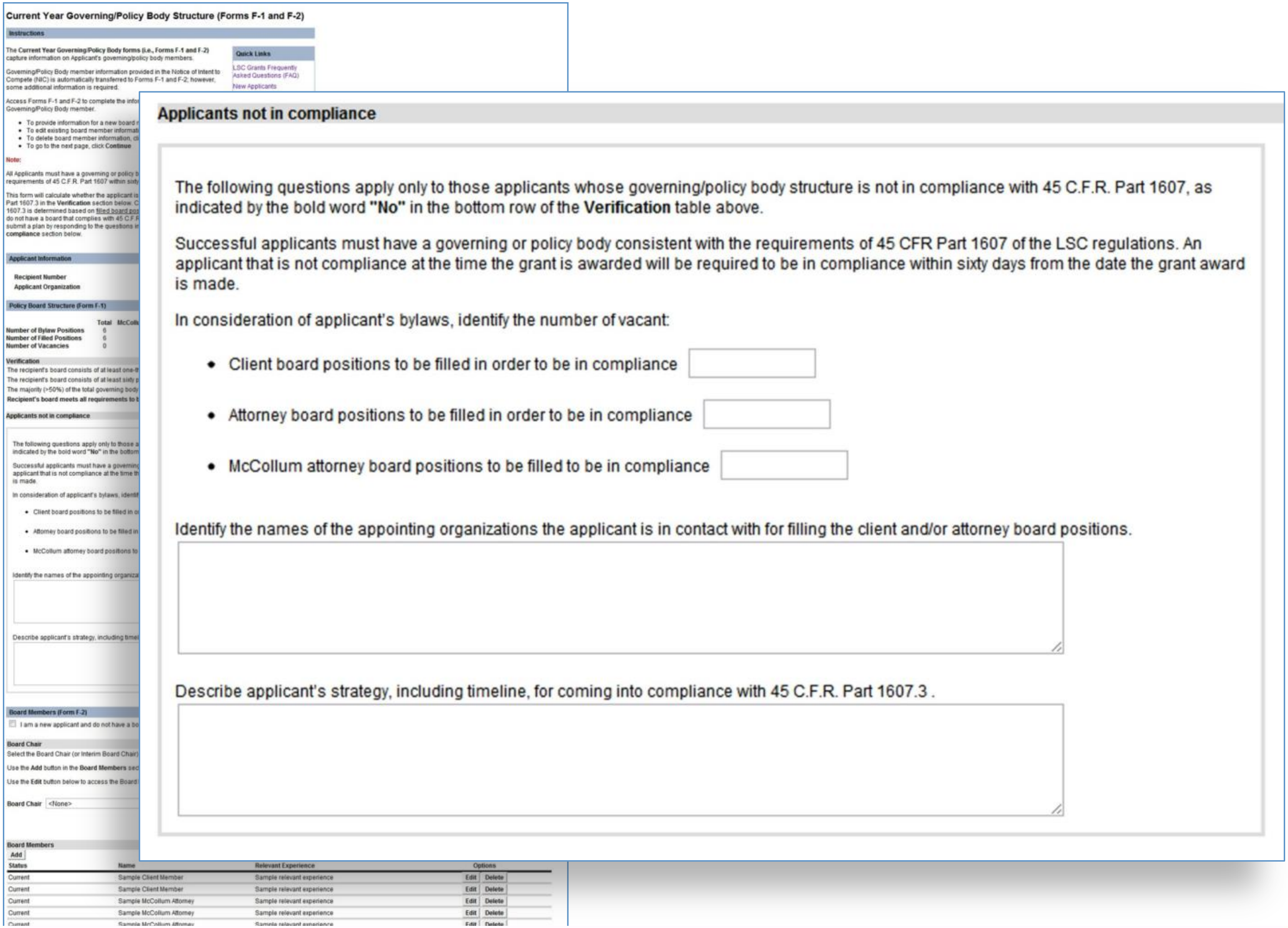
- Composition
- Training
- Oversight and Leadership
- Overlapping Boards & Conflicts of Interest
- Evaluation of the Executive Director

Performance Area 4

Criterion 1: Board Governance.

Governing Body and Structure

- LSC Grants will calculate whether the applicant is in compliance with 45 C.F.R. § 1607.3
- 45 C.F.R. § 1607.3 requirements:
  - At least one third of the governing body be eligible clients
  - At least sixty percent of the governing body be attorneys
  - The majority of governing body members (>50%) be “McCollum” attorneys
- Calculations are based on *filled positions*, defined as “current” Board Members entered into the form
- An applicant that is found to be out of compliance will submit a plan for coming into compliance.
- An applicant out of compliance will also submit an update in November



Current Year Governing/Policy Body Structure (Forms F-1 and F-2)

Applicants not in compliance

The following questions apply only to those applicants whose governing/policy body structure is not in compliance with 45 C.F.R. Part 1607, as indicated by the bold word **"No"** in the bottom row of the **Verification** table above.

Successful applicants must have a governing or policy body consistent with the requirements of 45 CFR Part 1607 of the LSC regulations. An applicant that is not compliance at the time the grant is awarded will be required to be in compliance within sixty days from the date the grant award is made.

In consideration of applicant's bylaws, identify the number of vacant:

- Client board positions to be filled in order to be in compliance
- Attorney board positions to be filled in order to be in compliance
- McCollum attorney board positions to be filled to be in compliance

Identify the names of the appointing organizations the applicant is in contact with for filling the client and/or attorney board positions.

Describe applicant's strategy, including timeline, for coming into compliance with 45 C.F.R. Part 1607.3 .

Performance Area 4

Criterion 2: Leadership.

- Leadership Team and Responsibilities
- Development of Future Leaders
- Leadership Succession Plan

- Cross References:
  - Staffing Chart
  - Organizational Chart
  - Resumes of Key Staff

Performance Area 4

Criterion 3: Overall management and administration.

- Efforts to ensure effective management and administration
  - Management Structure and Use of Middle Managers
  - Process for involving staff, board and others in policy matters
  - Compliance systems, procedures, training and review
- Continuity of Operations Planning
- Technology planning process
- Technology Use Policy

- Cross References:
  - Form K – Technology Form
  - Technology Plan
  - RFP Chart - Continuity of Operations

Performance Area 4

Criterion 4: Financial administration.

- Systems and procedures for budgeting and planning
  - Ensuring appropriate resource allocations to achieve priorities
  - Budget and financial planning beyond the current year

- Cross References:
  - Form D – Budget forms

Performance Area 4

Criterion 5: Human resources administration.

- Process for staff evaluation
- Human Resources administration efforts
  - Staffing and qualifications
  - Salary and benefits assessments
  - Procedures for maintenance of personnel records
  - Review of human resource plans and policies
  - Resolving employee complaints
- Strategies to retain/ promote high-quality staff
  - Retention efforts
  - Recognition of accomplishments
  - Leadership development

Performance Area 4

Criterion 6: Internal communication.

- Policies and procedures for promoting and assuring regular communication among staff and among offices
  - Frequency of meetings
  - Methods used for communications

Performance Area 4

Criterion 7: Resource development and maintenance.

- Resource development capacity
  - Staffing, qualifications, training
  - Use of consultants
- Resource development activities
  - Obtaining grants
  - Bar and private fundraising campaigns
  - Cy pres awards
  - Efforts with community organizations
  - Leveraging non-financial resources
- Publicizing program accomplishments to promote fundraising efforts

Performance Area 4

Criterion 9: Participation in an integrated legal services delivery system.

- Contributions to statewide or regional efforts
  - Ensure availability of a full range of civil legal assistance
  - Eliminate access barriers and provide meaningful services
  - Effectively utilize resources
  - Increase exchange of information among legal services providers
  - Ensure training and assistance in key areas of law and practice.
- Quality of legal services through partnerships necessary to ensure a full range of legal services.
- ***Note:*** additional information will be required from Applicants that do not provide a full range of services.
- Cross References:
  - RFP Chart – Accomplishments for Clients with Other Providers

Funding Application – Fiscal Component

How to Access

- All new competitive grant applicants are required to submit the Fiscal Application. Renewal applicants are not.

- All competitive applications are now accessible on the online application system (lscgrants.lsc.gov) once the applicant's Notice of Intent to Compete (NIC) has been approved by OPP.

- The deadline for filing the fiscal application is the same as the deadline for filing your competitive grant application.

- Will be submitted separately from the rest of the competitive grant application.
  - Log into LSC Grants online application system
  - On homepage, find "To Do" application section
  - Fiscal Funding Application task will be listed there

Overview

- LSC adopted the recommendations made by the following entities:
  - GAO Report (2010)
  - Fiscal Oversight Task Force Report (2011)

- Goal: to implement a more robust review of applicants fiscal internal controls during the grant application process in the following ways:

  - Ensuring grantees have sufficient financial systems, policies, and procedures in place that meet LSC requirements
  - Ensuring the adequacy of documentation submitted for grant award decisions
  - Performing a more holistic evaluation of other factors that may affect programs on-going operations

Composition of Fiscal Questionnaire

1. Board of Directors/Management Involvement
2. Profile of Financial Employees
3. Accounting Manual
4. Fiscal Oversight by Other Funders
5. Financial Management
6. Investigatory Inquiries
7. Accounting System

Board of Directors/Management Involvement

- Part I - 22 yes/no questions with multiple parts, and/or multiple choices.

- Purpose – to ensure the board of directors are properly governing the organization by performing the required oversight functions ("setting the tone at the top") and management is carrying out their roles and assignments in managing the operations.

Profile of Financial Employees

- Part II – 6 yes/no questions with multiple parts, and/or multiple choices.

- Purpose – to help assess, evaluate, and measure the qualifications of the fiscal employees and adherence to the programs policies and procedures.

Policies and Procedures (Accounting Manual)

- Part III – 6 yes/no questions with multiple parts, and/or multiple choices.

- Purpose – to assess and evaluate the consistency of the programs policies and procedures with LSC's Accounting Guide for Recipients (2010 edition).

Fiscal Oversight by Other Funders

- Part IV – 4 yes/no questions with multiple parts
- In the note section, describe any corrective actions and state the funding source(s).
- Purpose - to assess the frequency and resolution of prior findings identified by other funding sources during compliance and/or desk reviews performed by OCE.

Financial Management

- Part V – 3 yes/no questions with multiple parts, and/or multiple choices.
- Purpose - to assess and evaluate the management of fiscal resources by the program.

Investigatory Inquiries

- Part VI – 4 yes/no questions with multiple parts.
- In the note section, describe the nature of any reported incident and the actions taken by the program.
- Purpose – to evaluate investigatory inquiries of fraudulent activity encountered and assess the outcome of those inquiries.

Accounting System

- Part VII – 8 yes/no questions with multiple parts, and/or multiple choices.

- Purpose – to evaluate and assess the capacity of the Program's accounting system.

Additional Information

- Applicants are encouraged to review the LSC Accounting Guide for Recipients (2010 Edition) before responding to these inquiries at http://grants.lsc.gov/rin/grantee-guidance/accounting-guide-lsc-recipients

- Applicants must upload the following documents:
  - *Certificate of Good Standing* issued by your State or Territory
  - Accounting Manual and/or Other Fiscal Policies/Procedures
  - Current Fidelity Bond or Insurance Policy stating amount of coverage
  - Fiscal related Special Grant Conditions from Other Funding Sources Currently in Effect (if applicable)
  - Audit/Finance/Executive Committee Charters or written description of duties
  - Cost-Allocation Method/Policy
  - Private Attorney Involvement ("PAI") Method/Policy
  - Segregation of Financial Duties Worksheet

- Send questions to competition@lsc.gov

Subgrants

Subgrant Requests (Basic Field Grants)

Application Process

Provide subgrant information (Step 1) at the same time applicant files the competitive grant application

- Enter Information into LSC Data Fields
- Upload the Following:
  - ✓ Subgrant Information Form
  - ✓ Draft Subgrant Agreement
  - ✓ Subrecipient's most recent Audited Financial Statement
  - ✓ Evidence of Subrecipient's Fidelity Bond Coverage
  - ✓ Subrecipient's Accounting Manual

Request Subgrant Approval (Step 2) at Least 45 Days Before Effective Date (*i.e.*, October or Early November)

- Review Information in LSC Data Fields and Make Needed Changes
- Upload Executed Subgrant Agreement

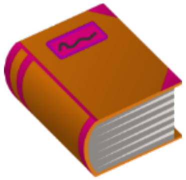
Oversight

- **Grantees have the obligation to oversee their subgrantees – includes fiscal and regulatory oversight** (*e.g.*, internal controls, adequate fiscal policies, fidelity bond coverage, LSC restrictions) *See* 45 CFR § 1627.3.

LSC Statutes, Regulations, and Grant Assurances

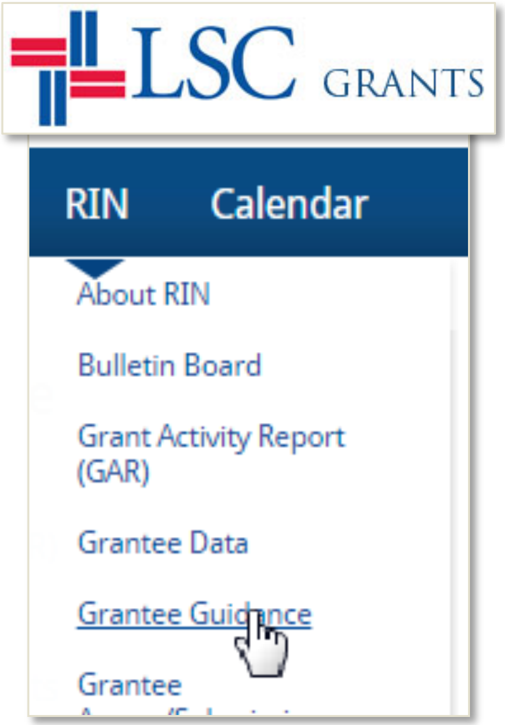
Where to Find Them

- www.lsc.gov—About
  - LSC Act, Appropriations, and Other Laws
  - LSC Regulations
  - External Advisory Opinions
  - Program Letters



LSC Source Book

- LSC Grants— RIN—Grantee Guidance
  http://grants.lsc.gov/rin/grantee-guidance
  - Annotated LSC Act and laws
  - Updated and annotated appropriations
    <u>*Only source of amended provisions*</u>
  - LSC Regulations
  - Property Acquisition and
    Maintenance Manual
  - Grant Assurances



LSC Statutes and Regulations

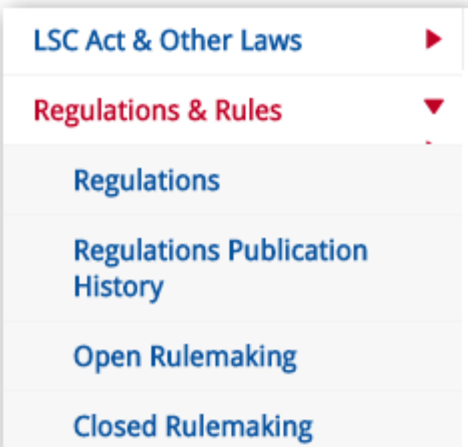
- Regulatory and statutory requirements for all LSC grants
- Federal law—supremacy over state and local laws
- All applicants agree to them in the grant assurances
- Some restrictions are *not* in the LSC regulations.
  - *E.g.,* abortion restrictions
    - One in the LSC Act
    - Different one in the LSC appropriations riders
    - No LSC regulation
- Some regulatory requirements are not in the statutes
  - PAI (Part 1614) has no statutory provision
  - Cost standards (Part 1630) involve the mechanics of grants

LSC Statutes

- LSC Act: 42 U.S.C. §§ 2996–2996l
  - Establishment of LSC
  - Grantee requirements
  - Restrictions on LSC & private funds
- LSC Appropriations Riders
  - Since 1983, many restrictions appear in LSC's appropriation
  - 1996 overhaul
    - Continues some restrictions—*e.g.,* aliens
    - New restrictions—*e.g.,* class actions
    - Entity restrictions—all funds of grantees (except Tribal)
  - Incorporated in and modified by later statutes

LSC website and source book have amended appropriations

LSC Regulations



- 45 CFR Parts 1600 through 1644
- www.lsc.gov—About – Regs & Rules
  - – Regulations—current
  - – Regulations Publication History
    - Preambles
    - Prior versions
  - – Open Rulemakings
  - – Closed Rulemakings

LSC Regulations

Broad categories

- Regulations governing LSC actions and procedures
- Regulations relating to restrictions on grantee activities

  <u>many restrictions apply to all non-LSC funds</u>

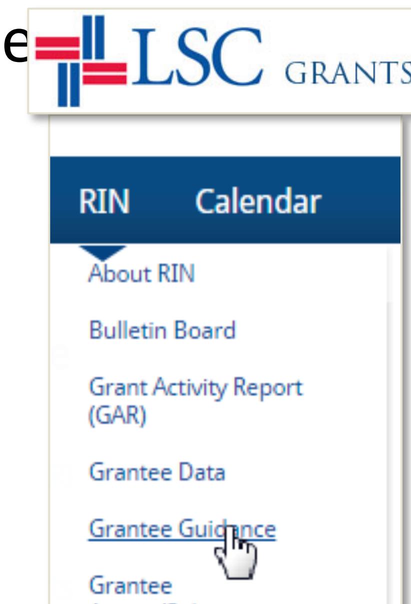
  – Part 1610: which restrictions apply to which funding

  – Part 1612: special provisions for non-LSC funds
- Regulations relating to grantee corporate activities

  – *E.g.,* Part 1607: governing bodies

Changes to the Regulations

- Part 1614—Private Attorney Involvement (PAI)
  - Major revision effective November 14, 2014
  - Mostly expansion of who and what qualifie
  - Retains 12.5% expenditure requirement
  - Preamble contains detailed discussion
  - PAI Frequently Asked Questions (FAQs)
    - *[LSC Grants—RIN—Grantee Guidance](#)*
    - *Further guidance forthcoming*

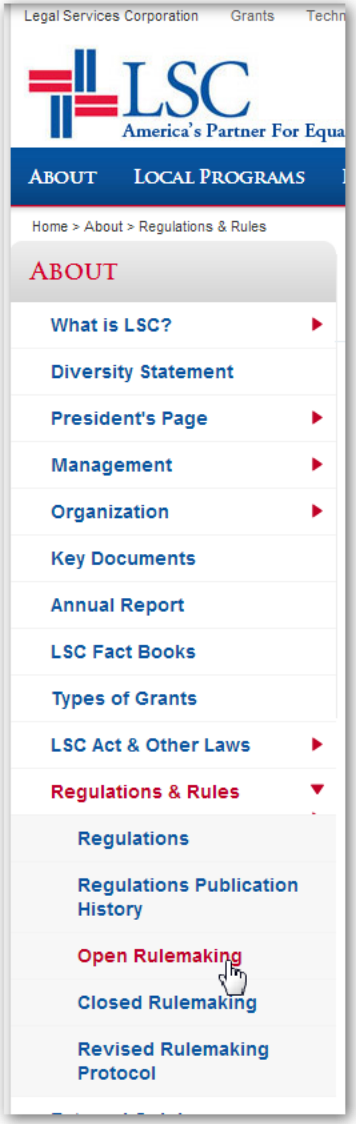


- Part 1640—updated list of fraud laws

Open Rulemaking

- Open rulemakings for public comment
  - [www.lsc.gov—About – Regulations & Rules]
    - – Open Rulemaking
    - – *Please comment—we want to hear from you.*

- Parts 1610, 1627, and 1630
  - Revisions to the subgrant and transfer rules
  - Comments due May 20
- Part 1628—Fund Balances
  - More flexibility
  - Comments due May 20



Grant Assurances

- Contractual obligations the recipient enters into as a condition of accepting LSC grant funds
- Will be available around August
- Draft 2016 Grant Assurances published for comment in the Federal Register
  - www.lsc.gov—About—Matters for Comment
  - Comments deadline on May 18, 2015
- Applicants will be notified by email when the final 2016 Grant Assurances are available

Grant Assurances

- Agreement to comply with applicable laws and regulations (both generally and specifically)
- Agreement to provide notice to LSC and to abide by certain procedures involving problems (like fraud or theft) or major changes to the grantee's operations
- Agreement to cooperate with oversight activities including submitting to audits and other reviews, providing reports, and maintaining and providing access to specified records
- Agreement to certain conditions on the conduct of recipient's business

Using the Online Application System at lscgrants.lsc.gov

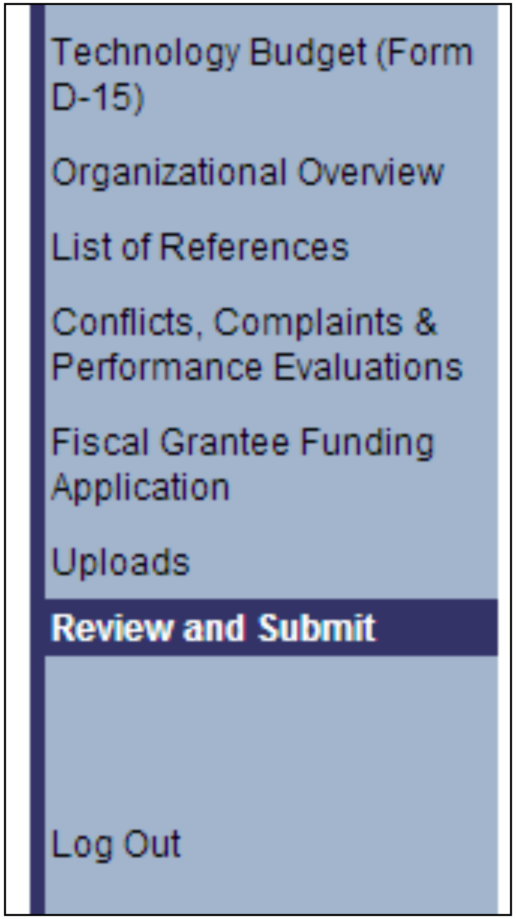
Why Can’t I Submit??

Red X’s indicate forms that are not yet complete

Validation Summary

Page Name	Status
Applicant Information	✓ Complete
Project and Subgrant Information	✓ Complete
RFP Inquiries	✓ Complete
Outcomes Met for Previous Priorities	✓ Complete
Intake Methods: Relative Percent and Time Elapsed Before Receiving Service	✓ Complete
Data collection methods	✗ Incomplete
Data Sources and Tools	✓ Complete
Program Priorities	✓ Complete
Intake System Technology	✓ Complete
LEP Plan and Components	✓ Complete
Training	✓ Complete
Legal Work Management	✓ Complete
CaseHandling Protocols	✓ Complete

The Review and Submit Page



Use the Review and Submit page to see detailed notes

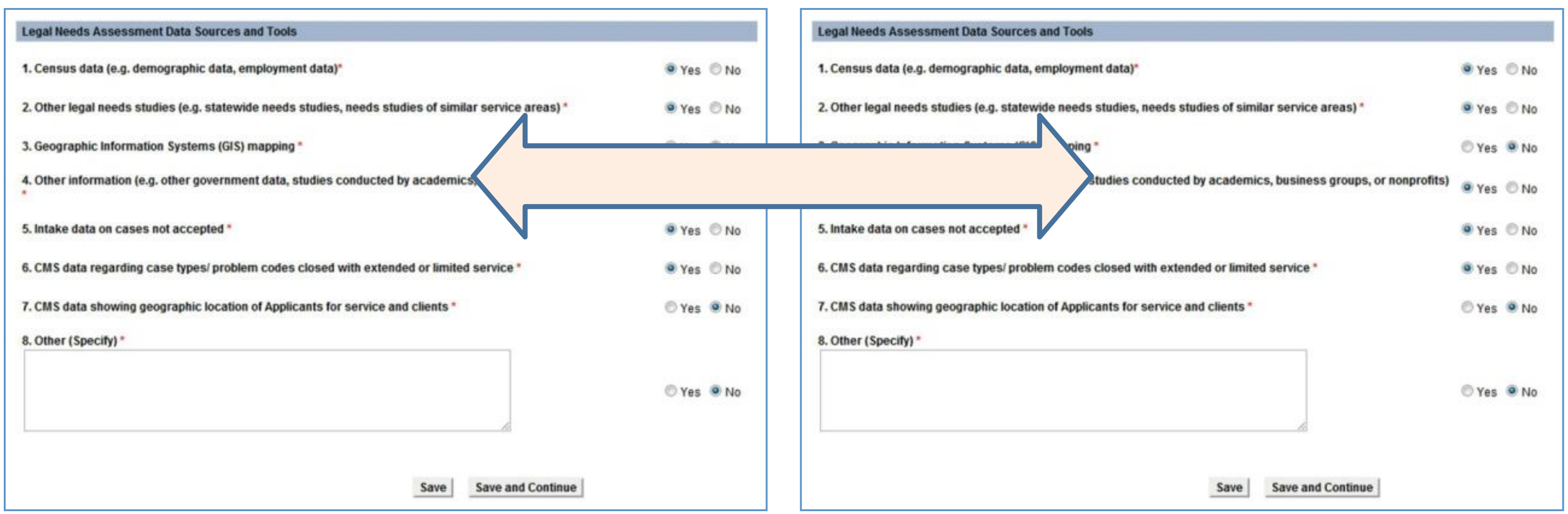
The Review and Submit Page

Review and Submit provides detailed notes on what's missing

Validation Summary	
Page Name	**Status**
Applicant Information	✓ Complete
Project and Subgrant Information	✓ Complete
RFP Inquiries	✓ Complete
Outcomes Met for Previous Priorities	✓ Complete
Intake Methods: Relative Percent and Time Elapsed Before Receiving Service	✓ Complete
Data collection methods "Low Income Person Focus" is required "Social Service Org Meetings" is required	✗ Incomplete
Data Sources and Tools	✓ Complete
Program Priorities	✓ Complete

Linked Forms

- For applicants applying to more than one service area
- Some RFP Charts and Forms are “linked” across service areas
- Any information entered in a “linked” form in *one* application is automatically transferred to all other service areas for which the applicant is applying



Linked Charts and Forms

- Involvement with Justice and Advocacy Community
- Board Policies and Practices
- Continuity of Operations Planning
- Accomplishments for Clients with Other Providers
- Project and Subgrant Information
- Governing/ Policy Body Structure (Forms F-1 and F-2)
- Technology (Form K)
- Technology Budget (Form D-15)
- Organizational Overview
- List of References
- Conflicts, Complaints and Performance Evaluations
- Fiscal Grantee Funding Application

The Copy Feature

- For applicants applying to more than one service area
- Copies application data from one service area to another
- Instructions for using the copy feature are on the “copy task page” in LSC grants
- Use carefully to avoid overwriting data unintentionally
- Uploads not copied

The Copy Feature

To Do - Application

View your NIC and Grant application(s) by clicking on the appropriate links. To create a new NIC or Grant application based on a existing one, click **Copy**.

Task	Service Area	Status	Due Date		
Submit Notice of Intent to Compete	FL-17	Complete		View PDF	
Submit Notice of Intent to Compete	PA-26	Complete		View PDF	
Submit Application	FL-17	Incomplete		View PDF	Copy
Submit Application	PA-26	Complete		View PDF	Copy

The Copy Feature

Copy Existing Task

Instructions

If you have applied for more than one service area (e.g., basic field and Native American) and wish to copy information from one application to the next, take the following steps:

1. On the **LSC Grants Home** page, select the application whose information you wish to copy and click **Copy**.
2. LSC Grants will then display the **Copy Existing Task** page. In the **Copy To** section of the page, select from the **Task** pull-down menu the service area application that you would like to fill with the information from the completed application.
3. When you press **Save** the information is copied to the empty application you selected and your **Home** page is displayed again. When you select the application that you copied to, you will see that it now contains the copied information. You can make changes where the copied information is inappropriate.

Copy From

Program	Competition/Renewal
Service Area	PA-26
Grant Period	PA-26
Task	Submit Application

Copy To

Task * <Select>

<Select>
FL-17 - Submit Application

Save Close

Top

The Copy Feature

- Review all copied information to ensure accuracy

Pre-population

- Allows users to save time by importing previous information

- Review all information to ensure accuracy

Pre-population

	Current Recipients	New Applicants
Intake System Technology	most recent grant application	-
Projected Expenses (D-12)	most recent grant application	-
Projected Revenue (D-14)	most recent grant application	-
Board Members (F-2)	most recent grant application, or 1607 Report	NIC
Technology (K)	most recent grant application	-

Review all information to ensure accuracy

Technical Support

Email techsupport@lsc.gov

Final Questions?

- Send questions through the chat feature
- The session has been recorded and will be posted on the LSC and LSC Grants websites
- Complete the AIS Evaluation Survey after the conference
- Questions after the webinar? Email competition@lsc.gov