



LEGAL SERVICES CORPORATION

Office of Program Performance

Final Report

for

Program Quality Visit

to

OHIO STATE LEGAL SERVICES ASSOCIATION

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**Ohio State Legal Services Association
Program Quality Report**

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INTRODUCTION

The Legal Services Corporation (LSC) Office of Program Performance (OPP) conducted a Program Quality Visit (PQV) to Ohio State Legal Services Association from June 1-5, 2015. OPP's team consisted of LSC program counsel Nancy Glickman, Ronké Hughes, and David Bonebrake, and LSC temporary employees Joseph Dailing, John Johnson, and Patrick (Mac) McIntyre.

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 administrative office in Columbus as well as its service offices in Columbus, Marion, Athens, Chillicothe, Newark, New Philadelphia, Portsmouth, and Steubenville. 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, community partner organizations, volunteer attorneys, and state stakeholders. Due to scheduling and time constraints, some of these interviews were conducted by telephone.

SERVICE AREA AND PROGRAM OVERVIEW

In 2014, LSC combined the service areas for Columbus and the neighboring southeast Ohio region to form OH-24, which earlier had been served by Ohio State Legal Services Association (OSLSA) and the Legal Aid Society of Columbus (LASC). OSLSA was founded in 1966 by the Ohio State Bar Association to provide service delivery to the southeastern Ohio region through Southeastern Ohio Legal Services (SEOLS) and to provide state support to the legal services organizations in Ohio.¹ LASC was founded in 1954 by members of the legal aid committee of the Columbus Bar Association to provide services for the greater Columbus metropolitan area. Following state planning efforts, OSLSA became the grantee for LSC's OH-17 thirty rural county service area and LASC became the grantee for LSC's OH-5 six county Columbus metropolitan service area. In 2009, following a highly unfavorable evaluation of LASC's

¹ The renamed Ohio Poverty Law Center still operates under the umbrella of OSLSA. As it receives no LSC funding, it was not part of the PQV assessment process.

management and legal work by the Ohio IOLTA funder, Ohio Legal Aid Foundation (OLAF), and at the request of LASC's board of directors, LASC became an affiliate program of OSLSA. Administrative functions were merged, the OSLSA board expanded to include members of the LASC board, and the executive director of OSLSA became the interim director of LASC². In 2010, LSC commenced funding OSLSA for both service areas. In 2014, LSC merged the two service areas to create the newly formed OH-24, with OSLSA as the sole grantee. The team assessed OH-24 in the aggregate, and any use of the word "program" refers to OSLSA and its service delivery affiliates and components with LASC generally referred to as the urban portion of the service area and SEOLS as the rural portion of the service area. This PQV was LSC's first visit to the newly configured OH-24 service area.

OSLSA consists of nine offices, an administrative office in Columbus, a separate Columbus service office, and seven³ offices scattered throughout rural central and southeastern Ohio. The rural southeastern region, often referred to as Appalachian Ohio, is one of the state's poorest areas and shares the culture of the entire Appalachian region, as well as some of its geographical challenges. The population is widely dispersed, and there is little or no public transportation. In contrast, Columbus, county seat of Franklin County, is a major metropolitan city that includes the state capitol, various administrative agencies, large law firms, and the Ohio State University. Close to one-half of both the service area's poverty population and OSLSA's direct service staff are located in Franklin County. According to the U.S. Census Bureau, American Community Survey Five Year Estimate (2009-2013), the OH-24 poverty population is 498,272. Approximately 75% of the poverty population is white, 18% is African American, 1.5% is Asian, 2% is another race, 4% identifies as two or more races, and 4% is Hispanic/Latino. The vast majority of the minority population lives within Franklin County, including the second largest Somali community in the United States.

OSLSA has undergone significant losses in funding from its principal funders in the last few years. While an overall decline in resources resulted in the layoffs of a considerable number of urban office staff at the time of the affiliation, a large monetary reserve enabled the program to forestall major layoffs in the rural region until 2014 when the program was forced to close three offices. It is of particular note that the March 2015 report by the Ohio Supreme Court's Task Force on Access to Justice recommended not only increased funding for all of Ohio's legal aid programs, but singled out OSLSA by specifically recommending funding for "the reopening of legal services offices in southeastern Ohio."

In 2015, OSLSA received \$3,505,040 in basic field funding from LSC, and projects \$7,198,484 in funding from other sources. LSC now comprises over 30% of OSLSA's funding. At the time of the visit, OSLSA had a staff of 85 consisting of 11 administrative staff, 49 case handling attorneys, five paralegals, and 20 additional support staff; a decrease of over 40% since 2008 in both the urban and rural components, the year before the affiliation.

² Although a separate director of LASC was hired in September 2010, after her departure in December 2011, the OSLSA executive director resumed leadership of the program and he has continued in that position without interruption to the present.

³ While technically the Marion office is a branch office within the metropolitan area configuration, the office has more closely operated within OSLSA's rural structure since the affiliation.

OSLSA provides a wide range of services including clinics, individual representation, complex litigation, and a variety of pro se assistance. In 2014, OSLSA closed 7,245 cases, the majority of which were in housing (28.4%), family (23.3%), consumer (13.9%), and income maintenance (10.3%). While this constituted a 10% drop from 2014, the program's closed cases per 10,000 poor persons still remains slightly above the national median for LSC grantees. Extended and contested case data were also in line with national figures. The program closed 834 PAI cases in 2014; a 30% increase from 2014, which is emblematic of the program's efforts to enhance its PAI component.

SUMMARY OF FINDINGS

OH-24's unique configuration presents both a challenge and an opportunity for strength. OSLSA has successfully balanced a combined administrative structure with a delivery system that acknowledges the diversity of its service area. At the same time, it has created a culture of high quality advocacy throughout the program. The PQV team applauds the program's accomplishments in coordinating and harmonizing its various components, and endorses the continuation and expansion of these efforts.

The urban and rural regions of OSLSA are each in different stages of effectuating a new comprehensive needs assessment. While the board of the urban affiliate developed a strategic plan in response to their needs assessment, OSLSA has deferred development of a strategic plan for the rural region until completion of a needs assessment there. The program routinely develops strategies to implement its priorities, which are evaluated for their effectiveness and adjusted to address new and emerging needs.

OSLSA is well known throughout the service area, with offices and outreach appropriately located. The urban region utilizes a centralized call center approach to intake whereas rural intake is more localized in its methodology. Intake procedures, management, and communication differ between the regions and a sharing of best practices would be of benefit to the program. Similarly, while OSLSA's technology capacity is adequate, it too could benefit from enhanced collaboration and training throughout the program.

OSLSA has experienced advocates that provide high quality legal services to the client community. The program provides its advocates the necessary training, support, and legal work management tools to assist in fulfilling the program's mission. OSLSA's efforts to integrate the legal work of the two regions has afforded an additional layer of support for the program's overall advocacy goals. The program's casework reflects innovative and aggressive representation, often resulting in major benefits to its client population. In addition, OSLSA is an active participant in the statewide legal services delivery system.

OSLSA has a comprehensive PAI plan. As the urban area has a larger and more diversified attorney base, it has a greater number of volunteer opportunities. Efforts are being made to expand usage of the urban volunteers to the rural region. The program also provides a wide range of other services to, and on behalf of, the client community including community education, pro se assistance, and participation with local, regional, and state stakeholder agencies and organizations.

The OSLSA board, comprised of members throughout the program's service area, is actively engaged in its policymaking and oversight responsibilities. As much of the board's recent activities have addressed economic issues, the revitalization of its finance committee appears warranted.

OSLSA has highly capable, well-respected leadership. The leadership team is supported by experienced managers that appropriately address each of their respective duties. While OSLSA staffing generally reflects the demographics of the service area, program management contains limited diversity. Additionally, despite the utilization of a number of best practices, internal communication also presents as a challenge. OSLSA has made significant efforts to enhance and diversify its funding throughout the Ohio 24 service area.

As OSLSA is still in a period of transition, most of the PQV team's recommendations involve continuation of ongoing efforts or enhancement of current procedures. Such recommendations include: expanding cross-region communications as to program priorities, strategic planning, and management; sharing best practices as to intake, case management, and staff training; and expanding collaborations in the areas of legal delivery, resource development, technology, and private attorney involvement. The PQV team also makes several recommendations to improve the program's intake systems, web-sites, and board financial oversight.

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. OSLSA is engaged in various stages of effectuating new comprehensive needs assessments in the urban and rural regions .

In 2014, OSLSA employed the Kirwan Institute for the Study of Race and Ethnicity at Ohio State University (Institute) to conduct a comprehensive needs assessment of the Columbus metropolitan area. The Institute undertook a mixed methods assessment utilizing a variety of data. Their assessment included an analysis of the area's population below 200% of the poverty level, program records of accepted and rejected cases, and closed case outcomes. The methodology also included GIS mapping of both populations in need and case data; a stakeholder survey of service providers and interest groups covering the same geographical area; and a review of various research studies conducted by local and state agencies. The Institute found that the top legal issues facing those in need were public benefits, housing, domestic and family law, foreclosures, and tax issues. These five general areas corresponded to the Columbus office's five substantive law teams and each law team developed specific case priorities which are being presented to the board for adoption at its next scheduled meeting.

A comprehensive needs assessment of the rural area was last conducted in 2008 through a contract with Ohio University's Voinovich School of Leadership and Public Affairs (School). The School gathered and analyzed case and demographic data, as well as reviewed surveys of clients, client-eligible persons, board, staff, and community leaders. In addition, the School

conducted three separate focus groups, consisting of African American, Hispanic, and representatives of mentally challenged residents of the service area. The assessment resulted in the rural area's adoption of four priority areas: promote and protect health and safety; protect and enlarge income and economic security; encourage and support strong, stable families, especially for the benefit of children; and promote full and meaningful access to the justice system. In 2015, OSLSA employed the School to undertake a new comprehensive needs assessment of the rural region. The first step in the process is disseminating separate surveys to community leaders via email and the client eligible population through the program's website. At the time of the PQV, survey instruments had been drafted and were being finalized by the School.

Although couched in different terms, the current priorities for both regions generally cover the same substantive areas. Moreover, each region follows the best practice of creating tiered case acceptance criteria within each priority to allow for resource fluctuation.

Finding 2. OSLSA routinely develops strategies with measurable goals to implement its priorities. They are routinely evaluated for their effectiveness as well as adjusted to address any new and emerging needs.

In an effort to address program priorities beyond individual case representation, OSLSA develops specific priority or impact plans with measurable outcomes to review. Historically, individual rural offices developed two-year plans for achieving their top two goals within their general priorities. However, in 2012, the reduction in staff coupled with a funder's recommendation for a wider approach to advocacy led to the adoption of a single region wide two-year priority plan for the area's most pressing need -- assuring access to appropriate healthcare and related public system supports. Specific objectives such as addressing state agency deficiencies, training staff, and client legal education were developed and measurable outcomes identified. Outcomes were tracked through the program's SharePoint software and reports were submitted throughout the process. The final report reflected that all of the outcomes were partially or fully achieved. Over the two-year period, after extensive outreach and education to clients, providers, and staff alike, the region received 799 applications for health related assistance, and total client benefits in the amount of \$431,444.88 were realized. Building upon the success of the 2012-2014 plan, the interim 2015 priority plan, pending results from the scheduled needs assessment, seeks to improve access to needed public assistance support for low-income families.

In a similar vein, the urban area's substantive units develop impact plans addressing an identified need and specifying desired outcomes. Current plans include addressing state agency failures to properly follow regulations, rent escrow projects for tenants, and providing better access to the courts through pro se assistance efforts. Reports are routinely generated listing both results and next steps. The most recent reports submitted to the PQV team reflected significant progress in each impact plan. In addition to reviewing the progress of these impact/priority plans, the program regularly compiles and evaluates outcome data for all of its casework.

Between needs assessments and plan development, new and emerging needs are identified through substantive team meetings, involvement in local consortiums, review of trends in requests for assistance, and the development of additional queries at the intake level. In 2012,

OSLSA held a program-wide emerging legal issues conference. In preparation for the conference, a panel of experienced advocates from both regions reviewed suggested topics and came up with four general issues, each reflecting a different substantive area. All advocates were invited to the conference to brainstorm. Issues were fleshed out and specific tasks were delegated to combined task forces or newly created work groups. One working group, in collaboration with other legal aid organizations in Ohio, was successful in their efforts to address county agencies' failure to grant reasonable accommodations when screening persons with disabilities for TANF work assignments. Other identified needs are still being addressed by prioritizing individual casework. Management is currently considering a similar conference to ascertain whether there are unique concerns in rural areas that are not otherwise being addressed by adherence to the program's current priorities.

Finding 3. Strategic plans have been, or will be, developed after the completion of the comprehensive needs assessment.

The board of directors of the urban affiliate of OSLSA has been active in initiating and facilitating a very thoughtful and ambitious formal strategic plan for that part of OSLSA's operations. The planning process and resulting report follows on the 2014 needs assessment. Five strategic goals were identified: continue to provide high quality legal representation and systemic advocacy on behalf of low-income individuals and families in Central Ohio; increase financial resources; increase pro bono and other volunteer capacity; review and develop the urban region's programs and staff/volunteers; and partner with other organizations. Within each goal are specific methods for achievement. OSLSA is now actively engaged in finalizing the implementation of the plan. Implementation includes the development of a dashboard, which expresses objectives in terms of desired outcomes for both individual clients and the low-income population as a whole. It establishes mileposts and measurable goals, and assigns responsibilities for implementation among specifically identified staff. Of note, the dashboard is color keyed to reflect matters that are on track, need attention, or are behind schedule. While a parallel planning mechanism has not yet been initiated to address the operations of the program's rural component, the management team indicated that a similar process would commence after completion of its needs assessment.

Recommendation 1.1.1.1⁴ Both needs assessments and approved priorities should be shared among all staff to further educate staff on points of commonality and enhance collaboration.

Recommendation 1.2.3.1* To the extent that resources permit, OSLSA should follow through on its goal to initiate a strategic planning process for its rural component and, to the maximum

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.

extent possible, should structure the process in a way that will best facilitate melding both plans into a document that applies to OSLSA as a whole.

Recommendation I.4.2.1 As additional questions are added to a region's intake system to identify an emerging need or address a recurrent issue, the program should consider having both intake systems add the new line of inquiry to both expand the research and enhance cross collaboration potential.

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

Intake

Finding 4. While each region of the service area has a number of client access portals; intake methods, procedures, oversight, and support vary among the urban and rural areas.

OSLSA's current intake system varies based on the population served: rural locations employ a "local" method of intake, while the services in the urban area are centralized through a call center. In the urban areas, intake is available by telephone, in-person, online using an A2J application, and by sending a text message to request assistance. Call center hours are between 9:30 a.m. and 3:30 pm. Intakes are screened by designated intake workers and referred to the appropriate substantive unit. In rural areas, intake is available by telephone, in-person, and through an online request form. New applications are accepted each day between 9:00 a.m. and 4:00 pm.⁵ Screening is conducted by office secretarial staff. Attorneys are assigned new applications for review with the assignment process differing somewhat by office.

In the urban portion of the service area, *front-end triage*, triage before the application is touched by staff, is offered through a telephone recording and the A2J online application's branching logic. While there is no front-end triage in the more rural areas, there is a general triage performed by the secretarial staff and, in limited instances, advice at this first point of contact. In the metropolitan portion of the service area, call center and intake statistics are monitored on a monthly basis and routinely shared with management. There is currently no similar component in the rural areas, but ongoing installation of a new phone system and adoption of a coordinated screening process will allow for such a review.

In both areas, applicants are encouraged to use methods other than in-person intake. Monthly average wait times for the urban call center range from two to twelve minutes. In the rural areas, support staff endeavor to immediately answer all calls and assess eligibility but, if otherwise busy, they attempt a call back the same day. Both sets of screeners utilize eligibility questionnaires linked to the program's PIKA case management system (CMS); however, the urban screeners also use an online survey tool, Lime Survey, which employs branching logic questions and scripts. Both regions use a callback method for attorney interviews of eligible intakes, though this process is automated in the urban portion of the service area. In both systems, the attorney call back is within three days. Cases with specific protocols are disposed of at the initial attorney call, with more complicated matters brought to group case acceptance

⁵ At the time of the visit, the New Philadelphia office did not conduct non-emergency intake on Wednesdays.

meetings. Each system has procedures for immediate assistance in the case of emergencies.

Technology usage is similarly diverse between the urban and rural regions. While both areas have an online component, the urban center utilizes a comprehensive A2J online application that is fully integrated with the CMS and capable of reducing the amount of data entry staff must complete during intake. In contrast, the rural area's online assistance request form requires entry of only basic information and offers no integration with the CMS. While callers to both systems have their information entered into the CMS, each region still utilizes some form of paper documentation. The urban call center has a paper call log and the rural offices have walk-in applicants fill out a paper application that is later entered into the CMS.

OSLSA is currently in the process of redesigning the intake system and workflow in the rural areas. The first phase is expansion of its rural office VOIP phone system to include a coordinated, "local office first" emphasis. The system is operational in four offices, with Portsmouth and Chillicothe scheduled to receive the updated system by July. Once all offices are online, the workflow will allow incoming calls to ring the local office first, then transition to a secretary ring group if unanswered. This method will balance the desire for local offices to be the initial point of contact, while allowing for "back-up" from other staff. The ultimate goal is to have a more coordinated approach to intake, though many of the details have not yet been finalized.

OSLSA has separate intake manuals for the rural and urban portions of the service area. The manuals are extremely dense and include office operational instructions, screening information, advisory opinions, conflicts procedures, referral information, and various other intake-related policies.⁶ The voluminous nature of the documents makes them unfriendly to users. In the rural areas, there are questionnaires included in the CMS, as well as the screening manual. Interviews revealed that the two methods yield similar information, but there is no consistency between which method should be used and each presents access challenges.

In the urban area, there is a full time supervising attorney for intake. She prepared and updates the intake manual, works jointly with technology staff to make adjustments in the CMS, monitors intake on a day-to-day basis, and designed the branch logic based Lime Surveys used by the intake workers. However, there is also an intake committee which makes recommendations on intake but does not appear to include a representative from the intake staff. In the rural areas, secretaries who conduct intake are supervised by office managing attorneys. There is currently no clearly identified overall intake manager for this portion of the service area, which leads to the potential for inconsistent decisions on intake matters. This structure seems to also cause confusion for the staff. Additionally, interviews revealed that some intake staff in the rural areas do not feel integrated in the redesign process.

In the urban areas, staff reported receiving intake training both annually and on an ongoing basis. The annual intake retreat is used as time to conduct a comprehensive review of the intake manual. Staff also reported meeting as a team throughout the year to discuss emerging issues, changes to intake procedures, and other issues as they arise. Rural intake staff reported never receiving a comprehensive training, though they acknowledged that periodically there have been

⁶ In total, the program provided 685 pages of intake-related materials in response to the PQV document request.

intake-focused sessions at the program-wide events. In addition, the rural support staff reported an absence of training on substantive law, resources in other offices, and county-specific resources.

Recommendation II.1.4.1* OSLSA should establish an intake taskforce that includes staff from both rural and urban offices at all levels, including front-line intake staff, whose mission is to seek, establish, and share best practices for intake throughout the service area.

Recommendation II.1.4.2 As the program implements the coordinated intake system in the rural areas, it should consider adding additional triage to its intake approach through its telephone menus, a redesigned online intake system, or other means.

Recommendation II.1.4.3 As resources allow, OSLSA should seek to harmonize the use of technology in intake to increase access and efficiency across the service area. This includes exploring and increasing the use of applicant-friendly features such as voice recognition telephone menus, automated callback, text messaging, an A2J online application, and Live Chat, as examples.

Recommendation II.1.4.4* The program should develop clear oversight for the program's intake in the rural areas, and include the individual in this role in the program's management structure.

Recommendation II.1.4.5 OSLSA should seek to harmonize its intake training approach and develop a comprehensive training curriculum for staff involved in intake that includes training on program services, substantive law, intake technology, and cultural competency.

Recommendation II.1.4.6 Program staff should revise the intake manuals to make them user-friendly by eliminating general office operations information and extraneous materials. This could be achieved by designing a separate, leaner guide for front-line users, while preserving the larger, comprehensive compilation for management or reference use.

Recommendation II.1.4.7* As the rural area offices launch the redesigned intake system and virtual call center, the program should begin analysis of intake statistics and call center data, including but not limited to queue depth, call hold times, agent talk time, call abandoned rates, and other key metrics.

Engagement with and access by the low-income population

Finding 5. OSLSA is well known throughout the service area, with offices and outreach appropriately located in areas that allow access by the low-income population.

OSLSA has offices located throughout the OH-24 service area. The program provides services through an office in Columbus, the state capital, along with seven offices throughout southeast Ohio, including locations in Athens, Chillicothe, Marion, Newark, New Philadelphia, Portsmouth, and Steubenville. Most offices have appropriate signage and are centrally located for the areas they serve. The Athens office was less accessible, having poor signage and a long,

winding driveway that is gravel in one portion. These features could negatively impact the public's ability to locate and access the services offered.

Each office visited had a separate waiting area for walk-in applicants. Some locations offered separate screening areas. Offices not only offered legal informational brochures, but also flyers for community activities and services offered by partners that would be beneficial to the client community. The program's offices are also largely accessible to individuals with mobility limitations. Athens would be very difficult to access without a car, but staff reported that most clients in the region have access to cars.

While funding cuts required the closure of three rural offices in 2014 in Lancaster, Zanesville, and Marietta, the program maintains satellite outreach offices in Lancaster and Zanesville as well as an interview site in Marietta. The Marion office also has available local office space to conduct intake in Delaware, Union, and Morrow counties. In addition to satellite offices, the program conducts ongoing outreach through evening walk-in clinics, staffed by volunteer attorneys, routinely held in community partner locations throughout the service area. There are 10 such sites in various areas of Columbus and 16 partner sites throughout the rural counties.

In response to the team's request for a listing of community activities within the last 12 months, OSLSA submitted various activities beyond the clinics including, among others, community education presentations, targeted outreach events, community resource fairs, workshops, and media engagement including television and radio show appearances. Many of the staff members interviewed were involved in local activities and members of community boards. It is of particular significance that the 2014 Kirwan Institute needs assessment specifically found that the urban component of the program was deeply engaged and connected with geographical areas of high need. This was corroborated by the team's onsite visit. As part of its review, the PQV team interviewed over a dozen community partners throughout the service area. They were consistent in their high level of praise for the program's work and its commitment to reaching all segments of the client eligible population. In an effort to maintain such effective client services, the program routinely sends client satisfaction forms. Any unfavorable responses trigger the program's client grievance policy.

Finding 6. Overall, OSLSA staffing reflects the demographics of its service area; however, diversity remains a challenge for management and supervisory staff.

The OH-24 poverty population is 75% white, 18% African American, and 7% various other ethnicities. Four and a half percent of the population, regardless of race, identifies as Hispanic or Latino. The vast majority of people of color, over 80% of the total, live in Franklin County, the home of the program's administration and Columbus service office. The Columbus service staff has nine people of color including four attorneys. There is one person of color, an attorney, in the seven rural offices.

The program's Columbus administrative office employs three African Americans including the program's only management level position staffed by a person of color; the program's development director. Despite management's desire to expand program diversity, as promotion

often occurs from within, racial diversity within the program's management team remains a challenge.

OSLSA offers adequate services for the limited English and deaf populations in the service area. LEP services in the metropolitan portion of the region are understandably greater than in the more rural portions, with linguistically isolated households reaching just over 3% compared to the service area average of 1.63%. The urban office has a single Spanish-speaking intake worker as well as a receptionist, who is being trained on intake, who speaks Somali. The program does not seem to currently track the number of calls that require assistance in Spanish or Somali because bilingual staff are used. Given the growth of Spanish and Somali speaking populations in the urban areas, such limited staffing may prove inadequate in the future.

The program has LEP policies in both the urban and rural areas that include the use of Optimal telephone interpretation service to assist with intake and extended services. In the rural areas, where there is no bilingual staff, interviews reflected little, if any, interaction with non-English speaking populations, but there is a desire to increase outreach to pocketed LEP populations that may not be aware of services the program offers.

Recommendation II.2.5.1 To the extent possible, OSLSA should improve signage for and access to the Athens office.

Recommendation II.2.6.1 The program should continue to examine ways to increase the diversity of the program's staff and leadership/management team.

Recommendation II.2.6.2 As the program hires additional staff, it should strive to increase its language capacity by hiring staff who speak the high frequency languages other than English in the OH-24 service area.

Recommendation II.2.6.3 Rural offices should seek to identify vulnerable LEP populations in their service area and evaluate how to conduct effective outreach.

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

Legal Representation

Finding 7. OH-24 is served by highly experienced poverty law advocates utilizing both specialist and generalist models.

Typical of many programs serving both urban and rural areas, OSLSA advocates operate as either generalists or specialists depending upon staffing levels and location. The Columbus service office has 19 case handling attorneys and two paralegals who are organized into five teams; consumer, domestic relations, housing, public benefits, and tax. Staffing in the seven rural offices ranges from two to six advocates, each serving as generalists with usually two areas of concentration. The overall average attorney experience level is 22 years; paralegals average 20 years of experience; and supervisors average 24 years of experience. There is no discernible

difference in these averages among the rural and urban advocates. Remarkably, over 50% of the program's attorneys have over 25 years of experience and only three staff attorneys have less than 8 years of experience. Additionally, the majority of the advocates' experience has been realized by working in the Ohio legal aid community with the average tenure exceeding 20 years. There is extensive expertise in all priority areas and a number of program attorneys serve as chairs of statewide substantive tasks forces and local and Ohio State Bar Association committees.

Finding 8. Despite a declining trend, OSLSA's closed cases are still above the LSC grantee national medians for all closed cases categories per 10,000 poor persons.

Over the last three years, OSLSA has suffered the snowball effect of declining funding, leading to loss of staff and, in turn, lower case closure figures. Yet, even in the face of such obstacles, OSLSA's LSC case closures are still above the LSC grantee median in all categories. In 2014, OSLSA closed 223 cases per 10,000 poor persons, compared to the national median of 196. The program closed 49 extended cases per 10,000 poor persons as compared to the national median of 45, and 27 contested cases as compared to the national median of 22. The significance of maintaining such statistics despite a reduction in staff is underscored by the fact that in 2014, through a variety of non-LSC grants, OSLSA closed close to 3,000 non-LSC eligible cases as well. Closed LSC-eligible cases were well dispersed among the various priority areas with housing and family law being the highest. Additionally, each service area county's percentage of the overall closed case total was generally equivalent to the county's percentage of the total client eligible population. Individual LSC-eligible caseloads ranged considerably, from the teens to over 100. While the team understood that non-LSC grant requirements and various staff responsibilities could easily account for the disparity, the range may invite further inquiry by program supervisors.

Finding 9. OSLSA provides high quality legal services often resulting in major benefits to its client community.

Management's vision to create a program culture of providing impactful services has clearly been realized. The use of substantive priority impact plans, discussed in Finding 2 above, has proven to be highly successful in promoting this culture. The program has addressed implementation of the Affordable Care Act, improving housing conditions through code enforcement, addressing excessive interest auto title loans, and maximizing use of temporary protective orders in criminal domestic violence cases. OSLSA's most recent Significant Litigation Report clearly reflects the commitment to providing the most meaningful of legal services. The report contains 38 cases, covering all priority areas, in a variety of forums including Courts of Common Pleas, the Ohio Supreme Court, the Ohio Court of Appeals, U.S. Tax Court, U.S. District Court, and the 6th Circuit Court of Appeals. Remarkably, more than half of the program's case handling attorneys had cases in the report. The cases reflected both innovative and aggressive advocacy. Examples include challenging debt settlement agencies assistance to judgment proof clients; requiring loss mitigation obligations to continue after the death of a mortgagor; limiting the weight of hearsay testimony in subsidized housing administrative hearings; assessing civil damages against criminally convicted domestic abusers; and challenging numerous questionable practices of lenders, landlords, and administrative agencies. OSLSA's outcome data underscores the effect of

such efforts. In 2014, the program recovered over \$1 million for its clients and avoided recovery of close to \$5 million.

Additionally, over the past year, the program has been successful in taking the lead on issues affecting the entire state including expanding Medicaid services, addressing discrimination in administering the Ohio Works First program, and expanding fair housing rights to victims of domestic violence. The program has also been heavily involved with a statewide legal aid effort to reform requirements that indigent litigants prepay their court costs. Just prior to the PQV, the program made state and national news for its successful settlement of its case challenging the procedure for removal of recipients from the state Medicaid rolls. Approximately 150,000 low income Ohioans will be the beneficiaries of the settlement. OSLSA is currently working on cases that address discrimination in SNAP work requirements and language access issues involving public housing notices. What is perhaps most impressive about these efforts is that the urban area has achieved such results so quickly after doing little in the way of impact work prior to the affiliation, and the rural areas have maintained such efforts despite the closing of offices and reduction in force.

Community partners, even those that are sometimes adversaries, as well as judges were uniform in their praise of the quality of the program's work. Writing samples also reflected creative and assertive work in a variety of forums covering all of the program priority areas. While most samples contained well-developed arguments with the appropriate research, others were somewhat formulaic and could have benefited from a more advocacy-oriented approach. Additionally, some samples did not appear to be of the quality appropriate for the experience level of the author.

Finding 10. The program employs a wide array of legal work management policies and protocols.

The program maintains a plethora of manuals each containing various legal work management policies and procedures. There are screening manuals, general policy manuals, a case management handbook, and a litigation protocols handbook. All are available on SharePoint for staff to access. In addition, memos are routinely sent to expand, update, or clarify manual topics.⁷ There are office-wide tickler and double calendaring procedures, supervision policies, protocols for potentially fee generating cases, and advice on handling certain types of cases. While the program's development of such extensive written policies covering every aspect of case assistance is admirable, the manuals often contained duplicative materials, outdated memos, and extraneous material rendering easy access problematic.

OSLSA also employs a variety of supervision mechanisms including office/unit case meetings, recurring individual case reviews, closed case reviews, review of weekly CMS generated case reports, review of written work, and supervisor access through clearly maintained open door policies. Interviews reflected that all of these mechanisms were generally followed and staff was pleased with their supervision. The team was especially impressed with many of the supervisors' commitment to assistance and oversight.

⁷ In response to the PQV document request for legal work management and supervision policies, in excess of 20 documents, including four lengthy manuals, were submitted.

The litigation director strives to visit all offices and conduct litigation reviews separate and apart from supervisor reviews. He also reviews all draft appellate briefs and complex Federal Court memoranda. Supervision of supervisors and their casework did, however, appear less robust than that of staff attorneys and other advocates. While there were mechanisms for peer case reviews of supervisors, and an evaluation system, supervision appeared less regular and more informal than that of the other advocates.

Finding 11. OSLSA provides extensive training and support for its advocates.

A myriad of training opportunities are available to OSLSA staff including in-house, statewide, Committee on Regional Training (a consortium of Ohio, Michigan, and West Virginia legal aid programs), and national trainings. A training responsible person reviews training opportunities and informs supervisors of their availability. Most supervisors have attended Management Information Exchange (MIE) supervisor training and many attorneys have attended National Institute for Trial Advocacy based skills training. While national trainings were more limited due to cost, efforts are made for periodic attendance at National Consumer Law Center, Internal Revenue Service, National Legal Aid and Defender Association, and MIE events. Additionally, the program attempts to have training costs included in grant applications to provide for targeted training. Program wide meetings also routinely contain a training component. As will be noted later in the technology section, there is a need for additional technology training. Although there has not been a class of new attorney hires in quite some time, the team was impressed with the rural area's long-standing new attorney orientation protocols with checklists ranging from the first week through the second year.

OSLSA provides various other avenues of support for its advocates beyond training. There are program and statewide substantive law task forces and email groups. Task forces generally have quarterly in-person meetings, often with monthly call meetings in between. Staff has access to Westlaw and manuals appropriate for their area of practice. The program's litigation director compiles an impressive litigation docket wherein pleadings from listed cases are easily accessible through links. A general pleadings bank is also available to all staff and the program is exploring ways to make it more user friendly. The program's PAI efforts have resulted in a writing mentorship program which has recently been expanded to include staff beyond the volunteer attorneys Columbus location. Participation by staff is voluntary and those that have availed themselves of the opportunity have found it highly valuable.

OSLSA has also recognized the vast potential for litigation support from within the merged service area. While the rural and urban areas have individual substantive task forces/teams, efforts have been made to combine attendance which has resulted in a number of collaborative projects and co-counseling endeavors. Visit team interviews of staff involved in such joint endeavors found them to be extremely beneficial. The litigation director has also initiated joint litigation calls and joint substantive team leader meetings. Efforts are also underway to share more specific resources such as developing a combined list of potential expert witnesses.

Recommendation III.1.9.1 The program may want to consider, as pro bono resources allow, expansion of the writing mentorship program as a mandatory exercise for all advocates.

Recommendation III.1.10.1 Manuals should be reviewed and, where appropriate, revised to reduce or eliminate unnecessary duplication and/or extraneous material. The program should further assure that manuals are made available in an easily accessible format.

Recommendation III.1.10.2* Supervision policies, including supervision of managers' casework, should be uniformly followed.

Recommendation III.1.10.3 An additional effort should be made to search out the best practices within the regions to be implemented by all of the program's various units and offices. By way of example, as new attorneys are brought on, regardless of region, the new attorney orientation/checklists should be utilized.

Recommendation III.1.11.1* The program should continue its efforts to combine resources throughout the service area in addressing client needs including tasks forces, co-counseling, training, and litigation strategies.

Private Attorney Involvement

Finding 12. OSLSA's program-wide Private Attorney Involvement Plan supports a wide range of mechanisms for involving private attorneys and other volunteers in its work.

The OSLSA unified PAI Plan emphasizes collaboration and synchronization of activities across the service area. There are two pro bono coordinators; one charged with activities in the urban center and the other in the rural areas. The pro bono coordinators are experienced legal services attorneys who are respected by staff and volunteers. They are supervised by their regional director or deputy director which encourages a high profile for their work. The pro bono coordinators consult with each other regularly, and are exploring ways to leverage resources of the larger metropolitan area to better serve rural communities.

OSLSA staff also collaborate with other providers in the state to develop systems and provide support for pro bono. Examples include (1) staff serving on the OSBA Access to Justice Committee; (2) staff participating in the statewide pro bono task force and listserv convened by OLAF; and (3) collaborations with law schools to utilize law students at clinics and in local offices. The pro bono coordinators also serve on the Columbus Bar Association Pro Bono Committee, and other attorneys are expected to be active in their local bar associations. This involvement encourages awareness of programs' work and promotes private bar involvement. As a result of these efforts, OSLSA has developed a vast array of service delivery models designed to meet the needs of the client community and volunteers.

The predominant method of pro bono delivery, utilized in both the urban and rural regions, is that of a variety of clinic settings including advice, informational, and potential extended service. There are 10 monthly clinics in Columbus held at community partner locations scattered throughout the city. In the rural areas, there are 16 clinic locations with varying degrees of frequency depending upon the population base. The urban region also hosts specialty clinics including a Chapter 7 Bankruptcy Project through which bankruptcy attorneys assist clients who

need bankruptcy relief due to wage garnishment, utility shut-off or license suspension; a bankruptcy bypass clinic for collection proof clients, a low income tax clinic, a senior wills seminar, and weekly brief advice clinics for veterans at the local Veterans Administration ambulatory care center.

The Columbus office houses a Volunteer Resource Center (VRC), through which retired attorneys and law students screen cases for merit, make referrals, and provide follow-up assistance for VRC's housing, consumer, and unemployment appeal projects. One of the more innovative projects is a writing mentorship program, where experienced volunteer attorneys review written products of staff and consult with the author. While this project initially involved only mentees from the urban area, it has since been expanded to include rural attorneys as well. OSLSA also collaborates with the Ohio Attorney General's office and the Paralegal Association of Central Ohio to assist seniors with wills and powers of attorney.

OSLSA is developing new projects recruiting large law firms in Columbus to handle or co-counsel cases with staff that could result in broad positive results for the client community. Issues will be identified by the litigation director and substantive teams and developed for referral to larger law firms in consultation with a panel of volunteer attorneys. A rural consumer issue is currently being considered for referral to this panel. In another new collaboration, one Columbus law firm has hired an associate to handle pro bono housing cases full time for a year, with the expectation that at the end of the year, this associate will continue on with the firm and another attorney will be hired to do pro bono work on behalf of OSLSA's clients.

OSLSA is taking advantage of Ohio's attorney practice rule encouraging pro bono activity by awarding CLE credit for certain pro bono work. The program recruits new and retired lawyers, members of small and large firms, in-house corporate counsel, and assistant attorneys general. The program has also recruited attorneys who specialize in particular areas of law, such as bankruptcy, tax, and probate. Non-lawyer volunteers include law students, paralegals, and accountants. There is a set of PAI procedures and an extensive Volunteer Information Packet for clinic volunteers in the Columbus area. The service area's websites include some information for prospective volunteers. Volunteers receive training and mentoring, sample pleadings/forms, office space and administrative support as needed, malpractice insurance, and reimbursement of litigation costs. Volunteer service is recognized in newsletters, in bar journals, and at bar association events.

In 2014, OSLSA closed 834 PAI cases (200 more than in 2013), of which 18% were extended cases. The bulk of closed cases came from the Columbus office (814), followed by Newark (6), Athens (5), Portsmouth (3), Chillicothe (2), and Zanesville, Lancaster, and New Philadelphia at one each. Of the rural closed cases, 50% involved extended assistance. While the total number of OSLSA PAI cases closed per 10,000 poor persons in 2014 was above the national median for LSC grantees, the program's extended and contested cases closed were below national medians, due in part to the emphasis on clinic and brief service.⁸ Oversight of cases handled by volunteers is conducted by the PAI coordinators and cases are routinely monitored for status and completion

⁸ OSLSA closed 23 PAI cases per 10,000 poor persons, compared to the national median of 20; four extended cases per 10,000 poor persons as compared to the median of seven; and one contested case as compared to the median of two.

with outcomes reviewed prior to closure. Upon case closure, clients are sent satisfaction forms to complete and return.

Recommendation III.2.12.1* OSLSA should continue to explore ways to coordinate PAI activities to effectively involve volunteers in the provision of services to the client community throughout the entire service area.

Recommendation III.1.12.2 OSLSA is encouraged to develop systems to quantify the services provided to persons to whom information, rather than legal advice, is provided, including the number of volunteer hours, and to include the data in its PAI plan for the following year, as appropriate.

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

Finding 13. OSLSA staff maintain a high level of engagement with the communities they serve by conducting a wide range of community education and pro se programs for consumers, and participating on boards and committees of stakeholder organizations.

OSLSA provides community legal education through presentations to the general public, volunteers, court personnel, and social service agencies. While the number of staff presentations has been reduced due to funding cuts, OSLSA staff continue to make presentations at shelters, senior centers, and community agencies throughout the service area. Audiences include public and subsidized housing managers and tenants; persons experiencing homelessness and shelter staff; domestic violence victim advocates, shelter staff, and victims; veterans and veterans services providers; seniors and their caregivers; and Head Start educators and at-risk youth. Topics include divorce, custody, protective orders, wills, probate, powers of attorney/advance directives/end of life care, guardianships/conservatorships, landlord/tenant issues, employment, fraud/elder fraud, consumer protection, financial literacy, debt collection/garnishment, and Medicaid. Staff also participate in events such as Homeless Connect and Veterans Stand Down.

As noted previously, OSLSA also maintains regularly scheduled pro se clinics, staffed by volunteers, throughout the service area. In addition, OSLSA has collaborated with one county court to operate a court-based self-help center, and with two other counties to hold a monthly onsite pro se assistance day.

Both educational and pro se information are available on OSLSA's web sites. In 2014, there were over 15,000 downloads of legal education materials and close to 5,000 downloads of pro se packets. In addition, community education materials and pro se packets are routinely provided to individual applicants, social service agencies, libraries, courthouses, and presentation attendees.

OSLSA staff are expected to participate in stakeholder organizations and coalitions serving the client community, and several staff serve on boards of these bodies. Staff are involved with the Ohio workforce coalition, numerous domestic violence and homeless task forces, senior center boards, and various county human service planning commissions, community action organizations, and Jobs and Family Service Boards.

Recommendation III.3.13.1 As resources allow, OSLSA staff are urged to increase participation in both educational outreach events and stakeholder/community organizations.

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

Board governance

Finding 14. The OSLSA board is comprised of members representative of the program's service area who fully understand, actively embrace and are deeply committed to the program's mission.

The OSLSA board is currently comprised of 26 members, including 16 attorneys and 10 client-eligible members. While the attorney members are appointed by the Ohio State Bar Association and the clients by various community organizations, the bylaws specifically require that each class of membership include at least one member from each of the program's field office service areas. Eleven board members are male and fifteen are female. There is only one person of color on the board; a client eligible member from Franklin County. With the recent addition of the more ethnically and racially diverse Columbus region to the service area, the program hopes to effectuate a more diversified board.

The board's bylaws call for the appointment of specific committees as deemed advisable. Currently, there are eight committees including executive, bylaws/personnel, finance, nominating, grievance, client activities, executive director evaluation, and investment. Each is made up of both attorney and client members, and addresses issues within their purview as the need arises.

The urban region affiliate, as a separate not-for-profit corporation, retains its own board of trustees. However, the sole *member* of the corporation is OSLSA and the OSLSA board of trustees appoints the affiliate board members. Additionally, four members of the OSLSA board sit on the board of the affiliate corporation. While OSLSA's board reviews various reports and oversees the budget of each of its affiliate and component parts, the urban affiliate board addresses local issues including public awareness, fundraising, PAI involvement, and implementation of its strategic plan.

Team interviews reflected that the caliber of OSLSA board members, whether client-eligible, attorney or community-based, is notably very high in terms of their diverse life experience, personal and professional accomplishments, and their broad community involvement, including related non-profit, social services-based board and volunteer work. Those with important and potentially valuable personal and/or working relationships do not hesitate to make them available to the extent possible to OSLSA. Based on document reviews and interviews, the board does a good job of balancing its need to rely upon the management team's information and recommendations. At the same time, the board is willing and able to exercise its independent judgment and authority where appropriate. The board appears to successfully draw the appropriate line between oversight and micromanagement.

Board meetings, held four times per year, are well attended and effectively conducted. The time allotted appears to be appropriate and the materials, which are consistently provided in a timely manner, reflect a high level of transparency and board sophistication. It is not clear whether there is a formal board orientation process, but all board members interviewed had received some orientation that had included one or more meetings with the executive director and various materials including the LSC regulations. OSLSA periodically conducts board training, including a presentation in 2012 on board responsibilities in the areas of fundraising, development, and outreach, and a May, 2015 session on the LSC Act, Regulations, and Accounting Guide. Immediately prior to every quarterly board meeting, members of the executive level management team conduct a preliminary preparatory session with the client-eligible members of the board. This practice was universally commended by the client-eligible board members, some of whom specifically noted that the extra explanation of and opportunity to ask questions about the financial reports was extremely important in making them feel like fully competent board members.

The Finance Committee, as such, does not meet regularly or keep minutes and apparently has not for some time. Rather, its functions have been rolled into the general responsibilities of the Executive Committee, that meets quarterly prior to full board meetings. It was explained that this had come about because for the past several years, the financial situation has become the predominant focus of virtually all board activities; board minutes corroborate this explanation. In the past two years, the board has addressed office closures, lay-offs and buy-outs, and has adopted a more aggressive investment policy. The board receives extensive financial information prior to each quarterly meeting which includes, among other items, a narrative summary of year to date revenue and expenses, variances within the adopted budgets, and comparisons with the prior year. While the board adopts and then later adjusts the yearly budget as appropriate, board members do not appear to be actively involved in the actual budget planning process. It also appears that budget adoption/adjustment is accomplished without the benefit of projections beyond the current year.

In part due to the program's financial challenges, the board has taken a more active role in resource development. They have provided assistance in obtaining local grants, spearheaded local fund raising efforts, and met with legislators to explain the value of the program to their constituency. In addition, the board regularly exercises its responsibility to evaluate the executive director, with the last evaluation completed in March, 2015. The board has also adopted a succession plan that addresses his emergency or planned replacement.

Recommendation IV.1.14.1* The program should revitalize the traditional Financial/Audit Committee model and process, including ongoing engagement with the director of finance and review of monthly financial reports.

Recommendation IV.1.14.2 The program should continue to engage in board training with an emphasis on financial stewardship responsibilities.

Leadership

Finding 15. OSLSA has strong and well-respected leaders in all of its component parts.

OSLSA's executive director has successfully led the program through both prosperous and challenging times for the last thirty years. He has been, and continues to be, integrally engaged in Ohio's civil legal aid delivery system, including acting as the Ohio liaison in LSC's State Planning process and serving on various state bar committees and task forces that address the needs of Ohio's poor. It was thus not surprising that in 2009, the board of the then-struggling Columbus program turned to OSLSA for assistance and to its executive director to run the program. He still serves as director of both entities⁹ and, while guiding the expanded OSLSA through some extremely difficult challenges, he has maintained a creative, mission-driven organization, unified in its commitment to excellence.

The executive director is assisted in his overall leadership responsibilities by a director of the rural region and a deputy director of the urban region. The rural director has been serving Ohio's rural communities for over 35 years and is a staunch advocate for the unique needs of those communities. The deputy director of the urban region was elevated to her position in January 2015, after serving eight years as a supervising attorney. She is well respected by the urban staff and the LSC team was impressed with her command of the position despite her short tenure. While all three leaders endeavor to engage in more direct office/unit contact, administrative responsibilities have recently limited such involvement. Aside from sometimes daily informal communications, this senior leadership team meets weekly by phone and every three weeks in person.

OSLSA provides leadership development and opportunities within the organization through training, special projects, task forces, lead counsel assignments, and its senior attorney designation process. Despite these efforts, there still appears to be a perception among staff that such opportunities are limited. While the fact that many senior staff are approaching their retirement in the relatively near future will necessarily lead to vacant leadership positions, there does not seem to be any planning as to addressing such a potentially large scale transition.

Recommendation IV.2.15.1* The executive director as well as the director of the rural region and the deputy director of the urban region should visit each office/unit on a periodic scheduled basis.

Recommendation IV.2.15.2 OSLSA is encouraged to be creative in its efforts to identify and expand leadership opportunities and plan for the future.

Overall management, including financial¹⁰ and human resource administration

Finding 16. OSLSA has an experienced managerial and supervisory staff that is effectively engaged in planning, organizing, and directing the program.

⁹ Except for a 15 month period in 2010//2011 when the urban region had its own director, the OSLSA executive director has also served as the director of the urban region.

¹⁰ 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.

The program's leadership is supported by a highly experienced senior management team consisting of directors of finance, litigation, and resource development. As the administrative functions of OSLSA's affiliates and components are merged, the three senior managers are responsible for supporting the entire program. The size of the management staff appears reasonable given the staff make-up and the current structure of OSLSA. While senior managers often informally interact with leadership on a daily basis, more formal senior management meetings are held at least quarterly.

Middle management consists of the six¹¹ rural office managing attorneys and the five urban unit supervising attorneys. Their experience ranges from 11 to 36 years with an average of 24 years. The managing attorneys each supervise an average of six employees, while the supervising attorneys average 4.5 employees. Major projects, programs, and decisions are discussed at bi-monthly management meetings with both agendas and minutes of the meetings shared with staff. This gives staff an opportunity to share their thoughts with their respective manager/supervisor, who then is expected to provide feedback to program leadership. However, the urban office and the rural offices currently conduct separate bi-monthly management meetings. There are no office managers. The support staff report directly to the attorney managers. The lines of management and supervision appear to be very clear and distinct. Many of the managers have attended management and/or supervisory training.

The program has a disaster response plan that addresses continuity of operations. While generally dealing with the issues of communications, payroll, protection of technology systems, and potential relocation needs, it lacks the specificity necessary for a swift transition in a time of emergency.

Recommendation IV.3.16.1* OSLSA should combine the two separate management meetings in an effort to enhance collaboration and communication.

Recommendation IV.3.16.2 OSLSA's disaster plan should be revised utilizing the ABA's Guide to Surviving a Disaster; www.americanbar.org/content/dam/aba/events/disaster.

Finding 17. OSLSA's finance department is experienced and appropriately staffed.

The program's director of finance has been a Certified Public Accountant since 1991. Before joining the program in 2007, she had a private accounting practice that specialized in non-profits. She has received extensive training in LSC accounting policies and regulations. She engages in budget planning, monitors revenues and expenses, submits quarterly written and oral finance reports to the board, and supervises the finance team. The director of finance is assisted by 2.5 experienced FTEs. The general ledger assistant has been with the program for more than 17 years, and is responsible for urban accounts receivable and payroll. The rural accounting assistant was hired only three weeks before the visit, but has almost 20 years of prior experience. A legal secretary assists with accounts payable, grant reporting, updating the policy manuals, and reconciling the bank accounts. She has been with OSLSA for an aggregate number of 34 years. The job descriptions clearly delineate the responsibilities of each of the finance department positions.

¹¹ The Steubenville and New Philadelphia offices currently share a managing attorney.

OSLSA generally participates in short-term fiscal planning. While the program routinely engages in general budget projecting, it is not done in a formal budget format nor is it specifically shared with the board. The director of finance prepares an annual budget that allocates resources to meet articulated program priorities and operational goals. Current-year budget adjustments are implemented as needed.

The program has an accounting manual updated in 2014 as well as written policies that describe its financial operations and procedures. None of the program audits have identified any problems or issues. The program has used the same audit firm for several years, but the actual auditor has changed.

Recommendation IV.4.17.1 As recommended under Finding 14, the program should share financial reports with the appropriate board members on a monthly basis and any board financial training should also include budget planning.

Finding 18. The program does not have a dedicated human resources (HR) administrator.

In the absence of an HR administrator, OSLSA divides HR responsibilities among a number of staff, including the leadership team, director of finance, accounting assistant, and the managing attorneys. OSLSA salaries and benefits are subject to two separate collective bargaining agreements; one for the urban staff and one for the rural. Salary and benefits are generally comparative although there are some minor differences. The program has written personnel policies and benefits that are detailed, clear, and can be viewed/updated through SharePoint.

Comprehensive performance evaluations are generally conducted for staff on an annual basis and result in identification of training needs and the setting of overall goals for the upcoming year. Manager reviews utilize a team approach, including the supervisor, a peer, and the supervisee. While senior management is currently undertaking a number of these evaluations, they have been conducted far less frequently than those of other staff, often resulting in upwards of three years between evaluations for managers.

Recommendation IV.5.18.1* The program should ensure that all performance evaluations continue to occur regularly and in a timely fashion.

Recommendation IV.5.18.2 As resources permit and the organization grows, the program should hire or contract with a full time HR director.

Technology

Finding 19. OSLSA has adequate technology capacity but could benefit from enhanced collaboration and training throughout the program.

OSLSA maintains a fairly standardized information technology (IT) environment, with a few notable exceptions. The rural and urban components each have their own director of technology. The two have significant experience with the program and, while having different skill sets, their

knowledge complements each other. They work well together and are beginning to consolidate the overall program IT environment.

For the most part, desktops, operating systems, and networking components are up-to-date in all offices. PQV team interviews revealed few users that were critical of their workstations. Most found the IT staff responsive to their support requests and believed they demonstrate a strong customer service focus. All workstations have been updated to Windows 7 and Office 2010. SharePoint is available to all staff for the sharing of programmatic information, including manuals. The SharePoint platform, however, is not used to its fullest potential and additional training appears warranted. Windows Server Update Services updates Microsoft products across the entire program and centralized antivirus software manages endpoint security for all offices. While these technologies are effectively coordinated, other key systems, such as the two phone systems, are not standardized.

Although OSLSA has taken some positive steps in using technology in new and innovative ways, it can still better utilize technology across the program. Use of new and emerging tools includes document assembly templates, SMS text messaging, and the A2J Author online intake system. However, use of all of these tools is limited to a handful of offices. In some instances, such as document assembly/online forms, different offices are duplicating efforts. The sharing of ideas and coordination of staff technology training would broaden the impact of any individual innovation.

OSLSA has a technology committee that has been responsible for several IT improvements. The committee has addressed particular IT challenges within the organization. As a result of the committee's work, IT improvements include significant adoption of dual monitors, standardization around Adobe Pro, and the purchase of wireless headsets. While OSLSA deserves credit for these improvements, the IT committee can do more to encourage innovation around the program and can help IT staff and management determine what technology investments will help OSLSA meet its mission more effectively.

OSLSA is beginning to utilize pro bono assistance from IT professionals at Columbus law firms. These partnerships could strengthen use of technology and provide IT staff with a better perspective on use of new technology. IT staff have not had significant training opportunities in recent years, and would thus also benefit from periodic national technology trainings to keep them apprised of emerging technology trends.

While more of an education/outreach vehicle, OSLSA's websites suffer from a similar lack of technological coordination. There are separate websites for the urban and rural regions, with each in need of improvement and each under various levels of redevelopment. The redesigned rural website should launch soon while the urban site re-launch is further away. Some design features on the current sites impact usability and potentially make the sites less accessible to individuals with disabilities. For instance, the use of the right navigation menu on the rural sites is inconsistent with best practices and creates problems for users with screen readers. The color scheme on the urban site makes the top level navigation difficult to read. The individual sites currently do not mention their regional counterpart nor do they share resources or pro bono information.

Recommendation IV.3.19.1* OSLSA should continue to collaborate and consolidate technologies across urban and rural areas. When evaluating IT improvements, OSLSA should assess whether the initiative can be shared across the entire service area.

Recommendation IV.3.19.2 The technology committee should meet routinely, identify innovations occurring across the program, and strive for widespread adoption of those innovations when they are useful.

Recommendation IV.3.19.3 New program websites should be redesigned to be accessible to the client community. OSLSA should consider hiring a designer to improve the accessibility of the sites as well as their look and feel. Content should be coordinated and consistent across both sites.

Recommendation IV.3.19.4 OSLSA should provide more technology training opportunities to both dedicated IT staff and staff generally.

Internal Communication

Finding 20. Despite management's utilization of a number of best practices, internal communication still presents as a challenge.

OSLSA uses a variety of means to ensure communication across the program. Various staff meetings are held by office, unit, and substantive task force. Managing/supervising attorney meetings are held bi-monthly and meeting minutes are distributed to staff. Quarterly labor/management meetings are held with minutes also disseminated to the appropriate staff. Staff are invited to attend board meetings and all board minutes and pre-meeting informational packets are provided to staff. Staff routinely submit cases to the litigation docket which is then shared program-wide. The program holds a yearly retreat of all staff containing informational, networking, and training components.¹² Additionally, program leadership visits staff offices though, as noted previously, not as often as optimal.

Despite these efforts, lack of effective internal communications was a theme among many of the PQV team interviews. Most of the concerns, expressed by both urban and rural staff, revolved around the financial aspects of the current configuration, with each feeling that their region had somehow suffered in the process. Most staff generally acknowledged receipt of the information that informs programmatic decisions, but some were unsure and, in turn, desirous of knowing more about the ultimate decision-making process itself. While far smaller in number, other staff were operating under various misperceptions and/or inaccurate information. It should, however, be underscored that numerous staff from both regions, and often those that had experienced the benefit of intra-region collaborations, expressed support for the current configuration. Although most communication concerns centered on program structure, others reflected dissatisfaction with the decision making process due to resource uncertainty. For example, staff had no idea

¹² While the urban staff only attended one day of the 2014 two-day retreat, both days of the 2015 retreat will include all OSLSA staff.

what to expect regarding the anticipated duration of the situation in which two of the rural offices are currently sharing one managing attorney.

Recommendation IV.6.20.1 As noted in Recommendation IV.2.15.1 above, the leadership team should endeavor to visit each office/unit on a periodic basis. Other senior management staff should seek out opportunities to engage with program staff throughout the service area.

Recommendation IV.6.20.2* At the next all-staff meeting, a plenary session should include a discussion of the history of OSLSA and how the present configuration came to be. The program may want to consider the delivery of such a presentation by a third party.

Recommendation IV.6.20.3 SharePoint, or other appropriate software, should be utilized as a means to provide program updates and notice of staff accomplishments, funding victories etc. to all staff between the formal dissemination of minutes and dockets.

General Resource Development and Maintenance

Finding 21. OSLSA has made significant efforts to enhance and diversify its funding throughout the Ohio 24 service area.

In an attempt to increase and diversify its funding sources, OSLSA created the position of director of development and, in November 2011, hired an experienced professional to oversee fundraising for the various components of the organization. She conducted an analysis of the then current and possible future sources of support. She next commenced building new, and strengthening existing, community relationships to further enhance potential sources of funding. In the urban area, this included meetings with large community boards and, in the rural region, she met with some 22 smaller local foundation directors. The results to date have generally been positive but mixed. The program was successful in garnering a two-year \$200,000 grant from the Alcohol, Drug, and Mental Health (ADAMH) Board of Franklin County and obtained smaller county targeted grants for the rural portion of the service area. Differing fair housing grants were also secured for both the urban and rural areas. Conversely, various proposals to the City of Columbus and a number of rural United Way applications were not funded. Undaunted, the program continues to seek new opportunities both within and outside of the service area. Current efforts include the further development of medical-legal partnerships, making inroads into the newly booming local oil and gas industry, and utilizing their Franklin County ADAMH success as a blueprint for other ADAMH boards throughout the service area. The program also engages in a lawyer-to-lawyer fundraising campaign in the urban area as well as a more general solicitation in the rural areas.

Marketing also continues to be a tool in expanding the program's funding base. In 2012 the offices in the rural area commenced publishing a quarterly electronic newsletter, *SEOLS Briefly*, which is distributed to state bar members and community leaders in the rural service area. The newsletter highlights the work at each of the southeastern Ohio offices. The urban area publishes a pro bono newsletter, *Pro Bono Update*, which details PAI opportunities and achievements. At the time of the PQV, the program was in the final stages of publishing an annual report. In

addition, local community receptions or meetings with OSLSA's new board chair are being scheduled throughout the service area as both an educational and marketing tool.

In attempting to identify and seek new sources of funding, the development director has worked with board, management, and staff. The board has created a development committee, identified initial priorities, and individual members have assisted with local grants. There appears, however, to be considerable lack of understanding among staff members about the role of both the development director and the role of staff in fundraising. While the fundraising activities of OSLSA present a thoughtful approach to resource development, there is no formal resource development plan.

Recommendation IV.7.21.1* OSLSA's director of development should develop a comprehensive development plan with input from board, management and staff, as appropriate. The development plan should include estimated financial goals for each grant, fundraising campaign, or event; achievement steps for completing the proposal; and identification and role definition for board, management or staff involved in completing any applications for funding or other fund raising task. In developing the plan, OSLSA should consider private bar fundraising beyond a general mail campaign. When completed, such a plan should be widely disseminated within OSLSA, preferably electronically, so that it can be updated as results become known.

Recommendation IV.7.21.2* OSLSA should continue its present efforts to identify and secure funding from an increasingly diverse group of funders, particularly those funders which might provide a regular source of funding for the critical legal needs of low income individuals and families.

Recommendation IV.7.21.3 OSLSA should endeavor to educate staff on the mechanics of resource development as well as the roles of both the overall coordinator and local staff in securing additional funds.

Recommendation IV.7.21.4 The OSLSA Board may want to consider committing to a policy that each board member makes an annual contribution in whatever amount to OSLSA.

Participation in an Integrated Legal Services Delivery System

Finding 22. OSLSA is highly engaged in both statewide and southeast Ohio regional delivery systems that provide legal services to the low income population.

OSLSA management and staff are actively involved in statewide and regional legal service delivery groups which are working to increase access to justice. Such groups include Ohio's Access to Justice Commission, statewide substantive law task forces, state and local bar association committees, and state and local advisory boards. In addition, OSLSA has representatives on the statewide website, document assembly, PAI, and intake working groups, as well as the Committee on Regional Training for legal aid program staff in Ohio, Michigan, and West Virginia.

CONCLUSION

While the current configuration of OLSA has faced financial and staffing challenges over its relatively short life span, it endures as a high quality legal services program. The program has realized the advantages of integration of various aspects of its structure and continues to harmonize its service delivery for the benefit of its client population. OLSA appropriately recognizes that the whole can be greater than the sum of its parts. The LSC team applauds the program's ongoing efforts and its recommendations seek to encourage their perpetuation.