



Estela Casas, Executive Director

March 17, 2015

Nancy Glickman, Program Counsel
Legal Services Corporation
3333 K Street, NW, 3rd Floor
Washington, DC 20007-3522

Re: Draft Program Quality Visit Report
Greater Bakersfield Legal Assistance, Inc
Recipient # 805010

Dear Ms. Glickman,

Thank you for the opportunity to review the draft Program Quality Visit Report from the LSC team's visit to Greater Bakersfield Legal Assistance, Inc. on December 8-12, 2014. This letter is GBLA's response to the report.

GENERAL COMMENTS

GBLA wishes to thank you and the entire OPP team for your professionalism throughout the visit. It was clear the team had reviewed the documents GBLA was asked to provide prior to the visit. The team was well informed about GBLA, its services, processes and structure. The team's knowledge of GBLA made the conversations between staff and team members much more meaningful. Your professionalism both before and during the visit provided confidence that management and staff could be forthright with you and your team.

Overall the findings in the report are intellectually honest and the recommendations reasonable.

RESPONSES TO RECOMMENDATIONS

PERFORMANCE AREA ONE – Effectiveness in identifying the most pressing civil legal needs of low-income people in the service area and targeting resources to address those needs.

Recommendation I.1.1.1 GBLA units should memorialize their specific case priorities and acceptance criteria to be disseminated to all staff for the purposes of intake and referral, and to serve as a blueprint for adjusting case acceptance should resources become limited.

GBLA agrees with the recommendation. GBLA utilizes an Advocacy Policy and Procedures Manual which combines in-house policies with LSC regulatory policies and procedures. GBLA will create a separate Intake Manual which will include specific policies regarding intake and case acceptance and referral.

Recommendation I.1.2.1 GBLA should capture the economic benefits gained by clients in its outcome measurement tabulations.

GBLA agrees with the recommendation. Efforts are currently underway by both LSC and the California IOLTA program to develop outcomes. GBLA intends to implement this recommendation in conjunction with these national and state efforts.

Recommendation I.2.3.1* As soon as resources permit, GBLA should engage in a “blank-slate” strategic planning process that articulates core values and discusses issues and challenges faced by the organization’s service delivery system so as to provide a roadmap for program development over the next five years.

GBLA agrees with the recommendation. As soon as resources permit, GBLA will engage in a long term strategic planning process.

PERFORMANCE AREA TWO – Effectiveness in engaging in and serving the low-income population throughout the service area.

Recommendation II.1.4.1* GBLA should review ways to enable the use of more private spaces for client interviews so as to ensure privacy and confidentiality.

Every effort is made to ensure client privacy and confidentiality is protected. As noted in the report GBLA has experienced a period of growth. A building committee of the GBLA Board of Directors has been tasked with reviewing office needs of the organization and to make appropriate recommendations to the full Board. This committee has retained the services of a real estate broker to facilitate the committee’s work.

Recommendation II.1.4.2* One person should be designated to oversee the program's entire intake process to provide for enhanced coordination, including the sharing of information among the various unit intake staff.

As noted in the report, GBLA advocates work within substantive law units, generally defined by various funding streams. Accordingly, intake procedures vary among the units in order to meet the funder's deliverables and other requirements. While GBLA generally agrees that ideally one person should be designated to oversee the program's entire intake process, the ability to implement this recommendation is largely a function of resources. GBLA will make a good faith effort to implement this recommendation, as resources permit.

Recommendation II.1.4.3* In addition to maintaining the summary intake matrix, GBLA should develop an intake manual to memorialize how intake is done in each unit including specific case acceptance and level of service criteria. The manual should be reviewed periodically and updated as needed. This can be combined with Recommendation I.1.1.1 above.

GBLA agrees with the recommendation and will devote the necessary staff resources to create an intake manual.

Recommendation II.1.4.4 As staffing permits, the program should consider assigning additional staff to cover the front reception area to conduct appropriate eligibility screening, cover the phones, and welcome walk-ins.

The recommendation is well taken and appreciated.

Recommendation II.1.4.5 As resources allow, GBLA should consider upgrading the phone system software, to provide reporting on caller hold times, queues, dropped calls, to allow callers to know where they are in the queue, and provide an option for automated callbacks.

The recommendation is well taken and appreciated.

Recommendation II.1.4.6 The program may want to consider adding a first point of contact advice component to its intake process for those matters not immediately referred to a unit or that routinely warrant only advice.

The recommendation is well taken and appreciated. GBLA will make a good faith effort to implement this recommendation, as resources permit.

Recommendation II.1.4.7* All co-located staff and staff who conduct any outreach intake activities should have reliable access to laptops, smart phones, and internet access either through a partner or hotspot.

GBLA agrees with the recommendation. GBLA will conduct a review of resources currently available to co-located staff to ensure staff have access to reliable and necessary technology to conduct intake activities.

Recommendation II.2.5.1* At a minimum, GBLA's website should contain general information about program access and services in Spanish.

Management acknowledges that GBLA needs to update its website. A committee of interested staff members has been tasked with reviewing the website and making recommendations to the executive director.

Recommendation II.2.5.2 The program should consider providing interpreter training for staff interpreters.

GBLA agrees with the recommendation.

PERFORMANCE AREA THREE – Effectiveness of legal representation and other program activities intended to benefit the low-income population.

Recommendation III.1.8.1* GBLA should determine how other LSC grantee programs with similar health grants are capturing LSC eligible case closures and, in turn, implement an appropriate procedure.

GBLA agrees with the recommendation.

Recommendation III.1.9.1 GBLA should continue to support more complex and impactful advocacy throughout the program.

GBLA appreciates the report's finding that GBLA provides high quality holistic assistance to its client community. We also appreciate that the report commends GBLA for its commitment to engage in affirmative litigation, noting that national, state, and regional legal partners uniformly praised GBLA's impactful work. GBLA is committed to continue its impactful advocacy throughout the program.

Recommendation III.1.10.1 GBLA should review its advocacy manual to make sure it is up to date and includes all program advocacy policies.

GBLA agrees with the recommendation.

Recommendation III.1.10.2* GBLA should assure supervision of all advocates at an appropriate and uniform level.

GBLA agrees with the recommendation. The newly created senior litigator position will assist in making sure GBLA's Legal Work Supervision Policies and Procedures are implemented uniformly throughout the organization.

Recommendation III.1.11.1 The program should consider adopting a cross-unit public benefits practice area meeting similar to the weekly housing and domestic violence meetings.

The recommendation is well-taken and appreciated.

Recommendation III.1.11.2 The program should consider methods by which the new senior litigator can capture both unit and cross-unit trends and emerging client needs to better assist in programmatic impact advocacy.

GBLA agrees with the recommendation.

Recommendation III.1.11.3 Although the senior litigator position addresses some of the responsibilities of a traditional litigation director, the program should consider methods to fully meet the other needs, including unit coordination and review, and assistance in supervising the unit supervisors.

GBLA agrees with the recommendation.

Recommendation III.2.12.1 GBLA should continue its PAI expansion efforts to include both additional recruitment efforts and volunteer opportunities.

GBLA agrees with the recommendation. GBLA appreciates the finding that GBLA is making a concerted effort to expand and enhance its Private Attorney Involvement (PAI) component, the Volunteer Attorney Program.

Recommendation III.2.12.2 As resources allow, the program should engage in more marketing of VAP through recognition events, a newsletter, newspaper articles, and/or other promotional endeavors.

GBLA agrees with the recommendation.

Recommendation III.3.13.1* GBLA should develop a strategy for making more effective use of its website, social media, and the resources available on the LawHelp California website.

GBLA agrees with the recommendation and acknowledges that it has struggled with integrating social media into its delivery system.

Recommendation III.3.13.2 The program should review ways it can increase client access to self-help materials and resources, by promoting self-help assistance both online and through in person workshops.

GBLA agrees with the report's finding that GBLA engages in a wide variety of other services and activities on behalf of the low-income community throughout its service area. The recommendation is well taken and appreciated.

PERFORMANCE AREA FOUR – Effectiveness of governance, leadership and administration.

Recommendation IV.1.14.1* GBLA should review and amend its bylaws as soon as possible in accordance with the recommendations and requirements of its funders, including the Legal Services Corporation.

GBLA will take immediate steps to review and amend its by-laws as needed.

Recommendation IV.1.14.2* GBLA should continue its efforts to recruit and retain client eligible candidates to fill any current vacancy. In doing so, the board should consider giving appointing authority to newly emerged organizations, agencies, and institutions within the community.

GBLA agrees with the recommendation.

Recommendation IV.1.14.3 GBLA should consider appointing a permanent finance committee to conduct a thorough review of financial reports prepared by program management on a monthly basis.

The report finds the members of GBLA's Board of Directors are diverse, informed, and motivated to accomplish the mission of the program. GBLA agrees with this finding. GBLA's governing board has a long standing culture of conducting its governance activities through the full board rather than committee structure. Active committees include the Audit and Investment Committees. These committees receive reports related to their respective charge once or twice annually. Ad Hoc committees, such as the Occupancy Committee, are appointed as needed for a limited purpose and duration. As such, all financial oversight is conducted by the full board, which includes an attorney who is also a CPA. The board will consider the recommendation to appoint a permanent finance committee at its next board meeting.

Recommendation IV.2.15.1* GBLA's leadership succession plan should be reviewed for any potential conflicts as well as address coverage of day-to-day duties in the event of an unexpected absence in leadership.

GBLA agrees with the recommendation.

Recommendation IV.4.17.1* GBLA should consider preparing for and presenting its financial information to a committee of the full board in a format that permits the board to engage in a thorough review of the financial reports. In particular, the review should encompass a monthly comparison of the grant activity to the budget of each grant adopted by the board.

Annual budgets for all programs, including revisions and carry-over budgets are thoroughly vetted and approved by GBLA's Board of Directors. The Board also reviews and approves financial close-out reports for each grant.

The board receives monthly unaudited year-to-date Statement of Financial Position and a Statement of Activities comparing current year with the preceding year. GBLA's Director of Finance compiles a monthly binder containing reports detailing a comparison of grant activity to the budget for each grant adopted by the board. This report is reviewed by the Executive Director. Budget revisions are prepared for board approval as necessary.

The recommendation is well taken and will be discussed in detail at the next meeting of the board of directors.

Recommendation IV.5.18.1* All evaluations should be conducted in the manner and time frames contained in the evaluation process.

GBLA will take steps to ensure that staff receive timely evaluations.

Recommendation IV.5.18.2 The program should consider expanding orientation to include the history and workings of GBLA, California legal services delivery, and LSC.

GBLA agrees with the recommendation.

Recommendation IV.5.18.3* The program should insure ample training opportunities for support staff.

The report acknowledges that GBLA provides extensive support for its advocates through training, collaborations, and internal mechanism. Unfortunately, over the years there has been a dearth of formal training opportunities for support staff (secretarial/clerical) beyond that provided by GBLA as in-house training. Nevertheless, GBLA will make extraordinary efforts, in consultation with support staff, to seek appropriate training opportunities.

Recommendation IV.5.18.4 As resources allow and, where appropriate, the program may want to consider raising salary caps to encourage future, and recognize current, long term employees.

GBLA is committed to maintaining a competitive salary and benefit package for its employees.

Recommendation IV.3.19.1 GBLA's disaster plan should be reviewed and revised and revised in accordance with the ABA's Guide to Surviving a Disaster which can be found at www.americanbar.org/content/dam/aba/events/disaster.

GBLA will review its disaster plan and make appropriate revisions.

Recommendation IV.3.20.1* GBLA should work with LanPro to develop an automated system to require network passwords be changed on a regular basis, ideally every 4-6 months.

GBLA agrees with the recommendation.

Recommendation IV.3.20.2 As resources allow, GBLA should consider strategic technology upgrades or additions, such as: upgrading their CMS; purchasing low-cost webcams and headsets to expand the ability of advocates to use web and low cost video conferencing; working with the new IT vendor to examine the cost effectiveness of moving some systems to the cloud in the future; and implementing a regular replacement cycle of hardware to ensure systems stay current and the program does not have extensive replacement costs in any one year.

GBLA concurs with the recommendation.

Recommendation IV.6.21.1 GBLA should develop a means to ensure periodic and regular communication to staff about programmatic activities, including funding developments, case victories, unit projects, and staffing changes.

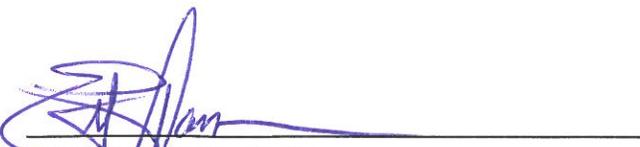
GBLA will consider ways to enhance internal communications, including more frequent meetings and other efficient methods for the ongoing flow of information between units.

Recommendation IV.7.22.1 GBLA should continue to strategically seek grants that promote their mission and priorities.

GBLA agrees.

Sincerely,

Estela Casas, Executive Director



GREATER BAKERSFIELD
LEGAL ASSISTANCE, INC.