



Irene Gomez-Bethke Papers.

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IMMIGRATION REFORM PROJECT

A Joint Proposal of:
Southern Minnesota Regional
Legal Services, Inc.
Centro Legal
Mid-Minnesota Legal Assistance

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PROPOSAL

IMMIGRATION REFORM PROJECT

1.0 Introduction and Background

On November 6, 1986, the President signed the Immigration Reform and Control Act of 1986, also known as the Simpson-Rodino Immigration Bill. This long awaited immigration reform makes drastic changes in the areas of alien legalization and employment. It also sets the stage for a severe legal crisis for Hispanics in the state of Minnesota.

The bill poses three issues which create a great many legal problems for Hispanics. The first grows out of a provision in the law which allows illegal aliens who have been in the country since before 1982 to secure legal status. The problems from this will arise out of the complex and considerable volume of proof and documentation required by the Immigration and Naturalization Service. An incomplete record or missing documents may be used to deny residency status to many qualified individuals. The granting of legal status will not be immediate for all those who apply and there will be a great many legal roadblocks for qualified persons to overcome. Without efficient and effective legal representation, many legally eligible persons will be unable to assert rights granted them under this legislation.

The second legal issue arises from another provision of this bill which calls for sanctions against employers who knowingly hire illegal aliens. The principal problem here, particularly for low-income Hispanics, is that many employers, in an attempt to avoid these sanctions, will simply discriminate against Hispanic workers. Without legal representation and effective employer education, many Hispanic workers will be denied employment opportunities and continue to live in conditions of poverty.

Yet another issue is presented by special provisions of the law applying to temporary agricultural workers, which will allow them to seek resident alien status. Again, the provision is highly complex, and experienced and competent counsel will be required to assist them in meeting the legal standards.

These new Immigration laws have many built in deadlines and time periods during which certain applications and actions must be taken. If an alien who has been residing in the country for the requisite length of time does not file the application within the one-year opening, then all rights under the reform legislation will be conclusively lost. Failure to comply with these deadlines will have devastating consequences for the aliens and their U.S. citizen families.

The crisis created in the aftermath of this bill is a very real one. ^{In 1986,} During the month of November, ^{the} Legal Services Offices and ~~Centro Legal~~ report over 150 calls of inquiry regarding the provisions and effect of this law. Additionally, the State of Minnesota's Spanish Speaking Affairs Council reports that it has received over 100 calls thus far. ~~Program~~ ^{we} sponsors estimate that each call represents an inquiry on behalf of two - three separate individuals. It is important to note that these calls have come before any publicity has been released on the bill, before any regulations have been promulgated or a system designed to effectuate the law. Thus, it is our feeling that these initial inquiries represent only the tip of the iceberg and ~~we can~~ ^{as we} anticipated ~~double~~ this number of calls ~~beginning~~ ^{began} sometime in ~~January or February.~~ ^{January}

This proposal is a joint submittal of Southern Minnesota Regional Legal Services, Inc. (SMRLS), Centro Legal, and Mid-Minnesota Legal Assistance (MMLA). It proposes expanding the capacity of these organizations to provide legal services to individuals and families; to provide education to persons seeking legal status, employers and the general public; and to provide information on

immigration issues to other agencies and organizations concerned about these problems.

The need for this project is great. Without it, it is likely that literally thousands of low income Hispanics from the state of Minnesota may be denied those rights which are guaranteed them under provisions of this bill. Those conditions which were the targets of this bill are likely to be exacerbated and alienation of the Hispanic community will be worsened. In short, implementation of this project is critical to consolidating the legal gains made under this bill and insuring that the law is fairly and effectively applied.

The Immigration and Reform Act of 1986 offers a unique and limited opportunity for certain aliens to legalize their status in this country and emerge from a life of fear and constant worry. These are people who have been living in and contributing to various Minnesota communities over the years. The new legislation not only offers legalized status, but also opens the path to ultimate United States citizenship.

2.0 What the Law Says

2.1 Legalization

The new legislation establishes a two stage legalization process for illegal aliens. The first stage results in a two year temporary resident status. Applicants must apply within 12 months of the date the application process begins. The Immigration and Naturalization Service has tentatively scheduled the application period to begin in May, 1987.

Those eligible to apply for temporary residency are persons who entered the United States before January 1, 1982, and who have been residing continuously in the United States since then in an unlawful status. There are other requirements for a successful application. For example, there can be no prior serious criminal convictions and there must be an adequate income other than from public assistance programs. The normal grounds for exclusion from the United States also apply. For example, a person may be ineligible because of drug addiction, insanity, membership in anarchist or terrorist organizations, etc.

The second stage of legalization provides for permanent legal residency. After 18 months as a temporary resident, the applicant has 12 months to apply for permanent resident status. Applicants will lose temporary status and are deportable if they fail to apply for or are denied permanent resident status.

The requirements for obtaining permanent residency include: 1) continuous residency in the United States since granting of temporary resident status; 2) no serious criminal convictions; 3) admissibility to the United States as an immigrant; 4) minimal understanding

of ordinary English; and 5) knowledge of United States history and government.

A separate provision of the immigration legislation provides for temporary residence to seasonal agricultural workers. The applicant must have performed at least 90 days of seasonal agricultural services between May, 1985 and May, 1986. In such a case, the applicant would be eligible for permanent residency after two years as a temporary resident. Applicants who have performed 90 days in each of the last three years will be eligible for permanent resident status after just one year as a temporary resident.

Employment authorization during the months prior to the application period is only available to aliens who are currently under deportation or exclusion proceedings or who are brought under proceedings prior to the application period. Those aliens who are presently unknown to the Immigration Service and appear to be eligible for legalization will not be able to obtain employment authorization until a legalization application is filed. This may create serious problems for aliens because of the concurrent requirements imposed on employers to verify authorization.

Persons detained or arrested by the Immigration Service cannot be deported if it appears they are eligible for legalization. However, once the application period begins, persons in deportation proceedings will only have 30 days in which to apply for temporary legal status.

2.2 Employment

The Simpson-Rodino Immigration Bill makes drastic changes regarding employment. It is now unlawful for an employer to knowingly hire, recruit or refer for a fee, an alien who is unauthorized to work. It is also unlawful for an employer to fail to comply with requirements for verification of work authorization and identity.

A crucial provision says that employer sanctions do not apply to an individual who was hired, recruited or referred prior to the date of enactment, nor do employer sanctions apply to the continuing employment of an alien hired before the date of enactment.

The first six months after the date of enactment are to be set aside for general education and clarification of what employers must do to comply with the law.

The law also creates a new cause of action for employees whose employers engage in immigration related employment discrimination for failure to hire or for termination of employment based on impermissible immigration related factors. This provision of the new law establishes new complaint procedures, hearing procedures, sanctions and review. This provision is important to citizens and aliens alike because in certain situations an individual may have to choose between rights created and afforded under the new law and rights afforded under the Equal Employment Opportunity Commission (EEOC) of Title III of the Civil Rights Act of 1964.

2.3 Additional Legal Concerns

In addition to these major issues of legalization and employment, there are other provisions of the law which will need to be addressed. For instance, the Alien Marriage Fraud Amendments, signed by the president on November 10, 1986, drastically alter the benefits and rights accruing to aliens through marriage to U.S. citizens. The law now confers conditional status on the alien which may be adjusted to permanent residence within a specific 90 day period after two years, only upon a showing that the marriage is still viable. More devastating, aliens who marry U.S. citizens after exclusion or deportation proceedings are commenced will be required to live outside the U.S. for two years before they will be allowed to live with their U.S. citizen spouses in the U.S.

Certain types of criminal convictions will also affect eligibility for legalization and other immigration benefits such as registry under the Act. This will necessitate careful, extensive screening and analysis of individual cases.

Finally, numerous other changes made by the new law will require re-evaluation of aliens' cases to determine when motions to re-open would be appropriate or when alternative relief might be available which previously was not. For example, prior case law held that an alien was ineligible to apply for suspension of deportation if that alien had, for any reason, been outside the U.S. during the preceding 7 years. The new law now allows for short casual departures from the U.S. during that 7 year period.

2.4 What the Law Means for Minnesota

Hundreds of Hispanic families in Minnesota may be eligible to apply for legal residency due to their many years of residency here or because they have performed the requisite number of days of agricultural services. Each will require careful screening to determine whether or not the applicant is eligible and what the potential problems are in each case. Community outreach will be crucial to fully inform potential applicants of the process and requirements. Outreach efforts are particularly important in this situation because unlawful residents will have an understandable reluctance to come forward and present themselves to the Immigration and Naturalization Service. Outreach is also crucial to ensure that all eligible persons apply within the relevant time deadlines. Failure to make a timely application may mean that a long time resident of Minnesota will be forced to leave, despite having had children born in the United States.

Each application will require extensive documentation to prove the applicant's continuous residency in this country. Applicants seeking legalization based on agricultural services performed will have to provide proof of employment for the requisite number of days. Documentation will prove extremely problematic where, for example, persons were hired for one or two days and were paid in cash. These difficulties are illustrated by the following examples:

Maria entered the United States illegally from Mexico in 1978. She has been continually employed since that time, but has used at least two names other than her own. One company, where she worked

after 1981 using a fictitious name, is now out of business.

Jose has resided continuously in this country since 1975, except for a three month trip to Mexico in 1982 to visit ailing parents.

Juan believes that he performed at least 90 days of agricultural work in each of the last three years. He says that much of the work was done in California where growers would hire him for a day and pay cash at the end of the day. Often times the grower did not record names of day laborers. Juan performed the 270 requisite days of field work in 7 different states and on perhaps 40 different farms or orchards.

Most applicants will also require that the person produce documents from the home country, for example birth certificates. Such documents may be impossible to obtain due to their destruction as a result of natural disasters, failure to register a birth, etc. For instance, in the case of one SMRLS client, his birth certificate could not be obtained in Mexico because of a cyclone in 1954. Both his parents were killed and he does not know the whereabouts of other relatives in Mexico who could attest to his birth date.

In all cases, time deadlines will be crucial. Persons who are already in immigration proceedings will need special attention since they will only have 30 days in which to apply for residency. Careful tracking of these cases will be essential. Cases will also need to be monitored throughout the two year temporary residency period to ensure that residents apply for permanent residency within the specified time frame.

Countless Hispanics, United States citizens as well as undocumented persons, will feel the effects of the employment provisions of the new legislation.

Employers may fire current employees who they believe to be undocumented, even though the new law does not sanction an employer on the basis of the status of current employees. Employers may require excessive documentation of an applicant's legal status. Some employers may decline to hire certain employees, with for example, minimal English skills, regardless of their legal status, out of fear that such an employee doesn't have employment authorization. The potential for discrimination against all Hispanics, regardless of legal status, is very real.

In conclusion, the new legislation requires extensive community outreach and education, detailed screening of applicants, careful assistance with documentation and gathering of relevant documents and careful monitoring of crucial deadlines.

Many persons will need representation before the Immigration Service if applications for residency are denied and deportation proceedings initiated. Attorneys will have to be prepared to defend persons in deportation proceedings begun as a result of a negative decision regarding the application or failure to submit the application within the designated period.

Attorneys will also be needed to engage in litigation to challenge unlawful regulations or unlawful implementation of regulations.

Finally, it will be crucial to monitor employment practices to guarantee that employers do not engage in discrimination in hiring and firing of employees.

3.0 Proposed Program

There will be two fundamental areas of activity of the Immigration Reform Project in its effort to meet the needs of the widely spread and diverse community of undocumented aliens in Minnesota. Those will be education and outreach on one hand, and individual representation of aliens and their families on the other. A third possible area would be the undertaking of federal litigation in response to misinterpretations or misapplications of the new legislation by the Immigration and Naturalization Service. While in a general sense these three areas will follow in a chronological order, there will necessarily be considerable overlap as the Immigration Reform Project moves forward with its work over the course of the next few years.

3.1 Education and Outreach

One of the most important tasks of the Project, upon its initiation, will be to conduct considerable outreach and education in the communities and population pockets where undocumented aliens reside throughout Minnesota. The combined experience of the Project participants, the Legal Aid offices in Minnesota, and their friends in social service agencies, will certainly provide the opportunity to establish a map and an itinerary. We contemplate the need to generate a multifaceted approach to the dissemination of information about the new law and about the availability of our services. This would include public service announcements and ads in the media, and the distribution of pamphlets, posters, and handouts throughout the network of churches, social service and voluntary agencies.

The need for the initial outreach is underscored by the relative lack of publicity which attended the President's signing of the new immigration law, coming as it did shortly after the November elections. There was some small amount of news at the time the bill was finding new life in Congress and upon its passage. But since that time there has been very little to capture the attention of those affected by the new law.

There will also be community legal education appearances in areas where there is a sufficiently large population to make it a useful expenditure of our personnel's time and resources. These efforts will necessarily include various parts of the Twin Cities; and we have also identified population pockets in different parts of rural Minnesota. Project participants have already engaged in similar community education efforts regarding the possibilities under the old law of becoming a permanent resident alien or a citizen. Their experience has indicated a fast-working network within these population pockets which draws a wide audience to these events.

An additional component of the education program of the Project will be efforts aimed at providing information to employers who are likely to be affected by this law. This will take the form of providing written materials explaining requirements of the law, and meeting with individual employers. In addition, Project participants will meet with labor unions which represent large numbers of Hispanic employees to ensure that they also are informed about the law's provisions.

Project participants will also provide information and meet regularly with representatives of social service agencies, churches and community based organizations to insure public understanding about immigration reform issues.

Finally, it should be pointed out that education and outreach on this bill requires immediate and on-going attention. The community should become aware of the new law as soon as possible so as to ensure that benefits are not lost through ignoring mandated time frames and deadlines. Community education, including education of the private bar and particularly criminal defense attorneys, must be on-going. Awareness of the changes in the law needs to be raised to ensure that old cases can be re-examined and new cases evaluated.

3.2 Legal Representation

It is the second aspect of the Project's mission, that of representation of individuals and families, which will certainly be the most important and time-consuming part of its work. The primary focus of the efforts of the attorneys and paralegals will be to process as many clients as is responsibly possible, to gain for them legal status under the new immigration law. Efforts are already underway in existing organizations and within our own sponsoring programs to develop streamlined forms and methods to handle the anticipated demand for services. As the vast majority of applicants for new legal status will not be able to file applications until May, we anticipate the Project will need to be ready to process individual applications as soon as the law permits.

We do anticipate some individual case representation needs will arise prior to the normal application date, as the law contemplates those detained by the Immigration and Naturalization Service being eligible to apply for legal status even if they are picked up prior to the implementation of the new law.

3.3 Complex Litigation

The third possible area of the Project's work will be federal litigation involving the regulations promulgated by the Immigration and Naturalization Service and the implementation of those regulations. We anticipate there may be some discordance between the regulations as written by the Immigration and Naturalization Service and the statute as written by Congress which would give rise to necessary appeals and litigation on behalf of individual clients. This may be especially true because of the newness of the law and the lack of experience in processing applications under it.

3.4 Program Structure

The three sponsoring organizations of the Immigration Reform Project have designed a cooperative program structure which will insure that all areas of the state which have significant Hispanic populations are able to secure necessary legal services to enforce new legal rights granted under the Immigration Reform Act. The staffing pattern for this program will be as follows:

3.41 Attorneys

Two attorneys will be hired to work full time on this project, one by Centro Legal and one by

SMRLS. SMRLS and Centro Legal currently share an office in the Neighborhood House on St. Paul's west side, and the two attorneys hired under this project will also be placed here. Their placement here ensures that they will be supervised by attorneys with a great deal of experience in immigration law, and that their efforts will be coordinated with existing programs. The two attorneys already working out of this office will also be committing a significant portion of their time to cases generated under the new law.

The attorneys will be placed in St. Paul because we expect the greatest demand for services to be in the Twin Cities. It is also the location of the Immigration and Naturalization Service, as well as the traveling immigration judge. Centro Legal also has an office in Minneapolis and intake and consultation can be done there as well for clients unable to get into St. Paul.

3.42 Paralegals

One full-time and three half-time paralegals will be hired for this project. The full time person will be located in St. Paul and work out of the west side office. One half time person will be placed in Albert Lea to cover the southern part of the state. The Albert Lea area has the highest concentration of Hispanic residents outside of the Twin Cities area. The SMRLS office in Albert Lea received over 50 inquiries regarding the Immigration Reform Bill during the month of November.

A second half-time paralegal will be placed in the Willmar office of Mid-Minnesota Legal Assistance and will be responsible for community education and processing of cases in the west-central Minnesota area. Communities with significant Hispanic populations in this part of the state include Litchfield, Willmar and Marshall. A third half-time paralegal will be placed in the SMRLS office in Fargo-Moorhead. This person will work out of SMRLS' Migrant Legal Services office and will be responsible for serving clients in the Red River Valley area.

Paralegals will be supervised directly by staff attorneys in each of these offices and work assignments and case review will be directed by project staff attorneys.

3.43 Secretarial

The project also anticipates hiring one full time secretary to work with the attorneys and paralegal in the St. Paul office.

Additionally, a one fourth time secretary will be hired in the Willmar office to provide support for that area.

3.44 In-Kind Contributed Staff Time

A significant and important feature of this project will be the additional staff time to be contributed by existing staff of the three organizations. Contributed time will include the equivalent of 2.75 full time attorneys, the equivalent of one full-time paralegal and one full-time secretary. Thus, the total staff

complement for this project will actually be 4.75 attorneys, 3.5 paralegals and 2.25 secretaries.

Additional services, including training, accounting, audit, program development and coordination, and evaluation will also be contributed by the sponsoring organizations.

Through this program structure it is anticipated that approximately 1,000 clients per year will be served through the project, in addition to carrying out extensive outreach and education activities.

3.5 Project Timetable

The project's time frame, as suggested and imposed by the provisions of the new law itself, is as follows:

3.51 0 to 6 months

Extensive and intensive community education to include community meetings, workshops, publications and media coverage, to acquaint the community with the new law, its effects and the time frames imposed by the law. There will also be close monitoring of the regulation promulgation process in order to provide comments and input prior to the issuance of final regulations which will govern implementation of the law. Client intake and processing of applications will begin.

3.52 Months 7 through 18

Continued outreach and community education as needed. Major focus will be on actual processing of legalization cases. Monitoring of employer sanction provisions and immigration-related employment discrimination will become more intensive.

3.53 Months 19 through 36

Follow-up community education, more intense monitoring of employer sanction problems and immigration-related employment discrimination. It will be necessary to continue work on and advocacy for those large number of cases filed within the deadline, which have not yet been acted upon. This period of time will include appeals on legalization cases, discrimination appeals and the development of issues that may require impact litigation to resolve.

Each phase of the project will have a major emphasis as described above. However, there necessarily will be on-going work in all areas during all phases of the project as inquiries received to date reflect questions and concerns addressed by all project priorities.

4.0 Project Sponsors

Southern Minnesota Regional Legal Services

Southern Minnesota Regional Legal Services, Inc. (SMRLS) provides legal advice and representation to low-income residents of 33 counties in southern Minnesota through offices in St. Paul, Carver, Mankato, Winona, Albert Lea, Worthington, and the Administrative/Program Support Office in St. Paul. Each office also has a senior citizens project.

SMRLS also provides services to migrant farmworkers throughout Minnesota and North Dakota. Additionally, it maintains the Oficina Legal in St. Paul's westside community, providing legal services to low-income Hispanics. SMRLS also uses a number of circuit-riding and "growing season" offices throughout Minnesota.

An additional outreach office is located in the American Indian Center in St. Paul. Special efforts to address unmet needs have been made by securing funding for SMRLS' family law and farm law projects.

Two statewide legal services projects, the Minnesota Legal Services Coalition and the Legal Services Advocacy Project, are housed in the SMRLS offices in St. Paul.

SMRLS closes about 10,500 cases annually, including five (successful) class actions in 1985, benefiting approximately 31,500 persons, as well as engaging in significant community advocacy efforts.

Approximately 70% of SMRLS clients are women, 15.7% are minority group members, and 25% are senior citizens.

SMRLS currently employs 38 attorneys, 19 paralegals, and 23 administrative and support staff.

SMRLS has strong working relationships with local bar associations, attorneys, and client groups, and has enlisted approximately 720 private practitioners in its volunteer attorney programs administered locally out of each SMRLS branch office. SMRLS also works with the 3M Corporation in Minnesota's first corporate pro-bono program.

SMRLS will act as the grantee on this project and will assume responsibility for program coordination, grants management, accounting, audit, evaluation and other administrative services.

Mid-Minnesota Assistance

Mid-Minnesota Legal Assistance (MMLA) provides legal advice and representation to low-income clients in twenty counties in central Minnesota, through offices in Minneapolis (3), St. Cloud, Little Falls, Cambridge, Willmar and Marshall. Efforts to increase access for especially disadvantaged clients have been made by securing funding for senior citizens projects, the Community Legal Education project, the Legal Advocacy Project for Hearing Impaired Persons, the Mental Health Advocacy Project, Legal Advocacy for Developmentally Disabled Persons, and the Family Farm Law Project.

MMLA closed 13,500 cases in 1985. Approximately 70% of MMLA clients are women, 15% are minority group members and 27% are senior citizens.

MMLA currently employs 49 attorneys and 20 paralegals as well as 40 administrative and support staff.

MMLA enjoys strong support from local bar associations, law firms and client groups. The local 1,000-lawyer volunteer program in Hennepin county has had a referral relationship with the Legal Aid Society of Minneapolis for over 16 years. In addition, approximately 235 attorneys participate in the MMLA volunteer attorney program administered by its local offices.

Centro Legal

Centro Legal was incorporated in August 1981, as a non-profit community law office. The goals are:

1. To provide bilingual legal representation to low-income persons in individual cases;
2. To provide community Legal education programs and literature for low-income Hispanics on issues that have a significant impact on their well being; and
3. To provide advocacy, and if need be, develop impact litigation in areas that affect the Hispanic community.

Currently Centro Legal provides civil legal services to Hispanics in the state of Minnesota, with the largest number residing in the Twin Cities. The services include:

Immigration - where the Immigration and Naturalization Service (INS) or other institutional practices have potential discriminatory impact on Hispanics and lead to a denial of constitutional rights;

Family Law - priority is given to children, monolingual spanish speakers, immigration implications, paternity, support modifications and post dissolution matters; and

Community Legal Education - preventive law education is an approach used at Centro Legal, both to assist the community to avoid legal problems as well as to reduce to need for direct individual service work in a particular area of law.

Centro clients include those individuals unable to use existing legal service programs due to language barriers and/or not eligible for federally funded legal services (i.e., MMLA or SMRLS) due to federal guidelines and restrictions.

Centro Legal presently has two offices, one in St. Paul and the other in Minneapolis. Individuals can call or walk in to either office. Criteria for eligibility for services from Centro Legal include income, family size, type of legal matter and caseload.

Services

Centro Legal presently has two offices, one in St. Paul and the other in Minneapolis. Individuals can call or walk in to either office. Criteria for eligibility for services from Centro Legal include: income, family size, type of legal matter and

caseload. Centro Legal has two attorneys, one paralegal and three support staff. It also has one part time volunteer attorney and one part time volunteer law clerk. 70% of Centro's clients are Hispanic, 30% other minorities. Centro has served 611 people in 1986.

JOINT BUDGET
IMMIGRATION REFORM PROJECT

	<u>Year 1</u>	<u>Year 2</u>	<u>Year 3</u>	<u>Total</u>
STAFF	\$99,125	\$105,640	\$112,508	\$317,273
Attorney----2 FTE	43,400	46,050	48,881	
Paralegals--2.50 FTE	37,500	40,000	42,500	
Secretaries-1.25 FTE	16,065	17,300	18,700	
Law Clerk---0.25 FTE	2,160	2,290	2,427	
FRINGE BENEFITS @17% includes FICA, health, workman's comp, unemployment comp, malpractice insurance	16,484	17,569	18,714	52,767
TRAVEL @2,000 mi pr mo.	5,000	5,000	5,000	15,000
OCCUPANCY	3,000	3,200	3,500	9,700
TELEPHONE	5,800	5,800	5,800	17,400
COPYING, SUPPLIES, AND EQUIPMENT	2,000	2,000	2,000	6,000
LITIGATION, TRAINING AND OTHER COSTS	13,141	13,921	14,752	41,814
<u>TOTAL FOUNDATION CONTRIBUTIONS</u>	<u>144,550</u>	<u>153,130</u>	<u>162,274</u>	<u>459,954</u>
<u>IN-KIND CONTRIBUTED COSTS</u>				
STAFF	127,190	134,028	140,673	401,891
Attorneys---3.25 FTE	87,240	91,401	95,540	
Paralegals--1.25 FTE	22,700	24,182	25,481	
Secretaries-1.25 FTE	17,250	18,445	19,652	
FRINGE BENEFITS	21,622	22,784	23,914	68,320
OCCUPANCY	7,400	7,400	7,500	22,300
COPYING, SUPPLIES, AND EQUIPMENT	6,500	6,500	6,500	19,500
ADMINISTRATION Includes supervision, training, accounting, audit and other services	16,500	16,500	16,500	49,500
<u>TOTAL IN-KIND CONTRIBUTIONS</u>	<u>179,212</u>	<u>187,212</u>	<u>195,087</u>	<u>561,511</u>
<u>TOTAL PROJECT COST</u>	<u>\$323,762</u>	<u>\$340,342</u>	<u>\$357,361</u>	<u>\$1,021,465</u>