

A REPORT OF THE  
**Chicago Law Enforcement  
Study Group**

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The Chicago Law Enforcement Study Group is a joint research project of the Center for Urban Affairs of Northwestern University and the Alliance to End Repression, American Civil Liberties Union, Businessmen for the Public Interest, Chicago Commons Association, Chicago Council of Lawyers, Chicago Urban League, Community Legal Council, Community Renewal Society, Lawyers Committee for Civil Rights Under Law, Leadership Resource Program, Legal Aid Bureau of United Churches of Chicago and the Roger Baldwin Foundation of the ACLU.

8/5/75

The Administration of Law Enforcement Assistance

Administration Grants in Illinois

1969-1971

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## Forward

The awarding of grants by the Law Enforcement Assistance Administration of The Department of Justice is the federal government's major tool for combatting crime in America. This study seeks to examine the conduit for these grants in Illinois, the Illinois Law Enforcement Commission. Two questions are examined in detail. First, how are the grants allocated among the components of the criminal justice system? Second, how can private agencies utilize the grants to take an active and innovative role in coping with crime and its related social problems?

The information for this study was obtained from the Illinois Law Enforcement Commission through interviews with staff members and Commissioners on the State and local levels, analysis of ILEC statistics, examination of ILEC application files, and observation of official meetings. The author wishes to thank the staff of ILEC for their cooperation.

## Legislative Mandate

### Philosophy

Recognizing that "Crime is essentially a local problem that must be dealt with by State and local governments," the Federal Government instituted its major crime control efforts through Title I of the Omnibus Crime Control and Safe Streets Act of 1968 (Public Law 90-351). The Safe Streets Act was originally written by the Johnson Administration to carry out the recommendations of the President's Commission on Law Enforcement and the Administration of Justice. The final bill generally reflected the views of its principal sponsors: Senators Eastland, McClellan, and Thurmond.

The bill generally limits the Federal Government's role in fighting crime to dispensing block grants to the State governments that, in turn, dispense the money according to their own priorities. Cities apply for grants from their State government, rather than directly to Federal agencies as is usually the case. This block grant concept goes the farthest of any Federal program in shifting power away from Washington by sharing revenues with the States.

The Safe Streets Act intends that each State evaluate the long range needs of law enforcement and proceed to assist public law enforcement agencies in meeting those goals. The bill lists seven categories of aid: public protection, recruitment and training, public education, construction of facilities, combating organized crime, riot control, and improvement of police-community relations.

The Act did not specify whether "law enforcement agencies" means only police or includes all the elements of the criminal justice system.

A January, 1971 amendment to the Safe Streets Act insured an expanded view of the program by specifically authorizing grants for community-based delinquency prevention programs and rehabilitation centers (Sec. 301 (b) (9)). Another addition to the Act (Part E) provided for the construction and implementation of correctional facilities and programs. Under this broadened definition the Act seeks to use State administrators to strengthen and improve all aspects of a comprehensive criminal justice system.

#### Structure of the Grant Process

The grant process authorized by the Safe Streets Act serves to give most discretion to the States while maintaining a strong executive oversight by the Federal Government. Responsibility for dispensing funds is given to the Law Enforcement Assistance Administration, an agency of the Department of Justice. Grants for research are to be distributed by a separate agency, the National Institute of Law Enforcement and Criminal Justice. (See chart I, following page for flow chart of LEAA grants.)

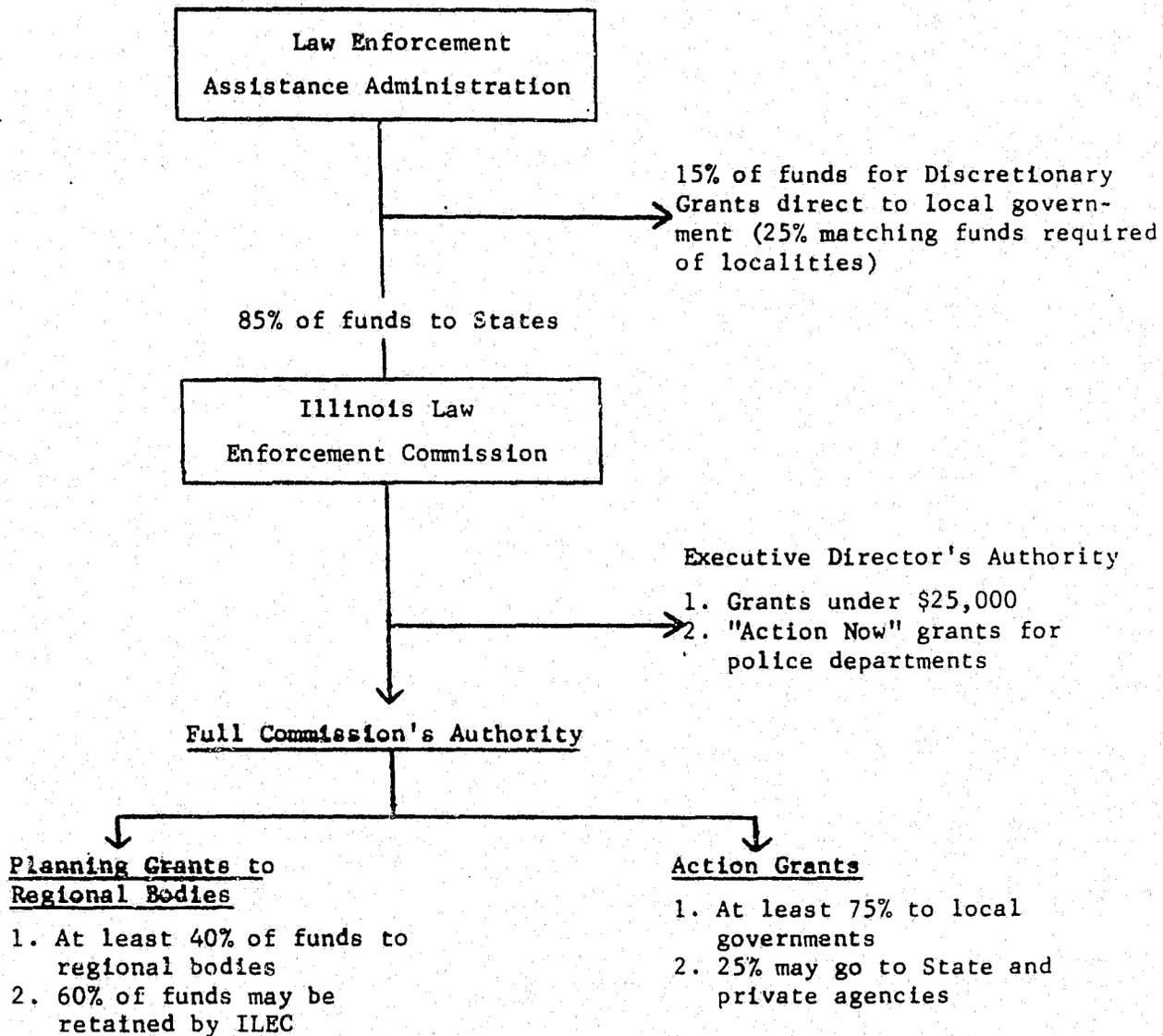
Of all funds available for grants, 15% is to be disbursed directly from LEAA to local governments in the form of "Discretionary Grants." There are no legal guidelines prescribed for the allocation of this direct federal local assistance.

LEAA is to make two block grants to the State planning agencies (SPA's) designated by the Governors of the respective States.

The first is a planning grant for funding the SPA's. Each state is awarded \$100,000 plus an award determined by population. To receive this grant, the State Planning Agency is required annually to present LEAA

Chart I

Flow Chart of Law Enforcement Assistance Administration  
Grants to Local Governments



"a comprehensive statewide plan for the improvement of law enforcement" (Sec. 203 (b)). At least 40% of the State's grant must then be passed on to local units of government to assist in planning.

The second block grant is given to the SPA's to be allocated to local units. Several Federal conditions controlling allocations of these "Action grants" are particularly important.

First, the State must allocate 75% of the block grants to "units of local government or combinations of such units" (Sec. 303 (2)), as opposed to private or State agencies.

Second, amendments stipulate that the SPA's grant can only be 75% of the grant project's total budget. In other words, the grantee must provide at least 25% of the project cost.

Third, no more than one-third of any grant can go for personnel, unless they are involved in training programs or "engaged in research, development, demonstration, or other short-term projects" (Sec. 301 (d)).

### Grant Process in Illinois

#### Structure and Procedure

Established by Governor Ogilvie's Executive Order No. 1, the Illinois Law Enforcement Commission (ILEC) was one of the first State Planning Agencies to receive its block grants under the new law. In 1969, the SPA received \$7.5 million from the State legislature. This State support has annually decreased to \$4.6 million in 1972.

ILEC presently has a structure of twenty-one regional committees, including the Chicago Committee on Criminal Justice with jurisdiction for the city of Chicago and the Cook County Committee on Criminal Justice which is responsible

for all suburban areas of the County. The other nineteen regions generally incorporate clusters of counties.

The operations of the regional committees are largely funded by ILEC planning grants. It is the responsibility of each region to develop its own comprehensive plan for solving criminal justice problems, and to recommend actual grant applications to ILEC.

An applicant for a grant which does not involve a statewide program normally applies first to the local regional committee. Exceptions to this process will be discussed in relation to private grant applications.

In Chicago, grant proposals are reviewed first by the staff of the Chicago Committee on Criminal Justice, secondly by a relevant subcommittee of Committee members (standing committees on Police, Courts, etc.), and thirdly by the full Committee where the application is either recommended favorably or negatively to ILEC.

It is important to note that the regional committees, although created by ILEC, are given no real power. Even if the region advises against a grant, the application still proceeds to ILEC where it is given full consideration. When a grant is finally awarded, the regional committee neither disburses the money nor audits its use.

Once a grant proposal reaches ILEC, it is processed in a manner similar to that of the Chicago region. Almost all the actual "work" of the Commission is done by the staff and standing committees. Each application is reviewed by a staff specialist and then examined by a meeting of the entire executive staff. The most important review occurs in the Standing Committee where Commission members who are professionally interested in the subject area make the final recommendation to the full Commission. Approval at the

bi-monthly Commission meeting is usually perfunctory. At a typical Commission meeting, only four or five grants are actually reviewed in detail although a package of twenty grants may be approved.

There are two circumstances in which the normal review process does not occur. First, a grant for less than \$25,000 can be approved directly by the Commission's Executive Director. Second, an entire grant program, called Project Action Now, also allows approval by the Executive Director without review by the Commission. These grants can be up to \$10,000 or 10% of a police department's budget. The program is designed solely for police departments and gives grants only for police management studies, police-community relations, training, and equipment.

ILEC also recommends Discretionary Grant applications to LEAA, but is not involved in the final decision.

ILEC has attempted to fulfill the intent of the Safe Streets Act by relying carefully on the State Comprehensive Plan (copies of the State Plan are available for review in Regional Offices). The completed State plan for 1971 includes not only categories of aid, such as corrections or courts, but also specific grants which the Commission would like to fund. Theoretically, all Action grants and Project Action Now grants awarded in Illinois each year were envisioned in that year's plan. Occasionally, unforeseen grants are funded after an amendment to the plan is approved by LEAA. Therefore, the most important decision in rewarding or rejecting a grant is usually its harmony with, if not specific mention in, the State Plan.

In developing the State plan, ILEC theoretically integrates the plans of the twenty-one regions. In practice, however, the State plan reflects the priorities of ILEC rather than the regional plans. In effect, ILEC assumes two roles. The primary role is to define specific grant areas and then search for applicants. In this function the Comprehensive Plan becomes a menu from which applicants select enticing entrees. The secondary role is to finance projects that the applicants themselves have devised. In this less common function, the State plan is occasionally stretched or amended to allow for grants attractive to ILEC.

#### Commission Members

Although most decision-making occurs in State Commission staff meetings, the thirty-one Commissioners have the potential power to decide all policy, including approval of each individual grant. The members of ILEC are appointed to unlimited terms by the Governor and are only compensated for travel expenses. The Safe Streets Act specifies only that members of planning units be "representative of the law enforcement agencies, units of general local government, and public agencies maintaining programs to reduce and control crime" (Sec. 203 (a)). There is no requirement for non-public, community or minority groups representation. (see Table I, following page)

TABLE I

Composition of the Illinois Law Enforcement Commission

<u>City Officials</u>	<u>Law Enforcement</u>	<u>Other Public Agencies</u>	<u>Private</u>
W.F. Browning City Manager, Champaign	H.D. Brown Dir., Dept. Law Enforc.	M.E. Begg Dir., Chicago Corrections Division	S.J. Adler, Dir., Youth Guidance
B.G. Cunningham President, Park Forest	J.B. Conlisk Supt. Chicago Police	P.B. Bensinger, Dir. Dept. Corrections	<u>H. Lopez</u> Attorney
W.B. Dunbar Mayor of Zion	E.V. Hanrahan State's Atty., Cook County	W.F. Brissenden, Chr. State Comm. on Children	G.B. Peters, Pres., Aurora Metal Co.
W.L. Waldmeier Mayor of Pekin	J.T. McGuire Supt. State Police	G.W. Getty, Public Defender of Cook Cnty.	<u>M.A. Pettis</u> John Deere Co.
	D.E. Peterson Chief, Rockford P.D.	A.V. Huffman State Criminalogist	J.J. Sullivan Attorney
	D. O'Neal Sheriff St. Clair County	J.M. Jordon, Supt. Audy Home	M. Wexler Attorney
	W. Cowlin State's Atty., McHenry Cnty.	B.S. Meeker, Chief U.S. Probation Officer	
	J. Flaum, Asst. Attorney General	<u>W.E. Moore</u> , Supt. Cook County Jail	
	<u>W. Dye</u> East St. Louis P.D.	J.P. O'Brien, Dir. Court Services, Cook County	
		D.J. Roberts Circuit Courts	
		A.J. Bilek Chr., ILEC	

Underlined names are members of minority groups  
(Black or Spanish-speaking).

The ILEC includes nearly all the officials who direct the agencies of Illinois' system of criminal justice. From Chicago, Republican Governor Ogilvie has appointed Police Superintendent James Conlisk, State's Attorney Edward Hanrahan, Public Defender Gerald Getty, and Cook County Jail Superintendent Winston Moore. In addition to the top Chicago officials, the Commission includes the head of the State Police (McGuire), the State Department of Corrections (Bensinger), the Department of Law Enforcement (Brown), and the Director of the Administrative Office of the Illinois Courts (Gulley). Therefore, the ILEC's function frequently becomes one of dividing federal funds among the Commissioners' own agencies. Even the largest grants to private agencies have gone to the state professional associations of State's Attorneys and Public Defenders. Therefore, conflict among Commission members might be expected over issues of fund allocation within the criminal justice system, i.e., how much money in the State plan for each jurisdiction and agency. In fact, this competition for funds among officials accounts for most of the controversy at ILEC meetings.

Table I demonstrates that the great majority of Commission members are public officials. A majority head agencies eligible for ILEC grants. Private representatives compose only 20% of the Commission and only one, Seymour Adler, represents a private agency which might receive ILEC funds. Four members of minority groups have been appointed, comprising about 13% of the Commission's membership.

Although all ILEC meetings are open to the public, meetings are not publicized and participation is not actively encouraged. By intention and practice, decisions are made by criminal justice professionals on the Commission and staff.

The staff members of the Commission are appointed by the Executive Director but serve at the pleasure of the Governor. Experienced experts in each field have been hired in each area of criminal justice.

The Chicago and Cook County regional committees are patterned after ILEC. Although no statutory guidelines exist for the membership or operation of the committees, they have generally followed ILEC's example in appointing criminal justice professionals.

All members of the Chicago Committee on Criminal Justice are appointed by the Mayor of Chicago. (See Table 2, following page) The Chicago Committee differs in membership from ILEC in that it has fewer law enforcement personnel and more (non-enforcement) City officials than ILEC has State officials. With one more private representative than ILEC, public members comprise about 77% of the committee. Minority members account for about 23% of the total Committee. Although the Chicago staff members do not write applications, they will provide assistance and advice to grant applicants. The staff members are appointed by authority of the Mayor.

Members of the Cook County Committee on Criminal Justice are appointed by the President of the Cook County Board. (See Table 3, page 13) The Committee membership is evenly divided between County and suburban public officials, lawmen, and other criminal justice officials. The three private representatives make up about 14% of the Committee. There is one minority group member.

Private criminal justice experts are rarely appointed. There is one on the Cook County Committee (Hans Mattick), none on the Chicago Committee, and one on the State Commission (Seymour Adler).

TABLE 2

Composition of the Chicago Committee on Criminal Justice\*

<u>City and County</u>		<u>Law Enforcement</u>	<u>Other Public Agencies</u>	<u>Private</u>
R. Devine, Administrative Asst. to the Mayor	L.W. Hill, Commissioner, Development and Planning	C.B. Carey, Asst. Dir., Dept. Law Enforcement	P.B. Bensinger, Dir., State Dept. of Corrections	T. Coulter, Chief Exec. Officer, Chicago Assoc. of Commerce and Industry
<u>E. France</u> , Administrative Asst. to the Mayor	<u>W.F. Moore</u> , Supt. Cook County Jail	R.L. Currey, Chicago Corporation Counsel	S.C. Bernstein, Dir., Ill. Bureau of Employment	M. Findley, Amalgamated Clothing Workers of America
D. Stahl, Mayor's Administrative Officer	J.F. Redmond, Supt. Board of Education	R. Quinn, National Guard	B.S. Meeker, Chief U.S. Probation Officer	<u>A. Griffin</u> , Rev., Mozart Baptist Church
M.E. Begg, Dir, Corrections Div.	O. Shabat, Chancellor, Chicago City College	R. Elrod, Sheriff, Cook County	<u>A.L. Smith</u> , Vice-Chr., Model Interim Counsel, Model Cities	J.B. Meegan, Exec. Secretary, Back of the Yards Council
J.S. Boyle, Chief Judge, Circuit court of Cook	M.C. Brown, Commissioner, Board of Health	J.B. Conlisk, Supt., Chicago Police	P.K. Snyder, Exec. Dir., Chicago Alcoholic Treatment Center	<u>S. Rivera</u> , Attorney
<u>D.J. Brooks, Jr.</u> , Commissioner, Human Resources	E.L. Wachowski, Circuit court, of Cook			J.J. Sullivan Attorney
G.W. Getty, Public Defender of Cook County				<u>R. Thomas</u> , Chr., South Side NAACP

\* Underlined names are members of minority groups (Black or Spanish Speaking).

TABLE 3

Composition of the Cook County Committee on Criminal Justice

<u>County Bd. &amp; Suburban</u>	<u>Law Enforcement</u>	<u>Other Public Agencies</u>	<u>Private</u>
C. Cohen, Administrative Asst. to County Board President	C. Emrikson, Chief, Niles Police	G.W. Getty, Public Defender, Cook County	P. Benton, John Hancock Mutual Life Insurance Co.
F. Dumke, President Oak Lawn	W.I. Hamby, Chief, Park Forest Police	J.M. Jordon, Supt., Cook County Audy Home	H. Fageron
W.N. Erickson, member, County Board of Commissioners	E.V. Hanrahan, State's Atty. of Cook County	P. Duel, Administrative Asst. to Cook Cnty. Circuit Court Clerk	H.W. Mattick, Dir., Center for Studies of Criminal Justice, University of Chicago
C.J. Grupp Jr., member Cook County Board of Commissioners	<u>W. Logan</u> , Evanston Police	W.D. Meyering, Chief Probation Officer, Cook County	
J.D. Pahl, President, Elk Grove	R. Elrod, Sheriff, Cook County	R. Napoli, Office of the Chief Judge, Circuit Court of Cook County	
G.W. Shea, State Representative	A.R. Yucecius, Cook County Sheriff's Police		

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Underlined names are members of minority groups (Black or Spanish-speaking).

The Cook County Committee's operations are similar to those of Chicago. By agreement with the Chicago Committee, Cook County only considers applications from those agencies or organizations who operate wholly outside the City of Chicago. Therefore, an agency like the Cook County Courts would fall under the jurisdiction of the Chicago Committee since all of its operations are not outside the City.

The staff of the Cook County Committee is hired by the Executive Director, in the name of the County Board President.

Characteristics of Approved Grants

Three ILEC grant patterns will be considered in this section: the allocations by functional categories, the amount given specifically for police equipment, and the percentage of all grants allocated to the city of Chicago.

Functional Categories

Broad categories of aid involve grants to police, corrections, and courts.

TABLE 4

Breakdown of all Grants Awarded by Category July 1969-June 30, 1971\*

<u>Category</u>	<u>Amount</u>	<u>Percentage of Total</u>
Police @	\$18,707,000	62.2
Corrections	\$ 5,986,000	19.8
Courts	\$ 3,442,000	11.4
Other#	\$ 1,995,000	6.6
<hr/>	<hr/>	<hr/>
TOTAL AWARD:	\$30,130,000	100.0

\* These include all Project Action Now, and Action grant awards.  
@"Police" includes training and community relations programs.  
#"Other" includes programs not classifiable in the above categories, including drug abuse and juvenile delinquency prevention grants.

Source: prepared by the Illinois Law Enforcement Commission

It should be noted that Table 4 identifies grants given for approximately two years, thus ignoring new trends which may soon take effect. Three recent developments may change grant trends in the near future.

First, the 1971 Amendments to the Safe Streets Act provide for specific and new block grants solely for corrections. In the first six months of 1971, ILEC "Financial Reports and Action Grant Listings" show that about 25% of all grants awarded have gone for corrections.

Second, Governor Ogilvie has pledged that ILEC will grant \$10 million for courts over the next three years. While the attainment of this figure is unlikely, proposed budget revisions indicate a desire to increase allocations significantly in this area.

Third, grants for juvenile delinquency, which come from the Department of Health, Education and Welfare, have increased dramatically in 1971.

#### Police Equipment

A more specific consideration concerns how much money has been allocated for the purchase and construction of police equipment and facilities. (See Table 5, following page)

Table 5 indicates that about 48% of ILEC PAN and Action grant funds have been spent for police equipment. A comparison of Table 4 and 5 shows that about 77% of all expenditures for police have been used for equipment. The remaining 23% of police expenditures was divided between training, community relations, police cadet programs, management studies, and other programs. ILEC grant lists show that police-community relations programs received about 8% of all police awards.

Why was the police equipment component of ILEC's plan favored? Several reasons explain this emphasis.

TABLE 5

ILEC Grants for Police Equipment July 1969-June 30, 1971

	Amount	Percentage of each type grant
<u>Project Action Now Grants</u>		
PAN Grants for Equipment*	\$3,786,000	71.9
Total PAN Grants	\$5,265,000	100.0
<u>Action Grants</u>		
Action Grants for Police Equipment**	\$10,658,000	42.8
Total Action Grants	\$24,865,000	100.0
<u>All Grants (PAN and Action)</u>		
All grants for Police Equipment	\$14,444,000	47.9
Total All Grants	\$30,130,000	100.0

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Source: Illinois Law Enforcement Commission, "Financial Reports and Action Grant Listings June 30, 1971"; and Illinois Law Enforcement Commission, "Status of 'PAN' Proposals."

\*"Equipment" is a category of PAN grants. It includes communications, vehicles, and other equipment for police department.

\*\*"Police Equipment" was designated as communications equipment and systems, construction and remodeling of police facilities, and the purchase of vehicles or other implements. Police training and any programs involving personnel were excluded.

First, it was felt that the physical upgrading of most Illinois police departments was a prerequisite to more advanced reforms involving the improvement of police personnel.

Second, the immediate flow of equipment grants would establish contacts and confidence with Illinois policemen which might later lead to their acceptance of more innovative programs.

Third, equipment grants are easier to apply for than grants involving personnel. ILEC grants are intended only as "seed money," rather than for continual funding. With a human resources program, the grantee risks developing a program that could fail after one or two years because the local government will not pick up the funding. Also, applying for a grant involving people is much more difficult because of the problems of hiring individuals in advance with no guarantee of receiving funds. All these factors stimulate the short form, one-shot grant for the purchase of equipment.

Fourth, the statutory limitation allowing only 1/3 of the funds for personnel promoted an equipment emphasis.

It is important to note that the statistics in Tables 4 and 5 cover a two year period and may not accurately indicate current patterns or predict future trends. In an agency as young as ILEC, patterns of operation can change rapidly. Several recent developments may cause a shift in emphasis. As already noted, larger grants are expected to be devoted to courts, corrections, and juvenile delinquency. There is also a widespread sentiment among the staff that the time has come for a greater concentration on human resources. The staff's proposed budget for 1972 reflects this desire to spread out the available money more evenly throughout the criminal justice field (see Appendix A). Whether this shift in emphasis will be accepted by the Commissioners is yet to be determined.

Chicago Grants

The City is reported to have over half the State's violent crime. Therefore, it would seem important for ILEC to grant Chicago a significant amount of its funds.

The exact percentage of ILEC grants that benefit Chicago is impossible to determine. Many grants are for statewide agencies such as prisons, which, though not located in Chicago, certainly serve the City's system of criminal justice.

ILEC has no guidelines for dividing funds between regions (except in PAN grants where Chicago is now entitled to 50%). Criteria such as population and crime rate have not been used as factors in determining fund allocation.

TABLE 6

All Grants to the City of Chicago By Date\*

	<u>To Chicago</u>	<u>To All Other Regions</u>	<u>Total to Regions</u>
<u>July '69-June '71</u>			
Amount	\$7,661,000	\$21,655,000	\$29,316,000
Percentage of total grants to regions	2.61	73.9	100.0
<u>Jan. 1-June 30, '71</u>			
Amount	\$3,339,000	\$3,883,000	\$7,282,000
Percentage of all grants	46.7	53.3	100.0

Source: prepared by the Illinois Law Enforcement Commission

\* "All Grants" means Planning, Project Action Now, Action, and Discretionary grants.

As Table 6 indicates, of all grants that were given to local regions since the founding of ILEC, Chicago received approximately 26% of the total. This figure is below Chicago's share of the reported population (30%) and well below the reported violent crime (53%). However, these statistics are deceptive. The Chicago Committee on Criminal Justice was the last region in the State to become operational. Since the Committee did not actively try for grants until May of 1970, it naturally fared poorly in comparison to other regions since they had been receiving grants for almost a year.

In the past year, Chicago has had a high percentage of grants approved. Its share of local grants from January 1 to June 30, 1971 has been about 47% (see Table 6).

#### Grants to Private Agencies

The relationship of private agencies to ILEC can be examined by considering the barriers to funding, alternative strategies for private agencies, and finally, the type of private applications that are approved.

#### Barriers to Private Agency Funding

The central barrier to private participation in the Safe Streets Act is simply that their participation was not envisioned by the Act's sponsors. Therefore, any efforts by ILEC in this direction must overcome the barriers inherent in the legislation. The greatest difficulty is the legislation's limitations upon the amount of money available to private agencies. The Safe Streets Act requires the SPA to pass on 75% of its funds to units of local government. This leaves 25% to be competed for by State and private agencies. Because the great majority of ILEC members are state and local public officials, private agencies should not be surprised when ILEC members divide the grants

among their own public agencies.

The struggle for the State-private 25% is exacerbated by two ILEC policies. The first is the Commission's emphasis on comprehensive statewide programs. Jurisdictionally, most State agencies are better prepared to meet this criteria than private agencies which tend to operate within limited geographic areas.

Secondly, where a program could be carried out by a private or State agency, ILEC often tends to favor the latter. ILEC staff members reason that the public agencies would not be encouraged to improve their service if their shortcomings were continually met by private organizations.

Since only one representative of a private agency sits on the State Commission, it is extremely difficult for private agencies to influence ILEC's Comprehensive Plan.

Private agencies will not find advocates in the Federal Government. A Federal regional official of LEAA indicated, in an interview, that accountability is difficult with private organizations and therefore, LEAA does not encourage grants to non-public groups.

Another barrier to private groups is the Safe Streets Act's requirement that only one-third of a grant can go for hiring personnel. This stipulation has a special effect upon private agencies because their proposed programs invariably deal with human resources. However, the 1971 Amendments to the safe Streets act ameliorated this restriction by making it inapplicable to personnel engaged in training programs, research, development, demonstration, or other short-term programs. Although this provision enables research and training grants, ILEC still finds the personnel limitation a problem since most private agencies seek to start long-term programs.

Another serious barrier to private participation is the temporary nature of ILEC funds. The Commission's philosophy is that funding for one or two years should be long enough for a program to prove its merit. Theoretically, if a program is successful, it will attract funding from local governments or foundations. If a program is not successful, it does not deserve further financing. For the private agency, this policy often presents a dilemma. If further funding cannot be obtained, the agency has wasted precious resources. Often, one or two years is not long enough to establish the success of programs like half-way houses which seek to rehabilitate individuals. ILEC short-term funding may confront the private agency with the necessity to cutback on existing programs in order to sustain the new ILEC funded program or allow the new program to wither on the vine.

The most common reason for rejecting private agency grant applications is that they do not fit within the State's Comprehensive Plan. Although this can be used as an excuse by ILEC for rejecting unwanted applications, it is apparent that many private grants were simply not envisioned in the Comprehensive Plan. Frequently, these project proposals are only tangential to criminal justice (e.g. a settlement house), or are specific projects that were not planned for by ILEC. Nevertheless, if the ILEC staff becomes interested in an unforeseen project, it can often fund the project in two ways. First, it can advise the applicant to restructure his project to conform more closely with a project suggested in the plan. Secondly, ILEC can obtain amendments to the State Plan from LEAA, as was done in the case of a \$169,000 grant for an Intern-at-Law project.

### Approaches for Private Agencies

Private agencies can develop a co-application with local government agencies. This partnership allows the private agencies to receive funds designated for the 75% share to local governments. Co-application is favored by ILEC because it provides accountability to local governments. The local government is given the responsibility of overseeing the use of the private agency's funds. In effect, the public agency is subcontracting with the private organization for the performance of a service. This method of application is often accomplished in Chicago by private agency partnerships with Chicago's Department of Human Resources. ILEC prefers this type of application from private agencies.

A much less common alternative is to obtain a waiver from a local government. This waiver means that a particular city subtracts the amount of a particular grant from the 75% of funds that was originally available to local governmental units. Since few cities or public agencies are anxious to decrease their possible funds, this method is rarely used successfully.

When a private agency cannot obtain an amendment to the State Plan for a project unforseen by ILEC, it may be able to obtain a Discretionary Grant. Distributed directly from Washington, Discretionary Grants are given according to a plan written by LEAA (Guide for Discretionary Grant Programs, Fiscal Year 1971) which seeks to fund important programs the States may neglect. These grants are intended for public agencies but may go to private agencies through co-application. The Chicago Traveler's Aid Society has obtained two grants for its "Looking Glass" program for runaways in this manner.

Another remedy may assist private agencies that cannot raise the 25% matching money required to receive most grants. The agency may make an "in kind" match such as office space, furniture, equipment, or personnel.

Type of Grants Awarded

Despite the numerous obstacles to private agencies, ILEC has been successful in funding several innovative private programs. It is impossible to define the characteristics of those private agency applications which have been rejected because of their extreme diversity. There are, however, several broad elements that many approved applications have in common.

TABLE 7

Proposed Federal Grants Potentially Available to Private Agencies in Fiscal Year 1971\*

<u>Project</u>	<u>Intended Applicant</u>	<u>Number of Grants</u>	<u>Amount</u>
Drug abuse treatment	Gateway House	1	\$ 75,000
Half-way houses	Public or Private agencies	3	\$50-70,000
Juvenile group homes	Public or Private agencies	Several	\$35-70,000
Public education material distribution	Public or Private agencies	2 or more	\$ 100,000 total

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Source: Illinois Law Enforcement Commission, "The Criminal Justice Plan for Illinois, 1971."

\*This list excludes grants for research and law revision, most of which are given to universities.

Table 7 is a list of proposed grants that might go to private agencies. The "intended applicants" are those agencies which ILEC believes are appropriate to carry out the Commission's proposed programs. In three of the four grant areas, the award could go to either private or public agencies, depending on which appears best able to perform effectively. If all these grants from the

Comprehensive Plan were funded to private agencies in the largest proposed amount, about \$600,000 might be allocated.

It should be kept in mind that Table 7 is not inclusive of all grants that can or will be funded to private agencies. For example, the Table specifically excludes grants for training and research.

Private grants tend to go to those agencies dealing with problems which public agencies have neglected. These areas usually deal with rehabilitation and guidance of criminals and juvenile delinquents. Typical projects are half-way houses, school counseling, and drug abuse programs.

Another category of applications approved for private groups involves research projects. These proposals are usually undertaken by universities, professional associations, or private research organizations. ILEC is particularly anxious to fund research projects that investigate a specific problem area and then offer recommendations. The 1971 Comprehensive Plan calls for one to three research projects of \$15,000 each with no matching requirements. Suggested topics include the bail process, drug abuse, and police-community relations programs. Research applications are usually received directly by ILEC rather than through the regions.

The final characteristic of approved private proposals is the well-established nature of the agency's programs. Instead of creating new programs with their seed money, ILEC grants tend to favor proven agencies that already have a proven record of success. Examples are Traveler's Aid, Gateway House, Chicago Opportunities Industrialization Center, and Youth Guidance. ILEC grants often use these well-established agencies to expand and innovate programs already in existence.

Although this trend seems to compromise ILEC's policy of providing seed money for new programs, two factors may explain the pattern. First, better organized agencies are likely to be skilled in "grantsmanship." If their applications are better prepared, they are more likely to be approved. Second, ILEC prefers organizations with a history of success. The Commission can then be assured of capable personnel and effective practices.

Although the history of private agency participation in the Safe Streets Act has been slight, prospective applicants should be encouraged to bid for funds. The guidelines of a young agency such as ILEC are constantly changing in the light of more experience. Any sound idea could eventually be funded and should be discussed with representatives of both ILEC and the appropriate regional committee.

APPENDIX A

Proposed Budget for the 1972 Criminal Justice Plan of Illinois

A. Criminal Justice Personnel Upgrading	\$ 3.0 million
B. Police Function Improvement	5.0
C. Civil Disorder Prevention and Control	0.2
D. Organized Crime Reduction	1.1
E. Court System Improvement and Law Reform	3.0
F. Correctional Services Improvement	3.5
G. Crime Prevention	1.0
H. Science and Technology Utilization	4.0
I. Research and Evaluation	0.5
J. Juvenile Delinquency Prevention and Control	<u>1.0</u>

TOTAL: \$22.3 million

APPENDIX B

Addresses of ILEC and the Chicago and Cook County Regional Committees

Illinois Law Enforcement Commission  
150 N. Wacker Drive  
Chicago, Illinois 60606

Telephone: 793-3393

Executive Director: William  
G. Bohn (Acting)

Chicago Committee on Criminal Justice  
185 N. Wabash Avenue  
Room 1515  
Chicago, Illinois 60601

Telephone: 744-3041

Executive Director: William F.  
Lacy

Cook County Committee on Criminal Justice  
130 N. Wells  
Suite 1519  
Chicago, Illinois 60606

Telephone: 321-8890

Executive Director: James I.  
Gottreich

**END**

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