TO: All Legal Services Programs, Workers and Clients
FROM: De Miller
DATE: August 25, 1978

This is a very brief report, occasioned by the upcoming Steering Committee meeting and a few recent developments. It is not intended to be comprehensive. A more full report will be distributed in mid-September.

1. 1979 grant applications - work force analysis - disclosure of names.

Despite a PAG Steering Committee resolution to the contrary, some LSC officials apparently continue to insist that they need names of all program staff, and at that names liked to, among other things, salary, ethnic/minority status, handicaps and language skills! In the grant application packages just mailed to programs, the "work force analysis" calls for names linked thusly. (It should be noted that the new director of Field Services, Clinton Lyons, did not make these decisions; they had already been completed before he began. Nonetheless, it is also clear that Field Services now has explicit responsibility for all data gathering through the grant applications and the eventual case reporting systems, so that Clint Lyons now becomes the responsible party in the future.)

The contemplated collection of names linked to the other information is patently offensive. Data linked with names has no justification; there further seems no clear reason why the Corporation needs names at all, although various LSC divisions perceive such a need.
Pursuant to the Steering Committee position, we call on projects to submit their grant applications without including names; the space should simply be left blank. Clint Lyons has indicated that there will be further discussions within the LSC as to the need for names; I have urged that we be able to explore the need for names directly with the LSC divisions that claim to need them - but as a question separate from the grant applications and the other linked data.

My own judgment is that this will be worked out in a satisfactory way, without names linked to other data, but that it will take several weeks. In the meantime, we - on behalf of your staffs - urge you to refrain from the submission of names. If you have any questions, call Bruce Morrison of New Haven at (203) 436-3644 or me.

2. Next PAG Steering Committee meeting.

The next quarterly meeting will be held in Nashville, Tennessee, on Thursday through Saturday, September 14-16, at the Hilton Inn-Central, 211 North First Street, Nashville, Tennessee 37213 (telephone 615-254-1551). The meeting will start promptly at 9:00 a.m. on Thursday. All program workers and clients who can be in the area are encouraged to come.

A rough sense of the agenda is as follows:

**Thursday**

9:00 a.m. LSC regulations, particularly the proposed 1620 (priority-setting)

10:30 a.m. Funding issues:
      FY 1979 - report on the appropriation (including the lobbying restriction; the support debate and the September 6-7 recommendations; experimental grants and the status of the Bellow proposal; NTAC recommendations regarding training; FCC recommendations from the September 8-9 meeting; the September 12 LSC staff position; Steering Committee action on each of the foregoing topics.
      FY 1980 and beyond - current status; timetable; staff position; FCC recommendations; Steering Committee action.

12:30 Lunch

1:30 p.m. Funding continued - remainder of day if necessary

**Friday**

9:00 a.m. Funding continued to completion
Friday (continued)

-- Title III legislation
-- LSC grant application/names issue
-- LSC Case Statistical Reports (reporting system)
-- Status reports on board nominations, Legal Services' Congressional relations, new board members
-- LSC reorganization
-- Next Steps
-- Field Services and regional offices

12:30
Lunch

1:30 p.m.
PAG internal matters

-- Paralegal Committee
-- NTAC and PAG Training Committee
-- Finances - dues collection and expenditures
-- Travel policies
-- Staff
-- Offices
-- Plans for annual meeting

Saturday

9:00 a.m.
Completion of Friday morning agenda

3. PAG Staff Counsel.

PAG has at last filled its Staff Counsel position, hiring Jeff Segal, currently a Reggie with the Mid-Hudson program in New York. He will join Anh Tu, our Staff Coordinator, in the Washington office at the beginning of October. Jeff appears (like Anh) sensitive, mature, committed and able - with good writing skills. We expect him to be an excellent addition.

4. PAG dues for staff and travel.

It is time to pay, folks! Please remit the 1978 amount to Anh now.

5. Summary of the Portland meeting.

Leroy Cordova's summary of the June Portland meeting is enclosed.

6. LSC Case Statistical Reports.

This is the beginning of the long-awaited permanent reporting system. Representatives of the PRS squad met with LSC staff on August 22 to review the proposed new approach. It is, stated simply, acceptable: the
version that we saw had only aggregate data on (i) case types, (ii) reasons for closure, (iii) client age (by range), ethnicity and race, and (iv) size of groups represented. There was a section for narrative: impact cases, community education, legislative advocacy and the like. There is nothing for time, cost, won/lost or type of activity.

In short, there are issues of detail, such as frequency (the statistical reports need to be quarterly; should the narratives be that often?), adequacy of the case problem codes (borne of the heat and ultimate light of the PRS conflict, they actually look fairly good), why group size, how detailed the narrative categories, why not keep track of tall people, and the like. But these are fair matters for reasoned discussion, and it will occur (draft reports will be distributed to all programs in mid-September; there will be an ample two-month comment period). If differences arise from program comments, the PRS squad and other concerned people can meet with LSC staff in mid-November to work out the issues. The LSC approach, under the guidance of Leona Vogt, is at this point balanced, thoughtful and sensitive, in refreshing contrast to the tendencies toward accretion of data through the grant applications. Actual implementation would begin on April 1, 1979, finally addressing the Congressional pressure for a national reporting system.

7. Proposed revisions in the priority-setting regulation - Section 1620 - comments due by September 11.

As indicated, this will be considered at the PAG Steering Committee, and thence at the next LSC Regulations Committee meeting, September 18. Please send copies of any comments you have to me and to Bari Schwartz, Legal Aid Bureau, P.O. Box 187, Mt. Ranier, Maryland 20822. The key issues involve the question of what is really involved in a "needs assessment," the degree of detail in and (assuming a high level of generality to avoid disclosing defendants, strategies and the like) ultimate utility of the "work plan," and the advisability of the documentation requirement [the bracketed optional subparagraph (d)]. If you have no idea what this is all about - but still think you care - see the July 28 Federal Register.

8. PAG's next steps.

The September mailing will, with any luck, contain perspectives on the PAG standards effort, the status of the Reggie program, the LSC Board committee meetings, the LSC staff budget decisions, the status of Gary Bellow's Legal Services Institute proposal, the counterculture's (contra the LSC Notes) viewpoint on the July LSC Board meeting, and undoubtedly more.