# NAPABA STRATEGIC PLAN (MASTER) 2012-2015

### **Vision Statement:**

Through the strength, talent, and engagement of our diverse and growing membership,

NAPABA is the preeminent professional development organization and voice for the Asian Pacific American legal community,

and is a leading proponent for justice.

### **NAPABA Mission Statement:**

We are the national voice for the Asian Pacific American legal profession.

We promote justice, equity, and opportunity for Asian Pacific Americans.

We foster professional development, legal scholarship, advocacy, and community involvement.

Goal 1: To grow the NAPABA enterprise and strengthen relationships with our affiliates, committees, and the NAPABA Law Foundation to best serve the interests of the APA legal community.

Strategic Areas	Action Items	Responsible Parties	Milestones	Status
1.1: Promote affiliate development and enhance interaction between affiliates and NAPABA.	1.1.1: Establish guidelines for Regional Governors to enhance affiliate development and interaction with NAPABA, which could include the following:  a. Coordinate meeting between NAPABA EC and affiliate Presidents and Presidents-Elect at each Regional Conference, which will include discussing opportunities for continued leadership in NAPABA,  b. Consider reception for affiliate leaders at NAPABA Annual Convention,  c. Work with VP of Membership to establish formal affiliate mentor partnerships between established affiliates (10+ years) and new affiliates (3 three years or less with NAPABA),  d. Establish standardized template for RGs to report affiliate activity, and a centralized public calendar accessible through the NAPABA website,  e. Encourage affiliate Committee Chairs to be members of the corresponding NAPABA Committee to enhance communication and development,  f. Revamp NAPABA Bar Leadership Institute to NAPABA Affiliate Summit to enhance leader development and to establish relationships among affiliate leaders, and  g. Consider how to coordinate advocacy efforts between NAPABA and affiliates.	RGs (1 RG as lead), 1 At Large Board Member (ALBM), VP of Mem., and VP of Comm.	1.1.1.1: (Feb. 2013) Present guidelines (including new milestones to implement the guidelines) to the NAPABA board for approval.	
	1.1.2: Develop NAPABA Affiliate Tool Kit to facilitate affiliate growth and development, which could include the following:  a. Sample guidelines (e.g., endorsements, nominations and elections, sponsorship, articles of organization, 501c3 applications, website template, etc.), and b. Best practices in programming, fundraising, communications, advocacy, and engagement with law students.	RGs (w/ 1 RG as the lead) and VP of Mem.	<ul> <li>1.1.2.1: (Feb. 2013) Present Toolkit with sample guidelines to the NAPABA Board for approval.</li> <li>1.1.2.2: (June 2013) Distribute Toolkit with sample guidelines to affiliates.</li> <li>1.1.2.3: (Nov. 2013) Present Toolkit with best practices to the NAPABA Board for approval.</li> <li>1.1.2.4: (Feb. 2014) Distribute Toolkit with sample guidelines and best practices to affiliates.</li> <li>1.1.2.5: Repeat 1.1.2.4 yearly for distribution to</li> </ul>	

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Strategic Areas	Action Items	Responsible Parties	Milestones	Status
			new affiliates and to affiliates in existence less than five years.	
	1.1.3: Develop and offer Collaborative Bar Leadership Academy through CBAC and the ABA.	PE (2012, and Pres. 2013; lead) and 1 ALBM.	1.1.3.1. (June 2013) Offer academy to affiliate leaders and committee chairs.	
1.2: Assess alternative membership and affiliate models.	1.2.1: Assess alternative membership models and their value propositions, including direct memberships, centralized membership management, and non-affiliate associate relationships. (See, also, Action Item 1.2.2.)	VP Mem. (lead) and RGs.	1.2.1.1: (Nov. 2012) Assess non-affiliate associate membership, and present summary report with analysis and proposed recommendation to NAPABA Board. 1.2.1.2: (Dec. 2012) Add milestones to implement recommendations. 1.2.1.3: (Nov. 2013) Assess direct membership and centralized membership management, and present summary report with analysis and proposed recommendation to NAPABA Board. (See, also, Action Item 2.2.3.) 1.2.1.4: (Dec. 2013) Add milestones to implement recommendations.	
	1.2.2: Implement a new membership management database/web portal to manage membership information and member-only benefits (e.g., job postings). (See, also, Action Item 1.2.1 (centralized membership management) and Action Item 2.1.1.)	VP Comm. (lead) and ED.	1.2.2.1: (Nov. 2013) Roll-out the database with ability to measure for member hits.	
1.3: Enhance the performance of NAPABA committees.	1.3.1: Develop standard operating procedures (SOPs) for NAPABA Committees, which could include the following: a. Committee leadership succession plan, b. Training and orientation for first time Committee Chairs, c. Develop statement for Committee Chairs to sign with expectations and responsibilities, d. Requirement to submit internal and external versions of quarterly reports to NAPABA Board,	VP Ops (lead), 2 ALBMs (At- Large Board Members), and Committee Chairs.	1.3.1.1: (Nov. 2013) Present SOPs to the NAPABA Board for approval. 1.3.1.2 (Dec. 2014) Add milestones to implement SOPs (as appropriate).	

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Strategic Areas	Action Items	Responsible Parties	Milestones	Status
	e. Guidance for the President to ensure diversity in appointing Committee Chairs, and f. Establish expectations for Board member liaisons to Committees.			
1.4: Optimize the partnership between NAPABA and NLF.	1.4.1: Develop a Memorandum of Understanding (MOU) between NAPABA and NLF to guide effective partnership, which could include the following: a. Exploring joint programmatic goals, b. Outlining joint fundraising goals, and c. Exploring NAPABA's role to support NLF fundraising.	Pres. (lead), ED, PE, IPP, and NLF Pres.	1.4.1.1: (Feb. 2013) Present MOU to the NAPABA and NLF Boards for approval. 1.4.1.2: (Mar. 2013) Add milestones to implement MOU (as appropriate).	

Goal 2: To enhance operational effectiveness in communications, fundraising, and board and staff development.

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Strategic Areas	Action Items	Responsible Parties	Milestones	Status	
2.1: Enhance communications and develop the NAPABA brand.	2.1.1: Determine necessary features and needs for redesigned website, which could include the following: a. Members only portions of the website; including for committees (See, also, Action Item 1.2.2.), and b. Improve external communications procedures.	VP Comm. (lead) and ED.	2.1.1.1: (Jun. 2012) Determine punch list for new website's needed features, including members-only pages and features, and utilizing branding committee for the look-and-feel of the website.  2.1.1.2: (Aug. 2012) Present proposal to board for improved external communications procedures.  2.1.1.3: (Sept. 2012) Add milestones to implement procedures.  2.1.1.4: (Nov. 2012) Launch completed beta website, and announce and unveil at DC Convention.		
	2.1.2: Implement a comprehensive communications plan incorporating electronic and social media.	VP Comm. (lead), ED, and Branding Committee.	2.1.2.1: (August 2012) Approve budget (if needed) by August board meeting. 2.1.2.2: (Sept. 2012) Improve and maximize NAPABA Facebook page. 2.1.2.3: (Sept. 2012) Improve/streamline Twitter feed as well as link same to Facebook page. 2.1.2.4: (Nov. 2012) Assess cost-benefit analysis and, if feasible, complete and launch Android app and improve iPhone app for NAPABA national convention in Washington, D.C. 2.1.2.5: (Yearly in Nov.) Continue assessing cost-benefit analysis and feasibility of Android and iPhone apps yearly for each national convention.		
2.2: Increase and diversify revenue streams, including more non-Convention income.	2.2.1: Develop a plan to generate revenue from non-Convention programming all year.	VP Fin. (lead), VP Ops, and Treas.	2.2.1.1: (May 2013) Formal directive to committee heads. 2.2.1.2: (Jun. 2013) Deadline for committee heads to submit webinars. 2.2.1.3: (Aug. 2013) Develop schedule of webinars for 2013-2014 with a goal to raise at least \$2,500 in funds from webinars during 2013-2014. 2.2.1.4: (Aug. 2013) Present proposal to the board regarding non-sponsor, non-webinar, non-affiliate, and non-501(c)(6) revenue. 2.2.1.5: (Aug. 2014) Develop schedule of webinars for		

Goal 2: To enhance operational effectiveness in communications, fundraising, and board and staff development.

Strategic Areas	Action Items	Responsible Parties	Milestones	Status
			2014-2015 with a goal to raise at least \$4,500 in funds from webinars during 2014-2015.	
	2.2.2: Adopt a financial policy on revenue sources, including refining the proposed SPASM guidelines.	SPASM Committee (w/ SPASM Committee Chair as the lead), VP Fin., and Treasurer.	2.2.2.1: (Feb. 2013) Expand jurisdiction of SPASM Committee by finalizing enforceable policies for sponsors desirous of wanting to market to our members, sponsors who want to make non-monetary contributions, and by developing a system for ensuring that competing sponsors (e.g., Legal Link vs. Special Counsel, Walmart vs. Target) have opportunities to sponsor events, etc.	
	2.2.3: Consider an increase in dues to be paid to NAPABA by affiliates and direct members. (See, also, Milestone 1.2.1.3.)	VP Mem. (lead), VP Fin., RGs, and Treas.	2.2.3.1: (Nov. 2013) Finalize proposal for dues increases for affiliates and direct members.	
	2.2.4: Explore opportunities to deepen relationships with new and existing law firm and corporate sponsors, which may include:  a. Package law firm and corporate sponsorships for multiple touch points,  b. Underwriting for specific proposed programmatic activities during national conventions, regional conferences, and other NAPABA activities outside of conventions and conferences,  c. Increased pro bono opportunities,  d. Diversity training by NAPABA for the law firms/corporate sponsors,  e. NAPABA providing other speakers for law firms/corporate sponsors,  f. Expanded sponsor contacts to include diversity/pro bono chairs at corporations and law firms because law firm partners leave,  g. Expanded sponsorship form to include option to donate unused registrations for clients, public interest attorneys, and NAPABA-invited guests such as local dignitaries.	VP Fin. (lead), IPP, NCHC (National Convention Host Committee), and Pro Bono Committee (as needed).	2.2.4.1: (Aug. 2012) Analyze historical sponsorship trends among law firms, and identify law firms/leaders who emphasize diversity. 2.2.4.2: (Nov. 2012) Meet with host committee chairs/presidents over last 3-5 years and determine key strategic relationships. 2.2.4.3: (Feb. 2013) Refine action items and milestones, as needed, to determine key strategic relationships. 2.2.4.4: (May 2013) Begin working with 2-3 law firms and 2-3 corporate sponsors for deeper long-term relationships. 2.2.4.5: (May 2014) Work with 5-7 law firms and 5-7 corporate sponsors for deeper long-term relationships. 2.2.4.6: (May 2015) Work with 8-10 law firms and 8-10 corporate sponsors for deeper long-term relationships.	
	2.2.5: Explore grants as a 501(c)(6), which may include	ED (lead) and	2.2.5.1: (Feb. 2015) Present grant proposals to board.	

Goal 2: To enhance operational effectiveness in communications, fundraising, and board and staff development.

Strategic Areas	Action Items	Responsible Parties	Milestones	Status
	offsetting costs associated with joint NAPABA and NLF leadership training and advocacy programs and initiatives via NLF-received grants.	Staff.	2.2.5.2: (Mar. 2015) Add milestones to implement proposals.	
2.3: Strengthen and foster Board	2.3.1: Conduct board orientation and training.	ED (lead), Pres., and IPP.	<ul><li>2.3.1.1: (Nov. 2012) Conduct new board orientation and training.</li><li>2.3.1.2: Repeat 2.3.1.1 yearly in Nov.</li></ul>	
membership development and a leadership pipeline.	2.3.2: Refine board member expectations and responsibilities, including more significant involvement in committees.	VP Ops (lead), ED; IPP, and 2 ALBM.	2.3.2.1: (Aug. 2012) Revise board member expectations, including committee liaison responsibilities, a code of conduct; and create specific responsibilities for at-large board members.  2.3.2.2: (Nov 2012) Obtain board member signatures for the board member expectations.  2.3.2.3: Repeat 2.3.2.2 yearly in Nov. (as appropriate).	
2.4: Develop and retain a high performing staff.	2.4.1: Assess and address staffing needs in light of the strategic plan.	ED (lead), and EC.	2.4.1.1: (May 2013) Present 2.5-year proposal to the board. 2.4.1.2: (Aug. 2013) Add milestones to implement proposal.	
	2.4.2: Identify ways to improve staff retention and professional development.	ED (lead), and EC.	<ul><li>2.4.2.1: (Aug. 2013) Present 2.5-year proposal to the board.</li><li>2.4.2.2: (Sept. 2013) Add milestones to implement proposal.</li></ul>	

Goal 3: To enhance membership services and engagement by being the preeminent organization for members from all sectors of the APA legal profession.

Strategic Areas	Action Items	Responsible Parties	Milestones	Status
3.1: Support members' professional and career development.	3.1.1: Offer professional development programming beyond the national convention and regional conferences by using our committees/affiliates more effectively.	2 ALBMs (w/ 1 as the lead), Alt. RGs, and Committee Chairs.	3.1.1.1: (Nov. 2012) Present RGs' proposal to the board. 3.1.1.2: (Dec. 2012) Add milestones to implement proposal.	
	3.1.2: Develop mentoring framework(s) that can be used by committees and affiliates. (Note: Some committees (e.g., in-house committee) and affiliates already have an extensive mentoring program.)	VP Mem. (lead), VP Ops, RGs, and Committee Chairs.	3.1.2.1: (May 2013) Present proposal to the board. 3.1.2.2: (Jun. 2013) Add milestones to implement proposal.	
3.2: Actively engage members through targeted outreach to specific demographic and practice segments.	3.2.1: Focus on legal education and networking for solo/small firm, public sector, and public interest practitioners.	Board liaisons for the Solo/Small Firm Committee and Public Interest Committees (w/ 1 liaison as the lead), Committee Chairs for the same Committees, PE, and NCHC.	3.2.1.1: (Feb. 2014) Present proposal to the board. 3.2.1.2: (Mar. 2014) Add milestones to implement proposal.	
	3.2.2: Expand outreach to law students through NAPALSA to increase pipeline, which could include establishing a board liaison to NAPALSA. (Note: Current activities include NLF Scholarship Program, Summer Internship Programs, and Moot Court).	1 ALBM (lead) and Alt. RGs.	3.2.2.1: (Feb. 2014) Present proposal to the board 3.2.2.2: (Mar. 2014) Add milestones to implement proposal.	
3.3: Ensure continued	3.3.1: Consider new programming tracks for different practice areas, and offer highest caliber speakers for	PE (lead) and	3.3.1.1: (Yearly) Implement action item.	

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Strategic Areas	Action Items	Responsible Parties	Milestones	Status
success of the	plenary sessions with new and diverse participants.	NCHC.		
annual Convention.	3.3.2: Prepare and update convention planning manual (from start to finish) and regional conference planning manual.	ED (lead), Pres., PE, IPP, and Regional Conference Committee Chairs.	<ul> <li>3.3.2.1: (Feb. 2013) Distribute regional conference planning manual, and distribute draft of national convention planning manual.</li> <li>3.3.2.2: (Feb. 2014) Distribute revised draft of national convention planning manual.</li> <li>3.3.2.3: (Feb. 2015) Distribute revised draft of national convention planning manual.</li> </ul>	

Goal 4: To advocate for opportunity, equity, and justice for the APA members of the legal profession and for the APA community, as the recognized national voice for APA lawyers.

Strategic Areas	Action Items	Responsible Parties	Milestones	Status
4.1: Promote the advancement of APAs to positions of leadership and influence in the legal profession.	4.1.1: Continue to enhance pipeline of credible APA nominees for the federal bench.	Varied as noted in the Milestones column.	4.1.1.1. (Nov. 2012) Continue annual Judicial Roundtable at the Convention, which targets potential candidates, and create and implement a 3-year schedule for hosting at least annual webinars for potential candidates. (Judiciary Committee and Board liaison to the Judiciary Committee) 4.1.1.2. (Aug. 2012) Consider developing an informational brochure for potential candidates. (NAPABA staff (lead)) 4.1.1.3. (Feb. 2013) Create and implement a plan to encourage law students to apply for judicial clerkships. (Judiciary Committee and Board liaison to the Judiciary Committee) 4.1.1.4. (Nov. 2013) Through the NAPABA Bar Leadership Institute and/or other means, continue to share best practices and encourage affiliates to develop programs regarding state and local-level judicial appointments and federal magistrate judge appointments. (Judiciary Committee)	
	4.1.2: Continue to promote the advancement of APA lawyers to positions of leadership and influence in the federal government.	ED (lead), Staff, Pres., and IPP.	<ul> <li>4.1.2.1: (Nov. 2012) Establish plan to place APA lawyers in political appointments following the 2012 Presidential election.</li> <li>4.1.2.2: (Yearly) Track and monitor APA lawyers in political appointments and the number of APAs in senior executive service.</li> </ul>	
	4.1.3: Continue to promote the advancement of APA lawyers to positions of leadership and influence in corporate/general counsel positions.	In-House Counsel Committee (lead), Board liaison for In- House Counsel Committee,	4.1.3.1: (On-going) Staff to revise and expand inhouse counsel listserv. 4.1.3.2: (Nov. 2013) Consider a new goal for APA GCs of Fortune 1000 companies (similar to the "10 x 10 Goal").	

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Strategic Areas	Action Items	Responsible Parties	Milestones	Status
		and Staff.		
	4.1.4: Continue to promote APA lawyer entrepreneurship and advancement.	Board liaisons for Partners, Solo/Small Firm, and Young Lawyers Committees (w/ 1 liaison as the lead), Committee Chairs for the same Committees , and HCHC.	4.1.4.1: (Aug. 2013) After completion of 3.1.2.1, enhance mentoring programs for Partners, Solo/Small Firm, and Young Lawyers Committees. 4.1.4.2: (Nov. 2013) Arrange for in-person mentoring pairs to meet during the National Convention. 4.1.4.3: Repeat 4.1.4.2 yearly. 4.1.4.4: (Nov. 2014) Consider the feasibility of NAPABA leaders meeting with leaders of large firms that have marginal numbers of APA partners to strategize ways to enhance retention and advancement of APA lawyers.	
	4.1.5: Continue to promote the advancement of APA lawyers to positions of leadership and influence in state and local government positions by creating a State and Local Government Subcommittee within the Public Sector Committee, which could do the following:  (a) organize 1 MCLE at each national convention concerning a relevant topic,  (b) use a listserv to share best practices on hot-topic issues, particularly where federal policy/laws impact state and local governance, and to share job postings and potential appointment opportunities,  (c) serve as a NAPABA liaison to the ABA's Government and Public Sector Lawyers Division, and  (d) serve as a resource for private firm and in-house attorneys who desire to transition to government positions.	VP Ops. (lead), Board liaison to Public Sector Committee, and Chairs for the State & Local Government Subcommittee of the Public Sector Committee.	4.1.5.1: (Aug. 2014) Create a State and Local Government Subcommittee of the Public Sector Committee.	

Goal 4: To advocate for opportunity, equity, and justice for the APA members of the legal profession and for the APA community, as the recognized national voice for APA lawyers.

Strategic Areas	Action Items	Responsible Parties	Milestones	Status
	4.1.6: Promote fact sheets about APA judges, lawyers, and legislators.	ED (lead), Staff, Judiciary Committee, Diversity Committee, and Board liaisons to the Diversity and Judiciary Committees.	4.1.6.1: (Aug. 2013) Reconstitute the NAPABA Diversity Task Force into a formal NAPABA Committee. 4.1.6.2: (Aug. 2014) More widely distribute fact sheets.	
4.2: Advocate on law-related matters affecting the APA community.	4.2.1: Continue promoting social justice issues relevant to the APA community.	1 ALBM (lead), PE, ED, Policy Director, NCHC, and Regional Conference Committee Chairs.	<ul> <li>4.2.1.1: (Nov. 2012) Continue providing at least 1 CLE panel or plenary session regarding a social justice issue relevant to the APA community at each national convention and at each regional conference in Nov. 2012-Oct. 2013.</li> <li>4.2.1.2: Repeat 4.2.1.1 yearly in Nov.</li> <li>4.2.1.3: (Feb. 2015) Evaluate whether to offer at least 1 webinar per year regarding a social justice issue relevant to the APA community.</li> </ul>	
	4.2.2: Share best practices for advocacy with affiliates.	1 ALBM (lead), ED, and Policy Director.	4.2.2.1: (Nov. 2013) Provide at least 1 training session regarding a social justice issue relevant to the APA community at each national convention and at each regional conference in Nov. 2013-Oct. 2014. 4.2.2.2: Repeat 4.2.2.1 yearly in Nov.	
	4.2.3: Expand attorney participation in Lobby Day.	ED (lead), Policy Director, Pres., IPP, and VP Ops.	4.2.3.1: (Feb. 2013) Create and implement a plan to encourage broader participation from the NAPABA membership by at least 10% from the previous year. 4.2.3.2: Repeat 4.2.3.1 yearly in Feb.	
	4.2.4: Expand lobbying efforts on the Hill and in the White House in connection with judicial nominations, legislation, and presidential appointments through (a) staff expansion or the shifting of duties, including educating affiliates about NAPABA's advocacy agenda, or (b) CBAC	ED (lead), Policy Director, Pres., and IPP.	4.2.4.1: (Aug. 2013) Begin evaluating options and funding requirements to increase staff. 4.2.4.2: (May. 2014) As appropriate, propose plan to the board.	

Goal 4: To advocate for opportunity, equity, and justice for the APA members of the legal profession and for the APA community, as the recognized national voice for APA lawyers.

Strategic Areas	Action Items	Responsible Parties	Milestones	Status
	participation.			
4.3: Continue to build coalitions and strategic partnerships to enhance advocacy for the APA community.	4.3.1: Deepen relationships with key partners for the APA community, which could include CBAC, SAALT, API Health Forum, AAJC, OCA, APAICS, AALDEF, APALC, etc.	ED (lead), Pres., IPP, and PE.	<ul> <li>4.3.1.1 (Aug. 2014) Identify key partners.</li> <li>4.3.1.2. (Feb. 2015) Create and propose plan to deepen relationships with key partners, including confirming appropriate liaisons.</li> <li>4.3.1.3. (Aug. 2015) Report to the board regarding the main developments for the key partners.</li> </ul>	

Goal 5: To provide a national network and resources to our members for pro bono and community service opportunities

Strategic Areas	Action Items	Responsible Parties	Milestones	Status
5.1: Develop and expand pro bono opportunities.	5.1.1: Develop and expand national pro bono opportunities and training in line with our advocacy objectives with existing and new partner organizations, especially those primarily serving the APA community.	Pro Bono Committee (lead), Board liaison to the Pro Bono Committee, VP Ops, VP Mem., and Policy Director.	<ul> <li>5.1.1.1: (Feb. 2013) Begin evaluation of which organizations to partner with first and how.</li> <li>5.1.1.2: (May 2013) Present proposal to the board.</li> <li>5.1.1.3: (Jun. 2013) Add milestones to implement proposals.</li> </ul>	
	5.1.2: Create a national pro bono referral directory/network of members to put on the website for pro bono organizations to view and utilize.	Pro Bono Committee (lead), Board liaison to the Pro Bono Committee, VP Mem., and VP Comm.	<ul> <li>5.1.2.1: (May 2014) Create proposal for using and publicizing the directory/network.</li> <li>5.1.2.2: (Nov. 2014) Complete compilation of directory of organizations and NAPABA members.</li> </ul>	
	5.1.3: Offer at least one pro bono training session at each national convention.	Pro Bono Committee (lead), Board liaison to the Pro Bono Committee, NCHC, and PE.	5.1.3.1: (Nov. 2013) Implement action item. 5.1.3.2: Repeat 5.1.3.1 yearly.	
	5.1.4: Recommend (but not require) each hosting affiliate(s) to offer a pro bono training session at each regional conference.	Pro Bono Committee (lead), Board liaisons to the Regional Conference and Pro Bono Committees, Regional	5.1.4.1: (Dec. 2015) Implement action item based on experiences from 5.1.3.1.	

### Goal 5: To provide a national network and resources to our members for pro bono and community service opportunities

Strategic Areas	Action Items	Responsible Parties	Milestones	Status
		Conference Committee Chair, and RGs.		
5.2: Expand community service opportunities.	5.2.1: Continue to offer at least one community service project at each national convention.	NCHC (lead) and PE.	<ul><li>5.2.1.1: (Nov. 2012) Implement action item.</li><li>5.2.1.2: Repeat 5.2.1.1 yearly.</li></ul>	
	5.2.2: Recommend (but not require) each hosting affiliate(s) to offer a community service project at each regional conference.	Regional Conference Committee Chairs (lead), Board liaison to the Regional Conference Committee, VP Ops, and RGs.	5.2.2.1: (Dec. 2013) Implement action item based on experiences from 5.2.1.1 and 5.2.1.2. 5.2.2: Repeat 5.2.2.1 yearly.	