



Legal Services Corporation
Office of Program Performance

Program Quality Visit Final Report

Statewide Legal Services of Connecticut, Inc.
Recipient No. 170000

February 7 – 11, 2011

LSC Review Team

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INTRODUCTION

The Legal Services Corporation's (LSC) Office of Program Performance (OPP) conducted a program quality visit to the Statewide Legal Assistance of Connecticut, Inc. (SLS) from February 7-11, 2011. The team members were Cheryl Nolan, team leader/OPP Program Counsel; and OPP Temporary Employees Alex Gulotta and Nancy Glickman.

Program quality visits are designed to ensure that LSC grantees are providing the highest quality legal services to eligible clients. In conducting its assessment, the team carefully reviewed the documents LSC has from the program including its grant application narratives for 2010 and 2011, its case service reports (CSRs) and other service reports (OSRs), the numerous documents the program submitted in advance of the visit including advocates' writing samples and an electronic survey of SLS staff. On site, the team visited the program's office in Middletown. In addition to speaking to most of the SLS staff members and the executive directors of its partners, the team conducted telephone interviews or met in-person with a large sample of representatives from SLS's board, and representatives of the bar, and community organizations. The team interviewed one judge.

In performing its evaluation of the grantee's delivery system, OPP relies on the LSC Act and regulations, LSC Performance Criteria, LSC Program Letters, and the ABA Standards for the Provision of Civil Legal Aid. The evaluation is organized according to the four LSC Performance Areas that cover needs assessment and priority setting; engagement with the low income community; legal work management and the legal work produced; and program management including board governance, leadership, strategic planning, resource development and coordination within the delivery system.

PROGRAM OVERVIEW

SLS was incorporated in 1996 and serves the entire state of Connecticut. The program provides advice and counsel, brief services and referrals as part of a planned network of legal aid providers, each providing a unique set of regional or functional services. Three regional providers, Greater Hartford Legal Aid (GHLA), Connecticut Legal Services (CLS), and New Haven Legal Assistance Association (NHLAA) provide a full range of traditional legal services for clients in their respective geographic service areas. SLS is one of two organizations that provide distinct functional services statewide. The other is the Legal Assistance Resource Center of Connecticut (LARCC), which provides legislative representation and policy advocacy for people living in poverty in Connecticut, as well as providing training support to the legal aid community and acting as publisher of client education materials. Collectively, they are referred to as the Connecticut Network for Legal Aid (Network).

SLS has one office located in Middletown. The program has a staff of 30 including attorneys, paralegals, intake specialists, support staff, and management. The management team is comprised of the executive director, a deputy director, a program

administrator, an executive secretary, and a bookkeeper. In 2011, SLS will receive \$2,744,544 in basic field LSC funding, and \$3,400 in a subgrant from Pine Tree Legal Assistance, Inc. for migrant outreach.¹ In 2011, SLS will receive \$26,100 in LSC Technology Initiative Grant (TIG) funding and approximately \$226,000 from non-LSC sources.

The SLS service area covers 5,544 square miles and has a poverty population of 259,514², which is 8% of the state's overall population. The ethnicity of the poverty population in the service area is approximately 54.8% white non-Hispanic, 21.1% African American, 29.3% Hispanic, .6% Native American, 2.6% Asian, 4.8% mixed, and 15.9% other.³ The primary language of a significant portion of the limited-English proficient (LEP) population is Spanish.

The program's legal work is centered on advice and counsel, brief service, pro se/self-help and referral. SLS's Priorities Statement provides that it determines case priorities "by the kinds of legal problems clients bring to us on a daily basis." SLS's experience is that most of the legal problems fall within the areas of family, housing, public benefits, employment and consumer law. SLS operates a specialized unit assisting with pardons. It has begun doing work with foreclosures. It operates a pro bono unit in collaboration with the Connecticut Bar Association (CBA) that accepts cases in family, consumer, housing, unemployment compensation, employment, and other cases involving a compelling need. As the referring partner of the Network, SLS's intake priorities are also guided by the case priorities of its legal services partners.

The pro bono unit is staffed by two full-time coordinators, and a full-time secretary. SLS's migrant outreach is staffed part-time by an experienced bilingual Spanish paralegal who also handles calls for SLS. The migrant paralegal personally conducts outreach across the SLS service area.

SUMMARY OF FINDINGS

Statewide Legal Services of Connecticut was created in 1996 to provide telephone advice to eligible clients and make referrals to full service regional legal services providers serving Connecticut's poor.

In 2008, the partners participated in a legal needs study, *Civil Legal Needs among Low-Income Households in Connecticut*, commissioned by the Connecticut Bar Foundation (CBF). The CBF supported a separate study on technology use by low-

¹ Pine Tree Legal Assistance, Inc. receives \$18,037 from LSC to provide legal services to the Connecticut Native American service area.

² These figures are based on the 2000 Census.

³ Census data for ethnicity exceeds 100 percent due to the methodology for Hispanic responses. Census 2000 allowed respondents to report two or more races and asked separate questions for race and Hispanic origin. "Because Hispanics may be any race, data in this report for Hispanics overlap with data for racial groups." U. S. Census Bureau. (December 2004). *We the People: Hispanics in the United States. Understanding Data On Race and Hispanic Origin from Census 2000*. Retrieved February 2, 2010, from <http://www.census.gov/prod/2004pubs/censr-18.pdf>.

income people, which was led by NHLAA. The report, *Low-Income People's Use of Technology in Connecticut*, was published April 2008. SLS itself has not engaged in a comprehensive needs assessment process. Its priorities statement is extremely broad and the program lacks case acceptance policies. Nevertheless, SLS appears to focus on cases in the areas of housing, family, public benefits, and consumer law.

SLS has a hard working, dedicated and diverse advocacy staff consisting of six attorneys and nine paralegals. Program attorneys and paralegals handle a very high volume of limited service cases. The program appears to emphasize quantity of services over quality. This is evidenced by its extraordinarily high number of case closings. Interviews with SLS staff further evidenced a culture of focusing on productivity in numbers of cases and calls handled. Some staff reported difficulty attending to administrative duties and other case work such as drafting letters and entering case notes as a result of the need to handle the incoming volume of calls.

The program does not gauge client satisfaction or seek feedback from clients on a regular basis. SLS has not assessed whether clients understand any of the advice they received or were successful in acting on the advice. While partner programs are pleased with the quality of referrals received from SLS, data indicates that the entire delivery structure may *not* be performing as effectively as intended. Many clients receive further advice from partner programs after already receiving advice from SLS. Further, partner programs perform their own intake activities. While the Network's technology is strong and all programs are linked to the same case management system, the lack of common case closing codes makes case closing analyses difficult.

Within SLS there are several areas for improvement. Overall supervision of legal work is lacking. SLS currently relies on a peer review system to supervise legal work. There is no protocol regarding case review. Substantive legal training for SLS' advocacy staff is good but staff could benefit from taking on some direct service casework. Program management is compartmentalized. Managers are unable to perform or describe tasks not within their specific job description. While this is understandable to some extent, the compartmentalization at SLS is more than would be expected given its size.

The SLS pro bono unit maintains a panel of approximately 750 attorneys to provide pro bono service to low-income clients. Attorneys are recruited through trainings at the CBA, where continuing legal education is free in exchange for an agreement to take a case pro bono. There is no formal written criteria as to what cases should be referred to the pro bono unit.

To its credit, SLS's function as the intake provider in the delivery system is well-regarded by the judiciary and its community partners. The executive director has served in this position for two years and many staff, the board, and members of the community reported support for her. However, leadership is stretched thin and attention to important details is lacking.

The board is active and involved in overseeing the work of the program. Board members increased their attention to the management of the program prior to the previous executive director's departure. The program and board are focused on maintaining an integrated statewide network of services and ensuring sound fiscal compliance. The board has minimal involvement with resource development. The executive director carries the primary responsibility for resource development which is limited to funding from LSC and the CBF.

FINDINGS 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.

Criteria 1, 2, 3 and 4. Periodic comprehensive assessment and ongoing consideration of legal needs. Setting goals and objectives, developing strategies and allocating resources. Implementation. Evaluation and adjustment.

Finding 1: In 2008, the CBF commissioned a statewide legal needs study to benefit the legal services community. The Network conducted a separate study in 2008 focusing on technology use by low-income people.

In 2008, the CBF commissioned a statewide legal needs study conducted by the Center for Survey Research and Analysis at the University of Connecticut. The study involved 400 telephone interviews of low-income households. SLS and the other members of the Network used the data to help guide their determination of program priorities. The report, *Civil Legal Needs among Low-Income Households in Connecticut*, provided data on legal problems, frequency of use of lawyers, self-help and relevant demographic data.⁴

The Network, with support from the Connecticut Bar Foundation, participated in a coordinated study of technology use by clients. *Low-Income People's Use of Technology in Connecticut* involved telephone surveys by SLS staff of 469 people in English and Spanish.⁵ The purpose of the study was to guide the programs in planning for services and specifically, helping clients accessing needed legal information and assistance. The report documented the increasing access to technology by clients, specifically access to the internet.

Finding 2: SLS has never completed its own assessment of client legal needs; its priority statement is overly broad; and the program has no case acceptance policies.

⁴ *Civil Legal Needs among Low-Income Households in Connecticut*, December 2008, is available at http://www.equaljustice.org/Financialcrisisnews/2008_Connecticut_Legal_Needs_Study.pdf.

⁵ *Low-Income People's Use of Technology in Connecticut*, April 2008, is available at http://www.connlegalservices.org/pdf/Client_Use_of_Technology_2008.pdf.

SLS has not engaged in a comprehensive needs assessment study in the past several years. It has not conducted any other needs assessments separate from the 2008 statewide study. SLS's Priorities Statement states that priorities are determined "by the kinds of legal problems clients bring to us on a daily basis." These priorities are not narrowed by a clearly articulated case acceptance policy. Consequently, SLS priorities are so broadly stated that they can limit SLS's ability to make necessary changes to services during times of shifting resources. In effect, its priorities statement requires advocates to advise on all areas of law, some of which they may not have the requisite experience or training. Any eligible caller with any legal problem could potentially receive assistance. While this approach is admirable, it is not realistic with limited or decreased funding. Drafting a priorities statement and case acceptance policies based on the critical legal needs of the low-income population is a best practice for proactive management of telephone-based delivery systems.

SLS's experience is that most of the legal problems it sees fall within the areas of family, housing, public benefits, employment and consumer law. SLS' case closing data reflect that the majority of its cases fall within these areas of law. In effect, the program has narrowed its priorities and developed an unwritten case acceptance policy based on its practices over time. The identification of program priorities and consequent case acceptance policies should be written, thoughtful, and strategic.

Finding 3: SLS does not have a strategic plan. SLS does not have a formal approach for evaluating program effectiveness and does not focus sufficiently on the results actually achieved compared with the outcomes originally intended.

SLS does not have a strategic plan. Interviews with the program indicate that the board and executive director have had minimal involvement in planning strategically. SLS has not engaged in any formal evaluation of its work or of the effectiveness of its delivery structure. SLS does not assess the effectiveness of its work or review whether any of the provided advice is helpful to clients. SLS's evaluation of program effectiveness is largely informal and occurs on an ad hoc basis. SLS does not assess its effectiveness as a referral partner. The quality of referrals, or the rate and level of service provided on referred cases by its partners, is not formally reviewed by management. However, interviews with the partners indicated support for the system as designed.

SLS has not heretofore had a regular process for obtaining feedback from clients, except during very limited periods for specific purposes. SLS's most extensive survey occurred in late 2009. In that survey period, 50 callers from 2008 were randomly selected for a 2009 telephone interview and 37 were successfully contacted.⁶ Given that the program serves 12,000 clients a year, the 37 persons interviewed could not provide the program the information needed to obtain clients' assessments of the hotline's

⁶ 67% of all respondents reported that they found SLS services very helpful in terms of helping them solve their legal problem; 20% reported that the problem they had called SLS about remained on-going; and 72% of clients who were given pro se advice reported that they would want to use SLS's services again for another problem.

effectiveness.⁷ This is especially the case given that that the 2009 survey appears to be the only systematic means the program employed over a four-year period (when it served nearly 50,000 clients) to obtain clients' assessments of the program's services. The program also appears to lack sufficient information from other community providers to assess its effectiveness, as it appears it has not engaged partners and other agencies serving the client community in a periodic systematic analysis of its client services. While program staff, bar representatives, and community organization representatives reported that SLS has a good reputation in the community, unanimous or near unanimous reports of satisfaction from clients and other knowledgeable persons in the community do not eliminate the need for future client assessment surveys and program evaluation.

SLS is the creation of Connecticut stakeholders to provide legal services through an LSC funded hotline program that partners with non-LSC funded regional programs. It has almost been 15 years since the creation of this delivery system. During this time limited evaluation of the system has occurred. While Network partners appear pleased with how the system is working, no one has strategically reflected on whether this delivery model is the best use of limited dollars at this point in time. A cursory review of program data suggests that the system may not be working as intended. For example, in 2010 of the 1,754 cases referred to partner programs, 752 (42.9%) were closed by the partner after extended representation and 755 of the referred cases were closed as advice only. This number is troubling. If the purpose of the Connecticut delivery system structure is to have SLS serve as the advice and referral line to the partners, one would expect to see a higher percentage of SLS referrals resulting in extended representation. Further, this data calls in question the efficiency of having SLS provide advice to the client when more advice is being provided by the partner program. These are some of the issues which are ripe for examination through a strategic planning process.

Recommendations:

I.2.2.1.⁸ SLS should engage in a comprehensive needs assessment process to determine the critical legal needs identified in the community for legal advice, pro bono referral and for limited services beyond advice. This should be done in collaboration with the Network. This process should be a precursor to strategic planning.

⁷ For example, a sample size of more than ten times that number would be necessary to obtain a statistically valid sample given the program's 12,000 person annual caseload. Although statistical validity may be an unrealistic standard and unnecessary to obtain information to assess its services effectively, this highlights the inadequate scope of the program's efforts to-date to assess its services.

⁸ Recommendations are numbered as follows: the Roman numeral references the Performance Area followed by the Criterion addressed by the recommendation, the finding number and lastly by the recommendation number that pertains to the finding.

There are two levels of recommendations in this report. In your next grant renewal application or competitive grant application, your program will be required to report what it has done in response to Tier One Recommendations instead of submitting a full narrative. Recommendations that are indicated with an asterisk are Tier One Recommendations and are intended to have a direct and major impact on program quality.

I.2.2.2*. SLS should immediately develop case acceptance policies to direct its case handling and referral work.

I.2.3.1*. SLS should consult with outside resources to conduct a strategic planning process in 2011. SLS' partners should be included in this process.

I.2.3.2. Program effectiveness for provided services and quality of referrals should be formally assessed on a periodic basis. SLS should evaluate the ratio of referrals to its partners and the percentage of referred cases resulting in service by a partner program. It should also evaluate its own performance including a review of call data, advice given and client feedback. After the strategic plan is developed, assessments should be revised in relation to the goals and objectives outlined in the strategic plan.

I.2.3.3*. SLS should develop a process for gauging client assessment of its services on a regular basis. The program should consider a survey to include with client letters where appropriate. The survey could also be posted to the <http://ctlawhelp.org> site and added to SLS's online intake system.

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

Criterion 1. Dignity and sensitivity.

Finding 4: In general, SLS is sensitive and responsive to individual clients' circumstances and is culturally and linguistically competent.

Within the level of legal assistance that SLS provides, SLS advocates and intake specialists identify and attempt to achieve each client's objective. SLS staff described opening new cases where applicable for clients with multiple legal problems and referring applicants to partner programs and other community organizations when their problem did not fall within the scope of SLS services. Most staff interviewed voiced genuine concern for clients and appeared to conduct their work with sensitivity to each client's unique circumstances. Bilingual staff is available to interpret for Spanish speakers, and SLS uses Language Line to interpret for clients who speak a language not spoken by any staff persons. Legal services programs in the state, and where feasible with other legal assistance providers in that state, collaborate so that clients do not experience multiple referrals before they reach the provider that will offer the maximum level of service.

SLS's operations could be improved in ways that affirm client dignity and are sensitive to client circumstances. Some staff reported a concern that advocates were not placing primary importance on establishing a relationship of trust and confidence with each client during their calls. Several staff reported the need to handle the high volume of incoming calls, which at times, takes priority over ensuring that each client understands the advice being given or has had ample time to discuss their legal problem.

One staff person reported overhearing calls where the callers were being rushed and/or staff was rushing through the calls.

Finding 5: SLS does not have an LEP Plan.

The program does not have a formal LEP Plan. However, SLS's use of Language Line, its use of advice in letters to clients and staff outreach activities demonstrate that it provides services to some of the major low-income racial, ethnic, and limited English proficient populations in its area. The <http://ctlawhelp.org> website is translated in Spanish with clearly identified resources on the site in Russian, Polish, Portuguese, Chinese and Arabic.⁹ In general, client letters are translated into Spanish. There may be some cases where staff is not mindful of the need for translation.

Recommendations:

II.1.5.1. SLS should develop an LEP Plan.¹⁰

II.1.5.2. Management should insure that monolingual staff is mindful of client letters that require translation.

Criterion 2. Engagement with the low-income population.

Finding 6: SLS is actively engaged and visible in the client community.

SLS participates in collaborative efforts with the legal services network to obtain information from the low-income client population on matters relevant to major program decisions objectives and plans. This is seen in its work gathering data during intake screening for the 2008 needs assessment and the 2007 study on technology use by clients.

The program's staff members are well connected with the service provider networks in their respective communities. Interviews with community partners indicate that SLS is known to, and has the trust of, client community and its representatives. SLS supports its outreach activities with several substantive brochures and client educational materials. The program also refers clients to the recently launched website <http://ctlawhelp.org>. SLS does not have a formal outreach plan, except for the outreach plan for <http://ctlawhelp.org>.

SLS works with a variety of community agencies such as the Connecticut Department of Veterans' Affairs, the Middletown Community Health Center, the Legal Rights Assistance Project and the Circle of Meriden, among others. As part of SLS's Pardon Assistance Project, staff conducts outreach presentations focused on employment and housing matters. Since 1999, SLS has participated in Utility Day with the Connecticut Light and Power Company and United Illuminating to help prevent the loss

⁹ The site is built on the Drupal template, which complies with Section 508 of the Rehabilitation Act of 1973 as amended for services to persons with disabilities.

¹⁰ Subsequent to the Program Quality Visit, SLS reported that it developed a written LEP Plan.

of heat and gas due to unpaid utilities by negotiating payment plans and other suitable arrangements. Utility Day is reported to have assisted some 4,000 to 5,000 consumers.

Intake specialists are included in some outreach activities. Several staff reported a desire to participate in more of the outreach activities. Some staff members believe their decreased participation in outreach activities is generally due to the need to handle incoming calls and provide coverage for the phones.

Recommendations:

II.2.6.1. SLS should create a plan for program outreach.

II.2.6.2. Intake specialists should be included in outreach efforts in a more formal and thoughtful way.

Finding 7: The migrant paralegal provides outreach to the farmworker community through visits to farms. SLS endeavors to provide services across the state with limited resources.

The migrant component of SLS receives a relatively small sub-grant of \$3,400 from Pine Tree Legal Assistance, Inc. in Maine. It is staffed part-time by an experienced paralegal who has worked with the migrant community since 1984. The majority of the work under the sub-grant is outreach, although SLS provides information about its intake and services in its direct contact with farmworkers and the larger community. SLS provides outreach to various segments of the farmworker population throughout Connecticut by visiting farms during harvest season. Outreach materials are comprehensive and of high quality. Of particular note is the annual Harvest Calendar, which is published as a collaborative effort among the migrant programs in New England and New York. The Harvest Calendar is in English and Spanish and advises farmworkers of their rights in a variety of legal areas. SLS also distributes a newsletter for Jamaican workers who work on various farms throughout the state between April and November. SLS staff also participates with other state and social service providers in outreach events (referred to as fairs) where information sessions are presented on substantive issues. These fairs are targeted to migrant and local per diem farmworkers.

Criterion 3. Access and utilization by the low-income population.

Finding 8: Office locations and intake hours are generally calculated to achieve access to clients, but there has been no measurement by SLS of its effectiveness in this regard.

The primary method for applicants to contact SLS is through the statewide toll-free telephone number (or a local number for Middletown and Hartford), Monday through Friday from 9:00 a.m. to 3:00 p.m. Applicants can apply in person by walking in to any of the Network partner offices where they are given a phone to call SLS. In the past, SLS opened intake during limited evening and weekend hours. This reportedly

ceased due to a lack of resources. A community member expressed a need for the expanded hours. Online intake is not yet available. Homebound clients are handled by telephone. SLS has a separate line answered by a paralegal for calls from community partners. Some staff reported that in the past they had the ability to conduct in-person intake through outreach using laptops, but that due to coverage needs for calls, this is no longer a practice.

SLS's office location, the locations of its partners, SLS's office and intake hours, screening procedures, language capabilities of staff, procedures for communicating with LEP people are generally calculated to achieve access by clients, including populations with traditional access difficulties. This could be enhanced by generating and reviewing data comparing service area demographics to program case statistics. Other than its work with the studies referenced above, SLS does not regularly gather or review information as to utilization by people who traditionally have access difficulties (i.e. LEP, disabled, migrants, seniors). SLS does not regularly assess anomalies between caseload and service area demographics that may suggest access barriers, nor does it change service delivery or take steps to address anomalies related to access barriers.

Recommendation:

II.3.8.1*. SLS should regularly assess anomalies between caseload and service area demographics that suggest access barriers and address them accordingly.

II.3.8.2. SLS should seek to make itself available to clients with access barriers or who may have difficulties using the telephone through in-person intake or others avenues. SLS should reassess expanded intake during limited evenings and weekends; volunteer attorneys may be a resource to staff these hours.

Finding 9: SLS has innovative technologies that increase access.

SLS recently launched a new coordinated website, <http://ctlawhelp.org>. The site targets the low-income community, advocates and the private bar. It is funded by an LSC Technology Initiative Grant (TIG) and the CBF and is a joint project of the Network. The website increases access to legal services by coordinating legal information, pro se and other resources. It helps users access benefits, locate free legal services, and understand their critical legal issues. The site features links to specific legal information, court forms, videos, referral information and other substantive information.

At the time of the visit, SLS demonstrated an online intake system it developed but has yet to launch pending completion of the XSL transform, a feature that translates data so it is compatible with Legal Files. This interactive intake system is designed to interface directly with Legal Files and uses the A2J Author[®] for the screening component. It will increase client access statewide by streamlining the intake process and creating a new access point for clients available at any time. SLS is participating with a group of Legal Files users in developing the A2J module for online intake. The

other programs are Indiana Legal Services, Inc., the Maryland Crime Victims' Resource Center, Inc., Pine Tree Legal Assistance, Inc. and Legal Aid of North Carolina, Inc.

Finding 10: SLS's telephone system is scheduled for an upgrade to VOIP in two years. Call system queues are not handling calls as efficiently or client-friendly as possible.

SLS is staffed by eight intake specialists, nine paralegal advocates, and six attorney advocates. Intake specialists screen callers for conflicts, financial eligibility, citizenship, and problem type. Intake specialists transfer eligible callers to advocates based on legal problem and the caller's language. Paralegal advocates and attorneys provide legal advice over the telephone under the supervision of the deputy director (an attorney). In general, staff enters data contemporaneously into the case management system. When SLS staff determines that additional services beyond advice or brief services are needed, they close the case in the system and refer it by email and fax to the partner program. The Network maintains a series of folders where SLS's partners provide updated referral protocols and case acceptance information for each office. SLS management and staff use these as a guide for referrals, in addition to communicating by email. Interviews indicate that such referrals are appropriate and in accordance with local program priorities.

The current telephone system has multiple queues and call management reporting. The queues are divided by legal problem, English and Spanish. The Network is currently undergoing an upgrade to a VOIP system; SLS is scheduled for its upgrade in two years after the other programs have transitioned. SLS management does not know the maximum number of calls allowed to hold in each queue. Anecdotal reports from staff indicate the queue depth may be limited to eight calls per queue. The queue does not provide a recorded message; callers on hold hear music. When the queue is at maximum capacity, callers are instructed to try again later.

Call data documents the high volume of traffic to SLS's intake line. In 2010, over 204,000 calls were made to SLS, and 51,417 were answered. Calls to the intake specialists were answered in an average of less than 4 minutes. SLS manages coverage by controlling the number of staff covering intake lines. The executive director, program administrator and deputy director watch the queues using call management software on their desktop. The program limits the amount of time staff take between calls to complete their work. Intake specialists are allowed two minutes to wrap-up work on a call before taking the next call. The program's intake manual instructs intake specialists to answer each call transferred from the queue before the fourth ring. Paralegals and attorneys are not called in to help cover the intake queue in times of high volume.

SLS tracks the callers who give up holding in the second queue by reviewing manual lists made by intake specialists at the end of the day. Those who do not reach an advocate after having been screened by an intake specialist receive a return call the next day.

Some advocates and intake specialists expressed frustration that the current phone system is managed in a less user-friendly manner; only a very limited number of staff can view or manipulate the calls in the queues. As one example, under the old system, an intake specialist who misdialed and sent a caller to the wrong queue could easily see that the misdial had occurred and then move the call to the appropriate queue. In the current system, this feature is not available. Currently, a misdirected call results in the caller waiting in the wrong queue only to learn that unless the advocate happened to be cross-trained and can answer their question, their call may be transferred again for another wait in the correct queue.

Recommendations:

II.3.10.1*. SLS should increase queue depth and handle extreme volumes by bringing advocates in for short periods to empty the queue.

II.3.10.2. SLS should record an outgoing message for the screening queue to communicate matters not handled and guide ineligible callers away.

II.3.10.3. SLS should consider having comprehensive, real-time call center information, such as wait times and number of calls holding, made available to all intake specialists and advocates. SLS could achieve this by installing the call management software on the desktops of all users. It may also be feasible for telephone display of queue data when SLS adopts the VOIP system.

Finding 11: Intake specialists are well-trained; intake is primarily supervised by the program administrator.

SLS's intake specialists are supervised by the program administrator. SLS advocates meet periodically to discuss changes to the law, trends, and other issues affecting their clients and their work. These meetings are not held on a regular basis. Intake specialists are not formerly included in substantive law trainings. Some intake specialists communicated a desire for more frequent and ongoing substantive law training. Intake staff is trained on LSC regulations, confidentiality issues, spotting legal trends, and using CMS.

Recommendation:

II.3.11.1. SLS should seek training opportunities for intake specialists on substantive issues.

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

Criterion 1. Legal representation.

Finding 12: SLS's advocates are aware of key issues in their substantive areas of practice. SLS does not have uniform substantive scripts or checklists.

SLS has a dedicated and diverse advocacy staff consisting of six attorney and eight paralegals. There are four substantive units (housing, consumer, family and benefits) and each advocate is a member of two units. As a hotline program, SLS's direct services are primarily the provision of counsel and advice through phone calls, referrals and follow-up letters. As previously noted, SLS has a small migrant grant staffed by an experienced paralegal with which they do outreach to selected farms during the growing season and individual assistance upon request.

Advocacy staff experience range from 3 to 39 years. Some of the newer attorneys came directly from law school to SLS and have no practical experience. Some of the more experienced attorneys and paralegals have not practiced in over 10 years. Recently, advocates have been encouraged to periodically take on cases beyond counsel and advice, but it is neither mandated nor is there a procedure (other than approval) for such undertakings and their supervision.

SLS advocates are aware of the key issues in their substantive areas of practice through task forces, trainings, and the specialized areas of partner programs. Some advocate staff reported having participated with a partner program on case work as a result of their work on a task force. An example of this is the work on a motion to dismiss in a mobile home eviction case in the Connecticut Supreme Court, as well as assistance in writing briefs. Partner programs providing primarily extended representation reported that they would welcome additional assistance from SLS advocates and have expressed a willingness to assist with what they consider to be necessary and extensive training for such cases.

SLS does not use uniform substantive scripts or checklists although some staff has generated their own. Staff has various manuals, lists, web sites, and other materials to rely upon. There is no central repository for this information. At the time of the visit, plans were underway for a program wiki to organize these materials and make them available electronically. A bank of client advice and information letters are available to staff on the Intranet, many of which have not been updated or reviewed in over a year. The Intranet is accessed by advocates from all partner programs. Staff is free to add additional information in the letters and most often do. Some staff members developed their own personal bank of letters.

Recommendations:

III.1.12.1. SLS should develop written scripts of screening questions which could be used by new staff, interns, and volunteers to support intake and for quality control.

III.1.12.2. SLS should continue with its plan to develop a resource wiki for staff. The wiki should include the development and/or updating of all appropriate manuals, scripts, forms, and advice letters to make them easily accessible to staff.¹¹

Finding 13: Advocates receive feedback on casework from the peer review of their closed cases and in discussions with the deputy director.

The deputy director serves as the supervisor of the advocates. Her supervision consists primarily of fielding questions through an open door policy, reviewing ongoing call center data, and walking the floor. The deputy director spot checks closed cases, generates open and closed case lists each month, or more frequently when needed. The advocacy staff frequently consults with each other and management during the course of an intake as to the best way to provide advice on the matter. Management supervision of ongoing cases is generally self-directed and written work beyond advice letters is reviewed only upon the request of the advocate. Staff attorneys review advice letters before mailing to ensure services are appropriate and to foster ongoing learning. The practice of peer-based case review is widely supported by advocacy staff. There is no formal procedure for case reviews or other ongoing oversight of casework by management, although there are monthly unit meetings where cases may be discussed.

Advocacy staff receives periodic training in their area as well as cross training. Advocates participate in local trainings conducted by partner programs on specific legal issues, and they attend other legal education programs. Four advocates participate on substantive task forces. An advocate staff member reported that training requests have only been denied when there was no available advocate to cover the phone calls for that specific area. Knowledge of these trainings is received from various sources.

Finding 14: SLS's case closing data surpasses case closings of other hotline programs. SLS's emphasis on high volume call handling appears to impact the quality of its work.

The program's case closings are well-above national medians. In 2009, the program closed 13,055 cases or 506 cases per 10,000 poor persons in its service area. This compares to the national median of cases closed per 10,000 poor persons of 265. SLS staff closed 11,566 cases in 2010; 11,524 were closed as advice and counsel, and 34 as brief service. Its 2009 case closing totals result in the largest per poor person ratio of any LSC funded hotline program in the country.¹² 2009 LSC CSR data indicates that SLS is the highest producing hotline program; the total case per 10,000 poor persons is almost twice as high as the national average and far higher than the next highest hotline program. In 2010, SLS closed less than .3% of cases (34 in total) as brief service and only eight cases involved extended representation, (including court and administrative matters). The remaining 99% of cases were counsel and advice.

¹¹ Subsequent to the Program Quality Visit, SLS reported that it launched its staff wiki.

¹² 2010 comparisons to other LSC-funded hotline programs were not available at the time of this report.

In 2009, SLS closed 183 extended service cases (1% of the total cases) and 12,872 limited service cases (99% of the total cases). This compares to a national extended service average of 21%. The lower extended service ratio is attributable to the fact that SLS is intentionally structured for limited service and referral and its Network partners handle the extended services in the service area.

Each advocate handles an average of eight to ten calls a day in their designated subject areas. Call time can range anywhere from 15 minutes to one hour. In general, case notes are entered simultaneously into the case management system. Some staff reported entering notes after the end of the call. Case notes follow a structured format created by management as a quality control and to provide a clear record for others reviewing the application. SLS's case note outline requires staff to input the issue, facts, analysis, and result. Staff is provided a training manual on the required format.

After each call, the advocate is allotted five minutes wrap-up time to complete the entry case notes, generate a client letter summarizing the advice given, input coded notes for the intake specialists as to any pamphlets or attachments for the client letter and printing the file from the case management system.¹³ Printed case files are kept in a filing cabinet in the office. Advocates are also assigned a brief service shift of a morning off of the phones to resolve any other work required on a case. The five minute wrap-up time period was adopted to ensure coverage for the incoming volume of calls. Several advocates felt that the allocated five minutes was often insufficient for the drafting of the follow-up letter, especially when additional information was added.

Prior to mailing, each intake, along with the proposed letter, is reviewed by a designated staff attorney who is assigned to the appropriate subject area. The designated attorneys review approximately 30 cases per day. This practice of peer review is reportedly received well by all staff. They view this is a learning tool and a way to share the work of case review under high volume. However, a review of a sample of submitted advice letters reflected that some could have benefited from more drafting time and/or a more thorough review.

Overall, there is more of an emphasis on quantity as opposed to quality. The team learned of several practices where quality could be improved. Examples include the short time frames between calls to handle other work related to their calls and the fact that some calls are rushed. Some staff reported callers who were frustrated and perhaps did not understand what was being told to them. The review team observed some staff rushing around the office. Many staff reported not having time to complete clerical tasks or take personal breaks. One staff person reported overhearing calls where staff was rushing the caller. Other times, staff is overhead to sound edgy with clients. The team was informed that staff does not typically provide their name on the call and that perhaps a customer service perspective toward clients would be warranted.

Recommendations:

¹³ Subsequent to the Program Quality Visit, SLS reported it had increased the wrap-up time for advocates to eight minutes.

III.1.14.1*. The deputy director should develop and implement a formal written procedure for case review and legal work supervision including spot checking cases prior to closure, periodically reviewing closed cases, co-counseling on brief and extended service cases, using the unit meetings as a forum for case discussions/reviews, and keeping abreast and coordinating appropriate training for screener and advocate staff.

III.1.14.2*. SLS should prioritize cases where it would be appropriate for staff to engage in direct representation and, after development of appropriate case assignment, training (including shadowing with partner program staff), and supervisory procedures, all advocacy staff should periodically be involved in representation beyond mere counsel and advice. This benefits quality of advocacy by providing training opportunities and enhancing their understanding of substantive law.

III.1.14.3*. The program's emphasis on producing high numbers and call volume should be balanced with increasing the quality of the legal advice given the client.

III.1.14.4*. Advocacy staff should be encouraged to take whatever time is necessary to draft a comprehensive advice letter or complete their other duties at the completion of the call and before taking the next call.

III.1.14.5*. Hard copies of printed files should be digitized and filed electronically.

Criterion 2. Private attorney involvement (PAI).

Finding 15: SLS effectively integrates private attorneys into its legal representation and client services, but would benefit from formal case acceptance procedures.

Pro bono in Connecticut is a joint initiative between the Network and the CBA, with SLS taking lead on intake and case placement and the bar leading recruitment, training and recognition. LARCC assists with training efforts and materials. SLS's private attorney involvement system seeks to involve the private bar in SLS's delivery of services. The SLS Private Attorney Involvement plan describes the program's structure and goals, mechanisms for involving the private bar, activities for volunteer support and recognition, and staffing. The PAI Plan also describes SLS's collaborations with other organizations in the state to encourage pro bono participation. The program's work generally reflects the PAI plan.

SLS collaborates with the state bar on pro bono. At the time of the visit, a pro bono coordinator had recently been hired by the state bar. SLS utilizes private attorneys in a full range of program activities, including direct representation (both full and limited), assistance to pro se litigants, including clinics, training, representation in non-judicial forums and other work. In general, SLS is thoughtful and innovative in the ways it uses the services of available private attorneys.

In Connecticut, there are approximately 2,955 attorneys eligible to participate in pro bono activities. SLS has a list of approximately 750 attorneys willing to volunteer for the program. This list is in the process of being updated. In 2010, 373 attorneys accepted 758 case referrals from SLS. In 2009, SLS closed 649 PAI cases, of which 180 involved extended services. In 2010, the program closed 767 PAI cases; 254 of which were extended services. The primary mechanism by which SLS involves private attorneys in its work is through the referral of individual cases. In general, volunteer attorneys handle consumer, bankruptcy, tenants' rights, public and private housing, foreclosure, wills/estate and family law matters. SLS involves volunteer attorneys in the provision of assistance with its Pardon Assistance Project. Pro se clinics are also an opportunity for volunteers. A Hartford law firm volunteers in a security deposit clinic and other similar clinics are staffed by volunteer attorneys from several law firms in New Haven. SLS also operates pro bono family law form clinics for pro se litigants.

PAI staffing includes a full-time experienced attorney coordinator and a full-time paralegal advocate coordinator. The pro bono attorney coordinator is responsible for case assignment and the paralegal handles the clinics. Supervision is provided by the deputy director. Cases come to the PAI program through general intake, and are determined to be appropriate for PAI by a case by case review by the pro bono attorney coordinator. There are no formal case acceptance guidelines for appropriate pro bono referral. Cases are reviewed for referral to pro bono either at closing or while the caller is on the phone. Often the coordinator peruses cases and/or staff brings individual cases to the attention of the pro bono coordinator for review. The program does not appear to provide the necessary oversight and follow-up once an attorney has agreed to take a case. SLS's involvement is limited to sending reminders regarding case closing every nine months.

SLS offers case support and volunteers receive malpractice insurance coverage and recognition. Support to volunteers includes sample pleadings and forms which can be downloaded from <http://ctlawhelp.org>, consultations with staff attorneys, and administrative support if needed. Volunteers are recruited by the state bar via continuing legal education, which is provided free in exchange for taking a case pro bono. Staff from the five programs works with the CBF to provide training to volunteers. Training materials are provided on the ctprobono.org website, on ctlawhelp.org and from the CBA. The state bar also holds recognition events at bar lunches or dinners.

Recommendations:

III.2.15.1. Case acceptance guidelines should be developed for SLS's pro bono component and disseminated to staff to allow for both an automatic and more expansive flow of cases to the pro bono unit. The guidelines should be updated as resources shift.¹⁴

III.2.15.2. SLS should establish case oversight protocols for individual cases referred to pro bono attorneys. This should become part of the program's PAI plan.

¹⁴ Subsequent to the Program Quality Visit, SLS reported that it updated its pro bono priorities for referrals to the unit and posted them on its wiki. The program reports they will be reviewed quarterly.

Criteria 3 and 4. Other program services to the eligible client population and other program activities on behalf of the eligible client population.

Finding 16: Consistent with its goals, objectives, and strategies, SLS participates in a wide range of services and activities that benefit the client population.

Consistent with its goals, objectives and strategies, the program provides services in addition to direct client representation that are designed to help low-income people address their legal needs and problems. Such services include, but are not limited to, community legal education, clinics, the Pardon Assistance project, Utility Day, and the Veterans' Stand Down.

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

Criterion 1. Board governance.

Finding 17: SLS's board demonstrates effective oversight and is actively engaged in decision making.

The 15-member board meets bimonthly. The board is comprised of 10 lawyers and 5 client representatives. The board does not have term limits. The board has a nominating committee that explores transition on an annual basis. The board is considering structural changes to enhance board engagement. It created the position of Immediate Past President and members have discussed the concept of using the Vice President position as a de facto President Elect -- both as efforts to insure continuity of leadership.

There is a core group of committed board members, including client members, who regularly participate in board meetings and provide meaningful oversight and guidance to program management. The board members interviewed by the team were knowledgeable about the program's mission. There was interest in learning more about the day-to-day operations of the program and meeting the staff responsible for the performance of the work.

Meetings are consistently well-attended in person and via telephone. However, most meetings are held by teleconference. As a whole, the board is representative of the various geographical areas and low-income populations served by the program. The board has a limited number of committees; substantial work is performed by ad hoc committees as the need arises. In addition to its nominating committee, it has standing committees for finance and client grievances. Regular, formal in-house training presentations for the board do not occur. Board members receive a comprehensive board manual outlining the areas of significance to SLS board members and the work of the program.

During the last four years, the board has become very active in the oversight of the program. The board successfully navigated the program through a major management restructuring. The board was actively involved in managing the succession of the long-time executive director, Norman Janes, to the current executive director, Jan Chiaretto. The board president and executive director communicate at least once each week. SLS's board is committed to regular, periodic evaluation of the executive director. The board has conducted an interim and final evaluation of the new executive director. The board exercises effective financial oversight over the program. The board regularly receives and reviews detailed financial reports. The budget approval process includes three-year data to assist the board in recognizing trends in the program's revenues and expenses.

Board members expressed support for the concept that a strategic planning process would be timely at this juncture in the organization's development. The board has not been actively engaged in fundraising and development activities. There is some concern about the implementation of fundraising initiatives in light of the program's relationship to the greater legal services network and the intention to not compete with partner programs for grants and federal funding. At least one board member mentioned the idea that a statewide campaign for legal services might be a laudable goal that could provide long-term financial benefit to the program. One key board member opined that the program could be more strategic about board appointments to increase the number of influential members of the bar participating in the support and oversight of the program.

Recommendations:

IV.1.17.1. Now that new management is in place, the time has come for SLS to move beyond its past and plan for meeting challenges in the future.

IV.1.17.2*. In recruiting future board members, effort should be made to insure that the board is an influential body, appropriately diverse, and representative of the various geographical areas and low-income populations served by the program.

Criterion 2 and 3. Leadership. Overall management and administration.

Finding 18: SLS's leadership and administration could be strengthened.

The management team is comprised of the executive director, a deputy director, a program administrator, an executive secretary, and a bookkeeper. Prior to the retirement of the previous executive director, the management function was shared by three substantive area managers. The changes to the management structure in the past several years are widely perceived as having been beneficial to the program. The executive director is responsible for reporting to the board, preparing and distributing the board materials, preparing the minutes of board meetings, overseeing program management and technology staff, leading relations with the union, assisting staff with problem solving, and maintaining partnerships with the partners.

The new executive director is seen as a responsive partner by the other members of the Network. However, the executive director has not yet established herself as a leader within the program. Implementing change within the program has been difficult. The executive director appears to be spending much of her time on outside office activities and when she is in the office on administrative activities that in some cases could be best accomplished by other staff. While maintaining good relationships with other stakeholders is valuable and a worthwhile activity, SLS leadership needs to be strengthened and directed more towards program issues. Best practices for legal services hotline programs call for a leader who has a clear vision and who projects a sense of positivism. These two qualities, among other qualities of an effective leader, foster cohesion among staff and alignment with the program's new directions and vision.

Throughout the visit, instances showed that senior program management lacked sufficient attention to details. An inordinate amount of confusion ensued over the program's scheduling of interviews for this visit. The executive director was significantly late for the opening conference. During the visit, further interview scheduling instructions were not followed. Further, some program materials showed a lack of attention to detail. Form letters to clients generated by the case management system lacked polish. Board meeting materials lacked a consistency and professionalism one would expect from a multi-million dollar law firm.

Recommendations:

IV.2.18.1. The executive director and the deputy director should both maintain a working knowledge of all aspects of program operations.

IV.2.18.2*. SLS should consider reorganizing the program's administration to provide more support for the work of the executive director and the deputy director. SLS should consider assigning administrative assistant responsibilities to the current program administrator. SLS should reorganize the intake specialists and advocates into one overall unit managed by the deputy director. The program should also consider eliminating shifts for coverage and staffing the calls in a more streamlined approach. LSC's Intake Focus Group is available to SLS for technical assistance.

IV.2.18.3*. As the executive director and deputy director are relatively new to their roles, SLS should consider the benefits of outside expertise through the development of mentoring relationships from the legal services community outside of Connecticut to serve as a confidential sounding board and technical assistance resource to the executive director and the deputy director.

Finding 19: Program management is compartmentalized. The supervision of intake and telephone advice is bifurcated between management staff.

The management of program operations is distributed between the executive director, the deputy director and the program administrator. At times, information is compartmentalized in a way that is contrary to overall program effectiveness. The

management of the telephone advice system is bifurcated between the program administrator and the deputy director where it leaves no one focused on the macro issues. Although real-time use of the telephone and computer data is utilized at the operational level, it appears that there are missed opportunities for after-the-fact assessment and data analysis that could be used to enhance outcomes for clients. This is symptomatic of the compartmentalization of information in the program.

This culture of compartmentalization also filters down to the staff level. Staff interviews showed that staff was often unaware of information that was within the purview or responsibility of another staff person. Throughout the interview process, many basic questions about program operations were answered by instructing the team member to see another person. For example, an advocate did not know how to print case reports from Legal Files - and the team was directed to the IT staff. The pro bono attorney directed the team to the pro bono secretary for questions regarding direct referrals, procedural questions or questions about case reporting. Another example of this is that advocate staff are not regularly brought in to support intake specialists when call volume is high.

The team also observed that management may not be focused on the larger picture of program management where efficiencies of time may be gained. Management spends a great deal of time managing coverage through shift schedules for the phones. SLS intake specialists are spending a great deal of time on clerical duties that could be streamlined. Examples include manual recording and collecting information on callbacks on daily logs, and faxing copies of applications to local offices to follow transfers via the case management system (as a check/balances system).¹⁵ In addition, the heightened attention to coverage on the phones has resulted in staff using their break time to perform clerical tasks.

Recommendations:

IV.3.19.1*. Intake specialists' clerical duties should be streamlined to be more efficient.

IV.3.19.2*. SLS should insure staff are afforded time for personal breaks.

IV.3.19.3*. SLS should evaluate its practice of managing coverage on the phones with shifts. Best practices adopted by other hotline programs may be helpful in assessing other ways to address coverage.

Finding 20: SLS has devoted adequate resources to its current technological structure.

SLS and the Network are strengthened by community-wide support for technology. The state bar foundation and all legal services providers in the network

¹⁵ Faxing applications would be better handled via technology, such as scanning documents into a digital record that could be sent via email. According to some staff, the faxing is time consuming and incurs long distance charges.

contribute to and support technology efforts. Network support and all technology initiatives are highly coordinated. SLS budgeted \$160,000 for technology in 2011. The Technology Plan provides for the sharing of expenses and resources, including staffing, hardware, software, bandwidth, centralized data storage, user training, an Intranet, and network security and backups among other requisite infrastructure. The five programs also benefit from a robust case management system, a WAN and a Citrix desktop with most applications included for all users. However, one weakness in the Network's use of technology is its failure to adopt common case coding practices in some aspects of its use of Legal Files. In some cases, open cases are not coded the same way. Outcomes codes may also be used differently. Without a common system, it is difficult to easily and accurately assess whether the Connecticut legal services delivery system is performing as intended.¹⁶

There is currently four IT staff paid for in part by each provider. Two full-time IT coordinators provide the WAN and user support for the five programs. One is housed at SLS and the other at CLS. These two IT coordinators use desktop sharing for training and support. Other technology training materials are located on the Intranet and users receive regular *Tech Tips* emails that answer frequently asked questions and provide other useful information. An additional IT support staff person was recently hired on contract. The Network also staffs a full-time Web E-Content manager. The programs also brought in an outside consultant to assist with the planning, development and marketing of <http://ctlawhelp.org>.

The Network is working through a statewide implementation of VOIP. Call center upgrades for SLS are planned in approximately two years. SLS has call management software monitoring call flow, volume and wait time. SLS does not regularly generate all the reports available to it in its call management program. As discussed above, SLS staff continues to rely on manual processes, despite having access to technology that could garner time savings.

Recommendations:

IV.3.20.1*. SLS should regularly generate and assess the reports from its call management software program and its case management system. These reports can help the program change delivery and staffing, among other aspects of operations, to meet the changing demands for its services.

IV.3.20.2*. SLS should assess each of its manual systems and logs and consider how technology could gain efficiencies for staff. Technology staff should be involved in this planning.

IV.3.20.3. SLS should scan and email digital copies of applications to local offices.¹⁷

¹⁶ Subsequent to the Program Quality Visit, SLS reported that its partners will be making outcome statistics available to SLS.

¹⁷ Subsequent to the Program Quality Visit, SLS reported that this is now done.

IV.3.20.4. SLS is strongly encouraged to work with its partners to develop common case closing codes.

Criteria 4, 5 and 6. Financial Administration. Human Resources Administration. Internal Communications.

Finding 21: The program has sufficient, capable, and trained staff dedicated to financial administration.

The program has capable and trained staff dedicated to financial administration. However, it does not staff a chief financial officer (or similar position). A part-time bookkeeper, with over 15 years of experience in her profession and a degree in Business Administration and Accounting, is responsible for the accounts payable, receipts, vendor relations and preparation for the audit among other general administrative duties. The program issues detailed financial statements on a timely basis. SLS uses Peachtree as its accounting software. The lack of a financial officer means that most high level financial functions, such as overseeing the budget and future planning, are performed by the executive director. This model may not be sustainable in the long run. Recent program audits have not revealed any significant problems or issues.

Finding 22: SLS does not have a full-time human resources director. Staff evaluation forms are an ineffective tool for performance management.

The human resources function is primarily staffed by the **program administrator** who splits her time among three areas: human resources, office administration and supervision of the intake specialists. She is responsible for managing coverage of the phones and leave requests. Her human resources duties include handling insurance and other benefits, receiving staff grievances before they are filed with the union, payroll and timekeeping. As program administrator, she handles supplies, bill payments and issues related to the office space. She meets with the deputy director and executive director on a weekly basis to discuss personnel issues and program developments.

Some staff reported difficulties and low morale related to the perceived inequities and rigidity in some management relations arising from the supervision of intake. This was exemplified in coverage decisions and time away from calls or leave requests. However, the program has been fortunate to avoid high rates of turnover.

Staff evaluations are conducted on a regular basis. The staff evaluation protocol is not an effective or comprehensive tool for assessing and improving employee performance. The evaluation form starts with a limited narrative assessment of each of the skills for the relevant job description, completed by either the executive director or the deputy director. This is followed by a space for a narrative response by the employee for each category, and an open-ended self-evaluation and a professional development plan following a similar format at the end of the form. The form does not provide ratings of any kind.

Recommendations:

IV.5.22.1*. SLS should implement a comprehensive staff evaluation system looking to resources like the Center for Legal Aid Education, the LSC Resource Information website or Management Information Exchange, among others, for guidance.

IV.5.22.2. The program administrator is encouraged to attend a formal training on human resources and personnel management focused on sensitivity to power dynamics in the employer-employee relationship and the value to the organization of team cohesion and high morale among employees.

Criterion 7. General resource development and maintenance.

Finding 23: SLS does not have a resource development director. Grant writing and other resource development is primarily handled by the executive director.

The program does not employ a resource development director. Resource development is currently handled by the executive director. As discussed above in board governance, the board is not actively engaged in fundraising and development activities due to the structure of the Network.

Criteria 8 and 9. Coherent and comprehensive delivery structure. Participation in integrated legal services delivery system.

Finding 24: SLS is an active participant in an overall delivery system statewide.

The program participates in statewide efforts to provide low-income persons in the state with equal access to a full range of civil legal assistance services in all forums. SLS's foreclosure work and Pardons Project are two examples of its awareness of the evolving needs of low-income communities and are responses consistent with the goals and interests of the broader delivery network.

SLS participates in statewide planning and oversight activities to achieve an integrated statewide delivery system, and coordinates and collaborates with other civil legal aid providers, private attorneys, the organized bar, and other public and private entities that provide legal and other social services to low-income persons. As stated under Performance Area I, the time is ripe for the Network to engage in strategic planning to determine whether the statewide delivery system is performing as efficiently as originally intended.