Coalition of California Welfare
Rights Organizations, Inc.

CCWRO

Kevin M. Aslanian,
Executive Director
Grace A. Galligher,
Directing Attorney
1901 Alhambra Blvd.,
Sacramento,
CA 95816-7000
Tel. (916) 736-0616
Fax (916) 736-2645
Cell (916) 712-0071
kevin.aslanian@ccwro.org
ccwro.org

CCWRO TRANSMITTAL

DATE: May 19, 2012

FROM: CCWRO
Kevin Aslanian
Seth Blackmon

TO: Legal Services Trust Fund Commission

SUBJECT: CCWRO IOLTA Budget Proposal for 2012-2013.

Attached are the CCWRO's 2012-2013 IOLTA budget proposal.

Please let me know if you have any questions.

Original

2012-2013

IOLTA BUDGET PROPOSAL

PROPOSED IOLTA BUDGET - FORM A
Qualified Support Centers
2012-2013 Grant Year

Program Name: Coalition of California Welfare Rights Organizations, Inc. (CCWRO)

Staff Director:	Kevin Aslanian	
	Type Name	Signature
Contact Person:	Seth Blackmon	(916) 736-0616
	Type Name	Phone Number and Extension
	Staff Attorney	sblackmon.ccwro@gmail.com
	Title	Email Address

1. Enter the amount of your grant allocation: $72,857

2. Describe the services and activities that will be funded with this grant.

   The following services and activities will be funded under the 2012-2013 IOLTA grant:

   a) CCWRO provides assistance to Qualified Legal Service Providers (QLSPs) throughout California. This broad category includes responding to requests by QLSPs for consultation, commenting and advising on QLSPs cases, assisting with litigation and/or litigation preparation, organizing statewide teleconference meetings with QLSPs and Qualified Support Centers (QSCs), creation of an e-mail newsletter, regarding major issues/news in the public benefits arena, which is distributed statewide to IOLTA recipients.

   b) When cases are referred to CCWRO from a QLSP, CCWRO follows up with the client to identify which options are the most realistic and pragmatic for the client. If the best option is litigation, the case is referred to CCWRO's litigation committee for review. Because of the uncertainties of litigation, and the ever changing face of public benefits laws, CCWRO's workload activities may be adjusted to meet new demands for service.

   c) Upon request by a QLSP, CCWRO provides legal training regarding public benefits issues. Recent requests have included trainings on CalWORKs Student Services and Self-Initiated Programs (LASSD, LAFLA), and Maximum Family Grant Child training.

   d) CCWRO regularly distributes information regarding changes in the Public Assistance Tables, CalFresh, CalWORKs, Medi-Cal, SSI/CAPI, and Child Care programs. These reference documents are used statewide by QLSPs.

   e) CCWRO, at the request of QLSPs or in concert with QLSPs, provides advocacy for public benefits programs before the State legislature and State administrative agencies.

3. Explain how your IOLTA grant fits into your overall budget planning. For example, is your IOLTA grant considered core funding that is allocated for both personnel and non-personnel expenses; are funds earmarked for specific positions or projects, or to cover administrative expenses; are IOLTA funds used to leverage or provide a match for other grants, etc.

   The IOLTA grant is one of two core-funding sources for CCWRO. It generally accounts for 30%-40% of CCWRO's operational expenses. The other core-funding source is the State Bar Equal Access Fund (EAF). The IOLTA grant is used to support CCWRO's litigation efforts and is allocated for both personnel and non-personnel expenses. IOLTA funds are not earmarked for a specific position or project, per se. Rather, CCWRO allocates the bulk of the IOLTA grant to fund its attorney's salaries and its general litigation activities. However, costs that bear a direct relation to IOLTA funded services are allocated to IOLTA. For example, the cost of malpractice insurance bears a direct relationship to CCWRO's litigation support services and is therefore allocated almost entirely to the IOLTA budget. Similarly, IOLTA funds are used to cover a pro rata portion of CCWRO's staff employee benefits. Lastly, the non-personnel expenses reflect the costs of CCWRO's litigation support services and litigation. All agency expenses are first reviewed and approved by CCWRO's Board of Directors prior to their allocation to the IOLTA budget.

PROPOSED IOLTA BUDGET - FORM B
Qualified Support Centers
2012-2013 Grant Year

Program Name: Coalition of California Welfare Rights Organizations, Inc. (CCWRO)

"The Standards for the Provision of Civil Legal Aid," adopted by the American Bar Association House of Delegates in August 2006, are the guidelines used by the State Bar in reviewing and approving the quality control procedures and evaluating the practices of applicant and recipient programs.

Standard 2.3 states, "A provider should participate in regional and statewide delivery systems to improve the systems' capacity to deliver a full range of services that address the interests of low-income communities."

The commentary to Standard 2.3 states, "... Each provider should actively work in concert with pertinent organizations in the system to be better able to meet the needs of low income persons with civil legal problems and to provide relatively uniform access for all persons who seek legal assistance."

1. Describe a project or activity in which your organization has been working in coordination with other support centers and/or provider(s) of legal services for low-income people.

   a. Identify the participants and summarize your achievements.

      A growing concern among the advocates in the public benefits field is the Food and Nutrition Services' (FNS) zealous attempts to root out fraudulent behavior by CalFresh (a.k.a. foodstamps) recipients. At the direction of the FNS, the State of California is preparing to modify its program to identify and punish CalFresh benefits recipients that are believed to be illegally trafficking their CalFresh benefits. However, numerous field programs have contacted CCWRO to discuss the shortcomings of FNS' expectations, the impact the new integrity plan would have on the State's program, and the legal protections required for suspected traffickers. The field programs that contacted CCWRO included, Bay Area Legal Aid (BALA), Legal Services of Northern California (LSNC), Legal Aid Foundation of Los Angeles (LAFLA), and Western Center on Law and Poverty (WCL&P).

      In response to the various concerns regarding the integrity of California's approach to correctly identifying and dealing with suspected traffickers, CCWRO alongside the Center for Budget and Policy Priorities (CBPP) arranged a conference call between the various field programs to identify the core issues of concern. The core issues include moderating California's stance toward non-habitual offenders, redirecting California's focus from the recipients involved to the various grocery stores that are facilitating the trafficking of the benefits to the detriment of the CalFresh recipients, and creating a transparent and understandable framework for dealing with suspected CalFresh benefits traffickers.

      During its outreach, CCWRO discovered that one of the more common offenses perpetrated by CalFresh recipients is a scheme where a recipient will pay a grocery store for $100 dollars in food, which they never actually purchase, for $50-$75 in cash. These types of actions are contrary to the federal and state laws regarding the use of CalFresh benefits, but we found that most of the offenders where engaging in this behavior, which resulted in a net loss to them, because they needed cash to pay rent or utilities. FNS agreed with our findings and asked that CBPP and California Legal Services investigate these issues in greater detail in order to report back.

      Following the identification of the issues, FNS organized a workgroup/taskforce with the California Department of Social Services, CCWRO and other advocates, and CBPP to discuss needed changes to California's current approach to CalFresh trafficking. The workgroup was just developed and the orientation process began on May 16, 2012. A series of meetings are planned over the next few months to determine the best way to discourage trafficking while being cognizant of the difficulties faced by recipients, many of whom are on the margins of survival. The current workgroup consists of advocates from LSNC, CCWRO, WCL&P, and BALA alongside an advocate from the CBPP. The remainder of the workgroup is composed of CDSS directors and County Welfare Department Directors.

b. How long have you been working on the collaborative effort?

CCWRO has only been working on this particular project for about 2 months. Although the Cal Fresh program is a state program, it operates almost entirely under the rules established by FNS's Supplemental Nutrition Assistance Program (SNAP). As a result, federal regulations and statutes limit the available advocacy options. While CCWRO is not pursuing legislation to deal with the expected problems, CCWRO and the other field programs are discussing litigation strategies if the workgroup is unable to reach an amicable result.

c. How have you evaluated its success?

At present, we have not evaluated the success of the collaboration. It is difficult to evaluate the success of an advocacy that is still in the beginning stages. However, advocates have suggested that a review of the changes finally adopted CDSS and FNS would operate as a functional evaluation. Additionally, the continuing interaction and open communication between advocates, CDSS and FNS is a success in itself and is critical to future success.

d. What were the outcomes of your evaluation process?

The fact that CCWRO was able to ensure that a number of Qualified Legal Services Programs were invited to the workgroup was a success in and of itself. One of the biggest problems with the workgroup is that FNS and CDSS have requested that these meetings take place in-person in Sacramento. This has limited the number of QLSPs that can attend because the workgroup meeting schedule is fairly heavy.

e. What changes have been instituted as the result of evaluation outcomes?

CCWRO is currently advocating that CDSS and FNS relax the requirement for in-person meetings and allow advocates to attend telephonically in order to accommodate out of area QLSPs. CDSS and FNS have not yet agreed to this request, however CCWRO will continue to advocate this position. In the interim, CCWRO is circulating the notes from these early meetings to interested advocates so that they can stay on top of the various workgroup discussions.

2. Describe your organization's plans to participate in additional collaborative efforts, with special regard to outreach, policy and strategic planning.

CCWRO has been collaborating with Legal Services of Northern California and Disability Rights of California (DRC) to address a growing problem with In Home Support Services' (IHSS) application processes. At present, IHSS receptionists administer a series of questions to potential clients and, depending on the answers, frequently refuse to give the potential client an IHSS application. The summary denial is often wrong. However, because no application was filed there was "no action" to review and the potential client is prescreened out even though the counties are legally obligated to accept and record all applications, even those made over the phone. CCWRO has sent out demand letters and is awaiting responses before moving forward.

CCWRO is also continuing its involvement in the Pich v. Wagner lawsuit. This lawsuit is a collaboration between Bay Area Legal Aid, Legal Services of Northern California, Legal Aid Society of

San Diego, CCWRO, and Western Center on Law & Poverty. The Pich lawsuit is challenging the CalWORKs Information Network (CalWIN), which wrongfully delays, reduces, and terminates CalWORKs and CalFresh benefits to eligible recipients. The case is currently on appeal. The appellate brief has been filed and we are awaiting a date for oral argument. This case is directly related to CCWRO's continuing outreach to QLSPs in an effort to provide quality litigation support and coordination. Within the context of this lawsuit, CCWRO is also continuing to monitor CalWIN, alongside other QLSPs, to ensure that the new online application process for CalWORKs and CalFresh is consistent with State regulations and agency policy.

CCWRO is continuing its work with the Child Care Development Division of the State Department of Education (CDE) and the California Child Development Administrators Association (CCDAA). The continuing issue is that Stage 2 and Stage 3 childcare recipients are given neither adequate due process protections regarding their right to a fair hearing nor adequate due process protections during and after the hearing. At the point of the previous IOLTA Budget Proposal, CCWRO and CCDAA were negotiating the terms of AB 596. Since that time, CCWRO, LSNC and the Child Care Law Center agreed to drop the legislation if CCDAA would work with its constituents to implement a large majority of our cost neutral requests that would significantly bolster recipients due process rights. At present, CCWRO and CCDAA presented a negotiated agreement to CDE whereby CCDAA will change their entire Notice of Action format to better inform recipients of the reasons for the negative actions taken against them. Furthermore, CCDAA has agreed to completely overhaul their hearing process to ensure that they protect the due process rights of their recipients by including written statements of position, interpreters, digitally recorded hearings, aid paid pending the hearing results, and a number of other positive changes.

In addition to the continuing work on the Stage 2 and Stage 3 childcare hearings, CCWRO is currently collaborating with the California Department of Social Services (CDSS) to develop more effective and efficient state hearing policies and procedures. The State Hearings Legislation (SB 320) authorizes a workgroup committee comprised of CDSS, CCWRO, and other public benefits advocates (i.e. QLSPs) to review, comment, and modify current CDSS fair hearing processes to ensure greater access to justice for low-income populations. The workgroup, which has been diligently working for eight (8) months, is composed of CCWRO advocates, LSNC advocates, LAFLA Advocates, and BALA advocates. At present, the workgroup has completely rewritten the Conditional Withdrawal and Withdrawal forms, the Hearings Publication 412, and CCWRO's Staff Attorney prepared an All County Information Notice (ACIN) regarding county hearing specialists pre-hearing obligations that will be adopted by CDSS and distributed to all County Welfare Departments. Additionally, the workgroup has reached an agreement regarding the statutory language for the final legislation that will protect recipient's rights to in-person hearings. The SB 320 work group may be one of the most important activities that CCWRO will be involved in over the next two years because it gives the advocate community the opportunity to affect necessary changes to California's Administrative Hearings to better protect low-income clients. The added benefit of the SB 320 workgroup is that creates a forum for discussing ways to enhance CDSS' ability to respond to its ever-increasing caseload without harming recipients of state services.

Finally, CCWRO continues to hold monthly "Welfare Round-Up" telephone calls for legal service programs throughout the state. The "Welfare Round-Up" includes an agenda that starts with an update from all of the QLSPs and QSCs on the call. This update provides a forum for each organization to share legal issues that are being encountered and to ask others for help. Also included in the update is any litigation that is being started/concluded and how that litigation has progressed. Following the field program update, WCL&P and CCWRO offer a Sacramento Legislative Update to discuss pending changes in public benefits law within California. Similarly, a Washington Legislative Update is offered to identify changes in the federal landscape of public benefits law and how these changes will impact California. The "Welfare Round-Up" has been an excellent source of information for attending field programs and affords advocates an opportunity to discuss issues in a collaborative manner.

PROPOSED IOLTA BUDGET - FORM C
Qualified Support Centers
2012-2013 Grant Year

Program Name: Coalition of California Welfare Rights Organizations, Inc. (CCWRO)

You must submit a plan to ensure that services funded with the Trust Fund grant are in addition to those already funded by other sources (Business & Professions Code § 6216(c) and Eligibility Guideline 2.4).

1. Did you receive funding from sources other than the Trust Fund Program to provide support services to qualified legal services projects in California? Yes ☒ No ☐

   a. If *yes*, how much income do you expect to receive from sources other than the Trust Fund Program for the period 7/1/2012 – 6/30/2013? $10000

   b. If *no*, describe your organization's efforts to identify and secure other sources of funding. Examples might include submission of applications for funding, identification of new funding sources, pursuit of *cy pres* opportunities, etc.

      While CCWRO does expect additional income from attorney's fees over the 2012-2013 grant year, CCWRO has also invested in a foundation grant search program to expedite the process of identifying grant agencies and their priorities. Unfortunately, CCWRO has not had the opportunity to work on supplementing its current IOLTA and EAF grants due to the current burdens on its staff.

2. Describe your overall plan to ensure that IOLTA funding is used only for services that are not funded by other sources.

   EAF and other non-IOLTA based services are reviewed by CCWRO's Board of Directors and charged to the appropriate account/budget. CCWRO's Executive Director and Directing Attorney review invoices prior to approval. This review and approval process is in place to ensure that IOLTA is only billed for services that are not funded by other budgets/sources.

   CCWRO's accountants allocate expenses to each budget fund pursuant to the proposed budget outline. Also, a quarterly budget is done and compared to actual expenses over that quarter so that unanticipated changes can be flagged and dealt with by either modifying the budget or modifying CCWRO's expense outlay. Any increase or decrease in will be deemed material in accordance with Article VII, Program Changes and Budget Revisions section 7.01.

   At present, attorney fee awards are expected to constitute the only revenue from a source other than IOLTA and EAF. If grants to other institutions are submitted, IOLTA will be notified immediately.

PROPOSED IOLTA BUDGET - FORM D
Qualified Support Centers
2012-2013 Grant Year

Program Name: Coalition of California Welfare Rights Organizations, Inc. (CCWRO)

1. If your organization provides services other than free support services to qualified legal services projects in California, describe those other services and how you will ensure that your Trust Fund grant is not spent to support those activities.

   CCWRO only provides supportive services to QLSPs.

2. Trust Fund grant expenses must be strictly segregated from other expenses in your internal accounting system. Describe the systems you will use to account separately for the use of Trust Fund money (Business & Professions Code §§6216 and 6223).

   The final approved IOLTA budget constitutes the outline for the use of IOLTA funds. CCWRO is negotiating with the accounting firm Damore, Hamric, and Schnider, for 2012-2013, to ensure that all IOLTA funding is assigned, traced, and used for IOLTA activities. IOLTA funds are accounted for separately in order to report the budget allocations appropriately in the quarterly reports. The quarterly reports are developed by Damore, Hamric, and Schnider using software called Creative Solutions. Internal accounting is maintained on Quick Books for comparison to the final quarterly reports. Additionally, separate budgets are prepared for EAF funds to simplify tracking monthly expenses and to ensure that EAF quarterly reports are accurate.

PROPOSED IOLTA BUDGET - FORM F
Qualified Support Centers
2012-2013 Grant Year

Program Name: Coalition of California Welfare Rights Organizations, Inc. (CCWRO)

1. Explain how you arrived at the amounts on each line of Form E. Explanations for all allocations should indicate whether the grant is being used to pay for specific items or is being allocated to line items on a percentage or formula basis.

- ❑ The explanation for each personnel allocation must specifically identify the total number of positions and the full-time equivalents to be funded with this grant. For example, if your budget for lawyers for program services represents funding for two half-time attorneys, the budget narrative might state: "Salary for one FTE attorney, including a half-time attorney to handle training and a half-time attorney for resource development." Do not state: "Two part-time attorneys." If your personnel allocations are an across-the-board share of all personnel costs, identify the number of positions to be funded in each category and the full-time equivalent for each category. For example, 10 percent of the salary of 12 full-time attorneys is equivalent to 1.2 full-time positions.

- ❑ Explanations for non-personnel allocations should indicate whether the grant is being used to pay for specific items or is being allocated to line items on a percentage or formula basis. If you propose to allocate this grant for an across-the-board percentage of non-personnel expenses, state the basis for the percentage. **Remember to itemize individual costs included on lines 23-25. Identify proposed contractors and the general nature of duties to be performed.**

Personnel Expenses (2012-2013) - $56,000 for salary and benefits for three staff positions. (line 9)

4) Salary for .82 FTE attorney, including a half-time attorney to handle primary litigation development and a one-third time attorney for significant resource development, administrative duties, and litigation support. (.82 FTE x $45,000 = $37,000).

5) Salary for .14 FTE paralegal/executive director. The $6500 allocation is representative of the fact that CCWRO's Executive Director plays almost no role in the litigation process. The allocation is primarily targeted at organizing and attending QLSP meetings. The remaining obligations include monitoring federal and state legislation regarding public benefits, and, when necessary, advocating for change. (.14 FTE x $45,500 = $6,500).

6) Salary for "other staff" has been moved to attorney salary and is reflective of CCWRO's hire of a part time attorney to help with litigation and administrative duties. Specifically, CCWRO has undertaken the grant process internally and has ceased using an outside consultant.

8) Expenses for employee benefits are allocated to IOLTA on the basis of its percentage share of the agency's total FTE, as detailed above. Benefits include health insurance and payroll taxes not allocated to the EAF budget. The $12,500 represents 22% of the total personnel costs and 40% of the total expected cost.

Non-Personnel Expenses (2012-2013) - $16,857

10) Space - $6800 has been allocated from the IOLTA grant to cover the remaining percentage not allocated to the EAF budget. 2012-2013 expected expenses include $14,400 in rent ($1200 per month) and $4,600 in utilities (approximately $385 per month) totaling $19000 in space expense. $12,200 has been allocated to the EAF budget. The 2012-2013 IOLTA allocation represents

36% of the total expected cost. (.36 x $19000 = $6800).

11) Equipment Rental and Maintenance - $1300 has been allocated from the IOLTA grant to cover the remaining percentage not allocated to the EAF budget. 2012-2013 expenses include $2900 for the copy machine lease and maintenance plan ($240 per month). The 2012-2013 IOLTA allocation represents 45% of the total expected cost. (.45 x $2900 = $1300).

12) Office Supplies - $350 has been allocated from the IOLTA grant to cover the office supplies including pens, pencils, writing tablets, calendars, file folders, and other organizational tools. 2012-2013 expenses are unknown at present, however, CCWRO plans to limit the purchase of supplies to the minimum because it doesn't currently need a great deal.

13) Printing & Postage - $1000 has been allocated from the IOLTA grant to cover the remaining percentage not allocated to the EAF budget. 2012-2013 expected expenses include $750 for copy toner cartridges, $500 for copies, $400 for copy paper, $200 for printer cartridges, and $150 for postage totaling $2000. The 2012-2013 IOLTA allocation represents 50% of the total expected cost. (.5 x $2000 = $1000).

14) Telecommunications - $900 has been allocated from the IOLTA grant to cover the total costs of the telephone. 2012-2013 expected expenses are $2750 ($230 per month) for 4 phone lines and internet service and $240 for conference call services ($19.95 per month), totaling $3000. The 2012-2013 IOLTA allocation represents 33% of the total expected cost. (.33 x $3000 = $1000).

15) Technology - $157 has been allocated from the IOLTA grant to cover the anticipated costs of new software. 2012-2013 expected expenses include updates for Mac Microsoft Office and updating our operating systems. The total to license the Business Microsoft Office Suite for three computers is $275. Updates for the operating systems on three computers is anticipated to cost approximately $200. The anticipated total is approximately $475. 2012-2013 IOLTA allocation represents 33% of the total expected cost. (.33 x $475 = $157).

16) Program Travel - $1100 has been allocated from the IOLTA grant to cover IOLTA related travel. This allocation will be used to offset some of the costs of at least two (2) Welfare Advocates Summit meetings in Los Angeles and an estimated four (4) LAAC meetings.

17) Training - $400 has been allocated from the IOLTA grant to cover training costs for the staff. This allocation will be used to offset some of the costs of the Pathways to Justice conference and other MCLE related training for staff.

18) Library - $500 has been allocated from the IOLTA grant to help cover CCWRO's subscription to Westlaw on-line. Additional expenses related to Westlaw will be covered by attorney fee awards.

19) Insurance - $2375 has been allocated from the IOLTA grant to cover the remaining percentage not allocated to the EAF budget. 2012-2013 expected expenses include $2500 for malpractice insurance ($208 per month) and $1400 for Office Insurance ($117 per month) totaling $3900. The 2012-2013 IOLTA allocation represents 65% of the total expected cost. (.61 x 3900 = 2375).

20) Audit - No money has been allocated from the IOLTA grant to cover the costs of the audit to be performed at the end of the grant year. The year end review will be performed by an accounting firm that has yet to be determined at a total estimated cost of $1500. The 2012-2013 IOLTA allocation represents 0% of the total expected cost.

21) Litigation - $850 has been allocated from the IOLTA grant to cover the expected costs of litigation support and preparation for CCWRO. CCWRO anticipates that any additional litigation expenses will be covered by attorney fee awards for the 2012-2013 grant year.

24) Contract Service/Organization. $1000 has been allocated from the IOLTA grant to cover the remaining percentage not allocated to the EAF budget. 2012-2013 expected expenses include $4000 for accounting services provided by Damore, Hamric & Schnider (the contractor may differ as CCWRO is looking for a more affordable option) for the remaining grant year and approximately $1000 for CCWRO's website consultant, totaling $5000. The 2012-2013 IOLTA allocation represents 20% of the total expected cost. (.2 x $5000 = $1000).

2. If you budget less than 75% of your grant for personnel expenses, or less than 75% of your grant for program costs, explain why (a) the proposed budget deviates from recommended percentages, and (b) the Commission should approve an exception in your case.

Not applicable.

Proposed Budget - Form E
Qualified Support Centers
2012-2013 Grant Year

1. Program Name:	Coalition of California Welfare Rights Organizations, Inc. (CCWRO)		
2. Preparer:	Seth Blackmon	**Phone/Ext:**	916-736-0616
Email:	sblackmon.ccwro@gmail.com	**Fax:**	916-736-2645
3. County:	Sacramento	**Allocation: $**	72,587

ACCOUNT TITLE	PROGRAM	ADMINISTRATION	TOTAL
Personnel			
4. Lawyers	28,250	8,750	37,000
5. Paralegals	5,500	1,000	6,500
6. Other Staff			
7. Subtotal Personnel	**33,750**	**9,750**	**43,500**
8. Employee Benefits	11,750	750	12,500
9. Total Personnel	**45,500**	**10,500**	**56,000**
Non-Personnel			
10. Space	6,800		6,800
11. Equipment Rental & Maintenance	1,150	150	1,300
12. Office Supplies	300	50	350
13. Printing & Postage	900	100	1,000
14. Telecommunications	800	100	900
15. Technology		157	157
16. Program Travel	1,000	100	1,100
17. Training	250	150	400
18. Library	500		500
19. Insurance	2,250	250	2,500
20. Audit			
21. Litigation	725	125	850
22. Capital Additions			
23. Contract Service/Clients			
24. Contract Service/Organization	750	250	1,000
25. Other			
26. Total Non-Personnel	**15,425**	**1,432**	**16,857**
27. GRAND TOTAL	**60925**	**11932**	**72857**

28. % Personnel: 77% + % Non-Personnel 23% = 100%

29. % Program: 84% + % Administration 16% = 100%

(Calculate as percentages of the figures on line 27.)

30. Identify, by percentage, **this grant's share of your total organizational budget** for the period 07/01/2012 - 06/30/2013: 39 %