



LEGAL SERVICES CORPORATION

Office of Program Performance

Final Report

for

Program Quality Visit

to

GREATER BAKERSFIELD LEGAL ASSISTANCE

Recipient No. 805010

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**Greater Bakersfield Legal Assistance
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INTRODUCTION

The Legal Services Corporation (LSC) Office of Program Performance (OPP) conducted a Program Quality Visit (PQV) to Greater Bakersfield Legal Assistance (GBLA) in Bakersfield, CA, from December 8 – 12, 2014. OPP's team consisted of LSC program counsel Nancy Glickman, Evora Thomas, and Meredith Horton, LSC Program Analyst Jane Ribadeneyra, and LSC temporary employee César Britos.

Program Quality Visits are designed to evaluate whether LSC grantees are providing the highest quality legal services to eligible clients. In conducting the evaluation, OPP relies on the LSC Act and regulations, the LSC Performance Criteria, LSC Program Letters, and the ABA Standards for the Provision of Civil Legal Aid. The on-site evaluation was organized to follow the four Performance Areas of the LSC Performance Criteria, which cover needs assessment and priority setting; access to services and engagement with the low-income community; legal work management and the legal work produced; and program management including board governance, leadership, resource development, and coordination within the delivery system.

In conducting its assessment, the team reviewed the documents provided by the program to LSC, including recent applications for funding, technology and PAI plans, workforce analysis charts, and case service and other services reports. The team also reviewed materials requested in advance of the visit, including documents relating to board governance, intake, legal work and case management policies and systems, advocates' writing samples, and the results of an online staff survey.

On site, the team visited the program's main office in Bakersfield as well as its Landlord-Tenant Assistance Center located in the Kern County Courthouse, also in Bakersfield. The team interviewed program leadership, management, and administrative staff, advocacy staff, and support staff. The team also interviewed members of the board of directors, judges, other funders, community partner organizations, volunteer attorneys, and state and national legal support center partners. Due to scheduling and time constraints, some of these interviews were conducted by telephone.

SERVICE AREA AND PROGRAM OVERVIEW

Founded in 1968, GBLA has continuously served the residents of Kern County for 46 years.¹ Kern County is the state's third-largest county in land area, covering 8,170 square miles with three distinct physical environments: valley, mountain, and desert. The 2012 American Community Survey (ACS) estimates the service area poverty population at 162,050. Although the ACS approximates 67% of the poverty population as white, 7% African American, 3% Asian, and over 20% another race, 61% is identified as Hispanic/Latino.

Bakersfield, home to the program's only full-time office and court based Landlord-Tenant Assistance Center, is both the county seat and largest city in the county. With a poverty rate of 26.3%, the 2012 ACS ranked Bakersfield as having the third highest metropolitan suburban area

¹ California Rural Legal Assistance's LSC basic field grant includes coverage of the northwest corner of Kern County.

poverty rate in the United States. That same year, the Food Research and Action Center food hardship report data ranked Bakersfield number one in the nation.²

As a result of successful resource development, GBLA is currently experiencing a period of growth. At the time of the visit, GBLA had a staff of 50 consisting of five administrative staff, 17 attorneys, 23 para professionals³, and two legal secretaries; an increase of over 30% since 2012. GBLA staff work within units, including an administrative unit, a volunteer attorney program, and 11 substantive law units, generally defined by the program's various funding streams. In 2013, GBLA received \$896,374 in LSC funding, a slight increase over 2012 due to the census adjustment. At the same time, however, GBLA significantly increased its non-LSC funding to \$2,801,275. GBLA closed 1,717 LSC eligible cases in 2013 with an impressive 38.5% consisting of extended representation. The majority of 2013 closed cases were in the areas of housing (43.4%), family law (20.2%), income maintenance (12.9%), and juvenile (10.5%).

In 2007, LSC's OPP and Office of Compliance and Enforcement (OCE) conducted a combined visit to GBLA. In 2010, OCE conducted a follow-up visit, and OPP a separate program engagement visit. Each office reported that GBLA had taken steps to address issues raised in the 2007 combined report. This PQV was the first visit by LSC since 2010.

SUMMARY OF FINDINGS

Led by an engaged board and experienced leaders, and staffed by dedicated personnel, GBLA is fully committed to its mission "to promote social change and justice by providing high quality legal services to the low-income community." Every facet of the program's structure, from engagement with the client community, to support of its advocates, to strategic resource development, is geared towards mission fulfillment.

Utilizing a variety of data sources, GBLA conducts a comprehensive needs assessment every three years. In between these formal assessments, GBLA continually monitors both client need and service delivery through a variety of means. As a result of these combined efforts, service delivery is adjusted and emerging needs addressed. GBLA has also engaged in programmatic strategic planning. However, its most recent plan has elapsed and new goals and objectives have yet to be determined.

GBLA provides broad access to its services by means of phone and walk-in intake at its Bakersfield office, and numerous outreach intake sites throughout the service area. While Bakersfield intake generally begins with an eligibility screen by front desk personnel, intake procedures vary among the program's substantive units.

GBLA has a diverse staff reflective of, and highly engaged with, its client community. The program conducts extensive outreach, makes numerous community education presentations, and serves on a host of local committees that address various client needs. GBLA treats its clients

² Food Research and Action Center (2013). Food Hardship in America 2012: Data for the Nation, States, 100 MSAs, and Every Congressional District. Retrieved from <http://frac.org/reports-and-resources/food-hardship-data/>.

³ Due to varying duties within the program's unit system, actual job position titles include paralegal, case manager, outreach worker, advocate, and intake coordinator.

with the utmost respect and dignity and has established a solid reputation throughout its service area.

GBLA has a mix of experienced and new advocates that provide a wide array of high quality legal services. Cases range from simple advice to complex litigation, with extended representation in well over one-third of all closed cases. GBLA supports these efforts through, among other things, providing extensive training opportunities and encouraging collaborations with state and local partners. The program is actively involved in the state's integrated legal delivery system. While GBLA has developed legal work management and supervision polices, uniform implementation could be improved.

GBLA has made significant efforts to expand its private attorney involvement (PAI) program. The program has engaged a consultant, hired additional staff, and undertaken recruitment drives. As a result of these efforts, PAI closed case statistics have increased dramatically.

GBLA has a sound administrative structure. GBLA is governed by an engaged board and led by an experienced executive director, with each highly committed to the program's mission. Program finance and human relations functions are carried out by skilled personnel. The program has a solid technology infrastructure that could be enhanced to reach its full potential. While staff are generally informed about programmatic issues, a more formalized structure would benefit overall internal communication. GBLA's strategic resource development efforts have been successful in sustaining current program efforts as well as expanding service opportunities.

As GBLA routinely strives to improve its processes and structure, most of the PQV team's recommendations involve continuation of ongoing efforts or enhancement of current procedures. Such recommendations include continuing strategic planning, PAI development, support of impact litigation, strategic resource development, and review of the program's bylaws. Additional recommendations are made to enhance capturing outcomes, use of technology, financial reporting, advocate case reviews and evaluations, and non-advocate training opportunities. The PQV team also makes several recommendations to improve the program's overall intake system.

FINDINGS, CONCLUSIONS, AND 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.

Finding 1. GBLA routinely undertakes comprehensive needs assessments of its client community.

Every three years GBLA conducts a comprehensive needs assessment. The most recent assessment was in 2012 and the next is scheduled for 2015. A variety of data collection methods are used in the assessment process including surveys, targeted focus groups of both clients and social service providers, interviews with court personnel, and staff input. The client focus

groups are targeted to assure geographical representation throughout the county as well as various vulnerable population groups such as the homeless, disabled, and victims of domestic violence. One focus group is conducted in Spanish. A number of community partners interviewed by the PQV team have been asked to serve on provider focus groups. The assessment process also incorporates review of an array of data sources including the census, closed case statistics, and other legal needs studies. Although GIS mapping has not been used as a source in the past, the program has recently acquired ARC-GIS and plans to utilize mapping as a tool in its next assessment.

Three broad priority areas have been identified by the program: housing, consumer, and adult and children services. Included within adult and children services are the sub-priorities of health, domestic violence, income maintenance, suspensions, expungements, and guardianship. While some grant requirements necessarily tier or prioritize cases within their scope, others do not, and units have developed their own form of case triage. There did not, however, appear to be any clear documentation as to the specific levels of service a unit would provide in any given case type.

Finding 2. GBLA continually evaluates its delivery systems and makes adjustments as needed.

GBLA sets yearly goals for its various units and monitors them throughout the year. Each GBLA unit completes a “monthly tracking form” that includes the proposed priorities, goals, strategies, and outcomes. Substantive outcome measures are recorded with each closed case, but economic benefits are not captured. The forms are reviewed by the unit and the executive director, and unit delivery may be modified if deemed appropriate. In addition, GBLA routinely disseminates and reviews client satisfaction surveys.

In between comprehensive needs assessments, emerging needs are recognized and addressed through a variety of methods, including specific grant required focus groups, weekly cross-unit substantive law meetings, ongoing involvement in community collaboratives, periodic unit supervisor meetings, and yearly grant concept meetings. Through these processes, new housing litigation strategies have been developed, education was added as a priority under adult and children services, and a veterans unit has been created.

Finding 3. GBLA has previously engaged in strategic planning, but has not defined goals and objectives to guide the organization since the lapse of the most recent strategic plan.

With the assistance of a consultant and input from the board of directors, staff, and client focus groups, GBLA adopted a strategic plan for the period of July 1, 2010 through June 30, 2013. Activities and timelines were included to achieve three specific goals: 1) implement an initial branding effort; 2) increase efforts to obtain non-grant funds; and, 3) implement board development for recruitment, retention and training of board members. During the planning, the board delegated significant responsibility and broad discretion to the executive director to develop and implement the activities of the plan. A formal review of the plan was undertaken in September, 2011 and again in May, 2012. Although there was no comprehensive formal evaluation at the conclusion of the plan term, PQV team interviews reflect that the board believes that GBLA has been successful in meeting the goals of the last plan. Additionally, the board has discussed the need to engage in strategic planning for the future. In the interim, they are

assessing several new initiatives, including purchase of their current leased space and implementation of a modest means project.

Recommendation I.1.1.1⁴ 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.

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

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.

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

Dignity and Sensitivity, including intake

Finding 4. GBLA provides access to its services through a variety of portals including telephone and walk-in intake at its main office, as well as numerous outreach intake sites throughout the county. Additional efforts could be made to enhance and coordinate the overall process.

GBLA maintains a central office in Bakersfield, not far from the courthouse, and along a major bus route. There appears to be ample street parking close to the office and there is “handicapped” parking available. The leased space is comprised of two buildings on either side of a parking lot. The main building is two stories, which are not connected internally; rather, one must walk up an outside set of stairs to reach the second floor offices. With the recent increase in staff, GBLA is running out of appropriate space and many individual offices are separated solely by partitions that are not fully sound proof. The program is currently negotiating purchase of the buildings with the intent to expand the space.

GBLA is open for intakes and scheduled appointments from 8:30 am - 12:00 pm and from 1:00 pm - 5:00 pm each day. The office has a professional appearance and legal information is provided in the lobby area in both English and Spanish. The waiting area is small and while it

⁴ Recommendations in this report will have a Roman Numeral to identify the Performance Area, followed by three numbers identifying, respectively, the Criterion addressed by the recommendation, the number of the finding and a number designating whether it is the first, second, third, etc., recommendation under that finding. For example, III.2.14.3 designates Performance Area III, Criterion 2, finding 14, and third recommendation under finding 14. There are two levels of recommendations in this report: Tier One and Tier Two. Recommendations that are indicated with an asterisk are Tier One recommendations and are seen as having a greater impact on program quality and/or program performance. In its next Application or Renewal, the program will be asked to report on its implementation of Tier One recommendations.

appears to have ample seating, the chairs are close together and close to the intake coordinator's window where she conducts initial screening, as well as answers the phones, and lets people in to the locked internal office doors. During the week of the PQV team's visit, routinely there were people in the waiting area for either intake or scheduled appointments.

Walk-ins to the GBLA office are given a sign-in sheet to provide their name and legal problem. The intake coordinator, who is located behind glass at a front desk, does an initial screening and identifies any emergencies. The intake coordinator utilizes an intake matrix spreadsheet with unit case requirements and interview days and times, along with a scheduling tool in the program's case management system (CMS), to arrange and keep track of appointments. GBLA currently uses Kemps Prime SQL Version 8 as its CMS. If the applicant appears to be eligible, and the problem is in a priority area, the intake coordinator will either contact a unit paralegal or advocate to see if they are available to speak to the applicant immediately, or she will schedule the first available unit appointment within the next two weeks. If no appointment is available for the appropriate unit within the two-week period and the applicant is not facing a deadline, the intake coordinator will ask them to return or call back to try to schedule an appointment. If there is a deadline, an interview slot will be added to ensure a timely appointment. If it is a housing issue with a deadline, she will refer them to the Shriver Center at the courthouse. She will also provide any appropriate resources, referrals, pamphlets, or online resources to educate the person about their problem.

Callers to the main number are first prompted to identify if they speak English or Spanish. The intake coordinator, who is bilingual, can see if a caller is a Spanish speaker, so she knows what language to use when she answers the call. The system also allows her to see how many people are on hold. Callers during business hours are provided with initial information about the priority areas of GBLA and offered a menu of options to select their legal issue. Depending on the area of law they select, there may be a sub-menu of topics within that area to choose from, or they may hear recorded information or referrals for areas of law that are outside GBLA priorities. Callers for certain units: Long Term Care Ombudsman, Community Homeless Law Center, First 5⁵ Guardianship, First 5 Domestic Violence, and Kern Health Consumer Center, are transferred directly to the unit for intake by the unit paralegal.⁶ Other units, or if not designated by the caller, are answered by the intake coordinator, who does an initial screening and follows the same process as that for walk-ins. Although the caller may have selected a specific legal area from the detailed phone tree, this information is not available to the intake coordinator in the console. GBLA does not have any reporting software for the phone system to allow them to monitor caller hold times, dropped calls, track the number of calls, or provide callers with information about where they are in the hold queue or expected hold time. An after-hours call has a different message. The recording informs callers of GBLA's priority areas and office hours but the recorded legal information is not available. A member of the PQV team tested the call-in system and found it user friendly with little if any wait time before speaking to the intake coordinator.

⁵ First 5 is a state initiative wherein counties receive funds to address the health, education, and familial needs of children under five.

⁶ The Fair Housing Unit has a separately published direct intake number, and the direct line of the First 5 Guardianship intake paralegal is on the guardianship forms packet handed out by the court.

Full intakes are done by each unit's intake paralegals and vary depending on the unit due to funding sources and grant requirements. Depending on the nature of the case, the paralegal might provide immediate advice or brief service, subject to review by the unit's supervising attorney. More complex cases will be referred to the unit attorney.

In addition to the main office intake system, GBLA conducts regularly scheduled intake at various outreach sites. Program staff are co-located at eight family resource centers and three health clinics spread throughout the service area. Similarly, scheduled outreach also occurs at homeless and domestic violence shelters. Most outreach workers have remote access to the program's CMS through laptops and conduct intakes as if they were in the office. Others must enter the information into the CMS upon their return to the office. The program has a number of Wi-Fi hotspots that are assigned to staff that work remotely or can be checked out for a particular off-site need. Some outreach staff have GBLA cell phones, or there may be a shared cell phone among a unit. However, there is not always a shared cell phone available; making it difficult for staff to connect with a client they are meeting at a remote location.

The program also maintains a full time Landlord-Tenant Assistance Center located at the courthouse, next to the clerk's office. In addition to referrals from the GBLA intake coordinator, the center also receives referrals from the clerk and from inserts provided with Unlawful Detainer (UD) filing notices mailed from the court. A paralegal screens people at the center's reception window and if eligible for GBLA services, they meet with an attorney on site.

Larger units meet weekly to go over intakes and make case acceptance decisions, while the smaller units discuss them more informally as cases come into the unit. There is no single staff member assigned to oversee screening or intake program wide, nor do the various unit intake coordinators meet with each other to share ideas or best practices. It is of note that none of the community partners interviewed by the PQV team raised client access to intake as an issue.

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.

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.

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.

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.

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.

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.

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.

Engagement with and access by the low-income population

Finding 5. GBLA has a diverse staff that reflects the demographics and language usage of its service area.

GBLA is committed to staff diversity. At the time of the visit, program staff was 44% Hispanic/Latino, 36% white, 10% African American, 6% Asian, and 4% identified as other. Such diversity was evident throughout the program's units and across all job classifications.

Language capability is considered a preferred quality in all GBLA hiring decisions. Approximately 60% of the program staff speak a language other than English, with all intake staff bilingual in English and Spanish. Of note, the program's intake matrix identifies a bilingual staff member available for intake in each of the units. Additional staff language capabilities include Arabic, Lao, Thai, and Korean. Staff members are routinely used as translators, although formal translation training does not appear to be provided. If a client presents with a language outside of staff capacity, the program's LEP plan calls for the use of a telephone language interpreting services or an available community partner agency. While all GBLA brochures, posters, and client form documents are printed in both English and Spanish, the GBLA website does not have a Spanish component.

Finding 6. GBLA is highly engaged with the low-income community throughout its service area.

In response to the team's request for a listing of community activities within the last 12 months, GBLA submitted a lengthy spreadsheet containing well over 400 separate entries. The activities included, among others, community education presentations, targeted outreach events, community resource fairs, workshops, collaborative meetings, and self-help assistance. Interviews with staff corroborated the breadth of these activities and most of the staff members interviewed were involved in one or more such activity. Of note, the spreadsheet did not include GBLA's recurring outreach at its numerous co-location intake sites.

GBLA's commitment to client engagement is no more evident than its support of full time outreach workers. The outreach workers not only conduct intake, make community education presentations, and provide a presence at community events, but they also attend various provider and community meetings including parent and church groups.⁷ In units where there is not a full

⁷ See Finding 13 below for a more detailed listing.

time outreach worker, there is at least one designated staff person engaged in similar pursuits. Unit outreach staff are members of GBLA's outreach committee that meets once a month to exchange information on various events and outreach opportunities.

As part of its review, the PQV team interviewed a dozen community partners throughout the service area. They were uniform in their high level of praise for the program's work and its commitment to reaching all segments of the client eligible population. It was clear that GBLA treats its clients with the utmost respect and dignity, and has established a reputation in the community for the holistic services it provides. Community partners routinely mentioned the dedication GBLA staff shows to each of their clients, as well as their ability to build the trust of clients, particularly in areas where the population is not trusting of agencies.

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

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

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

Legal Representation

Finding 7. GBLA utilizes a unit based model staffed by attorneys, paralegals, community advocates, and case managers, each with varying levels of experience.

GBLA advocates work within 12 separate units that are defined by the program's various funding streams. The units include the Community Homeless Law Center, Domestic Violence Reduction Project, Seniors Law Center, Long-Term Care Ombudsman Program, Guardianship Caregiver Project, Health Consumer Center, Immigration Violence Reduction Project, Rural Legal Assistance Program, Fair Housing Law Project, Landlord-Tenant Assistance Center, Volunteer Attorney Program, and a newly formed Veteran's Assistance Project which will be operational in January 2015. While many of the units are supported by LSC funding, advocates that work on cases not falling within other funding, e.g. public benefits for clients between the ages of six and 60, are loosely combined into an LSC unit. Unit size ranges from two to six staff members depending upon funding. Each is comprised of at least an attorney unit supervisor and a paraprofessional. Additional staffing can consist of staff attorneys, case managers, advocates, intake coordinators, and outreach workers. Although unit configurations can often lead to isolation or siloing, the PQV team found this not to be the case at GBLA. There is extensive informal interaction as well as weekly cross-unit case meetings for advocates who assist in the areas of housing and domestic violence.

Following the recommendations of the 2007 PQV, GBLA has more than doubled its attorney staff in the past seven years; from eight attorneys in 2007 to its present level of 17. While some of the attorneys have extensive experience, primarily in the areas of guardianship, housing, and

domestic violence, close to one half have less than two years' experience. Program leadership is mindful of this issue and has provided extensive training opportunities as well as encouraged collaboration with state poverty law experts. The newer staff has clearly availed themselves of these opportunities. For example, the PQV team heard of two separate instances wherein staff attended a training, sought specific advice from the trainer, and ultimately entered into a co-counseling relationship on a major piece of litigation. Paralegal staff also had a wide range of experience levels as some have been with the program over twenty years and others recently hired with the advent of new grants. The PQV team found all staff to be extremely dedicated with newer staff eager to learn and experienced staff readily offering mentoring assistance.

Finding 8. Although GBLA's overall closed cases per 10,000 poor persons is below the national median for LSC grantees, extended closed cases are above the national median.

In 2013 GBLA closed 152 cases per 10,000 poor persons as compared to the national median of 211. Of note, GBLA numbers did remain fairly constant from 2012 to 2013 whereas the national figures declined some 12 percent. There are a number of reasons for the comparatively low overall case closure rate at GBLA, including the absence of a hotline, limitations on advice in family cases, emphasis on extended work, and incomplete capture of all LSC eligible cases. Specifically, as funder requirements for the Health Consumer Center require extensive security for anyone with access to case data, GBLA has opted for a stand-alone database separate from its general case management system. LSC funds are not used to support these cases.

Significantly, over one-third, an impressive 38.5%, of GBLA closed cases were extended work. The national median for LSC grantees is 23.4%. In 2013, GBLA closed 58.5 extended cases per 10,000 poor persons compared to the national median of 47. GBLA clearly took to heart the 2007 PQV recommendations suggesting increased litigation, as extended case percentages have increased every year since a low of 13% in 2006. In 2013, over 75% of GBLA's extended cases involved a court or administrative agency action.

The majority of GBLA's closed cases were in the areas of housing (43.4%), family law (20.2%), income maintenance (12.9%), and juvenile (10.5%). Individual caseloads as well as unit case statistics for 2013 varied considerably. Individual caseloads ranged from five to 120 and unit closed cases from 61 to 280. While the disparities can often be explained due to unit staffing, the nature of the work, and/or other responsibilities of staff, it does not appear that GBLA has undertaken a comparative review.

Finding 9. GBLA provides high quality holistic assistance to its client community.

GBLA's high extended case numbers are emblematic of the quality of GBLA's work. The program is creating a culture of aggressive holistic advocacy for its clientele as opposed to simply processing cases. Judicial interviewees were uniform in their respect for the program's work. Judges knew staff by name, recalled specific cases, and found the attorneys and paralegals to be dedicated, professional, well prepared, and to the point. Interviews with state and national back-up centers echoed such admiration and identified a number of the staff as rising stars within the state's legal aid community. The writing samples submitted for team review reflected litigation in all priority areas, sometimes in complex matters. While some of the samples could have benefitted from supervisory edits, they each were appropriate for their intended function.

Although much of the program's advocacy is necessarily defensive in nature, GBLA is commended for its commitment to engaging in more affirmative litigation. National, state, and regional legal partners uniformly praised GBLA's impactful work and the PQV team was impressed that such recent efforts encompassed a wide range of GBLA's priorities. GBLA's Fair Housing Law Project (FHLP) successfully brought a federal fair housing lawsuit on behalf of two female residents, at two different mobile home parks in eastern Kern County, who were sexually harassed by the same park manager. Not only did the clients recover \$248,000 in damages and the manager "retired", but the park owners and management received fair housing training, distributed fair housing literature to all residents of both parks, and adopted non-discrimination and harassment policies that were approved by the FHLP. GBLA's Health Consumer Center's aggressive pursuit of denial of speech therapy under a Medi-Cal managed care plan ultimately resulted in both therapy for the client and Medi-Cal issuing appropriate guidance on the issue to all managed care plan providers across the state. GBLA is currently involved in a number of affirmative federal court actions including challenging the Housing Authority of Kern County's Section 8 informal hearing procedures, and addressing alleged discriminatory expulsion and school assignment policies within the Kern School District.

Equally impressive is the program's commitment to providing more than just case representation in its direct services. Rather, the program utilizes a holistic approach in rendering assistance. The program has full time case managers to provide supportive services for its clients in primarily housing, domestic violence, and health cases. Case managers utilize client self-assessment tools to determine client needs and assistance ranging from obtaining a winter coat for a homeless client to finding alternative housing for a domestic violence victim. Case managers assist clients in applying for various benefit programs, arranging for needed health care, or referral to another GBLA unit for additional legal assistance.

A prime example of the program's commitment to providing a full range of assistance is its implementation of its Sargent Shriver Civil Counsel Act (Act) grant. The Act, which funded seven pilot projects throughout the state, provides for free legal assistance in certain critical matters. The primary function of the Act in the housing arena is direct representation of low-income persons in eviction actions when the opposing party has an attorney. GBLA's project, the Landlord-Tenant Assistance Center (Center), located in the Kern County Courthouse in Bakersfield, provides services well beyond this mandate. The Center provides not only direct representation for eligible cases under the grant, but has set up a mediation service (with available GBLA interpreters) for those instances when the landlord is unrepresented. If the landlord refuses to mediate, then GBLA will advise the client on how to proceed pro per in the court action. Ineligible clients are referred to the court's unlawful detainer advisor housed within the Center. In addition to the legal services provided, the Center also has a full time social services coordinator to assist the clients not only with housing supportive services but any additional needs they may have, many of which may have led to the eviction. And, as with all of GBLA's units, the Center is routinely tweaked to enhance service delivery. For example, when the Center started receiving a number of Section 8 eviction notices, a part of the grant was carved out to provide representation at housing authority administrative hearings. Of note, that representation ultimately led to the affirmative Section 8 case discussed above.

Finding 10. GBLA has various policies that address legal work management and case supervision; uniformity in implementation is sometimes a challenge.

GBLA has compiled an Advocacy Policy and Procedures Manual which combines in-house policies with LSC regulatory policies and procedures. The manual was last fully updated in 2010. Legal work supervision policies were also submitted to the PQV team for review but do not appear to be formally incorporated into the procedures manual. The supervision policies call for the creation of monthly case reports that are submitted and reviewed by one's supervisor as well as monthly case review meetings. While monthly reports appear to be routinely done, case review meetings vary among units and supervisors. Some units have weekly one on one meetings, with others monthly, and still others less frequently. As the executive director supervises all the unit supervisors, formal case reviews of unit supervisors are even more sporadic. This was of some concern to the team as many of the unit supervisors have limited experience. All supervisors have an open door policy as well as other informal forms of supervision which are routinely utilized. Cases are reviewed upon closure but primarily for compliance. The program does utilize an office wide calendar and tickling system.

Finding 11. GBLA provides extensive support for its advocates through training, collaborations, and internal mechanisms.

GBLA provides a myriad of training opportunities for its advocates. Staff routinely attend Benchmark, Practice Law Institute, Western Center on Poverty Law, and other California training events. Additionally, and to the program's credit, despite the availability of these low cost California events, advocates are also encouraged to attend national events such as those sponsored by the National Legal Aid and Defender Association (NLADA), American Bar Association, the Management Information Exchange, and the National Association of Social Security Claims Representatives. The PQV team was quite impressed that four unit supervisors recently attended NLADA's Litigation and Advocacy Director Conference. GBLA also provides in-house training on a variety of topics. Substantive law sessions are provided to assist in issue spotting and intra unit referrals, and non-legal subjects are also offered to assist in daily practice; most notably one on vicarious trauma.

In addition to training, advocates are encouraged to partner with various regional, state, and national legal organizations that specialize in the GBLA's priority areas. Program advocates are members of task forces and list serves maintained by such organizations, and staff routinely seek individual case assistance. Of note, each of the major cases listed under Finding 8, above, involved collaboration with a partner organization. Internally, GBLA has both housing and domestic violence weekly meeting for all advocates, regardless of unit, that deal with those types of cases. Other advocates are invited to attend as well. These meetings generally serve as a forum for advocates to raise case specific questions. Some staff expressed a desire that cross unit meetings also be used as a forum to discuss trends and more systemic issues.

In an effort to provide additional in house support for its advocates, GBLA leadership recently created a senior litigator position to assist staff with their complex litigation and identify new opportunities for affirmative litigation across units. PQV team interviews reflected that advocates are eager to fully utilize this new resource.

Extensive internal research capabilities are also provided by the program. Staff have access to Westlaw as well as numerous poverty law manuals. Attorneys are also provided individual copies of the California Rules of Procedure. Additionally, the program has an S drive wherein

each unit has a folder for form pleadings and briefs. GBLA also recently purchased document management software and is piloting it in the fair housing unit.

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.

Recommendation III.1.9.1 GBLA should continue to support more complex and 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.

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

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.

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.

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.

Private Attorney Involvement

Finding 12. GBLA is making a concerted effort to expand and enhance its private attorney involvement component (PAI), the Volunteer Attorney Program (VAP).

Since its low point in 2012, with only 21 closed PAI cases, GBLA has worked towards improving its PAI component. A new coordinator was hired and a consultant, the prior director of the Volunteer Legal Services Program of the Bar of San Francisco, was brought in to assist the program. With the assistance of the consultant, best practices were developed and the PAI Plan was revised. Rather than detail an array of opportunities, the plan concentrated on two priority areas, each with a different level of service: limited assistance in housing and more extended work in guardianship. A recruitment drive with the assistance of the local judiciary was initiated, and a small group of dedicated volunteers was enlisted. Volunteers assist with the intake and giving of housing and elder law advice on a weekly basis and, when a guardianship volunteer wanted to expand her work, funds were donated to hire a part-time paralegal to assist her. Additional attorneys have also been enlisted for specific unit needs, including co-counseling in major litigation. In 2013, 119 PAI cases were closed and the 2014 interim report reflect that 89

cases were closed in the first half of 2014. Despite these impressive increases in PAI activity, interviews with volunteers reflected that many of their colleagues may not be aware of GBLA opportunities and their value.

With the recent arrival of a new PAI coordinator, efforts are being made to further expand the program. A new recruitment drive has commenced and VAP is expanding to include assistance in domestic violence matters. Training of the private bar, by GBLA attorneys in the violence reduction units, was held the week of the PQV, and the program hopes to roll out volunteer assistance in obtaining restraining orders in the coming weeks. The new coordinator is also meeting with other units to see how VAP can be integrated into their delivery of services as well.

As with enhancing legal representation, the GBLA leadership has fully supported VAP's expansion. Within weeks of coming on board, the new coordinator was sent to the NLADA annual conference to attend its many PAI sessions, and she is slated to attend the May Equal Justice Conference, as well as its new coordinator preconference. The prior VAP coordinator was also brought in to assist with her successor's orientation. Additionally, for the first time, VAP now has a full-time paralegal assigned to the unit to assist in recruitment, intake, and case assistance.

VAP has not only its best practices guidelines, but a manual for use by volunteer attorneys. There appears to be appropriate case oversight from the initial intake to case closure with routine tickled status checks in between. While there have been more formal volunteer attorney recognition events in the past, they have not occurred recently due to the change in coordinators.

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

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.

Other program services and activities on behalf of the low-income population

Finding 13. The program engages in a wide variety of other services and activities on behalf of the low-income community throughout their service area.

GBLA provides extensive community legal education, to both clients and providers, in a myriad of topics and forums. Each GBLA unit has at least one designated staff person that conducts education and training in the communities it serves. Larger events are coordinated through the monthly outreach workers' meetings. Within the last year, the program has given community education presentations in all of their priority areas at numerous community locations including senior centers, schools, head start projects, churches, community centers, housing complexes, and parole orientations. Many of the sessions were conducted in both English and Spanish and some solely in Spanish. GBLA is also very strategic in its presentations. For example, it has taught sessions on educational rights to pastors of color, tenant's rights to landlord groups, and immigration relief for victims of domestic violence to a migrant parent group. Additionally, the

program has hosted events in its large, multi-purpose training room on such topics as domestic violence, education rights, and the Affordable Care Act. The program also offers the multi-purpose space to community partners for their trainings, meetings, and events. GBLA staff are also heavily engaged in educating service providers and have made presentations to employees of health clinics, child development centers, the Veterans Administration, probation department, and attendees at numerous local social service consortiums on GBLA priority topics. The program has also hosted a grant writing workshop for fellow service providers.

Beyond formal presentations, GBLA provides printed informational brochures and booklets on a wide range of legal topics, which are available in the office lobby, the Landlord-Tenant Assistance Center in the courthouse, and the program's various outreach sites. GBLA also routinely staffs booths at community service events including Stand Down and local senior, health, and college fairs. The program maintains its own website, but it is not updated on a regular basis, information is limited, it offers very little self-help information and, as noted previously, it does not have a Spanish component. A couple of units have created Facebook pages and/or Twitter accounts to disseminate information about their work, but they are hard to find and are not linked to the GBLA website.

GBLA's engagement in organized pro se assistance has been more limited than its general education efforts. Until the later part of 2014, GBLA had a grant for an Orders Project wherein a GBLA staff person assisted pro se litigants in preparing post hearing orders and judgments. Since the court ultimately chose to hire its own staff person, the project ended in October 2014. VAP has also engaged volunteer lawyers to assist self-represented litigants by conducting periodic workshops at the Kern County Law Library on bankruptcy and probating small estates.

One of the major activities that GBLA engages in on behalf of its client population is the program's involvement in numerous provider-based consortiums. Each unit is involved in one or more such groups that address their client needs. Such collaboratives range from locality based rural provider meetings to more specialized subjects such as a monthly discharge planning group to help the homeless population that is being discharged from a hospital or incarceration. Staff are involved in various other groups that address the needs of vulnerable population groups including the elderly, disabled, and veterans, as well as substantive issues including domestic violence, trafficking, and health. Additionally, GBLA staff are also members of the Human Relations Committee for the County Board of Supervisors. Another unique and highly successful collaboration has been GBLA's monthly one on one meetings with the Kern County Department of Social Services. These meeting are used to address program identified issues as well as discuss development of agency policies to avoid future issues.

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 statewide LawHelp California website.

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.

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

Board governance

Finding 14. The members of GBLA's board of directors are diverse, informed, and motivated to accomplish the mission of the program.

GBLA board composition is racially, ethnically, and gender diverse. The board currently consists of 12 members, eight attorney members and four client eligible members. Seven of the eight attorneys are appointed by the Kern County Bar Association with the eighth appointed by the Kern County Woman Lawyers Association. Four of the attorneys are Caucasian, three Hispanic, and one Asian American. Most attorneys are in private practice with local firms in Bakersfield and some have significant leadership positions within the legal community, such as presidency of the Kern County Bar Association and Trustee of the Board of the California State Bar. The client members are appointed by various agencies throughout the county and include two Hispanics and two African Americans. Client eligible members feel that meetings are inclusive and that their contributions to the discussions are respected and taken into consideration. Most had prior experience in governance of other non-profit organizations prior to joining GBLA; and they were familiar with the work of the organization. There is a current vacancy in a client position on the board that has continued for more than one year; and, another vacancy was filled earlier this year.

The board meets five to six times a year to discuss appropriate subjects of oversight, including financial reports, program activities reported by the executive director, approval of funding proposals and applications, adoption and/or review of policies; and other new business. An opportunity for client reports is included on the agenda, but its purpose is not clearly defined.

GBLA conducts most of its governance activities through the full board rather than a robust committee structure. Currently, the active committees are the Audit Committee and the Investment Committee. Each meets to receive reports pertaining to their respective charge once or twice annually. The Occupancy Committee was recently established, ad hoc, to look into the acquisition of the properties that are currently leased by GBLA. The collective resolution of the board was to move forward with an acquisition. The board does not have a resource development committee, nor does it adopt a resource development plan. It has concluded that fundraising activities would not be a prudent resource allocation, opting instead, to encourage aggressive pursuit of grant funding. They are also considering a "fee for services" pilot project to provide legal assistance to clients of modest means that are not eligible for legal services under current income eligibility guidelines.

The board adopts an annual budget for each grant by approval of grant proposals and/or the final grant awards. There is an attorney on the board who is also a CPA, specifically recruited by the executive director, to provide financial expertise on the board. Financial oversight is performed via reports submitted to the full board and discussed with the program's director of finance during board meetings. The board receives an unaudited year-to-date Statement of Financial Position and a Statement of Activities comparing the current year with the preceding year. These

reports do not provide comparison to the budgets adopted by the board. The board also receives the report of the auditor following submission of the annual financial audit.

GBLA last amended the bylaws of the organization in January 1978 and has been cited by one of its funders, the State Bar of California, Legal Services Trust Fund Program (IOLTA), for several provisions being outdated. It appears that bylaws may also be inconsistent with provisions of the LSC Regulations. GBLA formed an ad hoc committee to address the concern, but has not updated its bylaws as yet.

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.

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.

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.

Leadership

Finding 15. GBLA is led by a well-respected, long standing, executive director who utilizes a hands on approach to effectuate the program's mission.

GBLA's executive director has long been committed to both legal aid and the people of Kern County. Raised in Bakersfield, she left the area to attend law school during which she clerked for both the Legal Aid Foundation of Los Angeles and California Rural Legal Assistance. When familial needs brought her back to Bakersfield, she accepted a position with GBLA's senior law unit in 1982. She has been with GBLA in various capacities ever since and has served as the executive director for the past 22 years. Team interviews reflect that she is easily accessible and is held in high regard by the staff, board, and community partners. She is a member of the Kern County, Kern Woman, and La Raza bar associations, and serves on the board of directors of Kern Health Systems, the county's largest managed health care provider.

The executive director is heavily engaged in all aspects of the program's operations including cultivating relationships with funders and community partners, program administration, personnel management, and legal work supervision. She is involved in all hiring decisions and will seek to find alternative placement for staff when grants have been discontinued. Whenever a new unit or project is created, she works closely with the assigned staff for the first few months to address any issues that may arise.

The executive director is constantly evaluating the program's delivery system seeking ways to improve. She has increased the size of the administrative team and engaged consultants for

additional expertise. The executive director also appears to be equally thoughtful in the selection of unit leadership. For example, several of the units are supervised by attorneys who may not necessarily be the longest serving practitioners, but who may have good management acumen. Leadership development is facilitated through various leadership training opportunities and in-house staff assignments. As evidenced by the program's entrance presentation to the PQV team, the executive director is always looking forward; rather than have each unit head describe their current operations, they were asked to state what they wanted to be doing in five years.

The board of directors recently approved a leadership succession plan. However, the plan's provision that the president of the board will serve as interim director may present a governance problem in that the oversight and executive function would be conflated. The plan also has no specific provision vesting someone with immediate check writing authority in the case of the director's unexpected absence.

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.⁸

Overall management and administration including financial management⁹ and human resources administration.

Finding 16. As the program has grown in size and complexity, GBLA has appropriately expanded its administrative team.

For many years, program administration consisted of just the executive director and an administrator. In 2012, experienced financial and human relations (HR) managers were hired. The administrative unit currently consists of the executive director, director of finance, administrator, human resources/plant manager and a senior paralegal who assists with compliance and technology. The program has engaged outside consultants for additional support for technology and resource development¹⁰. The administrative team communicates among themselves on a daily basis with more formal meetings as the need arises. Middle management consists of the various unit supervisors. While there used to be monthly supervisor meetings, such meetings have become less frequent and are more on an ad hoc basis.

Finding 17. GBLA has sufficient, experienced staff dedicated to the program's financial administration.

GBLA's fiscal team is led by the director of finance, who is a professional financial manager, with over 20 years of experience in a range of accounting and financial reporting environments

⁸ GBLA may want to consult LSC Resource Information at (<http://lri.lsc.gov/program-administration/leadership/succession-planning>) for examples of succession plans.

⁹ This visit was conducted by the Office of Program Performance (OPP) for the purposes set forth in the Introduction. OPP findings and recommendations under this criterion are limited to staffing, organization, and general functions. Assessment of fiscal operations is conducted by other offices at LSC.

¹⁰ The resource development consultant also assists with the needs assessment process and strategic planning.

that enhance his expertise in fund accounting. He is scheduled to earn his CPA in 2015. The unit also includes the administrator who has been with the program since 1993, and the HR/plant manager hired in the spring of 2012. The unit is assisted by a shared clerical position. Responsibilities are delegated to achieve segregation of duties for internal control purposes. The director oversees all accounting related functions, prepares extensive monthly financial statements, delivers reports to the board, and supervises unit staff. The administrator is primarily responsible for grant administration as well as receipt and coding of payables. The HR/plant manager addresses payroll and benefits administration. The unit continues to outsource banking reconciliation to a bank outside the service area; a remnant of separation of duties when the financial staff was much smaller. The financial unit staff complement each other's strengths and appear to work well together.

GBLA's financial team utilizes Sage ACCPAC 300 Advanced ERP (Version 2012), a fully-integrated accounting system which currently takes advantage of the following modules: system manager, general ledger, accounts payable, accounts receivable, payroll, human resources, and fixed assets. All appropriate administrative personnel have received cross-training in the accounting system. In addition, complete up-to-date operating manuals for all accounting modules are also on hand and easily accessible, as well as step-by-step instructions for routine functions. GBLA has revised its Accounting Manual several times since the adoption of the LSC Accounting Guide in 2010.

The director of finance prepares budgets for each grant that funds GBLA, and these budgets are approved by the board of directors. The director of finance reports on the activities of each budget (grant) on a monthly basis. This information is reviewed with the executive director and constitutes the basis of calculations provided in the reports prepared for the board of directors. This information, however, is not presented to the full board, but is available to them if they have questions concerning the more general financial report prepared for the board. GBLA conducts an annual audit, and the independent auditor reports its findings to the full board.

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.

Finding 18. HR Administration appears appropriate for the size of the organization.

In 2012, GBLA hired an HR manager with five years' experience in not for profit human resources. Prior to that, the function was mostly carried out by the executive director. The HR manager's duties include recruiting, terminations, evaluation oversight, time reporting, payroll, and benefits administration. She also serves as the plant manager for the program, addressing space, logistical, and various brick and mortar issues.

GBLA has a detailed employee handbook. The employee benefits package includes: 100% of health insurance premiums paid for the employee by GBLA, and the employee pays the full premium cost for dependents; 100% of dental insurance premiums for employee and family; group life and disability insurance; and a 403(b) program with 100% contributions by the employee.

GBLA has been successful in attracting junior attorneys based, in part, on a starting salary above the California LSC grantee average and competitive with the local Office of the County Attorney. Paralegal salaries are equally competitive. While starting attorney salaries have been raised, the scale is capped after ten steps; five as an Attorney 1 and five as an Attorney 2. Although there are far more new attorneys than experienced ones, GBLA reports having no generational friction, with the senior attorneys willingly providing needed guidance to the junior attorneys.

Performance evaluations are expected to be done annually but this requirement is not always followed. The HR manager has an evaluation tickler system in place based on an employee's anniversary and, when the evaluation is supposed to be done, she sends periodic reminder emails to employees and their supervisors. The procedure entails both a self-evaluation and a supervisor evaluation. The director receives both documents and has a joint meeting with the employee and supervisor to reconcile the evaluations, provide her own input, and finalize the process.

While all staff receive orientation on the program's policies and procedures as well as the CMS, time keeping, and LSC compliance, it did not appear that similar attention is given to the history and workings of GBLA, California legal services delivery systems, or LSC. Additionally, support staff did not appear to have as many training opportunities as advocates.

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

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.

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

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.

Finding 19. GBLA's disaster plan is in need of revision to accomplish its stated goals.

While the stated purposes of GBLA's disaster plan is to safeguard the lives of staff members and clients; to be available to clients and avoid disruption of program operations; and to minimize loss to agency assets and facilities, the plan is far too broad and general to effectuate those ideals. It does not sufficiently instruct the staff as to what they should do in times of disaster, nor does it discuss program operations if a disaster precludes usage of the main office.

Recommendation IV.3.19.1 GBLA's disaster plan should be reviewed 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.

Technology

Finding 20. GBLA has a solid technology infrastructure and provides critical tools and resources for staff, but there are areas in which they could make better strategic use of technology.

GBLA outsources its IT support to LanPro, a local Bakersfield company that provides network and day to day IT support for small to medium sized businesses. They selected LanPro in September of 2014, after issuing an RFP, interviewing three potential vendors, and getting board approval. LanPro has a staff of 12 and their assistance ranges from helpdesk support to high level network engineers.

Through LanPro, GBLA has leased new servers with a third party vendor, replaced over 20 desktops that were running on Windows XP, and have standardized everyone's systems so they are all on Office 2013 and Windows 7 Pro. Additionally, LanPro installed a software application on each desktop that monitors the system as well as provides each user with a direct connection if they need to request helpdesk support. The helpdesk can remote into the users system to try to resolve the problem. If there is a problem they can't resolve remotely, they will send a technician onsite. They also remotely monitor the network and make sure updates are installed regularly.

LanPro provides a robust backup solution, including local snapshots every two hours and nightly streaming of any changes to the system files to Amazon S3 servers, which offer redundant multi-location storage for disaster recovery. They have a monthly ticket to generate a random file to do a test recovery. The network also has strong security systems in place, including virus protection, web filtering, email filtering through LanPro, and a HIPPA compliant network firewall. Passwords have not changed in the last two years and the program will be looking into a way to easily implement quarterly password changes.

The program appears to have an adequate Internet connection, but as they grow and resource demands increase, additional bandwidth may be required. The program's two buildings are connected through a fiber cable. They do not have any wireless network in the building for guests or volunteers. The program has one desktop and monitor setup in the library with a webcam that can be used for video conferencing and for conducting interviews for hearing impaired clients. They also have a braille printer for producing documents for blind clients. While their CMS is adequate, there are more recent versions that would enhance effectiveness.

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.

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.

Internal Communications

Finding 21. While most staff are generally aware of program activities through informal means, the program could benefit from a more formalized communication structure.

In the past, GBLA held quarterly all staff meetings as well as monthly unit supervisor meetings. With the addition of individual unit meetings and cross-unit substantive meetings, the programmatic meetings were limited in favor of the more substantive delivery meetings. The entire staff gets together approximately twice a year and it serves as a combination of program/unit updates and staff training. Although staff reported that they were aware of other unit activities and program status, knowledge was generally gained through informal means and periodic management emails. There are currently no formalized programmatic updates to staff beyond the staff gatherings and emails, nor is there a forum for such communication such as a program e-web, newsletter, or recurring/scheduled emails.

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.

Resource Development

Finding 22. Despite not having a formal resource development plan, GBLA has been creative in successfully developing new and diverse income sources to sustain its priorities.

GBLA relies primarily on grant writing as a means of diversifying and expanding its funding sources. Fundraising from private and corporate sources in the service area is extremely challenging; a fact confirmed by partner organization representatives in PQV team interviews. However, GBLA has been successful in obtaining large grant award. Only two of the program's grants are less than \$50,000 with most well in excess of six figures. Many are for funding cycles longer than one year.

Since 2001, GBLA has had a resource developer whose expertise lies in grant writing. Although she has moved from the area and now operates under a contract with the program, she still maintains close connections with state and local funders. She travels to Bakersfield every three months and, while there, meets with the substantive units to determine their needs. She then identifies and applies for potential funding sources. She also conducts focus groups for the tri-annual needs assessment and assists with strategic planning. This integrated approach seems to have been conducive to a coherent development strategy. While curtailing mission drift, non-LSC funding has increased by almost \$1million since 2012.

Currently the program has 19 separate funding streams from federal, state, and local sources. Sources include federal homelessness, fair housing and domestic violence grants, and state health, rural justice, and housing grants. In addition, GBLA is one of the few legal aid programs in the state to receive county First 5 grants. GBLA receives two such grants, totaling over \$565,000; one for a domestic violence reduction program and the other for a guardianship/caregiver project.

Although each of GBLA's units is funded by different grants, the program appears to be highly selective in choosing funding sources, not necessarily pursuing every opportunity but instead giving careful consideration to how the potential new funding sources will fit in the overall delivery structure. For example, when it appeared that the program's homeless grant might not be renewed, the program sought and successfully secured veteran's funding to sustain the program's homeless efforts as many of the clients were veterans. This strategy appears to have led to reduced staff turnover and increased stability, as well as helping to avoid mission drift.

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

Participation in an integrated legal services delivery system

Finding 23. GBLA is actively involved with numerous statewide and regional efforts that foster an integrated legal services delivery system.

As noted throughout this report, GBLA is highly engaged in various state and regional collaborations. The executive director is a member of the California Project Directors Association and staff are members of various state substantive task forces and list serves. Program advocates collaborate with the state support center on statewide issues of concern and often co-counsel with other legal aid agencies. GBLA is a member of California's Health Care Alliance that routinely meets to coordinate health care initiatives throughout the state. The program is equally engaged in regional collaborations addressing all of the program's priority areas. Staff are members of numerous local consortiums including the Kern County Homeless Collaborative, Domestic Violence Advisory Council, and the Building Healthy Communities Initiative.

CONCLUSION

GBLA is a well-rounded legal services program. It provides a myriad of high quality services for its clientele while, at the same time, maintaining an appropriate infrastructure to support its delivery systems. As the program routinely evaluates its processes and structure in an effort to better itself, most of the recommendations contained in this report seek only to encourage the program's laudable ongoing efforts.