I am surprised that increasing the Congressional appropriation is not listed as a goal. Clearly a number of these, perhaps all, can be helpful in that endeavor, but I would think it would actually be a stated goal. If its too obvious to be a goal in the strategic plan, then perhaps a statement at the beginning that that is one of LSC’s primary purposes, and all of these goals will help in that endeavor.

- Page 8 – initiative 3: A lot of what is described here is currently being done, at least in part, by other organizations. I suggest an acknowledgement of that, and perhaps a statement that LSC will fill gaps in or augment what exists, and/or collaborate where appropriate?

- Page 9 – “matchmaking” idea: I would not limit that to matching a junior and with a senior ED. Instead, make it more broad, to match 2 EDs who can learn from each other?

- Page 14: the italicized paragraph after “ensure superior fiscal management”. I suggest changing the sentence that refers to “will be able to aid more of those in need” to include something about effective assistance. As written, this can be taken to mean that LSC cares only about the number of people served. Clearly, based on the prior discussion about outcomes and the impact of LSC grantees’ work, LSC does care about effective services to clients, in addition to efficient services to clients.
That should be reflected here.

I also have a few minor wording comments:

- I don’t think it’s appropriate to refer to LSC funded organizations as "programs". This is a term left over from decades ago when the organizations were seen as programs of a national entity. We have evolved from that, and our language should evolve also. Each LSC grantee is an independent organization, not a program. I suggest changing that throughout the document.

- Page 1 – I suggest adding “other federal funding” to the list of funding sources.

- Page 2 - there is a reference to LSC grantees reporting a 2% decrease in funding in 2011. That is a misleading statement. While that may be the case in 2011, the reality is that many organizations have seen a 25 - 50% decrease since 2007 because of IOLTA decreases. I would either take that sentence out, or change the statement to reflect the longer term decrease. As written it makes one wonder what the big deal is.
Page 3 – paragraph numbered (3) – the reference to pro bono as “beyond LSC’s grantees” is a bit misleading. Many pro bono programs are an important part of LSC grantees operations. Those organizations which operate high quality pro bono programs see the pro bono resources as part of their larger organization, albeit a leverage of our resources. Perhaps inserting leverage in this section might be more accurate?

The results of this submission may be viewed at:
http://www.lsc.gov/node/2233/submission/2926