

May 24, 2013

Sent Electronically and by Regular Mail

Cheryl Nolan
Office of Program Performance
Legal Services Corporation
333 K Street, NW 3rd Floor
Washington, DC 20007-3522

Re: Legal Advice and Referral Center, Inc.
Program Quality Review October 1-5, 2012
Recipient Number #130010

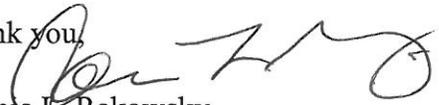
Dear Cheryl:

I am writing in response to the Draft Program Quality Report issued by LSC's Office of Program Performance in conjunction with its quality visit to Legal Advice and Referral Center during October 1-5, 2012.

I want to thank you and the members of the team for the professional and courteous manner in which you conducted the visit and for its thoughtful and thorough examination of our program.

The Report addresses many of the tasks and issues with which we are currently grappling. The OPP team noted that despite our many accomplishments we can continue to improve our performance. We agree. It is this recognition and our commitment to our clients that drives us to succeed. In the Attachment A LARC provides a few comments for your consideration.

Thank you,


Connie E. Rakowsky
Executive Director

Cc: Mark C. Rouvalis, Chair Board of Directors

Attachment A

Response of Legal Advice and Referral Center, Inc. to

The Legal Services Corporation Office of Program Performance

Draft

Program Quality Report for Program Quality Visit October 1-5, 2012

Recipient Number 130010

May 24, 2013

Team Members

Cheryl Nolan, OPP Program Counsel

John Idleman, OPP Program Counsel

J. Larry Green, Fellow, College of Law and Practice Management

Alex Gulotta, OPP Temporary Employee

Andrew Scherer, OPP Temporary Employee

Program Overview

LARC appreciates the time and effort spent by the OPP Review Team. We are grateful that the team learned of the high quality of our legal services delivery system, the high standards for legal services provided by LARC's staff, our commitment of and sensitivity to client needs, success of our technology implementation, strong reputation in the community, and the strength and experience of management and our board. We appreciate being recognized for the substantial improvement of access to services for our clients. We were very pleased to learn that LARC is at the top nationally of the volume of clients served and we will strive to continue to do so.

Regarding the Draft Report, we are very pleased with the findings in the Report. LARC invests a great deal of time, energy and resources in providing quality and effective services to clients. To have a third party review confirm that our investment has produced the desired result is reassuring.

We have a few comments and corrections¹ stated below. The Report addresses many of the tasks and issues with which we are currently grappling. The OPP team noted that despite our many accomplishments we can continue to improve our performance. We agree. It is this recognition and our commitment to our clients that drives us to succeed. We will be seriously considering the changes proposed and implement recommendations for which we have the resources.

Findings and Recommendations

Finding 4: LARC does not have an ongoing process for evaluating the effectiveness of its services.

1.4.4.1* LARC should determine the most feasible method to measure the results achieved for clients, including of the referrals made to its partners, and should employ the chosen method for doing so on a regular basis.

Since the visit, LARC engaged Great Programs, Inc. to conduct an economic analysis of the delivery of services provided to clients which can be found on our website at <http://www.nhlegalaid.org/about/>. This analysis measures the impact of results achieved for clients, based on a conservative approach and relying on proven, neutral techniques for evaluating performance and outcomes. Dollars working at LARC produce a return on investment of \$15.5 million, an extraordinary return for clients' benefit.

¹ Page 1, paragraph 5, number of employees correction: At the time of the visit, LARC had staff of 11.62 persons, not 9.25.

II.1.5.1* LARC should ensure that its new system for developing case handling procedures with the PBP is given the utmost attention and priority it deserves to strengthen the relationships among the programs.

II.1.5.2* LARC and PBP should evaluate the waiting periods for referrals, as well as the volume of callers returning to LARC for additional services, to determine what changes should be made to case handling protocols.

The staffs of LARC and PBP have successfully implemented new changes at both programs to improve services to clients by improving referrals, reducing wait times, increasing the knowledge of each others' programs, improving communications and having more fun together. Regular meetings are scheduled to continue making good progress on behalf of the client community.

II.1.5.3.* LARC should consider alternatives to replying entirely on callbacks for advocates to provide advice and limited services. The program might experiment with scheduled callbacks, a dedicated direct dial extension for pre-screened applicants to use, or directing a majority or high percentage of callers straight to an advocate rather than setting them up for a callback.

II.1.5.4.* In view of the inefficiencies of callback systems, LARC should consider future modifications to its internal operations that would allow for the provision of legal advice, in some defined types of cases, at the time of the initial call.

II.1.8.2 As resources permit, LARC should consider the benefits of an automatic callback feature added to the VOIP.

Since its inception in 1996 LARC has engaged in an ongoing process of self-evaluation and has continuously sought ways to improve the quality of service to clients and client access. In 2008 and 2009 LARC modified its case handling systems to increase applicant access. Following those changes LARC significantly increased the overall number of people served, and began to significantly exceed *national* averages, as the reviewers noted. Because of LARC's extremely small legal staff, providing clients with direct access – or even preferential access before 2009 – swamped the available resources and allowed for extremely limited numbers of new applicants to receive services. Nonetheless, LARC is constantly reviewing and re-evaluating its delivery model to enhance access and maximize the quality of services provided.

LARC has a new online application, and is in the early stages of developing an application that would be tailored to existing clients who are seeking follow-up services. LARC anticipates that this online form will provide the kind of stream-lined access envisioned by the review team.

Finding 6: LARC has implemented website and online intake technologies to increase access and efficiency.

Since the OPP team was here, LARC, in collaboration with NHLA, implemented a new online intake system created by Legal Server. NHLA applied for funding the vendor and a joint committee from both organizations worked through the applications and process. The data that applicants input now can be imported directly in our case management system after a conflict check has been completed. These automations significantly reduce labor costs allowing for improved client services. The system is easier for lawyers to maintain and change than A2J Author, will have mobile capabilities, and has all the other capabilities we were seeking. A soft launch occurred on May 1st while further improvements are ongoing. The initial reception to the program is very positive with 39% of intakes during the first month coming from online intakes.

Finding 8: Call data is limited due to the telephone technology used by the program. LARC's telephone system is scheduled for an upgrade to a different VOIP in two years.

Call management software and an automatic callback feature were investigated, including acquiring quotes. We do not have the resources to upgrade our system at this time but look forward to doing so in the future.

In view of our lack of funds to improve call management/reporting software, LARC acquired a small grant to upgrade its online intake system to save intake labor, thereby freeing up more staff to take calls off the telephone line. Intake staff now have more time to speak with clients rather than key in client data. We look forward to having both an improved online intake system and an improved reporting system and hope to have funding for the latter in the future.

II.1.8.5. * LARC's online intake system should be employed to alleviate the volume of incoming calls holding in queue by offering callers the option to apply online via prerecorded messages played in the queues. Callers who wish to apply online could be directed to community resources, such as libraries and community organizations, for free or assisted Internet access.

LARC's telephone messages currently advise callers that they can apply online. We will keep this message when we have the resources to implement a new telephone messaging system.

IV.1.19.2. * To the extent it has not already planned to do so, the LARC board should conduct a regular evaluation of the executive director at least once every two years.

An evaluation is planned annually and was recently conducted.

LARC appreciates the feedback and evaluations. Thank you,

Sincerely,



Connie L. Rakowsky
Executive Director