

Ext 1619



**LEGAL SERVICES CORPORATION**  
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John McKay  
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September 10, 1997

Gretchen Coll Marti, Executive Director  
Servicios Legales De Puerto Rico, Inc.  
Ave. Ponce de Leon 1859-Pda. 26  
Santurce, Puerto Rico 00912

Dear Ms. Coll Marti:

This is a response to your September 4, 1997 letter requesting guidance on whether Servicios Legales De Puerto Rico (SLPR) is legally required to provide copies of the minutes of its board meetings since 1995 or all documents to be considered at all future board meetings to the union which represents some of its employees.

I can find no statute or regulation requiring SLPR to disclose the documents requested by the union. The Corporation's regulation on a recipient's obligation to disclose information, 45 CFR Part 1619, does not require disclosure of this information. The rule requires recipients to:

adopt a procedure for affording the public appropriate access to the Act, Corporation rules, regulations and guidelines, the recipient's written policies, procedures, and guidelines, the names and addresses of the members of its governing body, and other materials that the recipient determines should be disclosed.

§ 1619.2. Board minutes and documents for consideration by a recipient board are not included in this requirement, unless the requested documents are included in your program board's adopted procedures for disclosure.

The rule also requires recipients to either provide information the Corporation is required to disclose under the Freedom of Information Act or inform the requester how to request the information from the Corporation. §1619.3. If SLPR has provided the Corporation any of the above

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mentioned documents, the documents may be releaseable under FOIA. In such a case, SLPR should inform the union how to request the documents from the Corporation.<sup>1</sup>

I hope this adequately responds to your inquiry. Please feel free to contact me if you need any additional assistance.

Sincerely,



Suzanne B. Glasow

Senior Assistant General Counsel

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<sup>1</sup> The Corporation is not required under FOIA to gain access to such documents if the Corporation does not already have possession of them.