

LEGAL SERVICES CORPORATION

Office of Inspector General

**Semiannual Report to the Congress
April 1, 2006 – September 30, 2006**

www.oig.lsc.gov

**TO THE BOARD OF DIRECTORS OF THE LEGAL SERVICES
CORPORATION AND THE UNITED STATES CONGRESS**

A MESSAGE FROM THE INSPECTOR GENERAL

This Semiannual Report sets forth the significant activities and accomplishments of the Office of Inspector General (OIG) from April 1, 2006 through September 30, 2006. During this period, the OIG continued to perform its work by conducting independent and objective audits, investigations, and other reviews, and issuing reports on the programs and operations of the Legal Services Corporation (LSC). This report details our efforts to oversee the system for routine monitoring of compliance with the restrictions on the use of LSC funds by grantees and reports on our efforts to improve the effectiveness and efficiency of LSC. In addition to our regular activities this period we issued two major reports. The first, in response to a Congressional request, reviewed LSC fiscal practices. The second, also in response to a Congressional request, concerned allegations against a major LSC grantee, California Rural Legal Assistance.

I am pleased to report that the foundation for a more positive working relationship between the OIG and the LSC Board and management appears to have been established during this reporting period. Regularly scheduled meetings, including a joint meeting of the Chairman and Vice Chairman with LSC management and OIG officials, were signs of progress. In addition, I was very pleased by the LSC Board and management's response to our review of LSC fiscal practices and their acceptance of our findings and willingness to take prompt corrective action. I am hopeful that our working relationship will continue to progress in this positive direction.

On September 26, 2006, I testified before the U.S. House of Representatives, Committee on the Judiciary, Subcommittee on Commercial and Administrative Law, to comment on the introduction of H.R. 6101, which would, if enacted, require the agreement of nine of the eleven LSC Board members to remove me or a future incumbent from the position of Inspector General. I supported this bill principally because of the need for a strong and independent Inspector General at LSC.

In this reporting period, we adjusted our work plan to address the two official inquiries that we received from Congressional committees. As a result of these inquiries, we had to defer planned audit work but continued with ongoing audits. We also conducted four audit service reviews. The OIG opened seven investigations and closed seven investigations. We also briefed the Board and contacted stakeholders about OIG strategic planning efforts.

As required by the Inspector General Act, I report regularly to the LSC Board and Congress on our work. In addition, I meet on a regular basis with the LSC

President. I look forward to continuing to work with Chairman Frank Strickland and the LSC Board, and with President Helaine Barnett and her senior staff, as we continue our mutual efforts to forge effective and positive working relationships. I also would like to extend my personal welcome to Jonann Chiles, the Board's newest member.

I would like to thank the many Members of Congress, Congressional committees and subcommittees, and Congressional staff for their confidence in the ability of my office to provide accurate, objective, and independent information and for their support of IG independence and resources. I also would like to thank the LSC Board and management for moving in a more positive direction in their dealings with the OIG. With their support, the OIG can continue to provide the information that is needed to help ensure the success of LSC's statutory mission to provide support to programs serving persons unable to afford legal assistance.

Sincerely,

Kirt West
Inspector General

October 31, 2006

TABLE OF CONTENTS

OFFICE OF INSPECTOR GENERAL OVERVIEW	1
AUDITS	3
Management of Oversight of Grantees - Office of Program Performance and Office of Information Management	3
Fiscal Year 2006 Corporate Audit.....	3
Audit Service Reviews.....	3
Review of Grantees' Annual Financial Statement and Compliance Audit Reports.....	3
INVESTIGATIONS	6
Hotline	6
STRATEGIC PLANNING	8
OIG Strategic Planning.....	8
LEGAL REVIEWS	9
Comments on H.R. 6101	9
LSC Grant Assurances.....	9
OTHER REVIEWS	10
Review of LSC Fiscal Practices.....	10
Interim Findings Regarding California Rural Legal Assistance.....	12
OTHER ACCOMPLISHMENTS	14
OIG Employee Receives Government-wide Award for Evaluating Geographic Information Systems	14
TABLE I - Audit Reports Issued with Questioned Costs for the Period Ending September 30, 2006	15
TABLE II - Audit Reports Issued with Funds to Be Put to Better Use for the Period Ending September 30, 2006	16
TABLE III - Index to Reporting Requirements of the Inspector General.....	18

OFFICE OF INSPECTOR GENERAL OVERVIEW

The LSC Office of Inspector General operates under the Inspector General Act of 1978, 5 U.S.C. app. 3. In 1988, Congress amended the IG Act and required LSC and about 30 other, mostly smaller, federally funded entities to establish independent Offices of Inspector General.

The OIG has two principal missions: 1) to assist management in identifying ways to promote efficiency and effectiveness in the activities and operations of LSC and its grantees; and 2) to prevent and detect fraud and abuse. Thus, the OIG assists management in fostering and overcoming obstacles to good program management and in preventing future problems. It must also identify and report on current problems.

The OIG's primary tool for achieving these missions is fact-finding through financial, performance and other types of audits, evaluations and reviews, as well as investigations into allegations of wrongdoing. Its fact-finding activities enable the OIG to develop recommendations to LSC, the Congress and LSC grantees for actions or changes that will correct problems, better safeguard the integrity of funds, improve procedures, or otherwise increase efficiency or effectiveness.

The OIG is also tasked with ensuring the quality of audits of LSC and its grantees that are conducted by independent public accountants, and with reviewing proposed and existing regulations and legislation affecting the operations and activities of LSC and the programs it funds.

In addition to the missions shared by all OIGs, Congress, starting with LSC's FY 1996 appropriation, directed that an additional tool for monitoring grantee compliance with legal requirements is to be the annual grantee audits conducted by independent public accountants under guidance developed by the OIG, thus adding participation in monitoring compliance to the role of the OIG. In addition, Congress specified the OIG's authority to conduct its own reviews of grantee compliance.

The OIG is headed by the Inspector General who reports to and is under the general supervision of the LSC Board of Directors. The IG has broad authority to manage the OIG, including setting OIG priorities and activities, and to hire OIG personnel, consultants and experts.

To ensure the objectivity of the IG, the IG Act grants the IG the independence to determine what reviews are performed; to gain access to all documents needed for OIG reviews; to publish findings and recommendations based on OIG reviews; and to report OIG findings and recommendations to the LSC Board and to Congress. The IG Act also prohibits LSC from assigning to its IG any of LSC's

own "program operating responsibilities." This means that the OIG does not perform functions assigned to LSC by the Legal Services Corporation Act, 42 U.S.C. §§2996-2996I, other than those transferred to the OIG under the IG Act, and those otherwise assigned by Congress, for example in the FY 1996 Appropriations Act. The IG Act further provides that the LSC Board of Directors may not prevent or prohibit the Inspector General from initiating, carrying out, or completing any audit or investigation.

The IG must report serious problems to the LSC Board and must also report to appropriate law enforcement authorities when, through audit, investigation or otherwise, the IG has found that there are reasonable grounds to believe that a crime has occurred. The OIG is not an "arm" of the Congress, as is the Comptroller General, but is required by law to keep the Congress informed through semiannual reports and other means. The IG also provides periodic reports to the Board and management of LSC and occasionally to the Boards of Directors and management of LSC grantees. Some of these reports will be specific (e.g., an audit of a particular grantee or an investigation of a theft), while others will be of more general interest to management.

Although the OIG is not a part of LSC management, it also is not an adversary of LSC management. To be most effective, the OIG seeks to work cooperatively with the Board and management, seeks their input prior to choosing topics for OIG review, and keeps them informed of OIG activities. Within their different statutory roles, the OIG and LSC management share a common commitment to improving the federal legal services program and increasing the availability and effectiveness of legal services to the poor.

AUDITS

In this reporting period, we adjusted our work plan to address two official inquiries received from Congressional committees. As a result of these inquiries, we had to defer planned audit work but continued with ongoing audits.

Management of Oversight of Grantees — Office of Program Performance and Office of Information Management

The OIG is continuing its audit of LSC's oversight of its grant recipients. The objective of our review is to evaluate the extent of duplication of effort among the various LSC offices providing oversight and to recommend efficiencies in providing oversight to LSC recipients. Because of the number of different program offices involved in the oversight of grantees, the OIG is issuing interim reports on each program office.

Work is nearing completion for audits of the Office of Program Performance and the Office of Information Management. These reports are scheduled to be issued during the next reporting period.

Fiscal Year 2006 Corporate Audit

The OIG issued a Request for Proposals to solicit bids from selected audit firms from the General Services Administration schedule to conduct the FY 2006 LSC Financial Statement Audit. The incumbent firm was selected and a one-year contract was executed with two option years. The audit field work is scheduled to begin in the near future.

Audit Service Reviews

The OIG is responsible for the oversight of the independent public accountants (IPAs) who are selected by LSC grantees to perform their annual financial and compliance audits. To fulfill this responsibility, the OIG conducts Audit Service Reviews (ASRs), which are reviews of the audit documentation of selected IPAs to ensure they adequately tested the grantee's compliance with LSC regulations. During this period, the OIG conducted four ASRs. These reports are scheduled to be issued in the next reporting period.

Review of Grantees' Annual Financial Statement and Compliance Audit Reports

LSC grantees are responsible for submitting annual financial statement and compliance audits to the OIG. Each grantee contracts with an IPA to conduct this audit in accordance with Government Auditing Standards, OMB Circular A-123, and the LSC OIG Audit Guide for Recipients and Auditors.

During the reporting period, the OIG reviewed 117 IPA audits for recipients with fiscal years ending from December 31, 2005 through March 31, 2006. These audits reported 54 findings. The OIG determined that for 29 of these findings, corrective action had already been implemented, or that the finding was not significant. The OIG also determined that 25 of the IPA-reported findings were significant and referred them to LSC's Office of Compliance and Enforcement for follow-up action.

Audit Reports

Open at beginning of reporting period	2
Issued during reporting period	0
Closed during reporting period	1
Open at end of reporting period	1

Recommendations to LSC Grantees

Pending at beginning of reporting period	0
Issued during reporting period	0
Closed during reporting period	0
Pending at end of reporting period	0

Recommendations to LSC Management

Pending at beginning of reporting period	10
Issued during reporting period	0
Closed during reporting period	3
Pending at end of reporting period	7

INVESTIGATIONS

The OIG opened seven investigations during the reporting period. Five cases involved theft of funds or property; one case involved embezzlement; and one case involved misuse of grant funds. During the reporting period, the OIG closed seven investigations. Two cases involved misuse of funds issues; one case involved embezzlement; three cases involved theft of grantee funds or property; and there was one investigative project. Investigative resources were also provided to support the two Congressional inquiries.

One of the open investigative cases concerns allegations that an LSC grantee staff member submitted fraudulent travel claims to the grantee allegedly to attend Department of Veterans Affairs (VA) benefits hearings. A joint case was initiated with the VA OIG to determine the validity of the employee's claims filed in connection with the hearings. We issued Inspector General subpoenas and reviewed third party records to determine the validity of mileage and per diem claimed by the case subject. The case was originally accepted for prosecution by the local District Attorney's Office during the prior reporting period, but has since been moved to the United States Attorney's Office for prosecution. To date, OIG investigators have identified approximately \$137,000 of potentially fraudulent travel claims.

During this reporting period, the OIG issued and served 11 Inspector General subpoenas. Five subpoenas were issued in a major embezzlement case; two subpoenas were issued in a theft of funds case; three subpoenas were issued in a matter involving an LSC employee; and one subpoena was issued in support of an OIG review of allegations against an LSC grantee.

Hotline

The OIG maintains a Hotline for reporting illegal or improper activities by LSC grantees or corporate staff. For this reporting period the OIG received 20 Hotline contacts, with one Hotline complaint referred to LSC management for follow-up.

Investigative Cases

Open at beginning of reporting period	9
Opened during reporting period	7
Closed during reporting period	7
Open at end of reporting period	9

Prosecutorial Activities

Referred for prosecution	0
Accepted for prosecution	0
Declined for prosecution	0

Investigative Activities

Inspector General subpoenas issued	11
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STRATEGIC PLANNING

OIG Strategic Planning

During the reporting period, the OIG has been working to update its five-year Strategic Plan. The plan, currently in draft, aligns OIG strategies with LSC's Strategic Directions and identifies major management challenges to ensure that our work continues to assist the LSC Board management and Congress in achieving organizational goals. In our planning process, we have voluntarily adopted practices under the Government Performance and Results Act, including the use of annual performance plans and results reports to improve planning, management and performance. The plan is designed to provide strategic direction and enable the IG to maintain flexibility and discretion to redirect resources so we can be a timely, relevant and an effective resource.

The OIG briefed the LSC Board at the July meeting on the plan and finished an internal LSC request for comment where we received and incorporated many helpful ideas from the Board and management. Most recently, the OIG shared the draft with LSC external stakeholders. We expect to finalize the plan before the end of the calendar year.

LEGAL REVIEWS

Pursuant to the IG's statutory responsibilities, the OIG reviewed and, where appropriate, commented on statutory and regulatory provisions affecting LSC and/or the OIG, as well as LSC interpretive guidance and its internal policies and procedures.

Comments on H.R. 6101

On September 26, 2006, the Inspector General testified before the U.S. House of Representatives, Committee on the Judiciary, Subcommittee on Commercial and Administrative Law, to comment on the introduction of H.R. 6101, which, if enacted, would require the written agreement of nine of the eleven LSC Board members to remove the LSC Inspector General. The Inspector General's testimony detailed the background and conditions which would support enactment of this bill. Historical and institutional misunderstanding between past and current Boards and their Inspectors General has threatened the independence and effectiveness of the LSC Inspector General. Unlike most Inspectors General who have civil service employment protections, the LSC Inspector General is an at-will employee and can be terminated by a majority of the Board without cause. H.R. 6101, which is similar to a provision enacted for the Inspector General of the United States Postal Service, would require three more Board members than the current majority requirement of six to remove the Inspector General, and would thereby promote Inspector General independence.

LSC Grant Assurances

As part of its periodic review process, LSC reviewed and modified the grant assurances that set conditions for LSC grantees. The OIG recommended LSC modify several provisions and LSC accepted some of these recommended changes. At LSC's July 2006 Board of Directors meeting, the OIG deferred its other recommendations as a result of LSC management's commitment to conduct a comprehensive review of the grant assurances in 2007. The OIG will be recommending certain changes in LSC grant assurances to help the OIG carry out its oversight role and to assist the OIG in investigations into grantee losses by preserving evidence and obtaining assistance from local law enforcement. We have committed to working with LSC management in its efforts to revamp the grant assurances in 2007.

OTHER REVIEWS

Review of LSC Fiscal Practices

On September 25, 2006, in response to a Congressional request, the OIG issued a report on LSC fiscal practices, including allegations of fiscal abuse and wasteful spending. The LSC Board and management responded positively to the report and agreed to implement substantially all of the report's recommendations. In some cases, they had already taken steps to do so.

With respect to many of the allegations, our review found spending practices that may appear excessive and inappropriate to LSC's status as a federally-funded non-profit corporation, particularly in light of its mission to distribute taxpayer dollars to fund legal services for the poor. We also found a number of transactions which did not follow LSC's own policies and some which would not be permissible under the rules governing federal agency spending. While generally those rules are not directly applicable to LSC, they provide a familiar reference point for Congressional overseers and the public and we recommended LSC review its policies in light of federal rules. We found that:

- The cost of food at LSC Board meetings appeared excessive in some instances and should be reduced. We also found the contracting process for Board meetings was not in compliance with LSC's own policies. Finally, we found LSC could save thousands of dollars by holding its local, Washington, D.C. Board meetings at its headquarters rather than at a hotel.
 - *LSC management responded that it has already taken steps to reduce costs and has agreed to comply with this recommendation. In addition, the Board voted unanimously at its September 22, 2006 meeting to hold its January 2007 meeting at the LSC offices.*

The LSC Chairman's authorization for the LSC President to travel to or from any of her homes in connection with official travel was contrary to the terms of the General Services Administration (GSA) travel contract and LSC's obligations as a mandatory user thereunder.

- *LSC management responded that since April 2006 the LSC President has requested and will continue to request reimbursement for her return from business trips on a Friday evening or Saturday, regardless of which residence she returns to, only in an amount*

equivalent to the cost of a government rate return to Washington, DC, but no more than what she personally pays to return to her residence.

- LSC spent over \$100,000 on coffee, holiday parties and picnics, working lunches, and business entertainment, going back as far as August 2000. These expenditures did not violate LSC policy but we questioned whether many of them were reasonable and necessary, and whether they were appropriate for LSC.
 - *LSC management responded that it has previously advised the House and Senate Appropriations Committees that it will undertake a review of LSC policies to see where they differ from federal policy and make modifications where appropriate. LSC management noted that there are some instances in which LSC might not adopt federal policies, for example, if it would cost more money. LSC management will brief the Board on any areas of difference between LSC policies and practices and federal policies and practices and the Board will determine how best to proceed.*
- LSC spent over \$1 million in the past ten years in settlement agreements with departing employees.
 - *LSC management responded that it is revising its Personnel Manual and will incorporate this review. LSC also has been reviewing its settlement policies and practices to determine whether costs can be reduced and whether they are in the best interest of the corporation and appropriate expenditure of public funds and will continue to do so.*

We also concluded that some of the allegations were unfounded, or could not be substantiated. Specifically:

- We did not find evidence of excessive or undisclosed bonuses or of other confidential or indirect payments by LSC to the LSC President. We found no evidence of any “secret deal” between the LSC President and the LSC Board of Directors.
- We did not find unreasonable LSC’s justification for holding a Board meeting in Puerto Rico. LSC stated it was appropriate to visit the largest LSC grantee and meet with various judicial officials and members of the

bar who are involved in promoting the delivery of legal services to low-income individuals in Puerto Rico.

- We did not find widespread first-class travel and found only one instance of questionable first-class travel.
- We did not find LSC spending practices violated any laws. However, we did find that LSC is not adhering to its contractual obligations under the GSA City Pair Contract, as well as instances where it is not following its own controls and procedures regarding spending, contracting, and travel.

Our overall recommendations to the LSC Board and LSC management included the following:

- Undertake a comprehensive review to bring LSC's spending policies and practices, particularly in the areas of travel, meals, meetings, and entertainment, in line with those applicable to federal agencies, and require that the Board review and approve any deviation from federal practice.
- Review the overall cost of LSC Board meetings to determine whether there are ways to reduce costs. Also, require that LSC's competitive requirements are followed in contracting for Board meeting locations.
- Provide training and education for LSC staff to ensure that all LSC policies are followed, particularly in the areas of contracting and the Federal Travel Regulation related to the GSA City Pair Contract.
- Review LSC employment policies and practices to determine if there are opportunities to reduce its potential liability, and review its settlement policies and practices to determine whether costs can be reduced and whether they are in the best interest of the corporation and are appropriate expenditures of public funds.

As stated previously, the LSC Board and management responded positively to the report and OIG recommendations.

Interim Findings Regarding California Rural Legal Assistance

On September 14, 2006, the OIG issued an Interim Report detailing its findings to date and continuing concerns regarding allegations lodged against California Rural Legal Assistance (CRLA), an LSC grantee. Broadly, the allegations include an improper focusing of resources on impact work to the detriment of basic services work and focusing on farmworker and Latino issues to the detriment of the urban and non-Latino populations in CRLA's service area. The

complaint also alleges specific violations of restricted activities directly resulting from CRLA's desire to engage in impact work.

The OIG found substantial evidence that CRLA violated federal law by soliciting clients, working a fee-generating case, requesting attorney fees, and associating CRLA with political activities. The OIG also uncovered several additional CRLA practices that raise serious concerns about CRLA's deviation from Congress' intended purpose in enacting the 1996 reforms—to refocus LSC grantees on the provision of basic legal services to indigent persons seeking assistance. These concerns, which may or may not violate specific provisions of federal law, include conducting significant work without a client, potential lobbying activities, monitoring employers and public agencies, filing of amicus briefs in its institutional capacity, filing cases on behalf of the "general public" under California's unfair competition law, and utilizing timekeeping and case management practices that at least create the condition in which representing ineligible aliens is possible without detection. The OIG is concerned that CRLA's activities divert scarce resources away from providing basic services to those seeking assistance.

The OIG could not complete its investigation due to CRLA's refusal and/or failure to provide the OIG certain requested information, required to be produced by federal law and LSC grant requirements. The OIG also encountered difficulties in trying to determine whether other CRLA activities comply with federal law because of inadequate LSC timekeeping requirements.

OTHER ACCOMPLISHMENTS

OIG Employee Receives Government-wide Award for Evaluating Geographic Information Systems

David Maddox, the OIG's Assistant Inspector General for Resource Management, was chosen by the Executive Council on Integrity and Efficiency to receive a Government-wide Individual Award for Excellence for evaluating the usefulness of Geographic Information Systems (GIS) to develop maps to help federally-funded legal services managers in their strategic and operational planning. Starting in 2001, the OIG conducted an evaluation to determine the usefulness of GIS to develop maps to help legal services managers in their strategic and operational planning at the local, state and national levels. The OIG project was designed to evaluate whether GIS had the potential of increasing effectiveness in determining the level of legal need for the poor, measuring how services are delivered and determining the effectiveness of different programs aimed at meeting these needs.

The evaluation used readily available Census and program data, and relatively low-cost but high-power technology applications, to design and produce maps that illustrated whether federally-funded legal services were being provided in geographical areas with the potentially greatest needs. The maps used Census data showing the poverty population and data on cases funded by LSC to show the relationship of poverty to the actual distribution of clients served by LSC grantees. The maps also used other data such as mortgage foreclosures and domestic violence reports to determine whether LSC-funded programs were addressing these areas of potential need.

As a result of the evaluation, the OIG determined that maps are a useful management tool and have potential long-range programmatic benefits in increasing access to legal services for low-income persons; strengthening planning, resource and performance management; and improving program promotion.

TABLE I
Audit Reports Issued with Questioned Costs
for the Period Ending September 30, 2006

	NUMBER OF REPORTS	QUESTIONED COSTS	UNSUPPORTED COSTS
A. For which no management decision has been made by the commencement of the reporting period.	0	\$0	\$0
B. Reports issued during the reporting period	0	\$0	\$0
Subtotals (A + B)	0	\$0	\$0
LESS:			
C. For which a management decision was made during the reporting period:	0	\$0	\$0
(i) dollar value of recommendations that were agreed to by management	0	\$0	\$0
(ii) dollar value of recommendations that were not agreed to by management	0	\$0	\$0
D. For which no management decision had been made by the end of the reporting period	0	\$0	\$0
E. Reports for which no management decision had been made within six months of issuance	0	\$0	\$0

TABLE II
Audit Reports Issued with Funds to Be Put to Better Use
for the Period Ending September 30, 2006

	NUMBER OF REPORTS	DOLLAR VALUE
A. For which no management decision has been made by the commencement of the reporting period.	2	\$5,640,400
B. Reports issued during the reporting period	0	0
	2	\$5,640,400
Subtotals (A + B)		
LESS:		
C. For which a management decision was made during the reporting period:	1	\$203,240
(i) dollar value of recommendations that were agreed to by management	1	\$203,240
(ii) dollar value of recommendations that were not agreed to by management	0	\$0
D. For which no management decision had been made by the end of the reporting period	0	\$0
Reports for which no management decision had been made within six months of issuance	1	\$5,437,160*

* Note: This item refers to the OIG's Audit of LSC's Office Space Needs. LSC management generally agreed to implement the recommendations of the OIG's audit and document the amount of savings, if any, when management actions are complete. On page 4 of its audit, the OIG states that "until a space study has been completed to determine actual space needs, the actual amount of overpayment, if any, cannot be determined." Nevertheless, the OIG assumed that, if LSC paid rent for an amount of space calculated by applying a General Services Administration (GSA) guideline of 230 square feet per person to the number of LSC staff, it would pay \$748,000 less per year in rent and \$5,437,160 over the then-remaining life of the lease.

LSC management has conducted a benchmark comparison of government and private organizations in the Washington area that employ large numbers of attorneys. LSC management believes that the benchmarking demonstrates that other organizations that were reviewed actually had higher space allocations than LSC's existing space. The OIG believes that regardless of the amount of space another organization occupies, LSC's space should be based on LSC's mission requirement. That is why the OIG's position remains that the space needs analysis should precede any benchmarking.

The OIG recommended that LSC conduct a space needs assessment, and should the assessment indicate office space needs above GSA guidelines, that management document a direct mission requirement and corroborate the need through benchmarking with organizations with similar mission

and needs. LSC management has indicated a bottoms up review of staffing and a space needs assessment is in progress and not yet complete. The OIG believes that if LSC's space study results in a higher overall average of 230 square feet per person, LSC should first ensure that the mission mandates a direct requirement for the space. Once the mission link is established, LSC management should then benchmark its office space with organizations with similar mission and needs. Therefore, the OIG believes that additional benchmarking may be needed depending on the results of LSC's ongoing review of staffing and space needs. A final resolution regarding space allocation and potential cost savings will be made following the conclusion of LSC management's review of staffing and space needs.

TABLE III
Index to Reporting Requirements
of the Inspector General

IG ACT REFERENCE*	REPORTING REQUIREMENT	PAGE
Section 4(a)(2)	Review of legislation and regulations	9
Section 5(a)(1)	Significant problems, abuses, and deficiencies	10
Section 5(a)(2)	Recommendations with respect to significant problems, abuses, and deficiencies	12
Section 5(a)(3)	Prior significant recommendations on which corrective action has not been completed	None
Section 5(a)(4)	Matters referred to prosecutive authorities	6
Section 5(a)(5)	Summary of instances where information was refused	None
Section 5(a)(6)	List of audit reports by subject matter, showing dollar value of questioned costs (including a separate category for the dollar value of unsupported costs) and funds to be put to better use	None
Section 5(a)(7)	Summary of each particularly significant report	10-13
Section 5(a)(8)	Statistical table showing number of audit reports and dollar value of questioned costs	15
Section 5(a)(9)	Statistical table showing number of reports and dollar value of recommendations that funds be put to better use	16
Section 5(a)(10)	Summary of each audit issued before this reporting period for which no management decision was made by the end of the reporting period	16
Section 5(a)(11)	Significant revised management decisions	None
Section 5(a)(12)	Significant management decisions with which the Inspector General disagrees	None

*Refers to sections in the Inspector General Act of 1978, as amended.

INSPECTOR GENERAL HOTLINE

To report suspected fraud, waste or abuse:

**Call: 1 800 678 8868 or
1 202 295 1670**

**Or write: PO Box 3699
Washington DC 20027**

You can request that your identity be protected.

LSC employees are protected from reprisals by the Corporation.