



LEGAL SERVICES CORPORATION

Office of Program Performance

***FINAL
PROGRAM QUALITY REPORT***

FOR

Central California Legal Services

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LSC Review Team:

Nancy Glickman, Program Counsel, LSC (Team Leader)

Grayce Wiggins, Program Counsel, LSC

Cesar Britos, Temporary Employee

Carolyn Worrell, Temporary Employee

**Central California Legal Services
Program Quality Report**

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INTRODUCTION

The Legal Services Corporation's (LSC) Office of Program Performance (OPP) conducted a Program Quality Visit (PQV) to Central California Legal Services (CCLS) from December 9-13, 2013. Team members included OPP Program Counsel Nancy Glickman (team leader), OPP Program Counsel Grayce Wiggins, and LSC temporary employees Cesar Britos and Carolyn Worrell.

Program Quality Visits are designed to evaluate the extent to which LSC grantees are providing the highest quality legal services to eligible clients. In conducting the evaluation, OPP relied 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 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.

The team reviewed documents routinely 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, as well as the results of an online staff survey.

While on site, the team visited CCLS's three offices located in the cities of Fresno, Merced, and Visalia. The team interviewed program leaders and administrators, along with attorneys, paralegals, and administrative and support staff. The team also interviewed several members of the board of directors, judges, community partner organizations, and state stakeholders.

SERVICE AREA AND PROGRAM OVERVIEW

CCLS is one of the 11 LSC-funded legal services programs in California. The program's roots date back to 1966 with the formation of Fresno County Legal Services. Fresno County Legal Services later merged with the Merced County program and concurrently expanded services to Tuolumne and Mariposa counties. In 1989, Fresno County Legal Services formally changed its name to Central California Legal Services. In 1997, the Tulare/Kings County Legal Services combined with CCLS resulting in the program's current six county service area, LSC service area CA-26.

CCLS is located in the central San Joaquin Valley. The *Central Valley* is one of the world's most productive agricultural regions. Three of the top four counties in agricultural sales in the United States are located within the program's service area. It was thus fitting that the *Central Valley* helped form the backdrop for the farmworker movement.¹ While predominately

¹ Although California Rural Legal Assistance has LSC's migrant grant for all of California, CCLS assists farmworkers in a variety of cases within its priority areas.

rural, the valley has a number of small to medium sized cities. Fresno, the largest city in the service area and the urban hub of the *Central Valley*, is the location of CCLS's main and largest office. The smaller branch offices of Visalia and Merced are located in the southern and northern portions of the service area, respectively.

The American Community Survey's (ACS) three year (2009-2011) study estimates that CA-26 has a poverty population of 434,275, an increase of approximately 26% over 2000 decennial census figures. The poverty population is comprised primarily of Hispanic/Latino residents (67.87%), as well as Asian (6.71%), and African American (5.53%). Over ten percent of all CA-26 households are linguistically isolated with Spanish being the primary language spoken at home.

At the time of the PQV, CCLS had a total workforce of 59, including 20 attorneys and 16 paralegals. There was an increase in attorney staff over the previous year due primarily to the receipt of substantial new grants in the areas of health and foreclosure assistance. In 2013, CCLS received LSC basic grant funding in the amount of \$2,692,051. Due to the combination of increased congressional funding and implementation of the census readjustment, CCLS's 2014 grant will be increased to \$2,779,936. LSC currently makes up close to 50% of CCLS's funding.

LSC's Office of Compliance and Enforcement conducted a CSR/CMS review of CCLS in 2011. Although OPP has visited the program on several occasions, most recently performing a Program Engagement Visit in 2010, this was CCLS's first Program Quality Visit.

SUMMARY OF FINDINGS

CCLS has an engaged board, experienced management, and energetic staff. Each is highly dedicated to the program's mission to advance justice and empower people. However, the program is in need of a comprehensive plan to assist them in achieving their goals.

CCLS last completed a comprehensive client needs assessment in 2010 and has addressed new and emerging needs as they became apparent. In contrast, CCLS has not developed a strategic plan to address the needs of the organization and methods to meet those needs.

CCLS is generally engaged in its client community as evidenced by its extensive outreach and community education efforts. However, rural outreach appears to be a challenge. The program has a well thought out Limited English Proficiency Plan that builds upon the program's staffing commitment to language access. CCLS is considering the adoption of a new intake system that will provide more efficiency and greater access than its current decentralized structure that relies heavily on walk-in intake.

While CCLS closed case statistics are below the national norms, the program has a demonstrated capacity to provide quality legal services to its client population. The program has a dedicated advocacy staff that would benefit from increased supervision and targeted training. Despite various efforts, private attorney involvement remains a challenge for CCLS, especially outside of Fresno County.

CCLS has a diverse and engaged board that continually seeks to improve its effectiveness. The program has an experienced leadership team that has over extended itself. The finance, human resources, and resource development functions are appropriately managed by knowledgeable staff. The program is without a current resource development plan to guide its revenue raising efforts. CCLS has a sufficient technology structure and the program is committed to enhancing its capabilities. The program is appropriately engaged with its local and state partners in the delivery of legal assistance to California's low-income population.

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. CCLS last completed a comprehensive needs assessment in 2010.

In 2009, CCLS engaged an outside consultant to complete a comprehensive needs assessment. Phase one of the assessment consisted of gathering information from board, staff, past and current clients, community partners, and key stakeholders through focus groups, surveys, and various interview settings. The collected information was reviewed by the board in a 2009 retreat. Phase two of the process included review of an array of data including census information, CCLS case closures, and reports issued by regional and state organizations, most notably the 2010 California State Commission on Access to Justice's report on *Improving Civil Justice in Rural California*. A 2010 board retreat resulted in the adoption of the following broad priorities: the delivery of legal services; maintaining, enhancing and protecting income and economic stability; preservation of housing and related housing needs; improving outcomes for children and youth; safety, stability and well-being; and protecting civil rights.

Finding 2. CCLS has identified major emerging needs that affect its entire service area and has taken steps to address such needs.

As the legal landscape evolves, CCLS attempts to address any new needs when they become apparent. For example, in the wake of the foreclosure crisis, CCLS sought and received funding that provides educational workshops to the client community and places attorneys that specialize in foreclosure work in each office. Similarly, due to the changes in the health care delivery system, under a California Department of Managed Health Care grant, CCLS has created a health care unit with a dedicated intake line to provide immediate assistance on health issues. Additionally, as a result of the epidemic in pay day loan schemes, there are signs in the Fresno office waiting room requesting that clients inform the intake staff if they have entered into such loan agreements.

Finding 3. CCLS does not have a comprehensive strategic plan that addresses the needs of the organization, methods to meet those needs, and measurable goals and objectives.

A standard question in all PQV document requests is for the program to list any current challenges it is facing. In response to the query, CCLS listed a myriad of challenges, including

an increased demand for services, staff recruitment, intake, and resource development. While each involve their own processes, they cannot be viewed in isolation as they are all inextricably entwined with each other and, ultimately, with the overall objective of delivery of quality legal services. Although the program has laid the groundwork for what directions it wants to pursue, without an overall plan with timetables and measurable goals, such efforts have been somewhat stalled. For example, while the implementation of a community lawyering approach was the focus of a 2012 leadership team retreat, the effort has yet to be effectuated. Similarly, there has been only limited response to the results of 2011/2012 individual team retreats addressing service delivery. In addition, CCLS gathers extensive outcome data each time it closes a case. Yet, it does not appear that the information gained is utilized in any formal evaluative process. CCLS recognizes the need to develop an overall strategic plan and, at the time of the visit, had commenced initial discussions as to a process.

Recommendation I.1.1.1² When undertaking its next comprehensive needs assessment, ideally within the next two years, the program should consider utilizing in-house staff to effectuate the process, supplemented by volunteer resources such as the local university.

Recommendation I.2.3.1* CCLS should engage in a comprehensive strategic planning process addressing goals as to service delivery and the resource development activities necessary to achieve them. Board and staff at all levels should be involved in the process and the plan should contain timetables and measurable goals.³ Throughout this report, recommendations will highlight specific areas to be included in the plan.

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

Intake

Finding 4. CCLS is exploring the possibility of restructuring its intake process to provide a system that is both more accessible and efficient. The team agrees there is a need for change.

CCLS currently operates a decentralized intake system. Support staff in each office conduct an initial screen for any phone or walk-in request during regular office hours. In Fresno, there are four designated intake/receptionists that rotate intake responsibilities with three

² 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.

³ CCLS may want to consult LSC Resource Information (LRI) (<http://lri.lsc.gov/identifying-need/strategic-plans>) for examples of strategic plans.

conducting intake and the fourth handling receptionist duties.⁴ In Visalia, the duties are rotated among the three office support staff and, in Merced, among the two support staff. Each intake screener is bi-lingual in Spanish and English. While Merced and Visalia estimate that intakes are equally divided between walk-ins and callers, in Fresno, which covers over 50% of the service area's population, an estimated 80% to 90% of all intakes are walk-ins. As the walk-ins have initial priority, a fact clearly not lost on the client community, the Fresno receptionist maintains a call back list for telephone requests if no one is available to take the call. Once the initial walk-ins are dealt with, the first available worker will start working through the call back list. While they attempt to call everyone back the same day, often times the call backs will not occur until the following day. If the call back list becomes extensive, Merced support staff will be enlisted to assist in the screenings.

The initial screen consists of an income and assets eligibility determination, a conflict check, a categorical case eligibility screen, and the gathering of a brief description of the problem. All information is contemporaneously placed in Kemps, the program's Case Management System (CMS). If ineligible, the applicant is rejected by the screener and given referral information from either a local social services directory or from personal knowledge. Rejected cases are not reviewed for accuracy. If eligible, the case is referred to the appropriate substantive law team. Screeners do not give any advice. In Fresno, the local team members rotate assignments. In Merced and Visalia the local team member is given the intake for follow-up. If a team member is available, they may meet with a walk-in during the initial visit to the office. Otherwise, the applicant will be called back or scheduled for an appointment depending on the team. There did not appear to be a system for handling emergencies as it was reported that if there is an emergency and no team member is available, the applicant will be referred to a different agency.

While there is no formal intake manual, CCLS has a Case File Procedures Manual which includes sections on eligibility and conflict checks as well as Case Service Report (CSR) and reject coding procedures. The team was also supplied with intake protocols for the public benefits team and its health unit. There did not appear to be written intake guidelines for the housing, consumer and family law teams. The intake screeners in Fresno are supervised by the Fresno intake team leader and the team meets monthly. The Visalia and Merced intake staff are supervised by their respective office managing attorneys. The program-wide intake staff do not meet as a group to share best practices, issues of concern, or intake trends.

CCLS is considering adoption of a new intake system, which would expand access to its services in its more rural areas, and is studying procedures used by other programs. The program is currently piloting procedures in its health unit utilizing voice over internet phones services and open source software wherein intake calls are directly routed to the unit. The three unit attorneys perform the initial eligibility check as well as give advice when appropriate. Alternatively, walk-ins are still screened by the intake staff and referred back to the unit. The system is currently working well as the attorneys have limited case responsibilities. However, once the Affordable Care Act is fully rolled out, it is anticipated that their caseloads will increase dramatically.

⁴ At the time of the PQV, one of the intake support workers was on medical leave and a temporary employee operated as a full time receptionist with the three intake/support staff covering intake responsibilities.

The unit advocates who receive the screened intakes make the determination whether to accept or reject the case, as well as the level of service to be given. In most teams there is no review of this decision unless the advocate chooses to run it by their supervisor; intake decisions by the paralegals in the housing team are the exception, as they are reviewed by attorneys. If any case is resolved solely by the provision of advice and counsel, the advice is written into the electronic case file in the CMS.

Recommendation II.1.4.1* Intake staff throughout the program should hold periodic meetings to discuss emerging trends, share insights and/or best practices, and receive training as needed.

Recommendation II.1.4.2* In revising its intake procedures, any new system should provide the following: clearly defined protocols as to what will be advised out and what will be retained for consideration for extended representation; supervisory review of advice given and case acceptance decisions made; and an evaluative scheme to review and adjust the system as needed. In addition, the program is encouraged to consider one central call-in number that can be staffed in all three offices and the giving of advice at the first point of contact for simple routine matters that will not be referred for extended representation.

Recommendation II.1.4.3 In contemplating new intake systems, the program should consider various technological enhancements such as the use of software that utilizes branching logic for interviews, case assignment, and case referrals; automated call distribution; automated document software for form letters; integration of a future online application process; automated call back options; and tracking software.

Engagement with and access by the low-income population

Finding 5. While CCLS is generally engaged with, and has a demonstrated commitment to providing access for, its client community, rural outreach appears to be a challenge.

CCLS's three offices are located in the major population centers of its service area. They are professional in appearance and welcoming to clients. All offices are accessible to persons with physical challenges. Signage, however, could be enhanced in the exterior of Visalia's building and the Merced lobby.

Through recruitment efforts, CCLS attempts to provide a staff that reflects the program's diverse population. The program's 2012 workforce analysis, submitted to LSC in March 2013, reflected that of CCLS's then 54 employees, 26 were Hispanic, four were of Asian descent, one was African American, and the remainder Caucasian. To address the diversity of languages spoken within CCLS's service area, the program has a well thought out Limited English Proficiency (LEP) plan that builds upon its commitment to language access. All intake workers and over 50% of the total staff, including over half of the paralegals and one third of the attorneys, speak another language in addition to English. In total, CCLS staff speak seven additional languages including Hmong and Spanish, the primary languages of the program's LEP client populations. The program utilizes Language Line when there is no in-house language capability. Community legal education materials are printed in English and Spanish, including tenants' rights information on the program's website. However, the general contents of the site

are only in English. While CCLS provides assistance for the hearing impaired through a TTY system, not all staff are familiar with its usage and the system itself has encountered problems.

CCLS attempts to reach its various client constituencies through outreach presentations, community awareness events, and community legal education presentations. The program's new foreclosure grant has resulted in additional targeted events in many of the rural areas of the service area. In addition, the program has enlisted OneJustice's Justice Bus, which sends volunteer urban lawyers and law students to assist in rural areas, in holding events in CCLS's outlying rural areas. CCLS also makes use of the media to reach broader audiences including newspaper public service announcements, television interviews and, most notably, radio interviews on non- English radio stations including Radio Billingue and Hmong Radio.

Despite all these efforts, the program recognizes and the team confirmed that CCLS is still not sufficiently reaching its more rural constituency. This was also a common theme among community partner interviews. As noted under Finding 13 below, the vast majority of the program's other services and activities are confined to the Fresno area. Closed case statistics corroborate the voiced concerns as well. While 2012 case service reports reflect that the percentage of closed cases in counties other than Fresno and Merced were only somewhat below the counties' proportional share of the program's poverty population, extended service statistics reflected a more problematic issue. Fresno county comprises approximately 51% of the program's client base, yet 70% of the extended closed cases were from Fresno County⁵. Each of the other counties were well below their proportional share, including only one extended closed case in Mariposa County and none in Tuolumne County.

Recommendation II.2.5.1 CCLS should continue in its efforts to recruit staff representative of its client community.

Recommendation II.2.5.2* CCLS should continue to identify portions of their service area that are underserved and enhance targeted outreach to inform potential clients of the availability of its services.

Recommendation II.2.5.3 As resources allow, the program should insure that its website content directed to the client community is, at a minimum, in both English and Spanish.

Recommendation II.2.5.4 The program should insure that its TTY service is fully operational and reception/intake staff are trained in its use.

Recommendation II.2.5.5 The program should consider methods to enhance signage outside of the Visalia office and the lobby of the Merced office building.

⁵ As the data reviewed was arranged by county and not zip code, it is unclear whether the cases were from the City of Fresno or the county at large.

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

Legal Representation

Finding 6. CCLS has a highly dedicated staff, consisting of a mix of experienced and new advocates, that work within substantive law teams spread across the program's offices.

The program currently has an advocacy staff of 36, including 20 attorneys and 16 paralegals. Due to a combination of attrition and new grant funding, almost half of CCLS's attorneys are new. Of the program's 20 attorneys, two have over 25 years of experience, five have 10 to 20 years, two have five to 10 years, and 11 have less than five years of experience with seven of the 11 having passed the bar within the last two years. Nine attorneys were hired in 2013, the vast majority of whom are new to either the law or legal aid. Conversely, 13 of the program's 16 paralegals have over 20 years of experience and only one has been hired within the last two years. The PQV team was consistently impressed with the dedication of each staff member it interviewed.

CCLS has divided its advocates into four substantive teams: 1) benefits/education; 2) consumer/tax/employment; 3) family/immigration; and, 4) housing. The health unit is a subset of the benefits team and the recently funded foreclosure project is part of the housing team. With the exception of certain grants such as the health law grant, team members generally limit their assistance to cases within their individual office service areas. As the Fresno office covers approximately 50% of the program's poverty population, the majority of team members are housed in Fresno thereby creating gaps in the other offices. For example, there is no family law team attorney in Merced, nor is there a consumer/tax/employment team attorney in Visalia. It was reported to the PQV team that in the absence of a substantive law team attorney in a particular office, the applicant would be assisted by a team paralegal, if appropriate; otherwise, the case would be rejected and the applicant referred to another agency, if available. Additionally, newer attorneys in the outer offices are often the only team member covering the local service area. Each team has a team leader that is responsible for the supervision and coordination of the team. The average experience of attorney team leaders is nine years.⁶ PQV interviews reflected that team meetings ranged from twice a month, to "trying" to have them once a month, to not having met the six months prior to the PQV. Despite monthly all attorney meetings, interviews indicated that many advocates were unaware of the work performed by teams other than their own.

Finding 7. CCLS does not have written or clear protocols for the supervision of its advocacy staff.

Prior to its visit, the PQV team requested all legal work management and legal work supervision policies and procedures. CCLS submitted its *Case Files Procedure Manual*, which contained neither supervision procedures nor guidelines. A second request was made on site and

⁶ One team leader is a paralegal with over 30 years of experience with the program.

a document titled *Performance Standards and Criteria Related to Job Categories*⁷ was submitted. While containing laudable goals for various levels of experience, the document lacked methods to assure goal achievement and/or oversight to maintain them. Absent specific procedures, supervisory methods vary among supervisors and are predominately self-directed. As reported in staff interviews, individual case acceptance decisions are not uniformly reviewed or discussed, there are no periodic comprehensive case reviews and, while there is a case closure review process, it is largely a compliance review of all paralegal cases and only one out of ten attorney cases. Although reports are periodically generated reflecting cases that have not had activity within 60 days, at most only a sampling is discussed in detail. Additionally, while all supervisors espouse an open door policy, accessibility varies as well. While some advocates found their supervisors most helpful, the team was also told of instances wherein supervisors could not be reached and/or failed to respond to requests for assistance. Other experienced advocates were often unable to assist due to their specialization and or grant responsibilities. Newer advocates were frequently left to turn to their equally inexperienced colleagues for assistance. A number of new attorneys attended their first hearings/trials on their own. Phrases such as “out here on my own” or “engaged in solo practice” were common refrains in team interviews of newer advocates. While not craving supervision like the new attorneys, a number of experienced paralegals voiced similar sentiments as to engaging in solo practice.

Finding 8. CCLS annually closes a lower number of individual cases as compared to other LSC grantees.⁸

CCLS’s 2012 total closed, extended closed, and contested closed cases per 10,000 poor persons were each well below the national median for LSC grantees. The program closed 163 cases per 10,000 poor persons as compared to the national median of 245, 17 extended cases as compared to 57, and 11 contested cases as compared to 28. There may be a number of reasons for such a disparity, many of which are discussed elsewhere in this report. As demonstrated in Finding 4 above, the program’s intake system does not lend itself to the giving of a high volume of legal advice. Additionally, some case handlers are currently responsible for grant reporting and a number of the grants require extensive community education and outreach activities that necessarily limit case handling opportunities.⁹ Moreover, to the extent advocates engage in complex litigation or community economic development activities, these do not yield large numbers of closed cases.

There is also a large disparity among the advocates’ individual caseloads. Attorney caseloads at the time of case list submissions to the PQV team ranged from four to 56. Although some of the lower numbered caseloads could be partially explained by grant responsibilities, complex litigation, or supervisory responsibilities, others could not. Paralegals, on the other hand, generally had higher caseloads, ranging from 14 to 102. The caseload imbalance, both

⁷ The document, which appeared to be part of a larger manual as the standards commenced with the number three, did not correspond to the table of contents of any manuals submitted to the team under its document request.

⁸ As noted in Section 1.1 of LSC’s Case Service Report (CSR) Handbook, while CSRs taken alone are not determinative of the effectiveness of the legal services a program provides, case statistics are an important indicator LSC considers in evaluating a program’s work.

⁹ For example, the foreclosure grant requires 60 community workshops, most of which are handled by the attorneys in the unit.

among and within advocate categories, may be the result of individual case acceptance decision making coupled with the supervisory challenges discussed in Finding 7 above.

Finding 9. CCLS has demonstrated that it has the capacity to provide quality legal services to its client community.

Many of the writing samples submitted as part of the PQV document request reflected the program's facility to engage in quality legal advocacy. For example, experienced attorney submissions included an appellate brief to the California Court of Appeals on an education matter, and a Superior Court memorandum in support of a permanent injunction in a complex foreclosure case. Newer advocate submissions, while some in need of supervisory edits, reflected an appreciation for aggressive advocacy on behalf of their clients. Examples include an opposition to a motion to set aside an attorneys fees order, a demurrer in an eviction case, and a well supported negotiation letter refusing to release client information. Paralegal samples encompassed letter briefs before administrative tribunals, detailed pro se assisted pleadings, and well crafted negotiation letters to landlords. Additionally, the program is currently engaged in complex federal court litigation challenging the city of Fresno's removal of homeless camps as violative of the terms of a 2008 federal-court settlement concerning similar cleanup sweeps.

As noted previously in Finding 8, extended and contested case closures were below the national norms for LSC grantees, suggesting that attorneys are not given the appropriate time and support to engage in extended advocacy. PQV team interviews with the judiciary tended to corroborate this supposition. While a number of judges both named and praised paralegal advocates for their assistance to pro se litigants, those same judges reported that attorneys only appeared before them every few months. It is of some significance that the highest extended case category in the program's 2012 Case Service Report was *administrative agency decision*, the majority of which are handled by paralegals.¹⁰ Community partner interviews revealed instances wherein partners chose not to refer priority court cases to CCLS as they believed the client would not receive assistance beyond advice.

Elimination of barriers to increased case numbers such as the restructuring of intake advice and the reduction of non-case related grant responsibilities, coupled with enhanced supervision, support, and training, would also clearly assist in creating a culture of advocacy. Additionally, streamlining program litigation prerequisites, which can be seen as discouraging such advocacy, would be of assistance. Currently, if it is determined, after the signing of an initial retainer, that CCLS should represent the client in a litigated case, a second-more detailed retainer must be signed. In addition, a lengthy litigation assessment plan, with 21 separate items, must be filled out and approved by both the team leader and deputy director-legal before any affirmative litigation is brought. While the team was later informed that only major affirmative litigation requires plan approval which would appear appropriate, many attorneys interviewed were of the belief that approval of the form was necessary for either all litigation or any affirmative action, including defenses and/or counterclaims. The program's case file procedure manual makes no mention of the form.

¹⁰ The 2012 basic field CSR reflected 197 administrative agency decisions as compared to 100 negotiated settlements with litigation, 39 contested court decisions, and seven uncontested court decisions.

Finding 10. Without a unified legal work management manual, utilization of systems and support vary among advocates.

CCLS has a Case Files Procedure Manual as well as a Program Policies and Procedures Manual, each with sections addressing legal work management procedures. The team was also supplied with standards of practice and a litigation assessment plan that each lacked clear implementation instructions. In addition, CCLS has available both Google applications and Kemps case management systems that allow for calendaring as well as a tickle function. No one system appears to be preferred and advocates use one or the other depending upon their own preference. It would thus be difficult for someone to quickly access scheduling information and/or provide back-up as needed without uniform protocols.

CCLS does not have a program-wide brief pleadings bank as offices each have their own server. Additionally, document assembly does not appear to be used freely in the program. Although CCLS does not have any substantive internal listservs, most advocates have chosen to be on state and/or national substantive law listservs. Further, more experienced advocates are aware of California and national back-up centers available to program staff. There does not appear to be an easily accessible reference tool for these valuable resources.

Finding 11. Although CCLS provides a variety of training opportunities for its staff, the program's training policies and procedures, as they relate to new employees, are not routinely followed.

CCLS's policies and procedures manual has a designated chapter on orientation, training, and education. Specifically, within 30 days of employment, new employees are to be provided an orientation program. Additionally, in that same 30-day time frame, the immediate supervisor is required to prepare an individualized training and work plan for the employee's first year to be discussed and reviewed as needed with the employee. Thereafter, at each annual evaluation, the prior year's plan is reviewed and a new one developed. As noted in Finding 16, CCLS is laudably compliant with yearly evaluations and commensurate training plans. However, the lack of appropriate orientation and planned training for new staff is concerning to the team. While PQV team interviews with new advocates reflected varied levels of orientation pertaining to human resource/personnel procedures, time keeping, and use of the case management system, there was an absence of substantive orientation on their assigned specialty. Additionally, we heard of no instance wherein a formal training plan was developed during their first month. Rather, the team was told of occurrences wherein new advocates were referred to manuals, web sites, or simply left to fend for themselves. This was especially true in the program's newly formed units that would have been cause for a planned orientation and training process. Of note, experienced advocates reported similar experiences when they, too, first arrived at CCLS.

Despite the absence of appropriately planned new advocate substantive and skills training, the program does provide a variety of training opportunities to attorneys as resources allow. Staff regularly attend webinars and local training events. The program also holds a monthly attorney meeting where training is routinely conducted either by an outside trainer or staff who report on conferences they attended. For example, due to the proximity of 2013's

National Legal Aid and Defender Association Annual Conference in Los Angeles, eight program advocates participated in the conference. Each was assigned sessions to attend and then come back and share information gained with the rest of the staff. Similarly, an advocate staff member attended a National Consumer Law Center annual conference and reported back to staff. Advocates with training costs included in their grants have also been able to attend more expensive national events. Additionally, program supervisors have attended OneJustice's leadership training and, at least, one has been to Management Information Exchange's *Manager in the Middle* training. Training opportunities for paralegal and support staff appear, however, to be more limited.

Recommendation III.1.7.1* CCLS should immediately develop and implement clear written protocols for supervision of advocacy staff to include, at a minimum, comprehensive case reviews, review of case acceptance decisions, review of written work, and substantive review of case closures, as well as case strategy discussions and accompanying new advocates to any court/hearing proceedings they may have.

Recommendation III.1.8.1* As part of its strategic planning process, CCLS should develop a means for its advocates to engage in more extended direct representation in all its priority areas. Consideration should be given to the following: how best to use the skills and expertise of staff, whether advocacy staff are handling a reasonable amount of casework; and to determine an appropriate balance between community education and advocacy.

Recommendation III.1.6.1 As part of its strategic planning process, CCLS should consider review of its substantive team structure to determine whether it is the most effective and efficient service delivery approach. This review should include strategies to provide coverage in all priority areas throughout the service area.

Recommendation III.1.10.1 The program should provide uniform legal work management procedures in a clear, easily accessible, format.

Recommendation III.1.10.2 The program is encouraged to develop a program-wide brief pleading back as well as a list of various local, state, and national resources available to assist staff.

Recommendation III.1.11.1 The program's orientation, training, and education policies should be strictly adhered to for all staff.

Private Attorney Involvement

Finding 12. Despite various efforts, private attorney involvement (PAI) remains a challenge for CCLS, especially outside of Fresno County.

CCLS closes a lower number of individual PAI cases as compared to other LSC funded programs. In 2012, CCLS's total, extended, and contested closed PAI cases per 10,000 poor persons were each well below the national medians for LSC grantees.¹¹ In 2012, CCLS reported closing 125 individual PAI cases, its lowest closed case PAI total in seven years; a decrease of 17% from 2011 and 34% from 2010. In addition, CCLS has sought partial waivers of its LSC PAI expenditure requirement for four out of the last five years.

While originally staffed by an attorney director and an administrative assistant, the PAI program is now operating with only the administrative assistant as interim coordinator. She is eager to expand the program. The coordinator's responsibilities include attorney recruitment, case referrals, and case oversight. She engages local attorneys in not only taking individual cases but assisting in other services delivery such as staffing substantive clinics and community education events. Volunteer attorneys are currently involved in the program's ongoing workers rights, guardianship, conservatorship, and senior clinics. Most clinic offerings are informational in nature and do not contribute to individual closed case statistics. Cases generally come to the VLSP for assignment from either the units or a clinic. There is no direct referral mechanism from intake to the VLSP. Attorneys have also assisted with such events as the program's Elder Abuse Prevention Conference and the Veterans Stand Down. Local attorneys have conducted training at various in-house and CCLS sponsored continuing legal education events. The program is also currently engaged in a major piece of litigation with pro bono co-counsel assistance.

CCLS has a close working relationship with the Fresno County Bar Association's Pro Bono Services Section. Periodic meetings are held between the two organizations to share ideas, coordinate recruitment, and recognize achievements of volunteer attorneys. The VLSP coordinator is sent a list of newly signed section members to recruit, and the section has a column in the monthly bar journal where pro bono activities are highlighted. While all of these efforts have resulted in increased Fresno assistance, the Fresno efforts have not been replicated in other counties. The ongoing substantive law clinics are only held in Fresno and the overwhelming majority of individual cases are from Fresno as well. Program data reflected only 3 closed PAI cases in Toulare County, one in Merced, and none in Mariposa or Tuolumne.¹²

Over the last few years, CCLS has endeavored to increase pro bono participation. In 2010 the program commenced a Central Valley Pro Bono Challenge with the then Chief Justice of the California Supreme Court coming to Fresno for the launch event. The project challenged attorneys to contribute a minimum of ten hours a year to pro bono work and a web site was created to provide resource support and an online means to sign-up for the challenge. Unfortunately, as described by one interviewee, the response was "underwhelming". In 2012, CCLS reported to LSC that 104 of the area's 2,275 attorneys were involved in the program's PAI

¹¹ In 2012, the program closed four PAI case per 10,000 poor persons as compared to the national median of 22. Statistically, it closed only one extended and zero contested cases per 10,000 poor persons as compared to the national median of eight and three, respectively.

¹² In 2012, the program reported to LSC through both its PAI case service reporting form and its Form J-1, components of PAI, that it closed a total of 125 PAI cases. A PQV document request for a CMS printout of closed PAI cases by county reflected a total of 148 closed PAI cases with 120 closed in Fresno, 25 in Kings County, and 3 in Merced. As the PAI plan did not address specific efforts in Kings County, the nature of these disparate figures is unclear.

component. Of note, although the program pays local bar dues for its staff attorneys, many do not participate in local bar activities. One of the most effective recruitment tools to obtain pro bono attorneys is the personal contacts often made through local bar activities as well as the opportunity to informally inform private bar members of the great need for legal assistance and the program's work.

CCLS has also worked with OneJustice, a statewide California support center that provides, among other things, assistance in the effective use of volunteers to assist legal aid organizations. CCLS has hosted OneJustice's Justice Bus on a number of occasions wherein urban lawyers and law students come to a rural area to assist in a project or event. CCLS has had Justice Bus projects work on senior issues, naturalization events, and tax issues.

Recommendation III.2.12.1* CCLS should continue its efforts to expand and enhance its PAI program, especially outside of Fresno County. The program should continue to engage in recruitment activities such as developing more local contacts for assignment in the outer counties (including getting newly admitted attorney lists for each county); expanding clinics in and beyond Fresno County and consideration of creating advice orientated clinics limited to client eligible participants; offering free continuing legal education classes/credits in exchange for case assignments; having private attorneys take shifts providing advice in any newly designed intake system; utilizing the private bar in any orientation, training, or mentoring program for new attorneys; and engaging contract attorneys in rural areas.¹³

Recommendation III.2.12.2 The program should encourage all of its attorneys to become more involved in their local bar associations as part of their work on behalf of the low income community.

Recommendation III.2.12.3 CCLS should strive to better capture PAI case data as well as non-case PAI statistics including donated clinic, co-counseling, and training hours as well as the number of persons assisted through those efforts.

Recommendation III.2.12.4 The program may want to consider referring specified cases directly to the PAI Coordinator, as part of the initial intake process.

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

Finding13. CLCS provides a variety of other services for, and on behalf of, the client community.

In response to the team's request for a list of other services to the client community provided by staff within the last 12 months, CCLS submitted a 44-page printout containing,

¹³ CCLS may want to consult LSC Resource Information (LRI) (<http://lri.lsc.gov/legal-representation/private-attorney-involvement>) and LSC Program Letter 07-02 for further suggestions..

among other things, well over 200 community education presentations.¹⁴ While many were grant mandated such as foreclosure and health sessions, most priority areas were covered including workshops on landlord and tenant rights, debtors' rights, education law, and energy assistance. Such sessions were held at various locations including, senior centers, public libraries, domestic violence shelters, schools, churches, and social service agencies. The program also conducts recurring clinics on workers' rights, guardianship, conservatorship, and senior issues. In addition to specialized presentations, CCLS has a presence at various events including Homeless Connect, job fairs, Veteran's Stand Downs, health fairs, and community awareness events. The program also sponsors a yearly elder law conference and has maintained a leadership role in Fresno's yearly We Connect fair. As with most activities provided by the program, these efforts are also mostly Fresno-centric. The overwhelming majority of community education presentations are in Fresno as are all of the program's clinics.

Technology also plays a role in CCLS's other services. The program's web site has approximately 18,000 visitors a year and its I-Can! E-File tax service project was used by 2,248 households in 2012. Federal refunds of over \$4 million and some \$236,000 in state refunds were realized through the project. Additionally, as part of the foreclosure assistance project, CCLS produced trilingual (English, Spanish, and Hmong) DVD's with information on homeowner rights, tenant rights, and financial literacy. Copies of the videos are mailed to residents of properties when notices of default are recorded. The videos are also available on CCLS's web site.

In addition to direct activities, CCLS participates in numerous local and regional collaborative efforts that benefit their client population. Examples include staff involvement in the Child Health Initiative Outreach, Enrollment, Retention and Utilization Collaborative; the Domestic Violence Round Table; the Elder Abuse Prevention Round Table; the Fresno County Rural Communities Collaborative; and, the Hmong Health Collaborative. CCLS staff are often called upon to conduct trainings for the staff members of these partner agencies or to assist in developing client/consumer education materials for them. A number of attorneys are similarly engaged in local bar efforts that affect the client population including membership in various sections and committees.

Recommendation III.3.13.1 CCLS should endeavor to provide its other services and activities throughout its entire service area.

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

Board governance

¹⁴ Although the PQV document request revealed numerous other services, the program's 2012 Other Service Report (Form M) submitted to LSC did not reflect the full extent of CCLS's work. It would behoove the program to fully capture and report all of their activities.

Finding 14. CCLS has a diverse and engaged board that continually seeks to improve its effectiveness.

CCLS's board is representative of the program's diverse service area. Of the current 13 directors¹⁵, six are Hispanic/Latino, two are Asian, and one is African American. The board meets bi-monthly with its executive committee meeting between each board meeting. There is also currently an events committee and an audit committee that meet as needed. At each board meeting the board hears extensive reports from the executive director, deputy director-litigation, director of fiscal services, director of development, and often a rotation of team leaders. While written documents are prepared and electronically forwarded to board members for each of these presentations, it was reported to the PQV team that they are often received in a piecemeal fashion and sometimes with insufficient time to permit proper review and preparation by members.

The board's financial oversight includes involvement in the budget planning process, monthly review of financial statements and projections, and selection and review of the audit. Of note, the same auditor has been used by the program for at least a decade. Additionally, there is little interaction between the director of finance and the board's treasurer outside of formal presentations.

The board has recently addressed a number of programmatic issues including evaluation of the executive director, implementation of a leadership succession plan, staff recruitment, and financial reserving. The board has also increased its involvement in fundraising through its event committee, which primarily addresses the program's annual Champions of Justice event; there is no general resource development committee. However, the board minutes are extremely abbreviated and it is difficult to discern the board's decision making process. Further, while the board is properly engaged in policy setting, there are indications that at times it may be encroaching into management duties beyond its proper oversight role. For example, although the board has not engaged in a strategic planning process, it was reported that the board has prepared a matrix of specific management actions for the executive director to implement.

Both board governance and fundraising have been topics of annual board retreats/training sessions facilitated by OneJustice. Retreats were held in 2011 and 2013. The board has asked OneJustice to return in early 2014 to continue building on the education process. Board development is also addressed through training opportunities including those sponsored by NLADA.

Recommendation IV.1.14.1* The board should be actively involved in the development and implementation of a strategic planning process as recommended under Finding 3 of this report.

Recommendation IV.1.14.2 The board is encouraged to continue to develop its fundraising capabilities, with perhaps the transition of the events committee into a more expansive development committee. It is also encouraged to continue its work to delineate policy/management separation.

¹⁵ The bylaws call for 15 directors but at the time of the PQV, there was a client and an attorney vacancy.

Recommendation IV.1.14.3 Board minutes should be drafted to serve as a record of how the board discharged its fiduciary and oversight duties. Additionally, minutes and other board materials should be distributed with sufficient anticipation to permit effective preparation by members,

Recommendation IV.1.14.4* The board should rotate the program’s auditors as well as increase contact between the board treasurer and the director of finance.

Leadership, management, and administration including financial¹⁶ and human resources administration.

Finding 15. The program has a longstanding director who is very dedicated to the program’s mission.

The executive director has a long standing commitment to the *Central Valley* including prior work with local farmworkers and California Rural Legal Assistance. He has been the executive director of CCLS for the past 20 years. The program has grown considerably over his tenure, yet he still attempts to be involved in every facet of the day to day operations and maintains an open door policy to all staff. While laudable, such a stance creates a very full plate that is understandably difficult to manage. Team interviews revealed instances where projects have been stalled and responses to internal requests delayed due to the executive director’s over extension.

The director’s dedication to the future of the program is evidenced by his commitment to leadership development. Not only has the director and deputy director been participants in OneJustice’s leadership program, but two of the four team leaders have completed the program, with the other two now attending the current cohort. Each has brought, or will bring, a Capstone Project to complete at CCLS. The Capstone Projects have included improving accessibility for rural residents, increasing board involvement in fundraising, better utilization of team members, and opportunities for securing attorney fees.

Finding 16. CCLS has an experienced management team that is highly committed to the success of the organization.

The program’s senior management structure has undergone a series of changes over the past few years. The configuration has included an executive director, deputy director–legal, deputy director–administration, and a director of litigation. The deputy director-administration position had long been vacant causing the deputy director–legal to undertake various additional administrative duties. Loss of directors of litigation over the past two years (one took another position and the other was terminated) only increased the load. Team interviews reflected that

¹⁶ 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.

while considered a resource to the program staff, accessibility to advocates had become an issue. However, just prior to the PQV, a team leader was elevated to the position of deputy director-administrative to ease the deputy director-legal's burden. Although a specific transfer of responsibilities has yet to be finalized, the filling of the position should enhance overall management.

The remainder of the administrative management team consists of the director of finance, director of development, and director of human resources; each of whom, as demonstrated below, are highly experienced. A review of the management job descriptions coupled with team interviews reflect that there is overlapping of various manager responsibilities that could be more clearly delineated. Although the executive director meets weekly with each senior manager, there does not appear to be routine meetings of the entire senior management staff. Middle management consists of the substantive team leaders and managing attorneys.¹⁷ The entire management team periodically meets as one.

Finding 17. CCLS has sufficient, highly experienced financial and human resources staff.

CCLS's financial team consists of four well qualified staff. The director of fiscal services has 38 years in the accounting/bookkeeping field, including 28 years at CCLS with the last 23 serving in her current position. She prepares and maintains the program budget, budgets for most of CCLS's grants, and oversees the fiscal staff. She delivers a detailed report at each board meeting that includes both a written narrative and various financial statements, graphs, and charts, reflecting current, year to date, and projected budgets. The fiscal officer, although relatively new to the program, has a B.A. in accounting and worked for both an accounting firm and the Fresno County auditor's office. Her duties include reconciling the programs various bank accounts and managing two program grants. The fiscal assistant has been with the program since 2004, first as a fiscal clerk and, after a training on accounts payable and payroll, she was promoted to her current position. The part-time fiscal clerk acts as the administrative assistant for the fiscal team and provides a range of supportive activities.

The director of human resources and special projects has been with the program in a number of capacities off and on since the 1990s. He has been in his current position since 2002. He holds both a law degree and an undergraduate degree in personnel management and industrial relations. He oversees CCLS's yearly¹⁸ staff evaluation scheme that includes self-assessments and individual training plans. His special projects include oversight of the program's I Can! tax project.

Recommendation IV.2.15.1* The executive director should delegate many of his current executive director tasks to his senior management team, reserving general oversight to assure that they are being carried out in furtherance of his vision. This will ideally allow him the time to be the face of the program in the legal and social service communities, and to work with the

¹⁷ The managing attorneys of Merced and Visalia are currently team leaders and there is no designated managing attorney for the Merced office.

¹⁸ New employees are initially evaluated after their first six months.

board and other constituencies on the design and implementation of a strategic plan, as recommended above.

Recommendation IV.4.15.2 Manager responsibilities should be clearly delineated so as to avoid duplication of duties and streamline the administrative process.

Technology

Finding 18. CCLS has an adequate technology infrastructure to support its work and an outside consultant to provide upkeep and support.

In the latter part of 2012, CCLS converted from utilizing a full time information technology manager to contracting with an outside consultant. The consultant reviewed the then existing system and developed a plan for both enhancement and life cycle replacement of the program's equipment. The program has appropriate computer workstations and advanced video conferencing equipment. The newly elevated deputy director-administration has placed technology advancement as one of his first priorities. In addition, younger staff are exploring the use of social media to enrich client services.

CCLS utilizes a variety of software in its various units including Sage accounting for the fiscal staff, eTapestry for resource development, Westlaw for legal research, and various Google applications for communication. Kemps serves as the program's case management system. While initial training is provided to staff on the program's software, team interviews reflected that not all staff were aware of the advanced capabilities available to them.

The CMS, accounting, and payroll databases are backed up daily on an independent server and then to removable encrypted media that is kept off-site. The remote servers in Merced and Visalia are backed up to external USB devices and in the Fresno mainframe. However, the program is lacking an off-site disaster recovery plan.

CCLS has a website at <http://www.CCLS.org/>. As it should, this website is about the program and generally defers to CaliforniaLawHelp (CLH) for materials to assist clients. The program provides both localized and general content materials to CLH. However, while having a client services section that includes housing material, CCLS's website does not have a link to CLH.

Recommendation IV.4.18.1 CCLS should continue to proceed with its plans to enhance and expand its technological capabilities.

Recommendation IV.4.18.2 CCLS should ensure that all staff are trained as to the program's current technology functionalities and, as the program expands its technology, it should provide appropriate training for staff.

Recommendation IV.4.18.3 The program should develop an off site disaster recovery plan for its technology.

Recommendation IV.4.18.4* CCLS's web site should have a prominent link to CLH.

Internal communication.

Finding 19. Despite various forms of program interaction, concerns were expressed about the need for expanded internal communication.

While there are quarterly all-staff meetings, periodic team leader meetings, and individual team meetings, ongoing programmatic information does not appear to be routinely and regularly shared program-wide. The main form of communication within the program is via email. The program does not have an intra web, online bulletin board, or internal newsletter. In team interviews, staff reported not knowing what was going on in other offices, other teams, or sometimes within their own team. Some staff were unaware of new hires until long after their work commenced with the program. While the executive director's report to the board is sent to staff, the entire board packet including financial, resource and, of perhaps most interest to staff, litigation reports, is only available upon request.

Recommendation IV.6.19.1 CCLS should consider various ways to address communication concerns such as an internal program newsletter and/or establishing an intranet with regular informative postings. At the same time, program staff should be encouraged to avail themselves of the communication opportunities currently available.

Resource development

Finding 20. CCLS has an experienced director of development who operates without the benefit of a current resource development plan.

CCLS's resource development unit is led by an experienced manager committed to the program's mission. Prior to becoming CCLS's director of development in 1999, she was the executive director of a local community service agency as well as the chief operating officer of a federal employment and training agency. The development director is responsible for researching and developing grant proposals, and coordinating programmatic fundraising and public relations events. She created the program's quarterly newsletter and prepares its annual reports¹⁹. She maintains a detailed funding calendar and provides comprehensive development reports at each board meeting. She is assisted by a development assistant. While the development team has been successful in doubling non-LSC grants over the last decade, they have done so without the guidance of a current resource development plan.

In 2001, CCLS adopted a resource development plan which included one year action items. Despite the changing fund development landscape, the plan has not been updated or otherwise amended since its initial inception. Additionally, without a programmatic strategic plan, there is no clearly articulated vision for the use of future revenue to help guide where

¹⁹ Although the team is mindful that the 2012 annual report was drafted somewhat quickly, it would benefit the program to have a finished product as polished as its newsletters.

development resources and energy should be focused. Similarly, there does not appear to be a clear process for conducting a cost-benefit analysis of the efficacy of the various development activities. As evidenced by the supervisory concerns voiced in Finding 7, it would behoove the program to produce a blueprint for any new grant it receives prior to implementation that includes delivery methods, staffing, orientation, training, and supervision.

In 2012, CCLS had 23 separate funding sources covering a variety of deliverables. Over 60% of the grants were for less than \$50,000, with six that were less than \$20,000. In 2013, the number of total funding sources remained the same with six new funding sources replacing those that had run out. The replacement grants were of a variety of sizes but resulted in a net gain of \$388,552. Of concern, two of the program's larger grants, including its foreclosure grant, will end in 2014. As noted under Finding 8, staff attorneys are responsible for reporting on some of their project grants and a number of the program's grants contain an extensive amount of deliverables other than legal representation.

Apart from grant funding, the program's major fundraising effort is its Champions of Justice event. In 2013, the event had a net profit of \$22,056. CCLS has also been the beneficiary of a considerable amount of cy pres funds, which currently constitute much of the program's reserve.

Recommendation IV.7.20.1* As part of the strategic planning process, CCLS should develop a vision for future program delivery, growth, and expansion. That vision should then be incorporated into a resource development plan to focus on development activities that move the program toward its strategic goals.

Recommendation IV.7.20.2 CCLS should consider creating a process for determining the cost benefit analysis of its various development activities. This process should consider all costs, including staff time, necessary to realize a particular return.

Recommendation IV.7.20.3. In light of the issues raised in Findings 7, 8, and 11, the program is encouraged to create an implementation plan for any new grant it receives that includes delivery methods, staffing, orientation, training, and supervision.

Participation in an integrated delivery system

Finding 21. CCLS is involved with its local and state partners in the delivery of legal assistance to California's low-income population.

As noted previously CCLS works with numerous regional partners to address issues affecting the homeless, elderly, disabled, and victims of domestic violence. On the state level, the program is actively involved in the California Access to Justice Commission, Legal Aid Association of California, OneJustice, the statewide Health Care Alliance, the Bench Bar Coalition, and various statewide task forces and other collaboratives.

CONCLUSION

As recognized by the program, CCLS is facing a number of challenges in its efforts to enhance and expand its delivery of legal services to the low-income population of the *Central Valley*. Engagement in a thorough planning process will provide them with opportunity to strategically map the future of the program in a thoughtful and cohesive manner to the benefit of both the program and, ultimately, the community at large.