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- Response to Federal Evaluation, 04/29/1971,

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# BOARD CHAIRMAN:

Name: Dr. Bill Zachmeier

Address: 701 Ocean

Santa Cruz, California 95060

Telephone: (408) 426-3140

Area : Contact:

Rio Hondo (Los Angeles County) Salvador Velasquez

Problems:

Rio Hondo CAP has been having problems in its administrative management, internal fiscal controls program evaluation services, and grant management procedures. These are being remedied by direct assistance from Pat Marwick and Mitchell. Additionathey have a great need for alternate funding sources and employment resources. No special problems with the SEOO or other CAP agencies.

Discussion:

- Elimination of weak projects; CAP not disagreein with State position, if State sincere.
- 2. No real problem with State Office because they have been left alone without outside interference
- 3. Semi-annual evaluations would be cooperated with if instituted.
- 4. ATAC has been helpful to them, training conference okay.

Needs:

Immediate need of technical management and management systems assistance is being resolved.

Need for alternate funding resources is pressing.
The CAP Versatile grant is not sufficient to fund a strong enough administrative core to operate all of the CAP programs. Number and cost of staff in relation to total funding is small and less then most comparable CAP's.

#### Recommendations:

- . A strong Inter-CAP technical assistance program be organized for the Los Angeles outlying area funds available from the SEOO for travel and pa
- 2. More funds for outlying and rural CAPs that do have other financial resources as Model Cities, HUD, CEP, HEW, etc.
- 3. Direct technical assistance on alternate fundir applications and resources especially to develope business enterprises.
- 1. Need for State conferences on varieties of tech cal assistance available to CAPs.

Impressions:

The community support, and provision of offices, acment and cooperation in program development for Ric Hondo is high. Although the CAP has had internal ment problems that are now being adequately resolvits community external support is excellent.

AREA: Santa Cruz (CCCDC)

DATE: Thursday - March 18, 1971

CONTACT: Alfred Navarro, Executive Director

PROBLEM: Establishment of Economic Development Corporation/Co-or Campesina, financial program.

DISCUSSION: 1. Accounting System and Internal Controls.

2. Financial statements and reports.

NEEDS: 1. Financial policies to assure proper management in accordance with basic management standards and OEO requirements. The appropriate policy-making

body should review regularly the operations and activities of the grantee, including its financial position and operations, to ascertain that its affairs are properly administered. The appropriate policy-making body remains ultimately responsible for the proper administration of the grantee's financial position and operations.

 Establish a strong accounting system/adequate system of internal control.

3. Effective financial reporting.

4. A comprehensive independent audit and continuing professional financial counsel on major problems.

#### RECOMMENDATIONS/ACTIONS:

- Direct cooperation and meetings between SEOO and OEO.
- 2. Continuous evaluation and monitoring.
- 3. Request SEOO technical assistance without hesitation.

AREA: Santa Cruz

Wednesday - Thursday, March 17-18, 1971 DATE:

Merrill Morton, Fiscal Officer CONTACT:

Technical Assistance - Fiscal Management Area PROBLEMS: 

DISCUSSION:

- Fiscal Management Financial Reports Budget Internal Controls Accounting System
- Direct cooperation, meetings and technical assistance between SEOO, OEO and CAA.
- Periodical evaluation of CAA Fiscal Management System.

NEEDS:

- No back-up in the Fiscal Section. Staffing Additional Fiscal Officer and Account Clerk. help needed in the preparation and maintaining of payroll.
- Contract between CAA and Certified Public Accountant
- firm.
  In-put of Finance Officer in preparation of budget.
- Grantee Monthly Financial Report, CAP Form 15. Report in the arrears since November 1970.
- Internal controls in fiscal management area lacking in certain areas. Division of employees' duties and control of blank checks.

#### RECOMMENDATIONS/ACTIONS:

- Recommend that CAP consider using a Work Study student to assist in the preparation of the payroll. The need could be satisfied by a student working 48 hours per month. student working 48 nours per month.
- Contract for CPA firm should be executed for the protection of both parties.
- It is essential for the Fiscal Officer to participate in the grantees program development and budget.

- 4. At month end the grantee statement of financial operations showing budgetary comparisons should be carefully reviewed. Any line items where expenditures appear to be progressing at a rate likely to exhaust monics too quickly should be carefully examined and the cause determined. (CAP Form 15).
- 5. Establish a division of employee duties and responsibilities that will result in a strong internal control. The separation of the operating employee duties (acquisition, custody and disposition of assets) from accounting employees' duties of recording and posting transactions is the basis of strong internal control.

6. CAP memo 23A requires reference checks be made on all new employees. The major reason for this is to establish the prior salary. This is not being accomplished. The Fiscal Officer has been requested by the Executive Director to accomplish this task. In my opinion this task should be performed by the Personnel Committee and in turn referred to the CAA Board for final selection approval

CB: vb

CB:vb

#### TA REPORT

AREA: Quechan Nation, Ft. Yuma, California

DATE: March 18 and 19, 1971

CONTACT: Fritz E. Brown, President, Quechan Tribal Council

Felix J. Montague, Colorado River Planning Area

Frank J. Kinale, Manpower Development & Training Consultan

PROBLEM: 1. Indians have claims to former tribal lands that they have tried to have restored to them.

- They are developing a master economic development plan which is contingent upon restoration of tribal lands.
- 3. There are problems with squatters who are settling the disputed areas along the Colorado River.
- 4. The Indians have failed to receive effective action on their behalf from State agencies assisting them with land and economic development problems.
- 5. Indians have not been trained to operate whatever businesses are being developed on the reservation or to operate agricultural developments on the reservation. Although cooperation is increasing with the Bureau of Land Management and the Bureau of Indian Affairs, it is not as good as it could be.

DISCUSSION:

We discussed the roll of technical assistance to the Indian nation, and that this consists of legal services, management services, economic development ideas, organizational assistance in the development of jobs, advice on contractural matters, direct assistance in contacting State agencies and getting State agency assistance, coordination with the Department of Human Resources Development, a desire to make the Indian nation self-sufficient with minimum reliance on the outside community, and a desire by our office to enhance the rapport and respect between

the Indian nation and the Arizona and California communit

NEEDS:

The reservation needs to have its land restored prior to economic development and before such time as the land becomes so valuable as to make land restoration almost impossible. They have a need for better quality onsite education and educational facilities. They have a need for stronger and more comprehensive HRD services on the reservation; they need economic and career development programs that will bring youth back to the reservation deep them in touch with cultural ties and families, yet progressing the reservation to self-sufficient economic development.

NEEDS (continued)

More in-depth business and employment development and training services from both Federal and State agencies as well as the support of local political leaders to achieve these goals.

Need transportation system on the reservation that is self-supporting.

They need to have control over their own police facilities and law enforcement services on the reservation. They need technical administration and management assistance to coordinate ideas presented to them and operational efficiency.

Recommend the ranch redesign its land planning proposal with more emphasis on recreational outdoor employment. rather than Indian indoor employment. This would include the development on a large scale of the Indian reservation as a "Palm Springs of the Colorado River Basin" with emphasis on such things as winter resort and winter recreation development.

The following are examples of the kind of recreational facilities feasible on the reservation:

- Develop high quality sand mining and to sell the sand to the Department of Parks and Recreation and that the reservation contact Mr. William Penn Mott to negotiate this kind of program.
- Excess land from sand mining be filled in with water and a forebay reservoir or small lake be created in which boating, canoeing, sailing and swimming, and other aquatic sports can take place.

Adjacent to such a development should be a full-time residential area for both recreational and retirement people especially in view of the no tax policy on reservation land.

Such development should be both operated, administered and controlled by the tribal council and Indian residents the reservation. of the reservation.

Provide corporations such as the McCulloch Corporation, Hughes AirWest Corporation, Southern Pacific or Georgia Pacific, or others with a perspective of the potential for such recreation development and encourage them to make investments in this area on the reservation with the stipulation that the Indians would receive a percentage of the profit in perpetuity and be trained to take over all facets of the administration of sucoperations, thus developing career opportunities for young and old alike.

Reservation should consider setting aside some lands as a wildlife refuge to be opened for hunting during the season to bring in sportsmen from all over the nation. That such an area also be reforested with conifers and deciduous trees that would thrive in the desert climate. Game animals that can survive should be introduced to the area. 

A youth investment program be developed by picking left-over crops and selling them competively in the Yuma-El Centro-Mexican markets, with the funds going for the youth center and youth center and youth organizational development.

In addition, the youth could develop and operate such facilities as resident camping, go-carts, mini-bike: trails, miniature golf courses, etc. 

The reservation should consider the development of an 18-hole championship golf course with accompanying clubhouse and seek private resources for such a development.

In cooperation with Safeway or other large markets in California, develop an on-site supermarket especially in view of the no sales tax policy on reservations, which would make prices competitive to those in Yuma. Added to this would be surplus farm commodities grown on the reservation as part of the inventory of the

Indians should be trained to farm the land they are now leasing. now reasing.

Development of their own agricultural resources. 

Because of the large gravel hills, it is suggested they develop skills in gravel mining and cement production and develop contracts with the Division of Highways as soon as possible for the impending freeway construction going through the reservation. 

On the freeway interchanges that are located on the reservation, it is suggested the Quechan Tribal Council negotiate a contract which will allow the Indians to have a percentage of the income from such businesses and be trained to administer and operate businesses as part of employment and career development. 

Our office will seek to assist revervation in developing ACTION: an immediate contract for the use of gravel that is now located on the reservation.

seek to help them develop a market for sand now located on the reservation.

Dole : April 15, 1971

Subject: Review of Santa Barbara Fiscal Program

From : Barny Schur

Please be sure that a note is sent to Santa Barbara concerning our last fiscal review doing the following:

- Noting a correction in our records on fiscal year dates.
- 2. Assuring them in writing that the \$45,000 allegation was discovered to be false by this office.

A prompt response in this area from the TA Section will assure them of our sincerity in helping solve problems in a positive manner.

BS:plg

#### ACTION (continued)

Seek to develop a resource for the supermarket and

other commercial development on the reservation.

Seek to assist in securing private corporation financial and construction development for both recreation and resident facilities on the reservation.

Seek to get State support the for Indian tribal land: claims that are now being processed.

Area:

Tulare County (Visalia)

Date:

Wednesday, January 13, 1971

Contact:

Nat Unikel

#### Problems:

CAP asserted its organization and functioning problems are minimal. Desire more alternate funding sources and assistance from State in locating such sources. SEOO fails to contact CAP before coming into area, operates guietly behind the scenes then appears before Board of Supervisors to provide advocacy to create CAP under Board of Supervisors in accord with Green Amendments — prefers to have this out in the open.

#### Discussion:

- 1. Elimination of weak projects, CAP not disagreeing with State position, if State sincere.
- 2. Development of a San Joaquin Valley Inter-CAP Assistance Unit so that each CAP with like problems would be able to assist one another to further serve the interests of the poor, area-wide.
- 3. No real problem with State office because they have been left alone without outside interference.
- 4. Semi-annual evaluations would be cooperated with if instituted.
- 5. ATAC has been helpful to them, training conference okay.

#### Needs:

- 1. Alternate funding.
- More general contact.

3. Mobiliziation of State resources, education, HRD, Department of Agriculture, etc. on behalf of CAP.

#### Recommendations:

- 1. Provide a staff person with responsibility for locating alternate funding sources, knowing application requirements, and assist CAP in securing such funding.
- Develop a San Joaquin area conference for or of CAP administrators to assist in solving their internal and external regional problems.
- P.S. Dr. Bob Rothschild, my old boss at the Contra Costa County
  Department of Education, sends his greetings.

Area: Date: Contact:

Wednesday, January 13, 1971 Jim Williams, Dick Price

Problems:

No continuity of Field Representatives in Federal or State so that working relationships and confidence can be achieved. Inadequate follow-through on State and Federal representative's recommendations, program objectives, or evaluations. Sometimes, no communications on these areas. Application decision should be concurrent with Regional sign-off so that State veto is not last minute. Equal distribution of all communications and technical assistance, grant materials to rural as well as urban CAP's. San Joaquin area economic development is poor.

Discussion:

- 1. Assistance in elimination of weak projects.
- 2. San Joaquin inter-CAP assistance program.
- 3. Semi-annual evaluations.

- 4. More contact with State supervisors of programs in addition to representatives.
- 5. More direct assistance from State with mobilizing educational, State office, and other such resources.

Needs:

- With mechanization should come plan for what to do with people displaced by such progress before the machine is used in production.
- 2. More housing and job development assistance to balance the Valley economy.
- 3. Help with placement of poor in new IRS facility.
- 4. Constructive assistance from State office, help in implementing ideas of recommendations.

#### Recommendations:

- 1. Assist with IRS employment program.
- 2. Get universities to develop program and plans for providing the needs of those displaced by mechanization in agriculture.
- 3. Get university and State college economics to work more closely with CAP's where such educational facilities exist.

AREA: Merced

DATE: March 10, 11 and 12, 1971

CONTACT: Richard Flint, Executive Director

Harrict Leves, Program Chairman

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PROBLEM: CAA short handed. Beyond program year end; operating on continuance budget with no clear date of refunding.

DISCUSSION:

NEEDS:

CAA requested general assistance with:

- 1.—Training in program planning and development for Program Committee members and staff.
- Direct assistance to lay multi-social group in preparation of application for HUD Community Facility Center.

3. Orientation and training to Economic Development

RECOMMENDATIONS:

- ACTION: 1. Determine availability of State architect (free).
  - 2. Write proposal.

- 3. Train neighborhood committee in proposal writing by involvement in (2) above.
- 4. Train new Economic Development Director in field.

#### BOARD CHAIRMAN:

Name: Leo Giobetti

Address: 2870 Evelyn Court, Merced, California 95403

A TOT RECE



# Office of Economic Opportunity

DEPARTMENT OF HUMAN RESOURCES DEVELOPMENT 800 CAPITOL MALL, SACRAMENTO 93814

February 1, 1971

Mr. Paul O'Rourke
Training Chief
U.S. Internal Revenue Service
450 Golden Gate Avenue
San Francisco, California

Dear Paul:

Our office is seeking to assist the Fresno Community Action Agency in placing low income and minority group peoples into your new IRS facility in that area.

I would appreciate it if you could personally contact Mr. Richard Heath, Executive Director at the EOC, Main Post Office, Room 328, Fresno, California 93721, and assure him of maximum assistance in the training and placement of such persons from his area.

Our office views the placement of low income peoples as vital to minimizing the welfare rolls and maximizing the progress of low income peoples as contributing members of our community.

Your personal assistance will be appreciated.

Sincerely yours,
Your old student and colleague

Barny Schur

STAP/Assistant to the Director

BS:plg

cc: Mr. Richard Heath, Fresno CAA

P.S. Are you still teaching at Golden Gate? I am now at Diablo Valley College in the evenings.

Area: Date: Contact:

Madera

Thursday, January 14, 1971 Pat Vogel and Ron Manfrede

Problems:

No employment. Insufficient funds to cover travel in rural areas. No real chances for upward mobility in CAP, county is tight in hiring qualifications for CAP supervision positions. State assistance has been meager but helpful. ATAC has been helpful. NAB's and HRD help on bottling company (Madera Glass Company).

Discussion:

- 1. Elimination of weak projects within CAP's.
- 2. Mobilization of State resources.
- 3. More personal contact within CAP's in Valley.
- 4. More mobilization of experts within colleges in the areas.
- 5. The CAP does not have a junior college or other educational training program in conjunction with work experience in the anti-poverty program.
- 6. Future meeting with County Manager.

Needs:

- 1. Contact with NAB's to assure issuance of the Job 70 contract for 117 of 190 positions with Madera Glass Company.
- Contact with San Francisco Regional DOL representative to assure issuance of Jobs 70 contract.
- 3. Contact with company personnel manager to stress importance of hiring of low income people by the Madera Glass Company.
- 4. Housing assistance is needed self-help, etc.

#### Recommendations:

- We do all we can to assure the Jobs 70 contract with NAB's and the hiring of low income people with Madera Glass Company.
- 2. Mobilize educational resources in the area to assist the CAP.
- 3. Get HRD to send a part-time employment counselor and pre-employment training representative to Madera.
- 4. Send in Housing Technical Assistant.

ACTION ITEM: Send letter to Madera Glass, DOL and NAB's stressing Governor's interest in the hiring of low income reople in the Madera Glass Company project.

TO: William Blue
Manager-Controller
Madera Glass Company
Avenue 13
Madera, California

Ralph Sager

AREA: Ventura County CAC

是海绵 计通知分析 医

DATE: March 23, 1971

CONTACT: Thomas O'Brien, Executive Director

Mercedes Robertson, Comptroller Thomas O. Mahon, County Auditor

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PROBLEMS: Evaluate the accounting system and internal controls

Determine technical assistance needs - Fiscal

Management area. Provide direct technical assistance
Fiscal Management area.

DISCUSSION: A general review and an evaluation of the grantee's accounting system and internal controls was conducted at this time. The review included basic grant documes organizational structure, operating procedures, auditional reports and various financial records. Mr. Pete Petersen, Community Program Analyst, SEOO participation in discussions held with responsible staff personnel

The control of the Ventura County anti-poverty progray by the Board of Supervisors involves the control of grantee's funds by the County Auditor. The grantee maintains expenditure records with the objective of providing the necessary data for financial reporting purposes. These expenditure records are reconciled monthly to the County's cash disbursement records. This system provides the grantee adequate reporting information but it involves some unnecessary accounting activity and a substantial amount of duplication of effort already available in the County's account system. The information required for reporting purposes could be readily extracted from the County records through modification of the County's system

of accounting for OEO funds. Thus, eliminating the need for the essentially duplicative system

An exit conference was held with the grantee's Deput

Director and Comptroller on March 23, 1971.

maintained by the grantee.

The need to establish a property accounting and control system was discussed. The grantee has neve established property records and controls over accountable property purchased with grant funds, donated as in-kind contributions, or acquired as GSA excess, as required by CAP Guide, Volume V. The Comptroller and Assistant are currently attempting to develop an adequate property accounting and control system and grant property is being marked with identifying symbols to show origin and/or ownership. The inadequacy of property records and controls was noted in independent audit reports for Program Years "A"

The grantee's control over vehicle use was considered inadequate. In my opinion, adequate vehicle utilization records for the two motor vehicles assigned were not being maintained. The daily log showing speedometer readings, user of vehicle, and purpose of use was incomplete in that there were significant gaps in speedometer reading postings. A new daily log format was discussed.

The grantee's control over telephone use was considered inadequate. The grantee does not maintain adequate telephone call records. As a result, evidence to show that telephone calls for only grant purposes by authorized persons is not available.

Documentation of the Legal Aid Program "In-kind" contributions are appro imately \$18,000 in the arrears for PY "E" ending March 31, 1971. Only \$5,500 of the non-federal contributions share has been documented.

#### NEEDS:

1. Improve property management by establishing (1) an adequate property accounting and control system (2) adequate vehicle utilization records.

- 2. Need to develop an adequate accounting and control system relating to telephone usage.
- 3. Grantee should address themselves to the need for "In-kind" contributions particularly in the Legal Aid program.
- 4. Written procedures for purchasing and property control.
- 5. Policies and procedures with respect to the usage of grant vehicles and telephones be stated in writing in sufficient detail to enable all persons concerned to comply.

#### RECOMMENDATIONS:

- 1. That this Grantee modify the accounting system to embrace all of the elements of accounting now being performed by the County Auditor and the Grant Accounting Unit. By modifying and/or consolidating the accounting system, greater control and uniformity can be achieved and duplication of efforts eliminated.

  2. That the Grantee Table 2.
- 2. That the Grantee resolve their accountability of property acquired during PY "A" through PY "E" as expeditiously as possible. The amount of proper which the Grantee is accountable for is not known at this date.

3. Policies and procedures with respect to purchasing and property control, usage of vehicles and telephones, and documentation of "In-kind" contributions be stated in writing. (Operations Manual/SOP etc.)

Area: Contact: Long Beach
Mrs. Elizabeth Moore
Carl P. Wallace

Problems:

Long Beach is suffering from unemployment and economic woes resulting not only from the nation's economic slump but also from cut backs in military spending at the Navy Ship-Yard.

State OEO personnel came into Long Beach last year to evaluate the programs, made positive statements, but filed negative reports.

Discussion:

- 1. State position on CAPs is to assist CAAs in eliminating weak projects within a CAP but to provide all the necessary technical assistance to save such projects first. If a project cannot be saved and a CAA is positively committed to a project that is not competent, then SEOO would use its veto power to encourage the CAA to eliminate such weak projects. The CAP would then redistribute funds to stronger programs.
- 2. State would begin to provide funding and program ideas to CAPs.
- 3. Boards should set policy and make decisions on the CAA level with CAP administrators carrying out such policy.
- 4. More leadership should be exercised by Regional OEO and SECO. More team pre-review and evaluation by Regional OEO and SECO jointly so they concurrather than conflict on recommendations.

Needs:

- l. Alternate funding specialist.
- 2. State Average Daily Attendance (ADA) reimbursement for CAP special education program for school dropou
- 3. More cooperative assistance from Regional and SEOO before problems develop.
- 4. Reconstitute State Advisory Committee to SEOO.

5. Develop a California CAA Board Chairman's group for problem solving among CAPs.

### Recommendations:

- 1. Hire alternate funding specialist in next grant.
- 2. Send review and evaluation personnel in Regional and SEOO teams with written comments at time they leave CAP and follow-up report to CAP within 3 wes
- 3. Develop a technical assistance conference for all CAA Board Chairmen and CAP Directors with position statements by Regional and State OEO that are open

ACTION:

- 1. Get Regional and State OEO Technical Assistance and Goals Conference going before summer.
- 2. Get State OEO Advisory Committee reconstituted (with outgoing CAA Board Chairman participating) before April, 1971.

Mr. Joe Williams Executive Director Economic Opportunities Commission 2309 Tulare Street Fresno, California. 93721

February 16, 1971

IRS Employee Subject: Placements

From : Barny Schur STAP/Assistant to the Director

> Attached is a copy of a letter from Mr. Paul O'Rourke of the IRS which I thought you might be interested in.

If you need any additional personal assistance from me on securing placement of the people you are training for the IRS facility, please contact me as soon as possible.

BS:plg

Attachment

Regional Commissioner Internal Revenue Service Western Region

Pate: | In raply refer to: February 10, 1971 Ad:T

Mr. Barny Schur
STAP/Assistant to the Director
Office of Economic Opportunity
Department of Human Resources
Development
800 Capitol Mall
Sacramento, California 95814

Dear Barny:

It was good, indeed, to hear from you. Your letter was timely as it prompted a telephone call from us to the newly appointed Executive Director of the EOC, Fresno, Mr. Joe Williams.

We were able, in our discussion with Mr. Williams, to learn about the EOC's training activities which might produce some future employees for our center. Mr. Williams now has 27 in training; we agreed with him on his plan to emphasize test-taking skills in the training class. Mr. Williams has been in contact with Mr. Claude Torres, Manager of the Fresno HUD Center.

A brief discussion ensued relative to the eventual placement of Economic Opportunity enrollees at the Center. It was brought out that the Center will be an excellent training ground for NYC, STEP, and CEP enrollees in 1972; however, Mr. Williams recognized there was little possibility for such trainee slots this year since the permanent staff won't begin to be employed until the end of 1971.

Mr. Williams was supplied with the names and telephone numbers of our Chief, Administration Division and Personnel Officer at Fresno. He plans to contact them soon. It is well for these gentlemen to become acquainted early in the game, even if no hiring is being done now. I feel our discussion with Mr. Williams was fruitful.

Thanks for contacting me. We will keep in touch.

Sincerely yours,

Paul O'Rourke

Chief, Training & Taxpayer Education Branch

Western Region

AREA: Santa Barbara

RECOMMENDATIONS

DATE: Wednesday, March 17, 1971

CONTACT: Dr. Norbert McNamara, President

Mr. Roger E. Heroux, Acting Executive Director

PROBLEM: The CAP does not have a permanent director at this time and the acting director does not have the authority to formulate firm administrative procedures.

A recent emergency food program was split into several components because of community pressures which puts more funds into administration than food distribution.

The CAP is failing to make maximum potential use of local banks as a financial source.

DISCUSSION: We discussed fund-raising ideas using local bowling allies or skating rinks.

Utilization of local bank with whom the CAP has an account for such things as local share, technical assistance in financial management, meeting room space for executive meetings, contributions to the youth program in lieu of interest balances on the money on deposit, and using the bank as a wedge to open other doors with businesses and industries with whom the bank is doing business that will help with economic development and job development programs.

The emergency food program should be unified under one unit serving the needs of the whole community; in particular, those of the aged.

NEEDS: CAP needs strong leadership, additional funding sources, increased economic picture that will lead to more jobs, and more innovative ideas for program development.

- In the hiring of a new director, the CAA Board should consider giving preference to people with a strong managerial and educational background as well as administrative.
- 2. Emergency food program be administered directly by the CAP on the inside basis or by a noncontroversial community agency that serves total community needs, such as a local church or civic organization.
- 3. The CAP should contact the local bank with whom it has an account and explore possible alternatives in the form of services to be rendered by the bank in exchange for having money on deposit.

# ERECOMMENDATIONS (Continued)

4. Monthly salary checks and related journals and ledger could be administered by the bank. This will relieve pressure on the bookkeeping and accounting procedures

AREA: Community Action Commission of Santa Barbara County, Inc.

DATE: March 16, 1971

CONTACT: Roger E. Heroux, (Acting) Executive Director

PROBLEM: Technical assistance - Fiscal management area.

#### DISCUSSION/NEED:

Purpose of visit to the CAA was to conduct a general review and an evaluation of the grantee's accounting system and internal controls. The review included basic grant documents, organizational structure, operating procedures, audit reports and various financial records; and we held discussions with responsible financial program individuals.

The accounting system and internal controls of the grantee are considered adequate to safeguard the assets of the grantee, check the accuracy and reliability of accounting data, promote operational efficiency, and encourage adherence to prescribed management policies.

We noted a need to improve financial management by timely submission of the application for grant funds to preclude borrowing of funds from other CAAs. This CAA borrowed \$10,000 on January 22, 1971, and \$25,000 on February 3, 1971 from the Ventura CAA, pending receipt of funds for PY "E", grant period November 1, 1971 to October 31, 1971. On March 3, 1971 \$65,000 was made available under PY "E". The funds borrowed have not been repaid to date.

An audit by the Certified Public Accountant (CPA), Mr. E. O. Gieseler of PY "D" is scheduled for completion by March 31, 1971. The PY "D" audit was discussed with Mr. Gieseler through coordination with the CAA Executive Director. The CPA is currently examining some 76 checks to assure that these expenditures are allowable. These items require additional substantiating information before final determination of validity. I will verify these items on the next visit to this CAA. I found the CPA audit to be quite comprehensive and am convinced that it involved more than the normal amount of time allotted for this type of audit. The only question I had relative to the CPA was the lack of a contract for these services with the CAA. The CPA received a regular fee amount for his services.

The only federal audit of this CAA was made in January 1968 for PY "A". The CAA fiscal officer is required to submit a voluminous monthly financial report, listing every expenditure for the month, to the board members. The February 1971 report contained 20 pages of posted entries and there were 30 Xerox copies made for the board members. We recommended that the CAA board establish a finance committee and the appointed chairman review the financial position of the CAA and give an oral report to the members based on his examination and verification of monthly expenditures.

There was certain questionable items uncovered in our cursory review of the CAA financial records, i.e.,

- 1. The expenditure of Economic Opportunity funds totalling \$1,750 to program "Operation Solidarity" was not adequately supported by documentation showing the basis of expenditures or the relationship to the approved program.
- Expenditures of some \$352 involving the use of three buses, to transport individuals to an unauthorized assembly.
- 3. The Assistant Director approved his own "time attendance and wage record" report for November 1970.
- 4. The executive director approved his own travel (Mileage) for February 1971.

5. Several program component budgets for travel expenses are being overspent based on monthly allotment reports.

The CAA bookkeeper was considered to be thoroughly qualified for the position through OJT received from the CAA fiscal officer. In the more than three years on the job, however, she has not had any formalized training relative to OEO policies, procedures, instructions, etc.

#### RECOMMENDATIONS/ACTION:

#### We recommend that:

- The grantee be instructed to implement review procedures to limit disbursement of grant funds to those expenditures which are allowable, authorized and properly supported.
- 2. Establish a finance committee to report to board members.
- 3. The executive director review travel expenses of various program components.
- 4. Provide formalized training where possible.
- 5. Execute contract with CPA firm conducting audit of CAA.

CB: vb: cv

Area: Date:

Contacts:

Bakersfield

Wednesday, January 13, 1971

Ed Taylor, Director

Met with general staff

Problems:

No real problems with State office; however, contacts have been limited and visitations are usually only in conjunction with pre-reviews.

CAP is now in process of consolidating its outreach offices and attempting to make them independent administrative service centers with the central office for overall operations, technical assistance, ideas, and coordination, as well as overall fiscal management.

Discussion:

- 1. Service to CAP by assisting in the elimination of weak projects within the CAP that are not politically feasible in curtailing:
  - a. State would attempt to provide field and technical services to weak projects.
  - b. If project cannot be saved or improved and if CAA Board will not eliminate from funding, State would apply conditional veto to the program to persuade the CAA to eliminate weak, incompetent, or nonfunction projects.
  - c. CAA would then redistribute these funds to strengthen well-functioning projects within that CAA.

#### 2. Needs:

- a. Alternate funding sources
- b. New program ideas with assistance until the idea is implemented.
- c. Inter-CAP cooperation and Administration-Management assistance.
- d. Quality problem solving conferences especially within the CAP Directors Conference.
- e. More communication with the State as a quarterly newsletter or letter from State Director on issues and positions, goals and directions.
- f. Technical conferences held by State were beneficial and desire more of them.
- g. More youth programs Forestry services assistance.
- h. More help from State office in mobilizing
  State resources.

Recommendations:

1. Quarterly memo from State Director to CAP
Directors discussing problems, issues and setting
for State goals, objectives and positions on

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  State resources.

Recommendations:

1. Quarterly memo from State Director to CAP
Directors discussing problems, issues and setting
for State goals, objectives and positions on

- SEOO to provide direct liaison to State offices for CAP area technical assistance.
  Visits by field representatives for semi-annual evaluations rather than only at pre-review periods.

#### GENERAL CONCLUSIONS

The over conclusions of the evaluation team are as follows:

- 1. The SEOO has potentially a very good senior level staff.
- 2. The SEOO is improving in internal management.
- 3. The SEOO has accomplished a number of special projects mentioned in the body of the report.
- 4. The California SEOO has not sufficiently followed the work programs agreed to as specified in its four grants.
- 5. The SEOO has not acted as an advocate for the poor in keeping with OEO Instruction 7501-1.
- 6. The SEOO has made little impact on state and federal agencies, private agencies, local government or the general public.
- 7. The SEOO is perceived to be antagonistic to the CAAs and the poor.
- 8. The SEOO is using the majority of its staff to perform investigative functions which are interpreted negatively by the CAAs.
- 9. The majority of the SEOO staff does not have sufficient technical background or experience to deliver quality technical assistance to the CAAs.
- 10. The Oakland Demonstration Grant # CG-9093-A/1 to deal with intensive management technical assistance has not been implemented in accordance with its terms.
- 11. An impasse exists between the CAAs, the Regional Office, and the SEOO.

# Page 57 GENERAL CONCLUSIONS (Charge)-4

"The California SEOO has not sufficiently followed the work programs agreed to as specified in its four grants."

### RESPONSE:

I must again refer to the timeframe for recruitment, selection and hiring and the many cases where we find CAAs incapable of implementing whatever suggestions our technichal assistants have been able to offer. This we believe to be the responsibility of the Regional Office to assure that those receiving public grant funds are capable of conducting and mounting programs for which they are funded.

Page 57, Paragraph 5:

#### Charge:

"The SEOO has not acted as an advocate for the poor in keeping with OEO Instruction 7501-1."

### Response:

The poor have, in many instances, come to the California State OEO to ask for assistance in making community action programs more functional to their needs. (See attached petition from Compton area signed by 150 people and petition signed in Venice area.)

Well Committy John State Copper of Caley.

State Copper Delegation De PERSONAL MAIL Dear Dovener: Aled your Nelp-Since Moused to Contract The oak Wood Commely. We We asking pri to Except This Copy We Written The longues from be couse like il He Home Help- Vo. v Pohest late De Wont This Stop - in the lieu

Venice Improvement Project o/o Hrs. Marie Banks, chairman 814 Hampton Dre apto 3 · Venice, Colife 90292

to: Rep. Thomas H. Reas

To CEO Stat Home. A Collection Tonight the Venice community assembled around a number of complaints to Thomas M. Rees, Congressmen, 26th Congressional District. We, the voters and residential poor, too long have been the stepchild. We protest funding of projects directly through our congressmans

Io The VoC.I.Vo has submitted proposals which have been granted. monies have been used without community involvement. We understand that this small group or ring is again requesting funds from the government and claiming to represent the community. It does not represent the community of

Mo We propose that our protest be placed in the hands of the House of TRopresentatives. We are faced with the greatest crisis that has ever been centered on the poor, buildings three stories high, built by exploiting persons from outside communities who have denied relocation to families.

The people in this community are living in the slums. Where the sludge backs up into the houses. Where need is so bad especially with the low-income people denied housing. It is possible that the 20% low-income units allocated for this area were filled to the satisfaction of the contract in one building (at 535 Venice, on the southwest side of Senta Clara). These houses were proposed to the Venice community during planning with false promisess

a. no high-rise to be allowed.

be every homeowner to be able to receive a loan, through the seme people who have full control of the housing now.

This information caused many homeowners to trust the housing group to advise them, while they were being betrayed.

We were also promised that neighborhood centers would hold meetings to advise when the building would begin to involve the community. With unemployment so high, every effort was to be made to get young and poor people from the community jobs with the building contractors. Union men were on hand to explain how this could be done. Nothing came of it.

"Les has not benefited by John or by homen.

We, the people of Venice, support this complaints Matie Banks, Chairman, Venice Improvement Project What fif g5 1971 Chance Din Louiste & Lewis are Robert Gers Winner Robert Gers Winner ann Forfredom, upset Vernee readest! Hitricia Fellman 26 Westminister #19 Vance Doretty Johnson 331 Dendrand Gre Verice dely Muhal Stewart 505 Westminder hur 90291 Just i James 656 San Juan Venice 80291 Dieborkh Elyn Luis 8/3 Brooks One Emmer M Closty 733 Brooks and Secus cons. Sen June conel State Ren June on Sun June conel State Rose of State State of State State of Stat 1. 1. 1. 11/01/1 7:33 Dools and

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COMPTON FILE

letters for Brece. Sept 4, 1970

Togeto Mr. Herry Howards, mes. ( Line Fre & My. ) M. Ferry Mayer . 100. Melek Hell. 111. 132.2.

Office of Economic Opportunity

Atten: Mr. Betz and To Whom It Concerns

Washington, D.C. (Han Fracisco, Calif)

We The citizens of the Compton, Willowbrook, Enterprise Community, hereby submit a petition for a change of the CWE CAA personnel and staff at the Avalon Multipurpose center, with the exception of certain community workers, who have this community at heart.

From our observation and participation, we feel that the program at the center has had very ineffective administration. The centers operation in producing and delivering services to the poor and the community, likewise has been very lacking. Under these conditions we feel that the program has been misused and abused and those workers who have been identifying with the community by making effective contributions and service, have been signled out for abuse by the administration of this center.

These actions by those in control would totally neglected and leave out the desires of the poor in this community. We therefore ask for a hearing on these matters.

Respectfully submitted,

Avalon Multipurpose (Youth Council) Center.....

President, Terrell/S. Myers 604 N. Evers St., Compton, Calif.

Vice President, Dennis Adams Jr.
417 E. 140th St., Compton, Calif.

Secretary, Westley Rudolph

107 E. 139th St., L.A. Calif.

Treasurer, Malcolm / James 938 W. 138th St., Compton, Calif.

B. Minefield

Sargent At Arms You with the Ala E. 140th Street Compton, Calif.

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# Page 57 GENERAL CONCLUSIONS (Charge) - 6

"The SEOO has made little impact on state and federal agencies, private agencies, local government or the general public."

#### RESPONSE:

It is too early for the evaluators to make that type of judgment. There are plans in this office to contact county supervisors associations, numerous ongoing contacts are being made with other federal agencies, such as the Farmers Home Administration, the Department of Labor, Housing and Urban Development, local elected public officials and private agencies interested in the problems of poverty. The statistical appendices do not include or are not sufficient to indicate that impact. Again, it should also be emphasized that the resources available to do and accomplish this particular function must be considered before impact and effectiveness can be measured.

Page 57

#### Charge:

"GENERAL CONCLUSIONS, 7.: The SEOO is perceived to be antagonistic to the CAAs and the poor."

#### Response:

It is interesting to note that in all cases where the State Office of Economic Opportunity has conducted special investigations, it has done so at the request of specific groups. Never has the State Office of Economic Opportunity gone into a Community Action Agency without written request from participants of that program. It is also interesting to note that most of these participants are low-income people.

### Charge:

"GENERAL CONCLUSIONS, 8.: The SEOO is using the majority of its staff to perform investigative functions which are interpreted negatively by the CAAs."

### Response:

Number 8 is patently false. See the attached list of technical assistance rendered, pre-reviews attended, and field trips taken.

# Page 57 -- 9. GENERAL CONCLUSIONS (Charge)

The majority of the SEOO staff does not have sufficient technical background or experience to deliver quality technical assistance to the CAAs.

#### RESPONSE:

The majority of the SEOO technical assistance staff does indeed have the technical qualifications and background. This includes Mr. Schur, Mr. Chickering, Mr. Frane, Mr. Blaker, and Mr. Whitely. Mr. Carter has been transferred out of the section.

# Page 57--General Conclusions (Charge)

"... 11. An impasse exists between the CAAs, the Regional Office, and the SEOO."

#### Response

We find this conclusion to be in error, though in fact it may have been more accurate during the time of the evaluation. At the April resources mobilization conference sponsored by the SEOO, 40 out of 44 Community Action Agencies in California participated. We had over 200 participants at these meetings. The mutual feeling developed between the State OEO and most community action agencies was that a new era of cooperation and joint partnership was not only necessary but would come about. Concerning the Western Regional Office of Economic Opportunity, I can only say that we are diligently and honestly working towards better communication and relationship with that office.

# Page 57 - GENERAL CONCLUSIONS (Charge)

"ll. An impasse exists between the CAAs, the Regional Office, and the SEOO."

#### RESPONSE

An impasse does not exist between the CAAs, the Regional Office and SEOO. As mentioned above, Regional Office meets on a regularly scheduled basis with Southern California SEOO staff. Attached are several letters which show the Executive Directors and Community Action personnel expressing appreciation for the help provided by SEOO to their Community Action Agencies. (See attachments.)

Bob Hawkins

March 17, 1971 .

Compton CAA

Herb Brown

I arranged an appointment with Mrs. Audrey Rhodes, Chairman of the Compton CAA Board, on March 16, 1971, at 3:00 p.m. The site of the meeting was the CAA headquarters, 227 East Compton Boulevard.

Arriving at the appointed time, I asked for Mrs. Rhodes. Mrs. Magee, Executive Secretary, told me that I was to meet with Mrs. Rhodes in Mr. Hayes' office, the Director of Compton CAA.

Once in the office, I was introduced by Mr. Hayes to Mrs. Rhodes, Mrs. Ester Jackson (Board member), and Mrs. Reeves, secretary to the Board. He, in turn, asked the purpose of my visit. I told them I had some concerns about some of the Multi-Purpose Centers (MPCs) and wanted Mrs. Rhodes to accompany me in visiting said MPCs.

Immediately there was a negative response against this "police action." I redefined my position, stating if some MPCs are not functioning according to the guidelines the Board should know.

An hour and one-half later of heated debate, the following determinations were made:

- That Mr. Hayes, the Director, will request technical assistance in the field of economic development.
- 2. That the Board, if it sees fit, will form an economic development committee to coordinate with SEOO in formulating some projects for economic development.
- 3. That Mr. Hayes, as Vice-President of the Black Caucas of the National Association for Community Development, invite Mr. Uhler and this office to the Regional NACD Conference to be held in Seattle, Washington (see attached).

In summation, there is now a meeting of the minds and a strong intent on both sides (the CAA and SEOO) to coordinate in the future.

Page 57

Mrs. Rhodes, the Board Chairman, representing the poor, seems very weak and apparently beholden to Leroy Hayes and Ester Jackson for direction.

I also told Mr. Hayes I will arrange a meeting with Supervisor Hahn of Los Angeles County so he can express his concerns regarding the County Model Cities program as it affects Willowbrook.

HB: js

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Board Chairmen's Organization

# H. Kludjian

Interviewed Mrs. Elizabeth Moore, Board Chairman of the Long Beach CAP. Her response to organizing board chairmen of the various CAPs was very enthusiastically received. She further commented that this type of input from State OEO could result in a relation-ship whereby the various executive directors would be more responsive to the boards' policies. Whereas, up to the present time, the executive directors have been in the position to control board members, and board members have merely reacted to directives submitted to the board.

The following suggestions were submitted by Mrs. Moore and, thus, merit thoughtful consideration:

- 1. Meetings should be held by section area -- theory being a statewide body may become too unwielding.
- 2. Section area meetings may allow the presence of the vicechairman as well as the board chairman to further negate possible control by the executive director through the board chairman.
- 3. Structure meetings in a business-like manner following a definite agenda to minimize domination by any particular board chairman who may be hostile and not constructive.
- 4. Also structure meetings whereby board chairmen are allowed to voice concerns but, again, designed to produce constructive results.
- 5. Program meetings as workshop sessions.
- 6. Define role of board members.
- 7. Program sessions to include technical assistance (i.e., how to read. financial reports, etc.).

HK: js

Page 57

# Memorandum

: Bob Hawkins

Date : April 19, 1971

Subject: Southern California CAP Meeting

From : Gil Archuletta

As I discussed in Sacramento, I would like to have a Southern California meeting with all CAA Executive Directors and Board Chairmen.

The CAA people are vitally interested in this type of meeting. I plan to send a letter to each individual asking for their desires as to subjects which could be discussed.

A tentative date of Way 12th has been scheduled. I expect you and Lew to attend; hence, the date would be subject to your schedules.

This meeting would be planned around a lunch and would include some appropriate speaker.

Any thoughts you have on this would be most welcome.

GA:js

Page 57

Many Community Action leaders in Southern California have expressed an interest in having a meeting with State OEO personnel in the Southern California area.

SEOO is convinced that this would be an excellent idea, and have set a date of May 12 for such an event.

However, to ensure the success of this meeting, we would like to have an idea from you as to subjects to be discussed. I have included a list of subjects which could be discussed. Please indicate your preference on these and include any others you feel would be appropriate.

If you would prefer "an expert" from a particular field, please indicate in your reply.

Mr. Lewis Uhler, State OEO Director; Mr. Robert Hawkins, Director SEOO/Operations, and I, as well as the entire Southern California field staff of SEOO will be in attendance.

The meeting is scheduled for the \_\_\_\_\_at \_\_\_\_at 10:00 a.m.

I would appreciate your response by the 3rd of May. Should you have any questions, please feel free to give me a call.

Sincerely,

Gil Archuletta Administrative Assistant/Operations Southern California

# EVALUATION TEAM RECOMMENDATIONS

# Regular Grant

Refunding the regular California SEOO grant should be made contingent upon acceptance by the SEOO of the following conditions:

- 1. The California SEOO agrees to discontinue the Community Program Analyst (CPA) type of investigations. The California SEOO can discharge its responsibility under Section 242 of the Equal Opportunity Act of 1964, as amended, more effectively by concentrating the resources of its office on assisting the CAAs in California by providing meaningful technical assistance, mobilizing federal, state and local resources, and insuring SEOO personnel are properly trained and have knowledge of grantee needs.
- 2. The SEOO agrees to insure that technical assistance personnel will have qualified backgrounds to allow them to deliver positive and constructive technical assistance to CAAs.
- 3. The California SEOO agrees to train technical assistance personnel in the proper methods of delivering technical assistance to CAAs.
- 4. The California SEOO agrees to implement the plan referred to in Lewis K. Uhler's letter of February 8, 1971, addressed to O. Mearl Custer of Elk Grove Unified School District (see Attachments), regarding the establishment of an Advisory Council to SEOO, and further agrees that the Advisory Council will include representatives of both the poor and CAAs.
- 5. The California SEOO agrees to establish and maintain minimum standards for experience and qualifications for staff consistent with the functions of the position.
- 6. The California SEOO and Region IX, OEO, have negotiated a memorandum of agreement in accordance with OEO Instruction 7501-1, Section 7f.
- 7. The California SEOO agrees that it will undertake an informational program specifying how it will implement the provisions of the Regional Office/SEOO memorandum of agreement and provisions of OEO Instruction 7501-1.
- 8. The California SEOO agrees that it will perform its obligation to be an advocate for the poor and specifies the steps it will take to meet this obligation.

Page 58

#### Charge:

"A. Regular Grant: 1. The California SEOO agrees to discontinue the Community Program Analyst (CPA) type of investigations. The California SEOO can discharge its responsibility under Section 242 of the Equal Opportunity Act of 1964, as amended, more effectively by concentrating the resources of its office on assisting the CAAs in California by providing meaningful technical assistance, mobilizing federal, state and local resources, and insuring SEOO personnel are properly trained and have knowledge of grantee needs."

#### Response:

- 1. This argument pur forth that the State Office of Economic Opportunity should discontinue the Community Program Analyst type of investigations is not only wrong-headed, but weak-minded. If the
- S State Office of Economic Opportunity is requested by low-income individuals to investigate inequities they feel exist in the program, it is our responsibility under the law to do so.
- 2. If the legislator desires to have some problem investigated that he is having in his area, and by his constituents, it is our responsibility to do so.
- 3. Given the history of OEO, it is highly probable in some instances that many programs need to be investigated so that the truly needy can receive benefits.
- 4. Given the history of OEO it is also equally obvious that what poverty programs need more than anything are a set of expectations as to permissible conduct and that conduct which is not permissible. The Regional Office of OEO does no investigation or evaluation work of any quality. Therefore, the State Office of Economic Opportunity is the only office in California that provides same.
- 5. For the record, all of our investigations have been above board and open, and all those who wish to see the records can do so by coming to our office.

# page 58 (continued)

## Response (continued)

6. The investigation that we conducted of the Monterey County Poverty Program received high praise from the County Board of Supervisors in its professional conduct and its findings. The County Board of Supervisors also discredited Regional OEO for failing to investigate an explosive issue between the brown and black communities in Monterey. The State Office of Economic Opportunity will not shirk its responsibility in such areas.

# Page 58 -- 2. REGULAR GRANT (Charge)

The SEOO agrees to insure that technical assistance personnel will have qualified backgrounds to allow them to deliver positive and constructive technical assistance to CAAs.

#### **RESPONSE:**

SEOO will agree to insure that all technical assistants are of qualified backgrounds.

# Page 58 -- 3. REGULAR GRANT (Charge)

The California SEOO agrees to train technical assistance personnel in the proper methods of delivering technical assistance to CAAs.

#### **RESPONSE:**

SEOO agrees not only to training but to send TA people on conferences anywhere in the country where they may be held to give them greater insight and training. It also encourages the TA staff to take the appropriate college courses or to teach appropriate college courses to gain additional insight and background in TA knowledge and techniques.

STAP section will agree to all the aforementioned recommendations made on Page 59 reference section B STAP grant. The only reservation would be #4 long term onsite field assignments that unless we are sufficiently funded with personnel who can live close to the areas being served that this is a very difficult recommendation to meet without breaking up families creating hardships on personnel trying to deliver such services. Therefore, we would have to expand the STAP grant and provide for services from people who live in the locales. It should be remembered by the people who made this evaluation who come from states that are very small both in the east, midwest and in the northwest, that California has the same length and distance as going from Minnesota to Indiana. We would hardly expect one STAP specialist to carry that kind of load in the midwest, it would neither be fair for us to take the same kind of responsibility in California. It should also be pointed out we have more geographical area to cover than all of the eastern coast of the U.S. running from Maine to North Carolina. We would not expect the STAP Specialist to assume that kind of responsibility either. Therefore in California the same assumption should be made and we should be given sufficient money and staff to provide regionalized service.

Page 58

#### Charge:

"A. Regular Grant 5. The California SEOO agrees to establish and maintain minimum standards for experience and qualifications for staff consistent with the functions of the position."

#### Response:

If one will take a look at the list of personnel and their qualifications, one will see that in terms of background and experience they have been highly diversified and give a mix of different perspectives. This is more than can be said of most OEO types who have one type of background.

# Page 58 6. RECOMMENDATIONS--Regular Grant (Charge)

"The California SEOO and Region IX, OEO, have negotiated a memorandum of agreement in accordance with OEO Instruction 7501-1, Section 7 f."

# **RESPONSE:**

It is now in the process of being written.

# Page 58 7. and 8. RECOMMENDATIONS--Regular Grant (Charge)

"The California SEOO agrees that it will undertake an informational program specifying how it will implement the provisions of the Regional Office/SEOO memorandum of agreement and provisions of OEO Instruction 7501-1."

"The California SEOO agrees that it will perform its obligation. to be an advocate for the poor and specified the steps it will take to meet this obligation."

#### RESPONSE:

Answers have previously been given. While SEOO, in performing its advocacy role, intends to continue to review legislation put before the California State Legislature, it is not a lobbyist and should not be construed as such. There are numerous organizations which do that type of lobbying, such as the Welfare Rights Organization, NAACP, ACLU, etc.