

Colorado Legal Services

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May 30, 2014

Reginald J. Haley
Office of Program Performance
Legal Services Corporation
3333 K Street, NW
Washington, DC 20007

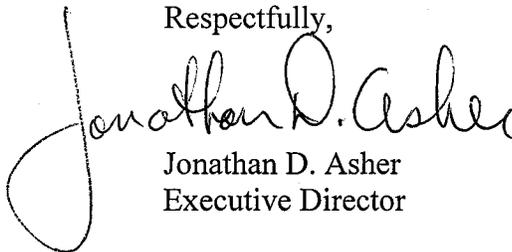
Re: Comment on Proposed Revision to LSC
Grant Assurance No. 15

Dear Mr. Haley:

Colorado Legal Services is concerned with, and opposes, the addition of “time” to the matters of mandatory reporting included in Grant Assurance No. 15. The inclusion of “time” is unnecessary, ambiguous, confusing and undefined. Grant Assurance No. 15 currently requires an LSC recipient to report to the Office of Inspector General “... within two business days the discovery of any information that gives it reason to believe it has been the victim of a loss of \$200 or more as a result of a crime, fraud, misappropriation, embezzlement or theft involving property, client funds, LSC funds...or when the program contacts local, state or Federal law enforcement officials about a crime.” This provision is sufficiently clear that when false time reporting constitutes a crime, that it must be reported. The addition of “time” only adds confusion to the reporting requirement and inappropriately and, most likely, unintentionally involves LSC in internal timekeeping and personnel matters that are best resolved by the program and not by the LSC OIG. Examples are numerous and need not be stated, except to assert that most errors in timekeeping are mistakes. The reporting requirement, however, does not make that distinction and is unnecessary. If actual misuse of time rises to the level of a crime, it, of course, must be reported. The addition of “time” to the reporting requirements simply confuses the reporting requirement. Mandatory reporting to the OIG is best reserved for criminal conduct, which is clearly and adequately covered by the current language of the current Grant Assurance.

If you have any questions or need additional information concerning CLS’ opposition to the addition of time to Grant Assurance No. 15, please inform me accordingly. Otherwise, we look forward to your serious consideration of our concern.

Respectfully,


Jonathan D. Asher
Executive Director