

**LEGAL SERVICES CORPORATION**

**OFFICE OF INSPECTOR GENERAL**

**STRATEGIC PLAN**

**FOR**

**YEARS 2007 – 2011**

## **Our Operating Philosophy**

- We, the employees of the Office of Inspector General, are motivated by the knowledge that our work enhances the effectiveness and efficiency of the Legal Services Corporation and its grant recipients.
- We are dedicated individuals who act with integrity and are creative, trustworthy, and committed to doing a good job.
- Each of us has a role in the work of leadership. We share information, support each other, treat each other with respect, and hold ourselves mutually accountable for the overall success of the OIG.
- Each of us has a role in the work of management. Each of us agrees to be a good steward of the OIG's resources; including the planning, budgeting, organizing, directing, coordinating, reporting and staffing of our projects and individual duties.
- Together we are creating a work place that values people; communicates openly; promotes continual learning, growth and improvement; makes decisions collaboratively; and solves problems creatively.

## **Message from the Inspector General**

I am proud to present the Strategic Plan of the Legal Services Corporation (LSC) Office of Inspector General (OIG) covering the years 2007 through 2011. The purpose of the Plan is to define the future direction of OIG activities, to guide resource decisions and to ensure that limited resources focus on the most important issues. It sets forth the OIG vision, mission, goals, statutory and institutional framework, assessment of the environment, major management challenges facing LSC, goals, objectives and strategies, and challenges to our success.

The OIG helps the LSC Board of Directors, management and the Congress oversee federally-funded civil legal services program to low-income individuals to ensure accountability of the operations of LSC and the grant recipients by fulfilling the inspector general mission. The OIG contributes to LSC's success by providing leadership with objective information to promote management, decision-making, and accountability. The OIG's lawyers, auditors, investigators, analysts, information technology specialists and others are a team of dedicated professionals who seek to enhance the economy, efficiency, and effectiveness and ensure the integrity of the federally-funded legal services. We set high standards for ourselves in the conduct of the OIG's work. We take a professional, objective, fact-based, non-partisan, non-ideological, balanced and impartial approach to all activities. The integrity of our products is the foundation of our reputation. We strive each day to ensure that our work is reliable, high quality, timely, accurate, fair and useful. While maintaining our independence, we intend to work in a cooperative fashion with all stakeholders to improve the federal component of civil legal services.

Although not required by law, this Plan conforms to the Government Performance and Results Act (GPRA) and the OIG community practice of identifying major management challenges. It also incorporates concepts from the President's Management Agenda and annual GPRA performance planning and reporting. The goals and objectives set out in this document are challenging and focus on improvement in substantive areas. We will review the Strategic Plan annually to evaluate prior year performance, reconsider operational methods, assess program risks, and use it to guide the creation of the annual performance plan for the next year. Starting in 2007, the annual performance plan will define the future year's performance goals, activities and resource levels, express the performance indicators to be used to measure validated results. At the end of each year, we will issue a performance report detailing our results in reaching our performance goals to ensure transparency and accountability to our stakeholders.

To develop this Plan we relied on our substantial LSC and OIG experience and incorporated information received from our major stakeholders during my tenure, including the LSC Board of Directors, the Congress, LSC Management, the LSC and OIG staffs and others. We also aligned this Plan to support LSC's Strategic Directions 2006-2010 and its three goals: (1) to increase public awareness of and support for civil legal services to low-income persons in order to respond appropriately to more of their legal needs; (2) to

enhance the quality and compliance of legal services programs; and (3) to ensure that LSC operates efficiently and effectively.

The OIG has a history of identifying innovative ideas that have significantly contributed to the legal services program. For instance in 1996, the OIG report entitled Increasing Legal Services Delivery Capacity through Information Technology, identified several innovative information technology applications to increase delivery capacity including legal assistance through telephone hotlines, the Internet and kiosk applications. The report was used to help justify the Technology Initiative Grants (TIG) started by the Congress in 2000. More recently, the OIG is finishing the second phase of the Evaluation of Legal Services Mapping, which recognizes the benefits of having better management information to assist in increasing access to legal services for low-income persons, strengthen planning and operations, improve promotion and to evaluate performance. It is my hope to be able to increase our work in areas ripe for identifying innovative approaches and best practices in grants management, compliance and the delivery of legal services to help improve the program and its results.

As much of our work is assigned to current issues and program priorities as well as requests from Congress, the Board of Directors and the public, our Plan is dynamic. As such, these factors make it difficult to project a specific OIG audit, investigation and evaluation into the future. Therefore, our Strategic Plan does not include the operational detail, which has been provided in the OIG work plan and in the future by the annual performance plan. To fulfill the inspector general mission we must maintain flexibility and discretion to redirect resources – when and where needed – to be a truly timely, relevant and effective resource for the LSC Board of Directors and the Congress.

Ultimately, the success of this Plan and the LSC OIG depends on the daily leadership and commitment of each OIG employee to our core mission.

Sincerely,



Kirt West  
Inspector General

December 21, 2006

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## **Statutory and Institutional Framework**

General OIG authority is established under the Inspector General Act of 1978, 5 U.S.C. Appendix 3, as amended, which provides statutory responsibility to create an independent and objective unit, among other things —

- “to conduct and supervise audits and investigations relating to the programs and operations of the establishment;”<sup>1</sup>
- “to provide leadership and coordination and recommend policies for activities to promote activities designed (A) to promote economy, efficiency, and effectiveness in the administration of, and (B) to prevent and detect fraud and abuse in, such programs and operations;”<sup>2</sup> and
- “to provide a means to keep the head of the establishment and the Congress fully and currently informed about problems and deficiencies relating to the administration of the programs and operations and the necessity for and progress of corrective action.”<sup>3</sup>

In 1988, Congress amended the IG Act and required LSC and about 30 other small, federally-funded entities to establish independent Offices of Inspector General. Today there are 60 statutory OIGs that work together in the President's Council on Integrity and Efficiency (PCIE) and the Executive Council on Integrity and Efficiency (ECIE) established by Executive Order 12805 to:

- address integrity, economy, and effectiveness issues that transcend individual Government agencies, and
- increase the professionalism and effectiveness of IG personnel throughout the Government.

To accomplish their mission, the PCIE and ECIE members look to conduct interagency audit, inspection, and investigation projects to promote economy and efficiency in Federal programs and address more effectively government-wide issues of fraud, waste, and abuse. The Council members also develop policies, standards, and approaches to aid in the establishment of a well-trained and highly skilled IG workforce.

The PCIE is primarily comprised of the Presidentially-appointed IGs and the ECIE is primarily comprised of the agency head-appointed IGs.<sup>4</sup> The LSC OIG, part of the ECIE, is unique among the OIGs in that it also has an explicit statutory role in monitoring grant

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<sup>1</sup> *Inspector General Act, §§ 2 (1); 4(a)(1).*

<sup>2</sup> *Inspector General Act, §§ 2 (2); 4(a)(2),(3) and (4).*

<sup>3</sup> *Inspector General Act, §§ 2 (3); 4(a)(5).*

<sup>4</sup> The Deputy Director for Management of the Office of Management and Budget chairs both Councils. The Chair appoints a Vice Chair from each Council to assist in carrying out its functions. Officials from the Office of Management and Budget, Federal Bureau of Investigation, Office of Government Ethics, Office of Special Counsel, and Office of Personnel Management serve on both Councils.

recipient compliance with laws and regulations.<sup>5</sup> The LSC Appropriation Act, which includes a separate budget line for the OIG, placed a significant additional responsibility with the OIG – overseeing the monitoring of grant recipient compliance with congressional restrictions via annual audits performed by IPAs. In addition, Congress specified the OIG's authority to conduct its own reviews of grantee compliance.

As prescribed by the IG Act, we will:

- Maintain an independent and objective organization to conduct and supervise audits and investigations relating to the operations of LSC and the grant recipients;
- Recommend policies for activities to promote economy, efficiency, and effectiveness in the administration of LSC and the grant recipients;
- Take appropriate actions to prevent and detect fraud, waste and abuse in LSC and grantee operations;
- Have shared oversight responsibility for monitoring LSC grantee compliance with the Congressionally prescribed restrictions;<sup>6</sup>
- Seek and enhance relationships between LSC and governmental agencies, and nongovernmental entities to achieve these ends;
- Keep the Board of Directors and the Congress fully informed about problems and deficiencies and the necessity for and progress of corrective action;
- Receive and, as appropriate, investigate complaints from any person or entity, including the Congress;
- Report violations of law to the U.S. Attorney General or appropriate law enforcement officials;
- Notify the Board of Directors and the Congress of serious or flagrant problems in LSC or grant recipients;
- Review existing and proposed legislation and regulations;
- Protect the identity of whistleblowers; and,
- Prepare semiannual reports to the Congress.

We will fulfill these responsibilities by providing leadership and coordination and recommend policies generated through the completion and reporting of fact-finding reviews such as audits, evaluations and investigations to ensure integrity, accountability and identify opportunities for improvement.

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<sup>5</sup> *FY 1996, Pub. L. 104—134, 110 Stat. 1321 (1996) § 509.*

<sup>6</sup> *FY 1996, Pub. L. 104—134, 110 Stat. 1321 (1996) § 509.* This monitoring function is shared with the LSC management.

## Vision

The OIG seeks to be a positive contributor to the federally-funded civil legal services program by helping to improve LSC operations, the delivery of legal services to eligible low-income individuals by legal services providers receiving LSC grants and ensuring the good stewardship of taxpayer dollars. We strive to be a valued resource to the LSC Board of Directors, management and staff, LSC grant recipients, the Congress, and the low-income clients and communities. The OIG endeavors to provide relevant, impartial, balanced, accurate, cost-effective products and services that our clients rely upon to make informed decisions.

## Mission

The mission of the OIG is to perform objective and independent audits, investigations, evaluations and reviews that help to support LSC by:

- Promoting economy, efficiency and effectiveness in the operations of LSC and grant recipients;<sup>7</sup>
- Preventing, deterring and detecting waste, fraud, abuse and non-compliance with laws and regulations that restrict or prohibit certain practices;<sup>8</sup> and
- Keeping the Board of Directors, Congress and management informed about problems, deficiencies and corresponding corrective actions.<sup>9</sup>

## Role

By providing objective information to promote management, decision-making, and accountability, the OIG contributes to LSC's success in fulfilling the LSC mission. The OIG is a constructive critic and an agent of positive change, focusing on eliminating waste, fraud and abuse, and on identifying problems and recommendations for corrective actions by LSC leadership. The OIG provides the LSC and Congress with objective assessments of opportunities to be more successful.<sup>10</sup>

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<sup>7</sup> *Inspector General Act, §§ 2 (2)(A); 4(a)(2) and (3).*

<sup>8</sup> *Inspector General Act, §§ 2 (2)(B); 4(a)(3); FY 1996, Pub. L. 104—134, 110 Stat. 1321 (1996) § 509.*

<sup>9</sup> *Inspector General Act, §§ 2 (3); 4(a)(5).*

<sup>10</sup> *Office of Management and Budget Memorandum – Working Relationships Principles for Agencies and Office of Inspector General*, re-released July 20, 2006.



## Stakeholders

The primary stakeholders of OIG products and services are the LSC Board of Directors, management and the Congress. Other stakeholders are LSC staff, grant recipients, those who receive or are eligible to receive legal services with appropriated funds, the legal aid community and the independent public accountants (IPAs) who annually audit LSC's grant recipients. The people of the United States who pay the taxes that fund LSC, the grant recipients and the OIG are the ultimate customers of our work. Any of our stakeholders may request our assistance at any time in any area of the federally-funded legal services program where the products and services coming from an independent, professional source would be of public benefit.

## Goals

OIG mission effectiveness is achieved by reaching the following goals to improve the OIG's contribution to the federally-funded civil legal services program.

- **GOAL 1: Provide products that are useful, mission-oriented and effectively communicated to stakeholders.**
- **GOAL 2: Ensure professional quality, credibility and independence, and operate in a manner that will provide greater effectiveness, efficiency and accountability.**
- **GOAL 3: Develop human capital, including motivation, knowledge and multiple competencies, in a healthy work environment to support our mission.**

We believe these broad goals or desired results, if reached, represent the best performance possible by the OIG. Later, our Plan presents a number of objectives and strategies to accomplish these strategic goals.

Following GPRA practices<sup>11</sup>, our annual performance plans will define the performance goals for the year in each of the strategic goals shown above. In addition, the performance plans will address activities and resource levels, and contain a number of measures and indicators of the degree of achievement of these goals, which apply to the OIG mission. At the end of each year, we will issue a performance report detailing our results in reaching the performance goals.

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<sup>11</sup> Government Performance and Results Act of 1993 (GPRA), § 4.

## The Environment

The environment in which LSC operates can have a material effect on its ability to accomplish its goals and objectives in an efficient and effective manner with minimal fraud and abuse.

### Government-wide Trends

**Accountability of Federal Programs** - Over the last 20 years, there has been an ever-increasing emphasis on accountability to the public for the effectiveness of federally-funded agencies and entities. The Government Performance and Results Act of 1993 (GPRA) requires government agencies to develop multi-year strategic plans, and to submit annual performance plans with their budget requests, along with a performance report on the previous year's results in terms of that year's plan. Although LSC is not subject to GPRA, in the past the Corporation committed to Congress to voluntarily follow a planning process based upon GPRA to promote sound management and effective realization of the Corporation's mission.<sup>12</sup>

The Office of Management and Budget (OMB) has created the Management Scorecard that tracks how well the departments and major agencies are executing their missions. The program assessment rating tool (PART) review helps to identify a program's strengths and weaknesses to inform funding and management decisions aimed at making the program more effective in achieving its mission. Therefore, PART looks at all factors that affect and reflect performance including program purpose and design; performance measurement, evaluations, and strategic planning; program management; and results. Agencies and entities covered by PART now have the burden of demonstrating results from prior appropriations as they request more resources, and the agencies that are able to do so convincingly are likely to receive greater support for their funding requests. While LSC is not required to follow PART, the OIG intends to consider PART in providing advice to LSC management.

Recent governance and accounting scandals have resulted in an increased emphasis on fiduciary responsibilities, decision-maker independence and accountability over financial reporting, processes, and systems in for-profit and not-for-profit businesses as well as government organizations.

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<sup>12</sup> This commitment was communicated to the Congress on several occasions, the first being the LSC Board of Directors' Semiannual Report to the Congress, April 1, 1997 - September 30, 1997, page 7 and as recently as 2000 in the Statement of the Legal Services Corporation Before the Subcommittee on Commerce, Justice, State, and the Judiciary Committee on Appropriations U.S. House of Representatives, February 17, 2000.

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**Innovation in Services** - "Today's information systems offer the government unprecedented opportunities to provide higher quality services, tailored to the public's changing needs, delivered more effectively, faster, and at lower cost,"<sup>13</sup> according to the Comptroller General of the United States. Significantly, increased productivity rates throughout the Nation's economy, is evidence of the power of the continuing integration of information technology into business processes. For example, the implementation of legal hotlines, automated forms, and websites by LSC grantees has made legal information and services more available in a timely manner to those in need. Information technology will continue to be the dominant influence in making administrative and service delivery processes more efficient and accessible. Legal aid providers can continue to increase the quantity and quality of legal services with relatively minor investment of resources in technology to deliver greater returns for the public dollar. This opportunity to serve more eligible persons derives from the near zero marginal costs of the use of software applications—once the application is fielded, the cost of using it repetitively is minimal. However, large returns from technology investments require substantial changes in the way organizations traditionally conduct their business.<sup>14</sup>

## LSC

The principal challenge faced by LSC was clearly stated by former LSC Board Chairman Douglas Eakeley: "The main issue remains how to provide meaningful access to justice when we are faced with needs that far exceed available resources." The number of persons generally income-eligible to receive LSC services is estimated to be as high as forty-nine million persons as of 2004.<sup>15</sup>

The federally-funded component of civil legal aid has seen many changes over the past ten years including the consolidation of the number of LSC grantees from 323 down to 138 with 32 of those grantees<sup>16</sup> currently servicing statewide areas. Consolidation was part of the LSC strategy of statewide planning to integrate, coordinate and increase resources available for civil legal assistance. It is reported to have resulted in a more tightly integrated social services network, a more diversified set of funders and the creation of state Access to Justice planning entities. In addition, the traditional practice of legal services for the low-income population has become increasingly unbundled and segmented, including self-

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<sup>13</sup> *Comptroller General's 1994 Annual Report*, United States General Accountability Office, page 32.

<sup>14</sup> LSC OIG report *Increasing Legal Services Delivery Capacity through Information Technology*. August 1996. See <http://oig.lsc.gov/tech/tech.htm>.

<sup>15</sup> U.S. Census Bureau Historical Poverty Table 6 - People Below 125 Percent of Poverty Level and the Near Poor: 1959 to 2004. <http://www.census.gov/hhes/www/poverty/histpov/hstpov6.html>.

<sup>16</sup> The count of thirty-two includes statewide grantees in the fifty United States, District of Columbia, Virgin Islands, Guam, Micronesia and American Samoa. In addition, the count includes Hawaii and Oklahoma, which do have separate grant recipients that receive Native American funding.

service, as providers attempt to stretch resources to serve more persons. The strategic and operational importance of information technology in the delivery of legal services has grown significantly.

In January 2006, LSC released its Strategic Directions 2006-2010 that establishes the following goals and objectives for the future:

**Goal 1** - Increase public awareness of and support for civil legal services to low-income persons in order to respond appropriately to more of their legal needs

- Increase access to and expand ways of providing assistance
- As the principal leader in the legal services/access to justice community, strengthen collaborations and strategic partnerships
- More effectively inform the public of what LSC grantees do
- Seek additional funding for legal services work

**Goal 2** - Enhance the quality and compliance of legal services programs

- Effectively use LSC performance criteria and other indicia of high-quality legal services
- Increase training and technical assistance
- Develop and enhance innovative approaches

**Goal 3** - Ensure that LSC operates efficiently and effectively

- Increase LSC productivity
- Use resources effectively
- Review administrative requirements for grantees

For LSC to reach its objectives in a challenging environment of decreasing funding for discretionary federal programs, LSC must present a performance and results-based case to federal and private funding sources displaying effective program results, while ensuring compliance with the congressionally mandated practice restrictions and accountability for proper use of public funds. Performance measures will need to be defined and functioning to ensure accountability, effectiveness and efficiency.

## **OIG**

As LSC considers updating processes including corporate governance, private fund-raising and management of grants, performance, personnel, and information systems, the OIG must focus its work to ensure the processes reap the benefits that the LSC and the Congress anticipate and provide sufficient controls to ensure accountability and appropriateness. The OIG will need to increase our focus on training and hiring personnel with expert OIG, legal, program evaluation and information systems skills. We will also need to revamp our audit and investigative processes, as additional information will be available only digitally. The days of hard-copy documentation have slipped away, and we need to ensure that sufficient controls are in place to protect automated data at LSC and the grant recipient locations.

## **Major Management Challenges Facing LSC**

Beginning in 2007, the OIG will identify and monitor major program management challenges facing LSC, and develop work priorities to assist LSC in addressing these challenges based on the OIG's experience and risk assessment. This practice mirrors that of the inspector general community, to monitor and annually identify major management challenges.<sup>17</sup> By identifying major management challenges and incorporating those into our work priorities, we will ensure that OIG work is focused on providing increased value to LSC.

The OIG's list of program management challenges facing LSC are:

- **Stewardship and Compliance** – LSC administers an annual federal appropriation of over \$300 million for legal services grants and LSC operations. LSC as the steward of these funds has a fiduciary responsibility to ensure that federally-funded dollars are expended in accordance with Congressional expectations. Congress has given LSC two principle missions: to enable local grantees to provide high quality civil legal services to low income persons and to ensure that the restrictions on the use of the funds are enforced. Ninety-five percent of the federal appropriation goes to legal services grants with the remaining five percent going to LSC's operations. LSC is responsible for the effective and efficient use of these funds through its grant-making activities and direct operations. LSC must also provide leadership in coordinating with others who have a stake in the provision of legal services to low-income individuals to further leverage the federal investment. As LSC has identified, the shortfall in legal services delivery capacity is a critical challenge to overall program effectiveness. Additionally, program compliance historically has been a major concern of Congressional oversight committees. It is the responsibility of both LSC and its grant recipients to ensure the programs comply with applicable laws.
- **Program Accountability** – LSC must ensure transparency in both its and the grant recipients' use of resources and must act as a good role model in its own use of limited resources. LSC is also responsible for providing an accurate reporting of services provided by its grantees and its own contributions to the legal services program. Additionally, LSC is responsible for ensuring its own internal controls, accounting and financial reporting practices, and procurements as well as the practices of the grant recipients receiving federal funds. Currently, LSC is working to implement its Strategic Directions, adopted by the Board of Directors in early 2006, and define performance measures in both grant recipient services and LSC operations, in an attempt to improve program accountability.

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<sup>17</sup> The practice is required at major government agencies by the *Reports Consolidation Act of 2000, 31 USC § 3516 (2) (d)* and is incorporated here as an OIG best practice.

- **Human Capital** – LSC, under its stewardship and employer roles, is responsible for ensuring the ethical conduct of the Corporation’s employees and management systems. More than 70 percent of the expenditures of LSC management operations are workforce related. The Government Accountability Office has identified several human capital areas as needing attention across the federal government including human capital planning and organizational alignment, pay-for-performance pay systems, leadership continuity and succession planning and the recruitment and retention of staff with the right skills. As with many Federal agencies, LSC also faces an aging staff and the potential of significant loss of institutional knowledge in the coming years. LSC will need to continue to address leadership development issues such as succession planning in the upcoming years and select staff who can help the Corporation harness the enabling power of information technology and management. The LSC grant recipients face many of the same human resource issues, which unless those challenges are met, will certainly have a negative impact on the efficiency and effectiveness of the delivery of legal services.
- **Information Technology (IT)** – The strategic application of information technology to legal services is one means by which LSC can ensure that funds are used effectively and efficiently. The relevance of the application of information technology in legal services has become apparent to all over the last ten years. Information resource management is central to delivering quality legal information, training, and services to a larger group of eligible persons. However, it needs effective executive-level management commitment and structure, investment strategies, practices and trained personnel in place to maximize returns. Through information technology applications, such as mapping, and the creation of new performance measures, LSC can increase the quality of its oversight of the grant recipients and information available to make funding decisions. By doing so, LSC can also act as a role model to the grantees. IT security risks are evolving on a daily basis and many systems store sensitive information. Thus, the ability to manage IT is critical to the degree of LSC’s mission success.

The matrix on the next page shows the alignment between the LSC Objectives for 2006-2010 as conveyed in the LSC Strategic Directions and what the OIG identifies as the major management challenges facing LSC. The check marks represent where LSC’s strategic goals, objectives, strategies and draft performance measures align with management challenges identified by the OIG. The matrix provides an interesting tool by which the OIG and LSC management can discuss challenges and creative ways to improve the program.

## Major Management Challenges Aligned with LSC Strategic Directions

Goals	Strategic Objectives	Stewardship & Compliance	Program Accountability	Human Capital	Information Technology
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### Goal 1: Increase public awareness of and support for civil legal services to low-income persons in order to respond appropriately to more of their legal needs

	Increase access to & expand ways of providing assistance	✓	✓	✓	✓
	Strengthen collaboration & strategic partnerships	✓	✓	✓	✓
	Effectively inform the public of what LSC grantees do	✓	✓	✓	✓
	Seek additional funding for legal services work	✓	✓	✓	

### Goal 2: Enhance the quality and compliance of legal services programs

	Effectively use LSC performance criteria	✓	✓	✓	✓
	Increase training and technical assistance	✓	✓	✓	✓
	Develop and enhance innovative approaches	✓		✓	✓

### Goal 3: Ensure that LSC operates efficiently and effectively

	Increase LSC productivity	✓	✓	✓	✓
	Use resources effectively	✓	✓	✓	✓
	Review administrative requirements for grantees	✓	✓	✓	✓

## **OIG Goals, Objectives & Strategies**

Consistent with GPRA, this Strategic Plan focuses on the mission effectiveness of our organization, the value and usefulness of our products, the efficiency of our operations and the contributions of our staff. To fulfill our mission more effectively, the OIG will monitor our performance and seek ways to improve. By maintaining objective data on key performance areas and establishing baselines, we will be able to measure our progress towards achieving our mission and goals and work towards improvement. We will include specific performance measures in our annual performance plans and continue working to develop new ones more reflective of our value to our clients. We will review performance at the end of each year identifying ways to improve and capture lessons learned.

### **GOAL 1: Provide products that are useful, mission-oriented and effectively communicated to stakeholders.**

The objectives of this goal are to:

1. Focus resources on producing the most beneficial products to decision-makers, legal aid providers and legal services eligible population.

Strategies:

- Identify major management challenges facing LSC and align OIG core mission areas to those challenges
  - Stay informed about management initiatives
  - Continue to ask for and respond to LSC Board, management and Congressional requests
  - Ensure continuing stakeholder communications and feedback
2. Strengthen assurance of an effective LSC compliance program that is cost efficient via our oversight role.<sup>18</sup>

Strategies:

- Verify the integrity of compliance activities by the IPAs, OIG and LSC Office of Compliance and Enforcement (OCE)
- Identify needed improvements in the system's structure and activities highlighting duplications, and promote coordination between the IPAs, OIG and OCE
- Improve IPA reviews via updating of the Audit Guide and the Compliance Supplements, provide training and conduct audit service reviews
- Assess outcomes and costs of compliance programs

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<sup>18</sup> FY 1996, Pub. L. 104—134, 110 Stat. 1321 (1996) § 509 .



3. Maximize economy, efficiency and effectiveness in the legal services program; be a force for positive change in improving how LSC and grant recipients do business in the 21st century.

Strategies:

- Identify, assess and make recommendations to improve LSC and grant recipient performance and management
  - Create a low-cost performance scorecard for LSC showing its performance improvements and opportunities for improvement modeled after OMB's PART
  - Identify and enhance relationships between LSC and other governmental agencies, and nongovernmental entities to achieve the LSC mission
  - Review existing and proposed legislation and regulations
  - Assess results of OIG recommendations by performing follow-up to assure recommendations are adequately considered and appropriately addressed
4. Prevent fraud, waste, abuse and mismanagement in LSC and grant recipient operations.

Strategies:

- Verify and enhance the integrity of LSC and grant recipient management operations, assess and recommend changes to strengthen management controls
  - Increase fraud, waste and abuse education and prevention efforts by the OIG for the grant recipients
  - Encourage reporting to OIG by working to develop improved protections for whistleblowers and improving hotline awareness
5. Enhance OIG communication to stakeholders.

Strategies:

- Strengthen professional relationships with the Congress, LSC and legal services community based on common goals
- Conduct briefings and perform outreach to stakeholders to increase awareness of the OIG's role, work and contributions
- Attain a greater understanding of LSC and grant recipients' roles and products
- Report the results of our work in a manner that achieves impact and encourages quick corrective action

**GOAL 2: Ensure professional quality, credibility and independence, and operate in a manner that will provide greater effectiveness, efficiency and accountability.**

The objectives of this goal are to:

1. Assure OIG operations are independent, products and services are objective, accurate and meet or exceed professional standards.

Strategies:

- Conduct reviews in an objective manner, free of conflict of interest in fact or appearance from personal, external and organizational impairments
- Ensure LSC OIG policies are up-to-date and comply with PCIE/ECIE and professional standards
- Employ independent verification of evidence, analysis, findings and recommendations
- Provide products that are written objectively and impartially based on evidence and facts
- Continue quality assessment and ensure peer review recommendations are implemented

2. Increase transparency and improve OIG planning and management systems.

Strategies:

- Strengthen processes for communications with the LSC Board and management
- Establish GPRA style management processes generating annual performance plans (with measures) and performance reports (measuring results)
- Use activity based costing to improve resource management to better integrate planning, budget and performance
- Strengthen project management and streamline work processes
- Leverage proven information technologies in support of our goals

3. Coordinate and work with the larger government, OIG, legal services and academic communities to leverage skills and identify best practices.

Strategies:

- Maintain a continuing partnership with the OIG Community leveraging expert resources
- Work on government-wide project teams based on relevant application at LSC
- Enhance cooperation and coordination within the OIG, LSC, legal services and academic communities

**GOAL 3: Develop human capital, including motivation, knowledge and multiple competencies, in a healthy work environment to support our mission.**

The objectives of this goal are to:

1. Develop the OIG into a more effective and performance-based organization operated by leaders to help improve LSC and its grant recipients.

Strategies:

- Identify and acquire required skill-sets
  - Attract and maintain productive, high-quality professional and experienced staff
  - Reward based on performance and contribution to the OIG mission
  - Share leadership responsibilities
2. Generate a positive work culture that supports productive teamwork, career development and is characterized by mutual respect.

Strategies:

- Follow the team-developed leadership philosophy and core values
- Plan and provide effective training meeting PCIE/ECIE core competencies and continuing education professional training requirements
- Prepare for succession and evolution within the LSC OIG

## **Challenges to OIG Success**

### **External Challenges**

We face several external challenges in meeting our strategic goals including:

- Timely access to grantee records
- Lengthy legal challenges to Congressionally imposed practice restrictions that create uncertainty as to enforceability during pending litigation
- Lack of appropriate national performance measures and data collection in order to assess cost effectiveness of LSC grant recipients
- The pending results of the newly developed LSC's Performance Criteria to enable the assessment of the quality of grant recipients services
- Inevitable changing of Congressional, Board of Director and management priorities

### **Internal Challenges**

We face the following internal challenges in meeting our strategic goals:

- Balance of our priorities, productivity and limited resources to assure adequate OIG mission coverage across the breadth of LSC and grant recipients operations across the nation and the concerns of the Board, management, the Congress and others
- Leverage technology and personnel to most effectively analyze LSC and grant recipient operations
- Determine meaningful performance measures of OIG operations as part of the annual performance plan and performance report process
- Identify ways to attract and retain a highly-skilled and professional workforce
- Provide for organizational continuity during times of succession so as to minimize the loss of organizational history

Over the next several years, we will continue to adjust the OIG structure, policies and practices, as necessary, as well as ensure that we recruit and maintain personnel with the critical expertise and experience.