

LEGAL SERVICES CORPORATION

CARES ACT SPENDING PLAN

June 19, 2020

EXECUTIVE SUMMARY

In the CARES Act, Congress appropriated \$50 million in supplemental funding to the Legal Services Corporation (LSC) for legal aid work “to prevent, prepare for, and respond to coronavirus, domestically or internationally” By April 20, 2020, LSC had awarded and distributed \$49.5 million (99%) to grantees already delivering legal aid through LSC grants. The remaining \$500,000 will be applied to management and oversight costs. LSC has provided grantees with guidance for required quarterly reporting. Additionally, LSC requires detailed case and other services reporting. All CARES Act funding is subject to extensive LSC oversight including annual audits by independent public accountants, oversight by the LSC Office of Compliance and Enforcement and Office of Program Performance, and review by the LSC Office of Inspector General. LSC’s management of CARES Act funding builds on LSC’s 45 years of experience managing legal aid grants with congressionally appropriated funds, including managing \$31 million of appropriated supplemental funds for disaster-relief grants since 2013.

TABLE OF FUNDING

CORONAVIRUS AID, RELIEF, AND ECONOMIC SECURITY ACT, 2020

| | | |
|--|-----------|-------------------|
| COVID-19 Supplement Grants (132 grantees) | \$ | 47,100,000 |
| Telework Capacity Building Grants (128 grantees) | \$ | 2,400,000 |
| Grant Management and Administration | \$ | 500,000 |
| Total CARES Act | \$ | 50,000,000 |

LEGAL SERVICES CORPORATION GRANTMAKING

LSC is the largest single funder of civil legal aid in the country. Created by Congress through the 1974 Legal Services Corporation Act, LSC is a D.C. nonprofit corporation and not a federal agency. For FY 2020, prior to the COVID-19 pandemic, Congress appropriated \$440 million to LSC.

As a grant-making organization, LSC distributes nearly 95% of our federal appropriation to eligible nonprofits that deliver civil legal aid. LSC awards grants through a competitive process and currently funds 132 independent legal aid organizations with 855 offices that operate in every county in every state, the District of Columbia, and the territories. LSC’s grantees serve thousands of low-income individuals, veterans, children, families, and seniors in every congressional district. LSC grantees handle the basic civil legal needs of low-income people, addressing matters involving safety, subsistence, and family stability.

CARES ACT FUNDING FOR LSC

Appropriation

On March 27, 2020, Congress appropriated an additional \$50 million to LSC in the CARES Act “to prevent, prepare for, and respond to coronavirus, domestically or internationally” By April 20, 2020, LSC had awarded and distributed \$49.5 million (99%) to LSC’s existing legal aid grantees to fund COVID-19 related services and expenses, including representing eligible clients experiencing eviction, domestic violence, and problems with unemployment benefits. The remaining \$500,000 (1%) will be applied to LSC’s management and oversight of the CARES Act grants.

Pub. L. 116-136, Div. B, Title II (2020)

Title II—Commerce, Related Agencies

LEGAL SERVICES CORPORATION

Payment to the Legal Services Corporation

For an additional amount for “Payment to the Legal Services Corporation”, \$50,000,000, to prevent, prepare for, and respond to coronavirus, domestically or internationally: *Provided*, That none of the funds appropriated under this heading in this Act to the Legal Services Corporation shall be expended for any purpose prohibited or limited by, or contrary to any of the provisions of, sections 501, 502, 503, 504, 505, and 506 of Public Law 105–119, and all funds appropriated in this Act to the Legal Services Corporation shall be subject to the same terms and conditions set forth in such sections, except that all references in sections 502 and 503 to 1997 and 1998 shall be deemed to refer instead to 2019 and 2020, respectively, and except that sections 501 and 503 of Public Law 104–134 (referenced by Public Law 105–119) shall not apply to the amount made available under this heading: *Provided further*, That for the purposes of this Act, the Legal Services Corporation shall be considered an agency of the United States Government: *Provided further*, That such amount is designated by the Congress as being for an emergency requirement pursuant to section 251(b)(2)(A)(i) of the Balanced Budget and Emergency Deficit Control Act of 1985.

LSC Grant Awards and Administration

LSC awarded funding in two categories. LSC distributed \$47.1 million (94%) to all 132 existing grantees as supplemental funding for legal aid delivery related to COVID-19. To direct the funds in response to the pandemic, LSC developed a formula based on the distribution of poverty population and aggregated data from the Department of Labor’s Unemployment Insurance Weekly Claims. Grantees serving every state, territory, the District of Columbia, and Native American communities received funding, with an emphasis on additional funding for areas experiencing higher than normal unemployment due to the pandemic. Additionally, LSC distributed \$2.4 million (5%) in Telework Capacity Building Grants to 126 grantees that identified specific new expenses related to quickly enabling their staff to serve clients while working remotely. Appendix A shows the awards by geographic area and grantee.

Reporting Requirements

As required by the CARES Act, LSC has provided all grantees with instructions regarding requirements of CARES Act awards and expenditures for quarterly reporting. Additionally, LSC has instructed grantees to provide more detailed information regarding COVID-19 related cases and other services, which the grantees collect for annual LSC reporting requirements. Together, these sets of data will provide LSC, Congress, and the public with detailed information about the use of these funds for addressing the pandemic-related legal needs of low-income individuals and families. Because LSC is not a federal agency, and LSC grants are not federal awards, neither LSC nor LSC grantees are part of the USASpending.gov system. As such, LSC and its grantees will report data to the Pandemic Response Accountability Committee in a separate format. LSC will provide monthly reports as required by the CARES Act. LSC also requires grantees to report, each year, on all closed cases funded by LSC, including those funded through special appropriations such as the CARES Act. Through these reports, LSC maintains detailed data on the legal services provided, the people represented as clients, and the types of legal issues addressed.

Grant Management and Oversight

LSC will apply \$500,000 (1%) to LSC's expenses for management and oversight of the CARES Act grants. All funds awarded are subject to cost standards and financial reporting. Any funds not properly accounted for will be questioned and, if appropriate, disallowed. LSC recovers disallowed costs through reimbursement by the grantee or deduction from future grant payments. Most LSC grantees have three-year grant cycles, which provide ample opportunity to recover any disallowed costs.

LSC has two systems for oversight of this funding. First, LSC has created a special grant program specifically for the CARES Act grants based on our experience managing supplemental disaster relief appropriations since 2013. LSC will provide oversight and guidance specific to the pandemic-related work, and staff will serve as a resource for grantees throughout the expenditure of funding.

Second, LSC provides extensive oversight for all LSC-funded work, including the CARES Act funding. Each grantee submits to the LSC Office of Inspector General (OIG) an audit conducted by an independent public accountant (IPA) in accordance with generally accepted government auditing standards. LSC's OIG oversees the IPA process and conducts oversight of grantee operations to identify fraud, waste, and abuse. The OIG refers its recommendations to LSC management, reports to the LSC Board of Directors quarterly, and provides semiannual reports to Congress.

The LSC Office of Compliance and Enforcement (OCE) conducts on-site and desk reviews of grantee compliance with all LSC requirements and financial standards. OCE handles questioned-cost proceedings, required corrective actions, and necessary follow-ups.

The LSC Office of Program Performance (OPP) manages the grant program, conducts on-site and desk reviews of grantee program quality and delivery, and actively addresses grantee deficiencies while promoting the highest standards for delivery of legal aid. In addition to the CARES Act grants and natural disaster grants, OPP also manages two special grant programs: the Technology Initiative Grant program and the Pro Bono Innovation Fund, both of which are funded by specific line items in LSC's annual congressional appropriation.

Appendix A: CARES ACT Funding Allocations

| <i>State</i> | <i>Grantee Name</i> | <i>COVID-19</i> | <i>Telework</i> | <i>Total</i> |
|--------------|---|------------------|-----------------|------------------|
| AK | Alaska Legal Services Corporation | 200,948 | 23,953 | 224,901 |
| AL | Legal Services Alabama, Inc. | 866,477 | 14,016 | 880,493 |
| AR | Legal Aid of Arkansas, Inc. | 144,272 | 10,511 | 154,783 |
| | Center for Arkansas Legal Services | 229,447 | 14,950 | 244,397 |
| | AR Total | 373,719 | 25,461 | 399,180 |
| AZ | Community Legal Services, Inc. | 555,064 | 14,722 | 569,786 |
| | Southern Arizona Legal Aid, Inc. | 311,916 | 19,520 | 331,436 |
| | DNA-Peoples Legal Services, Inc. | 431,379 | 24,720 | 456,099 |
| | AZ Total | 1,298,359 | 58,962 | 1,357,321 |
| CA | California Indian Legal Services, Inc. | 123,296 | 18,500 | 141,796 |
| | Greater Bakersfield Legal Assistance, Inc. | 172,298 | 0 | 172,298 |
| | Central California Legal Services | 435,882 | 17,800 | 453,682 |
| | Legal Aid Foundation of Los Angeles | 830,707 | 25,000 | 855,707 |
| | Neighborhood Legal Services of Los Angeles County | 571,783 | 25,000 | 596,783 |
| | Inland Counties Legal Services, Inc. | 680,437 | 25,000 | 705,437 |
| | Legal Services of Northern California, Inc. | 561,900 | 24,507 | 586,407 |
| | Legal Aid Society of San Diego, Inc. | 404,923 | 25,000 | 429,923 |
| | California Rural Legal Assistance, Inc. | 1,066,516 | 17,187 | 1,083,703 |
| | Bay Area Legal Aid | 580,912 | 25,000 | 605,912 |
| | Community Legal Aid SoCal | 546,458 | 25,000 | 571,458 |
| | CA Total | 5,975,112 | 227,993 | 6,203,105 |
| CO | Colorado Legal Services | 364,118 | 14,905 | 379,023 |
| CT | Statewide Legal Services of Connecticut, Inc. | 170,964 | 21,299 | 192,263 |
| DC | Neighborhood Legal Services Program of the District of Columbia | 120,676 | 19,470 | 140,146 |
| DE | Legal Services Corporation of Delaware, Inc. | 136,191 | 10,063 | 146,254 |
| FL | Community Legal Services of Mid-Florida, Inc. | 334,521 | 25,000 | 359,521 |
| | Florida Rural Legal Services, Inc. | 302,346 | 25,000 | 327,346 |
| | Legal Services of Greater Miami, Inc. | 238,455 | 19,875 | 258,330 |
| | Legal Services of North Florida, Inc. | 109,986 | 22,621 | 132,607 |
| | Bay Area Legal Services, Inc. | 245,145 | 17,754 | 262,899 |
| | Three Rivers Legal Services, Inc. | 155,770 | 13,131 | 168,901 |
| | Coast to Coast Legal Aid of South Florida, Inc. | 152,799 | 18,500 | 171,299 |
| | FL Total | 1,539,022 | 141,880 | 1,680,902 |

Appendix A: CARES ACT Funding Allocations

| <i>State</i> | <i>Grantee Name</i> | <i>COVID-19</i> | <i>Telework</i> | <i>Total</i> |
|--------------|---|------------------|-----------------|------------------|
| GA | Atlanta Legal Aid Society, Inc. | 639,999 | 24,989 | 664,988 |
| | Georgia Legal Services Program | 1,523,048 | 25,000 | 1,548,048 |
| | GA Total | 2,163,047 | 49,989 | 2,213,036 |
| HI | Legal Aid Society of Hawaii | 314,979 | 14,034 | 329,013 |
| IA | Iowa Legal Aid | 343,716 | 25,000 | 368,716 |
| ID | Idaho Legal Aid Services, Inc. | 201,677 | 11,950 | 213,627 |
| IL | Legal Aid Chicago | 638,471 | 24,832 | 663,303 |
| | Land of Lincoln Legal Assistance Foundation, Inc. | 289,498 | 17,500 | 306,998 |
| | Prairie State Legal Services, Inc. | 391,553 | 17,631 | 409,184 |
| | IL Total | 1,319,522 | 59,962 | 1,379,484 |
| IN | Indiana Legal Services, Inc. | 1,027,797 | 18,251 | 1,046,048 |
| KS | Kansas Legal Services, Inc. | 304,347 | 15,953 | 320,300 |
| KY | Legal Aid of the Bluegrass | 319,880 | 24,994 | 319,880 |
| | Legal Aid Society, Inc. | 253,225 | 25,000 | 278,225 |
| | Appalachian Research and Defense Fund of Kentucky | 354,258 | 15,934 | 370,192 |
| | Kentucky Legal Aid | 260,430 | 9,958 | 270,388 |
| | KY Total | 1,187,793 | 75,886 | 1,238,685 |
| LA | Acadiana Legal Service Corporation | 655,650 | 18,640 | 674,290 |
| | Southeast Louisiana Legal Services Corporation | 634,145 | 15,000 | 649,145 |
| | LA Total | 1,289,795 | 33,640 | 1,323,435 |
| MA | Volunteer Lawyers Project of the Boston Bar Association | 341,932 | 11,770 | 353,702 |
| | South Coastal Counties Legal Services | 143,561 | 0 | 143,561 |
| | Northeast Legal Aid, Inc. | 151,749 | 23,882 | 175,631 |
| | Community Legal Aid, Inc. | 246,936 | 16,443 | 263,379 |
| | MA Total | 884,178 | 52,095 | 936,273 |
| MD | Maryland Legal Aid | 422,690 | 24,190 | 446,880 |
| ME | Pine Tree Legal Assistance, Inc. | 199,298 | 24,925 | 224,223 |
| MI | Michigan Advocacy Program | 481,504 | 24,045 | 505,549 |
| | Legal Services of Eastern Michigan | 377,254 | 25,000 | 402,254 |
| | Lakeshore Legal Aid | 1,036,635 | 25,000 | 1,061,635 |
| | Legal Services of Northern Michigan, Inc. | 187,743 | 21,820 | 209,563 |
| | Legal Aid of Western Michigan | 447,115 | 15,150 | 462,265 |
| | Michigan Indian Legal Services, Inc. | 25,000 | 12,591 | 37,591 |
| | MI Total | 2,555,251 | 123,606 | 2,678,857 |

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| <i>State</i> | <i>Grantee Name</i> | <i>COVID-19</i> | <i>Telework</i> | <i>Total</i> |
|-------------------------------------|---|------------------|-----------------|------------------|
| MN | Legal Aid Service of Northeastern Minnesota | 60,153 | 23,727 | 83,880 |
| | Central Minnesota Legal Services, Inc. | 228,352 | 17,145 | 245,497 |
| | Legal Services of Northwest Minnesota Corporation | 52,632 | 4,983 | 57,615 |
| | Southern Minnesota Regional Legal Services, Inc. | 290,138 | 25,000 | 315,138 |
| | Anishinabe Legal Services, Inc. | 32,827 | 13,865 | 46,692 |
| MN Total | | 664,102 | 84,720 | 748,822 |
| MO | Legal Aid of Western Missouri | 231,133 | 25,000 | 256,133 |
| | Legal Services of Eastern Missouri, Inc. | 215,742 | 18,660 | 234,402 |
| | Mid-Missouri Legal Services Corporation | 48,458 | 10,695 | 59,153 |
| | Legal Services of Southern Missouri | 197,825 | 10,966 | 208,791 |
| MO Total | | 693,158 | 65,322 | 758,480 |
| MS | North Mississippi Rural Legal Services, Inc. | 188,828 | 23,368 | 212,196 |
| | Mississippi Center for Legal Services | 316,206 | 25,000 | 341,206 |
| MS Total | | 505,034 | 48,368 | 553,402 |
| MT | Montana Legal Services Association | 159,035 | 19,450 | 178,485 |
| NC | Legal Aid of North Carolina, Inc. | 1,381,877 | 25,000 | 1,406,877 |
| ND | Legal Services of North Dakota | 92,886 | 19,652 | 112,538 |
| NE | Legal Aid of Nebraska | 143,073 | 24,375 | 167,448 |
| NH | Legal Advice & Referral Center, Inc. | 118,335 | 18,232 | 136,567 |
| NJ | Legal Services of Northwest Jersey | 77,937 | 6,179 | 84,116 |
| | South Jersey Legal Services, Inc. | 397,828 | 15,000 | 412,828 |
| | Northeast New Jersey Legal Services Corporation | 315,731 | 15,956 | 331,687 |
| | Essex-Newark Legal Services Project, Inc. | 162,396 | 0 | 162,396 |
| | Central Jersey Legal Services, Inc. | 212,187 | 0 | 212,187 |
| NJ Total | | 1,166,079 | 37,135 | 1,203,214 |
| NM | New Mexico Legal Aid | 366,777 | 24,522 | 391,299 |
| NV | Nevada Legal Services, Inc. | 659,341 | 13,980 | 673,321 |
| NY | Legal Aid Society of Northeastern New York, Inc. | 175,157 | 25,000 | 200,157 |
| | Neighborhood Legal Services, Inc. | 179,143 | 15,000 | 194,143 |
| | Nassau/Suffolk Law Services Committee, Inc. | 185,782 | 19,225 | 205,007 |
| | Legal Services NYC | 1,572,537 | 25,000 | 1,597,537 |
| | Legal Assistance of Western New York, Inc. | 237,575 | 17,345 | 254,920 |
| | Legal Aid Society of Mid-New York, Inc. | 262,107 | 25,000 | 287,107 |
| Legal Services of the Hudson Valley | 235,892 | 25,000 | 260,892 | |
| NY Total | | 2,848,193 | 151,571 | 2,999,764 |

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|-----------------|--|------------------|------------------|------------------|
| OH | Community Legal Aid Services, Inc. | 307,257 | 18,000 | 325,257 |
| | Legal Aid Society of Greater Cincinnati | 264,529 | 15,765 | 280,294 |
| | The Legal Aid Society of Cleveland | 373,872 | 20,798 | 394,670 |
| | Ohio State Legal Services | 545,383 | 19,415 | 564,798 |
| | Legal Aid of Western Ohio, Inc. | 479,102 | 13,197 | 492,299 |
| OH Total | | 1,970,143 | 87,175 | 2,057,318 |
| OK | Oklahoma Indian Legal Services, Inc. | 112,470 | 24,486 | 136,956 |
| | Legal Aid Services of Oklahoma, Inc. | 460,318 | 11,242 | 471,560 |
| OK Total | | 572,788 | 35,728 | 608,516 |
| OR | Legal Aid Services of Oregon | 382,065 | 0 | 382,065 |
| PA | Philadelphia Legal Assistance Center | 706,087 | 17,346 | 723,433 |
| | Laurel Legal Services, Inc. | 141,380 | 14,482 | 155,862 |
| | MidPenn Legal Services, Inc. | 546,121 | 12,269 | 558,390 |
| | Neighborhood Legal Services Association | 296,048 | 18,744 | 314,792 |
| | North Penn Legal Services, Inc. | 420,863 | 14,952 | 435,815 |
| | Southwestern Pennsylvania Legal Services, Inc. | 87,737 | 14,399 | 102,136 |
| | Northwestern Legal Services | 154,267 | 10,795 | 165,062 |
| | Legal Aid of Southeastern Pennsylvania | 282,000 | 24,307 | 306,307 |
| | PA Total | 2,634,503 | 127,295 | 2,761,798 |
| RI | Rhode Island Legal Services, Inc. | 208,487 | 15,500 | 223,987 |
| SC | South Carolina Legal Services, Inc. | 728,397 | 24,549 | 752,946 |
| SD | East River Legal Services | 25,000 | 16,100 | 41,100 |
| | Dakota Plains Legal Services, Inc. | 152,086 | 15,000 | 167,086 |
| SD Total | | 177,086 | 31,100 | 208,186 |
| TN | Legal Aid of East Tennessee | 256,078 | 24,644 | 280,722 |
| | Memphis Area Legal Services, Inc. | 157,361 | 24,909 | 182,270 |
| | Legal Aid Society of Middle Tennessee and the Cumberland | 317,146 | 15,648 | 332,794 |
| | West Tennessee Legal Services, Inc. | 72,526 | 13,325 | 85,851 |
| TN Total | 803,111 | 78,525 | 881,636 | |
| TX | Legal Aid of NorthWest Texas | 666,399 | 24,727 | 691,126 |
| | Lone Star Legal Aid | 876,913 | 24,843 | 901,756 |
| | Texas RioGrande Legal Aid, Inc. | 983,982 | 24,950 | 1,008,932 |
| TX Total | 2,527,294 | 74,520 | 2,601,814 | |
| UT | Utah Legal Services, Inc. | 145,013 | 15,000 | 160,013 |

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|-----------------------|--|-------------------|------------------|-------------------|
| VA | Legal Services of Northern Virginia, Inc. | 157,429 | 14,610 | 172,039 |
| | Southwest Virginia Legal Aid Society, Inc. | 85,435 | 23,880 | 109,315 |
| | Legal Aid Society of Eastern Virginia | 154,775 | 20,287 | 175,062 |
| | Central Virginia Legal Aid Society, Inc. | 147,658 | 18,327 | 165,985 |
| | Virginia Legal Aid Society, Inc. | 79,617 | 12,555 | 92,172 |
| | Blue Ridge Legal Services, Inc. | 84,866 | 15,455 | 100,321 |
| | VA Total | 709,780 | 105,114 | 814,894 |
| VT | Legal Services Vermont | 69,323 | 7,800 | 77,123 |
| WA | Northwest Justice Project | 1,157,505 | 24,576 | 1,182,081 |
| WI | Legal Action of Wisconsin, Inc. | 465,260 | 25,000 | 490,260 |
| | Wisconsin Judicare, Inc. | 131,624 | 15,078 | 146,702 |
| | WI Total | 596,884 | 40,078 | 636,962 |
| WV | Legal Aid of West Virginia, Inc. | 159,765 | 23,223 | 182,988 |
| WY | Legal Aid of Wyoming, Inc. | 52,964 | 12,205 | 65,169 |
| TERRITORIES | | | | |
| American Samoa | American Samoa Legal Aid | 30,814 | 15,997 | 46,811 |
| Micronesia | Micronesian Legal Services Corporation | 208,885 | 15,000 | 223,885 |
| Puerto Rico | Puerto Rico Legal Services, Inc. | 1,854,493 | 21,960 | 1,876,453 |
| | Community Law Office, Inc. | 33,699 | 14,283 | 47,982 |
| | PR Total | 1,888,192 | 36,243 | 1,924,435 |
| Virgin Islands | Legal Services of the Virgin Islands, Inc. | 25,000 | 0 | 25,000 |
| PENDING | | | | |
| | Remaining funds for addition to an existing grant. | | 5,000 | 5,000 |
| GRAND TOTAL | | 47,105,565 | 2,394,435 | 49,500,000 |