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August 17, 2015

Mr. Willie Abrams  
Legal Services Corporation  
3333 K Street NW  
Washington, DC 20007

## **RE: Draft Report March 2015 Southeast Louisiana Legal Services (SLLS) Program Quality Visit (PQV)**

Dear Willie:

On behalf of SLLS, our Board, and staff, we wanted to tell you again how much we enjoyed the March 2015 PQV by the LSC team. We appreciate the time devoted to reviewing our efforts to achieve justice for low-income people in our service area. The team's insights and thoughtful analysis as to what we can do to improve the quality, impact, and future sustainability of our program will be considered in strategic planning, program design, and evaluation of our effectiveness. Thanks for the opportunity to review the draft report and correct factual errors and provide comments as follows:

1. Page 6, Footnote 1- The footnote says SLLS will be required to report what actions or activities, if any, the program has taken in response to Tier One Recommendations as denoted by an asterisk instead of submitting a 2016 full grant renewal or competitive application narrative. Prior to getting the draft PQV Report, SLLS had already submitted its 2016 grant renewal which was due June 1, 2015. Please advise on corrective action if any is required by SLLS for its 2016 grant renewal.
2. Page 7, Recommendation I.2.2.2 – SLLS has already developed revised, detailed case acceptance guidelines after 2013-2014 strategic planning. We continue to revise case acceptance guidelines on an ongoing basis. For instance, the Family Law acceptance guidelines were updated as recently as March 2015 in response to changes in divorce laws for victims of domestic violence. In connection with ongoing revisiting of strategic planning, we will further revise case acceptance guidelines accordingly
3. Page 8, Recommendation I.4.3.1- Since the PQV visit, the major SLLS practice area groups have already developed and/or updated Advocacy Plans with strategic goals for 2015-2016
4. Page 9, Finding 5, Paragraph 3, Sentence 2- SLLS would like to clarify that the appointment within 5 days of screening with an advocate can be either in person or by telephone. Later conclusions reached in the draft report seem to imply that this appointment must be in person.



5. Page 10, Finding 6, Paragraph 1, Sentence 5—The draft report states that “Advocates conducting intake off-site do not have ready access to the CMS on their laptops and some are unable to perform conflict checks in the field”. This statement is not accurate. SLLS’ CMS can be accessed remotely anywhere at any time provided there is a Wi-Fi connection. Installation of the remote access system on any computer can be completed in less than 2-3 minutes. SLLS has obtained several Wi-Fi cards for staff to use remotely if there is no readily accessible internet connection. Remote access to CMS is routinely used at our Self-Help Desk in rural Washington Parish, by our attorneys at the Family Justice Center, at Ask A Lawyer events, and other outreach locations. Delgado Community College has strict security protocols in place that make access to our CMS more difficult at that location. That is the only location with this problem. We will revisit this issue again in consultation with our technology consultant.
6. Page 11, Item 6, Top of Page- We wanted to correct this statement. SLLS is reviewing the design of existing websites and may redesign all or some of them. All program related websites may not be redesigned.
7. Page 11, Recommendation II.1.5.4 – SLLS has already begun investigating a VOIP telephone system to streamline telephone intake. The efficacy of these systems hinge on having reliable internet service which has historically been problematic.
8. Page 11, Recommendation II.1.5.4 - We also wanted to correct an inaccuracy in the report in this section regarding the statement “Applicants should not be required to walk in to the offices for routine intake.” All SLLS offices already offer routine intake through telephone, walk-ins, or online. Applicants are not routinely required to walk in to be seen or to have an appointment scheduled. This confusion may be due to the requirements of a few of our housing grants which require voluminous amounts of intake documents to be completed and signed for grant eligibility. The case types for these grants are usually emergencies. We do ask clients to come into the office right away if they can for intake in these emergency matters as there is usually a very short time before an eviction or adverse action will take place.
9. Page 12, Paragraph 5 from top – The Louisiana Civil Justice Center is incorrectly identified as the Louisiana Civil Justice Coalition.
10. Page 12, Finding 8, paragraph 1 below Finding- The last sentence in this paragraph mentions a new grant from the New Orleans Foundation. The correct name of the foundation is the Greater New Orleans Foundation.
11. Page 13, Recommendation II.3.8.2- This recommendation advises SLLS to all have all intake staff and advocates note in the case file the client’s primary language and any need for an interpreter. This is already done in the CMS system.
12. Page 15, Finding 11 – In the list of SLLS staff who supervise legal work and advocacy, the Executive Director was left off the list.
13. Page 15, Finding 11, paragraph 3, first sentence- The draft report states there is no formal set procedure for orienting new attorneys. That is incorrect. All new attorneys are provided with

information at the onset of employment regarding program policies, manuals, and LSC regulations. An LSC TIG grant has allowed SLLS to create orientation resources which can be accessed online at any time for employees, volunteer law students, and pro bono attorneys. An in person orientation with the Director is usually scheduled within 30 days of employment for new staff.

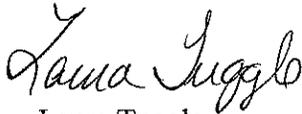
14. Page 16, First paragraph- The draft report states that formal evaluations do not occur on a consistent scheduled across the program. This is not correct. SLLS conducted formal evaluations in the fall of 2013. At a prior manager's meeting in the fall of 2014, it was determined that formal evaluations would take place annually but not in the fall since end of year CSR reporting is an area of concentration in the last quarter. Instead, it was determined that formal annual evaluations would be done from August 1-September 30, 2015 each year. The last two sentences are also inaccurate. Managers review at least 10 files for a substantive review of the quantity and quality of staff performance—5 randomly selected by the computer and 5 selected by the staff member. Different evaluation forms are used for case handlers as opposed to support staff.
15. Page 16, Finding 13, Paragraph 1, first sentence- The sentence should be revised to state that SLLS closed 7,263 LSC eligible cases in 2014. We closed 8,106 cases total in 2014 as we have a number of grants with different income guidelines than LSC such as our foreclosure prevention, Title III B, and Low Income Tax Clinic grants.
16. Page 20, Finding 17, Paragraph 4, last sentence- The draft report states "Some clients needing a divorce are served using a reduced fee model". To clarify, no SLLS clients are ever charged a fee either by the program or a pro bono attorney. Rather, SLLS sometimes pays private attorneys a reduced fee to provide representation in limited instances such as for a domestic violence victim or child abuse victim when SLLS is conflicted out.
17. Page 21, Finding 17, Paragraph 2- The draft report references a panel run in partnership with the American College of Bankruptcy Foundation. This is not accurate. SLLS received a grant from the American College of Bankruptcy Foundation to provide training to help develop a pro bono panel for SLLS' North Shore Pro Bono Project to handle consumer debt matters.
18. Page 21, Finding 17, Paragraph 3- This needs some revision for accuracy. SLLS operates a Self-Help Desk in rural Washington Parish. SLLS collaborates with the court run self-help desk in Baton Rouge and often helps staff it. When it was first created, SLLS helped staff the Orleans and Jefferson Parish Self-Help Desk. The Orleans and Jefferson Parish Self-Help Desks are now operated by the Louisiana Civil Justice Center.
19. Page 23, Finding 19, Paragraph 2, sentences 5 and 6- This should be corrected to clarify that while some Board members do not attend in person when meetings take place outside the geographic area where client members live, all Board members generally attend meetings either in person, by telephone, or by proxy. SLLS does not have an attendance problem at our Board meetings.
20. On page 25, Finding 20, Paragraph 3, sentence 1- The monthly meetings referenced in this sentence were incorrectly called monthly management meeting. SLLS dubbed this monthly meeting as a Leadership Team meetings to differentiate it from Manager's Meetings. The Leadership Team meetings and its composition is now changing to be more inclusive of other

staff members. This group will be our new Leadership Team to move forward with Strategic Planning. Manager meetings will continue to be held quarterly.

21. On page 26, Finding 20, Paragraph 1, last sentence – There is a reference to the quarterly manager meetings being composed of all the managing attorneys of the practice groups. That is incorrect. Not all leaders of practice area groups are managing attorneys. Manager meetings are attended by all SLLS Managing Attorneys, the Finance Administrator, the Litigation Director, the Intake Manager, the Deputy Director, and the Executive Director.
22. Page 28, Finding 23, Paragraph 1, last sentence – To clarify, both attorneys and support staff can take comp time up to 5 hours per pay period, not just attorneys. Our regular work day is 7.5 hours, not 7 hours.
23. Page 28, Finding 23, Paragraph 3, last sentence – There is a typo. Kemp’s is called Kenp’s in error.
24. Page 30, Finding 25, Paragraph 1, last sentence- SLLS experienced a 15% reduction in LSC funding, not a 50% decrease. Technically, I believe it was 16%.
25. Page 31, Finding 25, Recommendation IV.7.25.4- SLLS has already produced its first ever Annual Report for calendar year 2014. It was completed in July 2015 and released through our website and Face book page. Key funders have received it by email. A final version is at the printer for dissemination to donors, funders, and other supporters. The 2014 Annual Report can be accessed through SLLS’ home page at [www.slls.org](http://www.slls.org).

Again, thank you for your recommendations for improving our program and operations. It was a pleasure working with the Team. Feel free to reach me at [ltuggle@slls.org](mailto:ltuggle@slls.org) or at (504) 529-1000 ext. 270 for any needed follow-up. You can also reach me on my cell at (504) 913-6617.

Respectfully,



Laura Tuggle  
Executive Director