



Nassau/Suffolk Law Services Committee, Inc.

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June 1, 2015

Cheryl Nolan, Program Counsel
Office of Program Performance
Legal Services Corporation
3333 K Street, NW, 3rd Floor
Washington, D.C. 20007-3522

Re: Comments to Draft Report of PQV October 27-31, 2014

Dear Ms. Nolan:

We wish to express to you our gratitude for the painstaking effort that you and your Team put into reviewing and evaluating the voluminous documents obtained and interviews conducted during your visit to us in October 2014, and for the thoughtful and thought-provoking analysis and recommendations contained in the Draft Report. We appreciate the Team's commitment to assuring that clients receive high quality legal assistance, which was evident during the visit and is visible throughout the report.

Our comments on the draft report will follow the order of the report itself.

Service Area and Program Overview:

Factual correction: Pages 2 and 4: We do not have specialized projects serving low income children or military families and veterans. We do have a project for veterans in contemplation, and will be submitting an application for funding for such a project in early June 2015.

Strategic Plan:

1.1.1.1 To the extent NSLSC obtains additional funding it should consider expanding its services in the areas of consumer and family law.

One of the first things NSLSC did when we began to receive NYS Judiciary Civil Legal Services funding, was to restore and then expand our Consumer Debt project. We now have an attorney specializing in consumer debt in each county, where formerly we had one bi-county attorney. Also, most of the units devoted to a special population (David Project, Mental Health



Law Project, Senior Citizen Project, PLAN Project) provide legal services in consumer debt matters to their constituents, and our pro bono bankruptcy clinics in both counties assist clients to obtain bankruptcies.

While we acknowledge that we do not maintain a large family law unit, this is in large measure an attempt to avoid duplication of services provided by other agencies in the counties. Litigants in many Family Court cases, such as custody, neglect, termination of parental rights and some child support cases are entitled to appointment of an attorney, and those are represented by the Legal Aid Society in each county and by what is known as an "18b panel" of private attorneys assigned by the judge and paid by the county. The Safe Center in Nassau County provides legal assistance to victims of domestic violence there, and Touro Law Center operates a Family Law Clinic in Suffolk.

Divorce cases in New York State are far more complicated than in most states, and each case requires a very large investment of attorney time. The creation of a divorce unit has been under consideration by NSLSC for some time, but we have been cautious, due to the costliness of such a unit and the lengthy commitment required by each case. The need to create such a unit has been mitigated by the fact that we have been highly fortunate in developing a panel of private attorneys who have been willing to accept divorce cases on a pro bono basis. This has long been our primary method of providing legal assistance in divorce cases, and with the addition over the past few years of staff to our pro bono units, we have achieved a marked success in recruiting new attorneys to accept pro bono divorce cases. As a result, the need to establish a staff model has seemed less urgent. Several of the units for special populations also represent their clients in divorces in some circumstances.

1.3.2.1 In addition to its evaluation of meeting funding requirements, NSLSC should regularly assess its progress in addressing client legal needs and programmatic goals.

On an informal basis and in various groupings, management staff does frequently review the extent to which we are meeting client need and meeting programmatic goals. We agree that a more formal review would be beneficial. In the past several years, we have initiated a one-day management "retreat" at a location outside the offices, which would be an appropriate forum for such an assessment. We plan to devote our next retreat in late September to discussing our vision for the program, together with reviewing programmatic goals and objectives.

1.2.2.1*(page 6) On a regular basis, NSLSC management and board members should assess its progress in implementing the strategic plan. The board and management should also respond to progress updates and guide the program's steps in implementing the strategic plan.

As correctly stated in the report, we have implemented some, but not all of the recommendations contained in the Strategic Plan. We will be preparing a report for the Board on those aspects of the strategic plan that have been implemented and those items which have not been implemented, together with a discussion of what steps and investment of resources

will be required in order to implement the outstanding items, and what course corrections may be required.

Intake:

II.1.4.1*(page 9) *NSLSC should improve its screening and intake functions to minimize use of attorney and other advocate time in the initial screening tasks; reduce delays for applicants, limit the use of callbacks where feasible; and provide simple advice as appropriate at the initial point of contact.*

II.1.4.2*(page 9) *While maintaining an office and unit-based approach to intake, NSLSC should establish clear standards and processes to be followed by each unit. This overall structure should include: appointing an intake supervising attorney; ensuring that all screeners and other intake staff are trained and provided continuous updates; and ensuring prompt entry of data into the case management system.*

The LSC PQV Team showed a marked preference for a stand-alone intake system, with staff dedicated solely to intake, including a dedicated supervisor. We disagree that, given the complex requirements of our many funding sources and the variety of our projects, this is the most effective model for us. The report appears critical of the fact that some - we don't know how many - advocates indicated that they spend 40 to 45% of their time on intake work, and recommends minimizing use of advocate time in screening tasks, at the same it suggests assigning staff - including a supervisor - to do nothing but intake and screening.

We assigned a paralegal to be intake coordinator in Suffolk several years ago, but we did not find it to have a significantly positive impact on our intake system. We find intake works best when, beyond the basic screening that occurs at the reception desk, advocates who are intimately familiar with both the eligibility requirements of the particular unit and the work that the unit does, are the people who conduct intake for that unit. However, to assign an advocate to each unit to handle just the intake and provision of basic advice, would be financially prohibitive. Moreover, we find that "callbacks" are an excellent way for a new advocate, under close supervision, to become acclimated to a unit, by reinforcing the eligibility requirements and by imparting a broad understanding of the issues addressed by the unit. (Many new advocates spend most of their first weeks handling callbacks, reviewing each one with their supervisor.) Likewise, we believe that the supervisors of the individual units - all of whom are experts in the area of law they supervise - are the best persons to supervise the advice being given at the intake or callback level.

In this model, virtually no one is assigned a job that is comprised solely of intake tasks: everyone has the opportunity to participate in advocacy activities and develop first hand practical knowledge of how cases are actually handled in the local courts and administrative forums. We maintain that advice given to clients is more useful when it is based upon this level of experience. Some of our other funders have made it clear that they prefer that the

advocates providing advice be the same ones handling the cases. Recently, several staff members were required to attend a conference run by one of our funders, at which a client advocate group spoke vehemently about clients' preference that, if they were only going to receive advice, it should at least be from someone whose advice was based upon personal experience of what to expect in the legal forum in which the client found themselves.

In the balance between immediate assistance from a person with limited experience, and delayed assistance through a callback from an experienced advocate, we come down in favor of the callback system, where the matter is referred to someone who will get back to the client with more detailed and useful information than can be provided by someone whose advice is based on a manual. On the other hand, calls that are not picked up at all constitute a problem that needs to be addressed.

The report correctly indicates that NSLS puts a premium on extended service cases and full representation. (p.2) It also reports that the number of NSLS extended cases per 10,000 eligible population is nearly three times as high as the national median, and the number of contested cases is nearly 4 times as high as the national median. (p. 16.) Yet the report seems to suggest that we should have in place an intake system appropriate for a hotline-based program. A shift in this direction might be needed if, in our drive to handle more extended and contested cases, the total number of cases handled per 10,000 eligible population was below the norm, which would indicate that perhaps we were not assisting as many clients as we should. But this is not the case. The total number of cases handled at NSLS is slightly above the median, and has therefore not suffered as a result of our focus on extended service and representation in contested cases.

We are not suggesting that our intake system could not benefit from some improvements. We acknowledge that our phone system needed to be upgraded and, just last month, an entirely new telephone system was installed. We are still experimenting with its various new capabilities and features, as they may relate to intake and client access. One of the first things we did with the new phone system was to make sure that the greeting when a call is initially answered is given in Spanish as well as English.

In the pro bono section, the report refers to a Hofstra Law School Capstone project to develop document assembly programs. They have already developed a document assembly intake, which we will be utilizing in the new Family Court pro bono project in Suffolk, but we are also considering how we can best utilize, in our staff-based programs, a more generic intake they have also developed.

Although intake is an integrated part of all we do, we acknowledge that it has been several years since we last took a concentrated review of how intake is working and what we can do to make improvements, particularly from the perspective of client accessibility, but also from the perspective of appropriate allocation of resources. In the coming months, we will reconstitute an Intake Task Force for this purpose. One of the goals of this Task Force will be to develop and implement training for front desk staff and screeners.

II.1.4.4 NSLSC should ensure that appropriate signage is installed at the Riverhead office.

This has been completed. Our office location is now indicated on the directory on each of the three floors of the building.

II.2.5.1 NSLSC should implement regular training to ensure staff familiarity with and use of the program's LEP plan and professional translation service. The program should also consider including some aspects of cultural competency training to increase staff sensitivity in this area.

We will continue to provide training in this area, but in the year preceding the PQV, we conducted two separate trainings for staff, expressly encouraged them to utilize the translation service, and added a cultural competency aspect to the training by inviting a speaker connected to an organization promoting cultural sensitivity towards Spanish-speakers on Long Island.

II.2.5.2*(page 10) To the extent it is able to do so with its current phone system, NSLSC should include Spanish in the phone messaging.

We agree that it is important to accomplish this. Our new telephone VoiP system has just been installed and we are in the process of customizing it to better serve all our clients, including those whose primary language is Spanish. The initial greeting is now in both English and Spanish, and we will be including Spanish in any special voicemail boxes created for specific projects.

On page 10, the Draft Report notes that while Latinos comprise 31% of the poverty population in our area, they make up only 12% of our cases. While NSLSC needs to continue to be vigilant to assure that this is not in part due to barriers to access, we would point out that many within that population are undocumented, and not eligible due to LSC regulations.

Legal Representation:

Factual correction: On page 11, the draft report states that the Nassau Landlord-Tenant Attorney-of-the-Day Project in Nassau District Court is run by a pro bono coordinator, a paralegal and 2 staff attorneys. The 2 staff attorneys are actually not part of the pro bono project, but instead constitute the staff model landlord-tenant unit in Nassau, which accepts referrals of complex cases from the Attorney-of-the-Day Project and also handles housing subsidy cases. The Suffolk court project for landlord-tenant matters is staffed by 4 staff attorneys and a supervising attorney, plus one attorney focusing on appeals and housing subsidy cases.

Finding #8, p.12 *"In addition to the defense of evictions where housing rights are preserved, including where subsidized and public housing rights are at issue, the program handles cases where the delay of an eviction would benefit clients in crisis situations. The program reported to the LSC team that it has made an explicit decision to provide representation to tenants to obtain a delay in the eviction to enable the client to find alternate housing or make other plans as it prevents homelessness. However, some of housing advocates were not aware of this strategy and it is not recorded in any documents outlining strategic approach to identified client objectives or goals."*

Homelessness is one of the most frightening experiences faced by our clients, and it is far too common. Many of our clients have experienced homelessness at least once in their lives, and every year we represent many hundreds of clients who are at risk of homelessness in eviction proceedings. Once a family is actually homeless, the high cost of housing and the shortage of rentals on Long Island make it difficult to secure new housing. We litigate to achieve the best possible result for these clients. We are often successful in preventing the eviction and preserving the housing for the family. But just as often, the circumstances of the case make this infeasible, and the best we can do for some is to negotiate for more time, so that the family can try to secure other housing before the eviction occurs, and avoid homelessness in that way. Our negotiation skills will also frequently result in avoiding or reducing a judgment against the client for unpaid rent, making it easier for the family to locate new housing. Inevitably, some clients for whom we have delayed eviction will ultimately end up in emergency housing, but much later than they would have had we not represented them. We at NSLSC believe that every day not spent in a homeless shelter is a much better day and a small victory for that client and her family. We will assure that all staff are made aware of the value we place on avoiding homelessness, and that we see negotiation to delay an eviction to enable a family to secure alternate housing as one means of doing so.

Finding 9 (p. 13) *"Advocates spend significant amounts of time in screening and other intake-related functions which detour them from full representation of clients."*

As we indicated in our response to the intake-related recommendations (II.1.4.1.2, above), our system deliberately spreads intake responsibilities among all the advocates, instead of creating advocate positions whose sole responsibility is intake.

Finding 10 (p. 13) *"The practice group structure, while efficient, tends to have a siloing effect."*

Interaction among units is encouraged, and advocates from the specialized units will often, for example, attend meetings of the Welfare or Housing units to discuss cases with common issues. Newer staff are made aware of who the experts are in the program in the various areas of law, and advocates consult freely and frequently with both supervisors and experienced advocates. Supervisors have been meeting recently primarily to discuss the establishment of standards for supervisors, but they are close to completing this task, and it may be advisable for them to continue these meetings to discuss substantive legal issues arising out of their units which may be of more general concern.

III.1.11.1 (p.15) *Program leadership should consider assigning responsibility for supervision of unit supervisors to someone other than the executive director. Traditionally, this would fall within the purview of a litigation or deputy director.*

This structure has been the preference of the Executive Director because, although the supervisors are granted significant latitude and are not micro-managed by the Executive Director (see response to IV.2.17.1, below,) his direct supervision of the supervisors gives him a more direct and in-depth view of the work occurring in and challenges facing the various units, than he would get if relying on the reports of a deputy or litigation director.

III.1.11.2 (p. 15) *The program should invest in supervision training for its supervisory staff including training in management and administrative systems. The Guide for Supervisors should be followed.*

We recently authorized one of the supervisors to attend a 16-hour webinar training for supervisors. He felt it was very useful, and we will be discussing how to enable other supervisors to benefit from similar training.

III.1.11.3 *NSLSC should consider organizing the management and supervisory functions in a simple and clear way that reflects lines of responsibility, accountability and communication.*

See response to IV.2.17.1 below.

III.1.11.4*(page 15) *The program should consider the creation of an advocacy coordinator position, or alternatively, free up the litigation director to allow him time to support strategic advocacy throughout the program.*

In an agency in which not only the supervisors but also a large percentage of the advocates are highly experienced and knowledgeable in their areas of the law, advocacy coordination is perhaps not as crucial as it might be if most of the supervisors only had a few years of legal services under their belts. But we agree that an overview of litigation in the program, of issues being faced and addressed by the various units, and of legal strategies being developed and employed, would be beneficial for the program as a whole. After a discussion among the supervising attorneys, the Litigation Director and the Executive Director, we concluded that, rather than add to the responsibilities of one person or add another management position, we would try a different model that would take advantage of the unusual degree of experience among the supervisors: we will form an Advocacy Coordination Committee, to be chaired by the Director of Litigation. This committee will review existing litigation, identify recurring client problems which might be ripe for litigation and discuss potential litigation strategies.

III.1.11.5 *The program should develop an intranet or internal means to facilitate staff access to available program resources such as the brief bank.*

See response to IV.6.21.1&2 below.

III.1.12.1 *NSLSC should consider a training policy for its social work staff that provides for their continuing education requirements.*

New York State only recently implemented continuing education requirements for social workers. We agree that, just as the attorneys are assisted in meeting their CLE requirements, the social work staff should receive the same assistance, provided their choice of training relates in some way to their work at NSLSC. We have already implemented that policy.

III.1.12.2. *NSLSC should consider establishing guidelines for professional development of staff at all levels of the organization.*

The supervisors are currently developing professional development standards for the staff attorneys. We will consider developing standards for other staff.

III.2.15.1 *NSLSC should explore how innovations in document assembly guided interviews, such as those developed through Hofstra Law School, can be utilized to enhance service delivery.*

The Executive Director and several other staff recently witnessed a demonstration of Hofstra Law School's Capstone project, and were favorably impressed. It has already been decided that the product will be used for interviews for the new child support project, and we are exploring how it can be used for other aspects of our intake, including our staff-based in-court projects.

Leadership:

IV.2.17.1*(page 21) *NSLSC should implement a firm-wide, integrated and coordinated organizational structure. This structure should clarify the roles of leadership and management, establish accurate job titles, and provide clear lines of accountability.*

Management roles evolve over time, based upon a number of factors, including the special aptitudes of the managers themselves, the needs of clients, the needs of the program, the needs of staff (newer advocates need more close supervision than experienced advocates) and the vicissitudes of funding. Almost all of our managers have been with the program for decades, and from time to time have been asked to take on additional responsibilities, consistent with their abilities and experience. Most supervisors have administrative as well as supervision duties, and we don't see it as inappropriate that they should report directly to the Executive Director. Given their experience, it is not surprising that they are given latitude in performing their duties, and that they are afforded a degree of independence. Nor is it surprising that the interaction among these experienced managers is more collegial than hierarchical. Since our programs are functioning well and clients are provided high quality legal services (see pages 2 & 12 of Draft Report), we are not convinced that a change of management structure would necessarily lead to improvements, and might in fact be as likely to result in

damage. The finding (page 20) that "Some of the more seasoned leaders will likely be leaving the program in the near future," is premature, as we are aware of only one supervising attorney who plans to leave within the next 5 years, and most managers are planning to remain 10 years or more.

We will review the management titles and change where needed, but it may be a worthwhile exercise to define the roles played by various management staff and provide these descriptions to staff, to clarify whatever confusion may exist about what they do. We have been developing content for the intranet we hope to initiate soon, and written explanations of this nature, easily accessible from an employee's desktop computer, could be useful to staff.

IV.2.17.2*(page 21) *The executive director and management team should provide more effective ways of communicating a clear and sustainable vision for the program.*

The report found that staff share the mission of NSLSC, but that several did not have a strong sense of the executive director's long-term vision. (p. 20) The report rightly identifies a culture of providing extended representation in cases dealing with the survival needs of the poor, but did not identify the fact that this culture is inextricably linked to the vision of management and the executive director. Our vision is of a legal services agency responsive to the changing legal needs of its low income and disabled population, utilizing all available resources, both public and private, to serve as many in need as we can, with a focus on full representation whenever possible and appropriate. In setting full representation as the ideal standard, our vision recognizes that several ends can be achieved through full representation which significantly impact our clients' lives and the degree of justice they are able to obtain. First, for individual clients with a cognizable claim or a legal defense to an action brought against them, legal advice and pro se assistance may indeed be helpful, but legal representation provides their best hope for the best possible outcome. Second, we have seen that our constant presence in court and administrative forums effects change through precedential decisions, by educating judges concerning our client's legal rights and even by affecting the behavior of opposing attorneys (see draft report page 12, final paragraph.)

To the extent that we have not fully articulated this vision and strategy to staff, we have perhaps been remiss, and will attempt to rectify this. At our annual senior staff "retreat," we plan to work together to craft a more cohesive message to impart to staff, and to discuss the best means of getting that message out.

Financial management and human resources administration:

IV.4.19.1*(page 22) *In view of the length of time the program has contracted with its current auditor, NSLSC should consider a bidding process to hire a new auditing firm.*

This issue will be brought to the attention of our Board of Directors at an upcoming meeting. We understand the concern that a long-term relationship between an agency and an auditor

may negatively affect the objectivity of the auditor. However, LSC's own requirements that include additional non-financial auditing that is outside the normal parameters of an accounting firm, make it difficult to identify a suitable firm, and especially difficult to change once the auditors have become familiar with these requirements. The firm with which we contract has now had 8 years' experience conducting an audit of these unusual items, and there are no other local accounting firms that have this experience. In fact, in 2013, our auditors were audited by the OIG, received a good report and implemented the few changes in their procedures to comply with recommendations by the OIG.

IV.5.19.1 To the extent that funding is possible, NSLSC should consider hiring an experienced human resources director.

Prior to receiving the draft report, NSLSC contracted with ADP, which has long administered our payroll, to utilize its human resources services. See response to IV.6.21.3 for description of services. We are hopeful that this will help meet the unmet human resource needs and enhance services for staff.

Technology:

IV.3.20.1 The program should consult with other legal services programs and review information available for previous TIG grantees to identify resources that could enhance their practice, particularly in housing. NSLSC staff should use opportunities to learn more about innovations in service delivery from other legal services providers.

Through the NYS Office of Court Administration, we were one of only 6 providers statewide to be offered a unique opportunity to have technology professionals from a large law firm review and assess all of our systems and consult with us on ways to improve and expand our technology. We have recently responded to a very detailed survey of our existing systems and capacity, and we are looking forward to learning from these experts.

IV.3.20.2* (page 23) NSLSC should evaluate the potential benefits and costs associated with other case management systems. To the extent that funding is available, it should develop a plan to upgrade its CMS so that features - such as secure, reliable remote access for staff are implemented.

Unfortunately, the team seems to have developed several misconceptions concerning the functioning of our case management system, TIME. While true that there was a two-week period during which we were unable to access it, the problem had nothing to do with the TIME software. Our server collapsed, affecting all of our programs. While this was undoubtedly a crisis at the time, it was corrected by the installation of a new server and a cloud-based back-up system. The team also seems to be under the impression that the TIME system cannot be accessed remotely. This is actually not a failure of TIME, and some staff - mostly management - do have access. We plan to extend access to other staff, where appropriate, especially for staff who conduct intake in court. This can be done without replacing the TIME software.

The TIME system has worked well for us, and with the alterations made by Western NY Law Center to accommodate changes in data collection requirements of LSC, IOLA and other funders, it continues to meet our needs. The TIME system also has one feature we do not believe can be matched by any other system available in the marketplace: it is provided to us free of charge, including maintenance and upgrades. Absent extremely significant benefits, we are not willing to give up our current system to take on the costs of a new system, including the attendant costs of transferring data and training all of our staff on a new system.

IV.3.20.3 NSLSC should continue its work with cloud solutions by implementing the planned hosted VoIP phone system and evaluating the use of Google Apps and Office 365 across the organization.

We have recently completed the installation of a cloud-based, voice over system for our telephones. The new Broadview system is more user-friendly and has many features not available in our old system. On May 1, 2015, we also changed to a new computer consulting firm, and during the transition period will be evaluating Google Apps, Office 365 and other applications which may be appropriate for our program.

IV.3.20.5 The program should move forward with its plan to hire a full-time technology assistant to work with the Director of Administration and Information Systems.

We are preparing a posting for the position of technology assistant, and hope to hire someone by fall, 2015.

IV.3.20.6 The program should offer its staff technology trainings on Microsoft Office, basic user security practices, and resources that help users do their job effectively.

We will be evaluating the needs for Microsoft Office training that exists among staff, and explore the best ways to get them the training they need.

Internal Communication:

IV.6.21.1&2 (p.24) The program should improve its internal communication so that staff at all levels of the organization understand the program's goals and strategic initiatives. There should be consideration and planning for leveraging the intranet to enhance this understanding.

We had contracted with our last computer consultants to develop an intranet, which they did. However, we were not satisfied with the initial product, and before it could be modified to suit our needs, the company underwent a complete upheaval and significantly reduced its services on Long Island. We now have a new computer consulting firm, and are working with them to develop an intranet. Unfortunately, it appears that in order to obtain a product that will function at the level we were hoping for, we will need to virtually start from scratch. However,

while developing the aborted intranet, we did compile much of the content we plan to upload to the intranet, which will be ready to upload once the intranet goes online.

IV.6.21.3*(page 24) *Management should initiate an effort to address the diminished morale among staff. Such an initiative would emphasize recognition and appreciation of the work of staff.*

First, we would like to point out that, at the time of the visit, we had just a few weeks earlier completed collective bargaining and entered into three-year contracts with attorneys and support staff, and the negotiations had been in progress for many months at the time the survey was conducted. A feeling by some staff that they are not fully appreciated is an almost unavoidable side effect of the collective bargaining process. And since the very nature of negotiations of this kind results in raises that are lower than those requested by the union, there is always a degree of disappointment experienced by some staff. In terms of recognition of staff achievements, we do this in several ways. The Director of Litigation sends program-wide emails congratulating staff on achievements in cases, and staff are encouraged to contribute detailed descriptions of successes they have achieved for clients to the Newsletter, where they are publicized not only to Law Services staff, but to the thousands of advocates and supporters who read the Newsletter. The Newsletter also reports on community education conducted by staff, and staff anniversaries with the program. Additionally, each year we hold two events specifically for the purpose of promoting staff morale and camaraderie. The Board sponsors a holiday luncheon in December at a restaurant, and we hold a picnic at a local park in the summer.

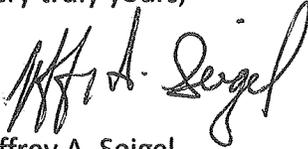
Job satisfaction is certainly an important element of morale, and as noted in the Draft Report, advocates are "engaged in their work" (p. 2,) "enjoy collegial relationships and routinely seek assistance and support from colleagues throughout the program" (p.11,) and "report senior management and program leadership are accessible and approachable on both legal and workplace issues." (p.14)

That being said, we have recently contracted with ADP, which formerly just handled payroll for us, to cover some of the human resource functions which we acknowledge were not being handled adequately. ADP operates a web-based program which will provide staff with instant information regarding available vacation and sick time, FMLA information, pay details and history, etc. Previously, it has sometimes been difficult for staff to get a prompt accounting of their time, particularly when the accounting department is under deadlines for grant-related submissions. This should resolve that problem. ADP also includes in this service several additional employee benefits, including shopping discounts and special deals, and a Life's Solutions Employee Assistance Program hotline, providing counseling and referrals free of charge. There will also be an opportunity for NSLSC to use the website to provide HR-related information to staff.

We plan to involve staff in our review of our intake system, as described in response to II.1.4.1&2, above. Also under consideration is the establishment of a committee including both management and staff to address professional concerns, and "Lunch 'n' Learn" meetings for staff on resources available to them and substantive legal issues.

We thank you again for the efforts of you and your Team.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jeffrey A. Seigel". The signature is written in a cursive style with a large, looping initial "J".

Jeffrey A. Seigel
Executive Director