



1700 SOUTH 1ST AVENUE, SUITE 10
EASTDALE PLAZA
IOWA CITY, IOWA 52240-6036
319-351-6570 OR 800-272-0008
SE HABLA ESPAÑOL
FAX: 319-351-0079
WWW.IOWALEGALAID.ORG

Comment on Paragraph 15 of LSC Grant Assurances for Calendar Year 2015 Funding

Paragraph 15 currently requires the reporting of any illegal or fraudulent act no matter what the nature of the property stolen. The addition of the word “time” to Paragraph 15 is not necessary and only causes confusion regarding what is reportable.

The current provision adequately addresses any situation where there is a criminal act such as an employee submitting false time sheets indicating they were working when they were actually elsewhere and not working. The addition of the word “time” raises a question as to what additional activities or categories of activities are reportable. It might be construed to encompass not only criminal acts but also employee misbehavior subject to a program's personnel policies or collective bargaining agreement. As a result, this could lead to over-reporting, become overly burdensome for grantees and LSC and unnecessarily entwine LSC and the Office of Inspector General in grantees’ personnel and collective bargaining issues.

We recommend that paragraph 15 should not be changed. Mandatory reporting within 2 business days to the OIG should be reserved for criminal or fraudulent conduct which is clearly covered by the current language.

Respectfully submitted,

Christine M. Luzzie
Deputy Director