



Law Offices of

Florida Rural Legal Services, Inc.

Servicios Legales de Florida Rural, S.A.
Legal Servis Riral De Florida, Inc.

Donald Isaac
Executive Director

Respond to:

- **Belle Glade**
1500 NW Avenue "L", Suite A
Belle Glade, Florida 33430
561-993-0003
561-993-0004 fax
Toll Free Clients Only
1-888-993-0003

Angela Thompson
Managing Attorney

- **Ft. Myers**
3210 Cleveland Avenue,
Suite 100 A
P.O. Box 219
Ft. Myers, Florida 33902-219
239-334-4554
239-334-3042 fax
239-936-7038 Admin fax
Toll Free Clients Only
1-800-476-8937

Cathy Lucrezi
Managing Attorney

Migrant Farmworker Unit
1-800-476-1837

- **Ft. Pierce**
510 South US Hwy 1, Suite 1
P.O. Box 4333
Fort Pierce, Florida 34948
772-466-4766
772-489-3176 fax
Toll Free Clients Only
1-888-582-3410

Sandra Rodriguez-Hickman
Managing Attorney

- **Lakeland**
963 E. Memorial Blvd.
P.O. Box 24688
Lakeland, Florida 33802-4688
863-688-7376
863-683-7861 fax
863-683-7969 Admin fax only
Toll Free Clients Only
1-800-277-7680

Phil Short
Managing Attorney

- **Punta Gorda**
226 Taylor Road, Room 210
Punta Gorda, Florida 33950
941-505-9007
941-505-9626 fax

Jenny Seltzer
Supervising Attorney

- **West Palm Beach**
3111 S. Dixie Hwy, Suite 140
W. Palm Beach, Florida 33405
561-820-8902
561-820-8892 fax
Toll Free Clients Only
1-800-284-4588

Hazel Lucas
Managing Attorney

www.frls.org

December 15, 2009

Michael Genz, Esq.
Program Counsel
Office of Program Performance
3333 K Street, NW, 3rd Floor
Washington, DC 20007-3522

Re: FRLS Program Quality Visit
Recipient No. 610020

Dear Mr. Genz,

We have received the November 19, 2009 letter from the Legal Services Corporation, which contained the draft report from the visit conducted by the Office of Program Performance to our program in September of 2009. In the fourth paragraph of that letter, Director Janet LaBella requested that we notify you of any factual inaccuracies to the report, prior to December 21, 2009. While most of the information in the report was accurate, we did notice a few small factual errors. We would like to bring them to your attention, as follows:

1. On page 4 under Finding 1., the first sentence states that FRLS has conducted a comprehensive legal needs assessment since 2003. In fact, we have conducted such assessments every three years since 1986. We have copies of those assessments on file here.
2. On page 5 under Finding 2., the second paragraph refers to hurricanes in 2006 and 2007. In fact our area suffered from storm related disasters in 2004, 2005 and 2007. That paragraph goes on to state that we filed a motion to intervene in the flood related case. In fact, in that case we actually filed appeals with FEMA for claims for replacement housing on behalf of the mobile homeowners. We were also able to pressure the county into inspecting the homes for flood damage in order to support our appeals with evidence.
3. On page 8 under Finding 6., we do not believe that the intake procedures for each office are completely accurate, but as these are in the process of being completely revamped, so it may not be important to describe these accurately. We would note, though, that clients can be interviewed by telephone in all of our offices, depending on their circumstances, and that advocates



Michael Genz, Esq.
December 15, 2009
Page 2 of 3

can get court documents from the clerk's website in many other counties, such as Lee, Palm Beach, St. Lucie, etc.

4. On page 10 under Finding 8., we would just like to stress that the described list of agencies with whom we work on a regular basis is not exhaustive and that we have relationships with many more groups than the 6 that are listed. We would be happy to send you a more complete list should you so desire.
5. On page 12 under Finding 11., the first paragraph makes mention of approval procedures required of advocates for certain kinds of litigation. In fact our litigation approval form is required for federal litigation and for other casework that will require a substantial amount of time *or expense*.
6. On page 15 under Finding 14., the third paragraph mentions the successful receipt of a grant from the Institute for Foreclosure Legal Aid. In fact, our applications for these funds were denied, but we were successful in obtaining a foreclosure prevention grant from the Florida Attorney General's Office and the Florida Bar Foundation.
7. On page 16 under Finding 14., the second full paragraph mentions our work in representing tenants being relocated from public housing by the school district's purchase of the housing project land. It states that we represented tenants in a suit. In fact, no suit was ever filed in that case because the case was resolved through negotiations before any suit was filed.
8. On page 19 under Finding 17., we would just like to add that our Board is, indeed, quite diverse and that in addition to our six African American and two Hispanic Board Members, we also have a Native American attorney member, Mr. Travis Trueblood.
9. On page 24 under Finding 21., the first paragraph lists the duties of the program administrator. While our administrator has many duties, including, among many other things the procurement and administration of all of our insurance policies, she does not perform the duties listed in the last sentence of that paragraph. Our recruitment committee helps with our hiring process and the deputy director is in charge of the structure and implementation of staff evaluations. We would also point out that many of the documents in each current and former employees personnel file are available electronically on our shared administration drive- the Q drive. In the last sentence of the third paragraph, we would also like to point out that the evaluation process for paralegals also involves the review of files.
10. On page 25 under Finding 21., there were several inaccuracies. The third full paragraph states that FRLS non-attorney staff have not been receiving any salary increases in the last few years. Pursuant to our union contract, every satisfactory employee of FRLS receives a salary increase on his or her anniversary date by moving up one step on our salary scale.



Michael Genz, Esq.
December 15, 2009
Page 3 of 3

The step increases are \$1,000 per year. The Fourth paragraph describes the administrator as the supervisor of the Office Managers. This is not the case. The Office Managers are supervised by the Managing Attorneys in the respective offices. This is shown on our organizational chart and is the practice in each local office. The administrator is considered to be the Work Group leader for the support staff, helping to keep them up to date with best practices and helping the office managers with issues such as office repairs, petty cash and trust accounts. Under the organizational chart and in actual practice, Office Managers are the supervisors of the other support staff in each office.

11. On page 27 under Finding 24., the last paragraph states that our Board formed FEJC two years ago. In fact, FEJC officially came into existence on February 14, 2005.
12. On page 29, under Finding M-2, we would like to point out in paragraph one that it is actually a Creole speaker that visits our Belle Glade office every Friday. As to paragraph two of that part, we wish to add that while some outreach is driven by the H2A clearance orders, the rest is driven by a list of registered migrant housing which we obtain from the county health department information each year. That outreach may or may not have anything to do with H2A workers, depending on who is found to be residing in the migrant housing.
13. On page 30 under Finding M-4 we would just like to clarify that our Migrant Unit actually relocated from Immokalee to Fort Myers in August of 2003, over six years ago.

We thank you for all of the hard work done by your team during the visit and for your patience in reading these comments. We would also like to express that while your report referred to areas of concern as program "weaknesses," we would instead like to view them in a more positive light as program "challenges." We know that we have work to do and the work has already begun here at FRLS. Hopefully, on your next visit, you will see more improvements and an even higher commitment to serve clients in evidence.

Sincerely yours,

Don Isaac
Executive Director

Christine Larson
Deputy-Director