



ALASKA LEGAL SERVICES CORPORATION
ANCHORAGE AND STATEWIDE OFFICE

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Ms. Stephanie Edelstein
Temporary Employee
Office of Program Performance
Legal Services Corporation
3333 K Street NW, 3rd Floor
Washington, DC 20007-3522

November 20, 2014

Re: ALSC Response to OPP Draft PQV Report

Dear Ms. Edelstein:

On behalf of the staff and board of Alaska Legal Services Corporation, we want to thank the Office of Program Performance (OPP) for its recent visit to our program. We very much appreciate the time and attention to improving our program and are grateful for the insight given to us by the visiting team and contained in this very thorough and detailed report.

We believe the report fairly represents both our program's strengths and those areas where we can improve. We are in agreement with respect to the report's findings and we have been working on implementing the recommendations since we learned of them in our exit interview. We have fully implemented several of the recommendations and have made progress on others. Below is an update on those recommendations where we have already made progress:

- **Recommendation I.1.3.1.*** ALSC should continue to develop action steps to implement its strategic plan.

Program Response:

As noted in your report, at the time of the team's visit our strategic plan guiding us through 2020 had just been adopted by our board and we were in process of assigning action steps designed to implement our program vision. We are happy to report that since your visit, we have completed this task.

- **Recommendation I.1.4.1.*** ALSC should implement a program-wide system for determining and aggregating outcomes in extended services cases, including through the use of its case management system.

Program Response:

We are currently consulting other LSC grantees, particularly those utilizing our case management system, regarding outcomes data collection and reporting. In addition to assessing what particular measurables are most meaningful for our program, we are also looking at data entry processes and system modification requirements that will be needed to incorporate a workable reporting feature into the case management system. We are eagerly awaiting the release of a LSC “tool kit” of suggested options that might be selected to meet the Performance Criteria and LSC’s requirements. We fully anticipate having a system in place in 2015.

- **Recommendation II.1.5.1.*** ALSC should proceed with all deliberate speed to streamline its intake processes. This should include reducing the reliance on paper applications, and increasing the use of telephone intake as feasible, considering the unique geographic and demographic challenges of the service area. To the extent possible, intake data should be contemporaneously entered into the case management system. And, to the extent feasible, some level of information or assistance should be provided to applicants at the first point of contact. ALSC should conduct an analysis of the current ALSC intake process and telephone infrastructure, and options for improving them, as well as a review of telephone and online intake systems in other legal services programs.

Program Response:

We agree with this finding and are working to improve our program in this area. Since the OPP team’s visit in July we have staffed an “Intake Revamp Taskforce” exploring various options available to modernize our system and make it more user-friendly to those we serve.

To that end, over a two week period, September 29-October 10, all offices tracked the number of applications distributed and received, whether in person, or by fax, email or mail. The number of callers/walk-ins not provided with an application and referred elsewhere (due to e.g., a non-legal issue, prohibited matter, or case outside priorities) was also recorded. Although there is some duplication within the number of applications distributed and received, the results provide a preliminary estimate of call volume for both local offices and the program as a whole, providing insight regarding both technology and staffing needs that may be required when implementing a new system.

Committee members have been assigned to various tasks including gathering information about the availability of technology in our remote service areas, funding opportunities for such new technology and also researching the intake systems and staffing of other similarly situated

programs particularly those use our case management system. The Taskforce is meeting regularly and we anticipate that we will make strides in implementing its recommendations in the upcoming year.

- **Recommendation II.2.6.1.** ALSC is encouraged to review LSC's language access resources available on LRI, including the 2004 Program Letter, "Guidance to LSC Programs for Serving Client Eligible Individuals with Limited English Capacity," the language access checklist for legal aid organizations, and links to self-assessment tools.

Program Response:

LSC's language access resources, the 2004 Program Letter and other referenced materials were helpful in the development of our current LEP plan, and we will continue to use these resources to expand and improve the plan and our services to limited English proficiency clients.

- **Recommendation II.3.7.1.*** ALSC should ensure that all offices have adequate security and that they provide areas for confidential conversations between staff members and applicants or clients.

Program Response:

We have taken steps to assure that there is additional security in two offices where improvements were necessary. A security barrier has been erected in our Juneau office and we are currently in discussions with the landlord of our Fairbanks office to see whether a similar structure can be constructed; we are also exploring alternate office locations in the event modifications aren't feasible. Additionally, we have changed office locations in Kotzebue so as to give our intake staff additional privacy when speaking with potential clients. As noted above, our Intake Revamp Committee is also exploring intake improvements that relate to assuring private space for the gathering confidential information.

- **Recommendation III.1.12.1.*** ALSC should develop supervision protocols to be uniformly followed throughout the program. Tools to consider include periodic scheduled individual meetings with advocates (frequency depending on experience), periodic review of New Attorney Training Protocols, annual in-person hands-on full case review (more frequently with new attorneys), and development of a professional development/training plan for all staff. (The last two items could be part of the yearly evaluation).
- **Recommendation III.1.12.2.*** ALSC should develop a work plan for supervision and coordination of the newly designated rural unit's legal work.

Program Response:

As recommended, ALSC's supervising attorneys have adopted a statewide supervision protocol for the program. The protocol includes scheduled individual meetings with staff, review of the New Attorney Training Protocols, and at least once a year having an in-person full review of all cases on the advocates' case list to occur in conjunction with annual evaluations. We are also modifying our evaluations forms so as to include discussion and development of a development/training plan for staff.

Likewise, we have completed a work plan that addresses the supervision and coordination of our new rural unit's legal work. This plan details the frequency of office visits to each of our rural offices, sets a schedule for individual meetings, and aligns with the statewide supervision protocol above.

- **Recommendation III.1.13.1.*** ALSC should clarify its guidance to staff on which cases are assigned and reported to LSC as Basic Field and which are reported under the Basic Field-Native American Grant.

Program Response:

A memo clarifying the basis of assigning cases to the LSC Basic Field vs. LSC Native American grants, for both staff and PAI cases, was distributed to all staff on November 5, 2014.

- **Recommendations III.2.14.1.** ALSC should continue to explore ways to effectively involve volunteers in the provision of services to clients.

Program Response:

We continue to explore new avenues to encourage volunteers to become engaged in our work. Toward that end, we have started a pilot project in conjunction with the Court System and Appellate Law Section of the Alaska Bar Association. Also, we are in discussions with Seattle University and University of Washington in the hopes of establishing clinical pro bono programs with their soon to be established satellite campuses in Alaska.

- **Recommendation III.2.14.2.*** ALSC should clarify its guidance to staff on which cases are assigned and reported to LSC as Basic Field-PAI and which are reported as Basic Field-Native American.

Program Response:

A memo clarifying the basis of assigning cases to the LSC Basic Field vs. LSC Native American grants, for both staff and PAI cases, was distributed to all staff on November 5, 2014.

- **Recommendation III.2.14.3.** ALSC is encouraged to develop systems to quantify the services provided to persons to whom information, rather than legal advice, is

provided, including the number of volunteer hours, and to include the data in its PAI plan or Other Services Reports to LSC, as appropriate.

Program Response:

We are currently tracking this information and as recommended intend to include it in our next PAI plan.

- **Recommendation IV.1.16.1.*** The board should be provided training in board governance and fiduciary responsibility.

Program Response:

We have scheduled such a training to coincide with our next in person board meeting on December 6, 2014. The training will be offered to all board members and alternates and will be conducted by the Foraker Group (an organization dedicated to the advancement and support of Alaska's non-profit organizations).

- **Recommendation IV.1.16.2.*** To enhance financial oversight, ALSC should consider having the finance and audit committee review financial reports on a monthly basis, and the full board continue to review quarterly financial reports.

Program Response:

ALSC has implemented this recommendation. Audit and Finance committee members are being provided with monthly financial statements in addition to provision of quarterly statements to the full board.

- **Recommendation IV.3.18.1.** ALSC should explore fundraising opportunities that could result in improved technology, including intake enhancements and videoconferencing equipment.

Program Response:

We have identified two potential funding sources for technology improvements. Once our Intake Revamp Committee has made its recommendations as to next steps we will pursue the financial support necessary to implement them.

- **Recommendation IV.3.19.1.** ALSC should revise its draft disaster plan to identify who would serve in critical roles if the designated person(s) cannot serve and to address where affected staff would work if ALSC office(s) are damaged and unusable.

Program Response:

We have revised our disaster plan to identify alternates to serve in critical roles if the designated person cannot serve. The disaster plan states, "In situations involving an office closure for more than 48 hours, operations will transfer to the Anchorage office, or if Anchorage is the site of displacement, to the Fairbanks office, until the local office can re-open or an alternate local location can be arranged." Disasters that will close an office for more than 48 hours are likely to be natural disasters, such as earthquakes or severe storm damage. Should that occur, it is unlikely any prearranged alternate local location will not likewise be affected. We feel it more practical to transfer operations as described in the plan, and arrange for local alternate locations once viable options are known.

- **Recommendation: IV.5.21.1.*** ALSC is urged to provide the controller with training in employment and other human resources related laws and regulations.

Program Response:

ALSC's controller has enrolled in training seminars on employment and other human resources related laws and regulations including the Family Medical Leave Act. Such training has been included as part of her yearly workplan.

Additionally, for the sake of accuracy we did want to clarify a few minor points that we hope will be corrected in the final report. Listed below are our clarifications:

- On page 11, the last paragraph following Finding 8 the report states that new staff receives a "one week" training in Anchorage upon hire. While it is accurate that new staff receives orientation training in Anchorage upon hire, it is usually 1-2 days versus a full-week.
- On Page 19, the first sentence of the second full paragraph states: "ALSC also supports a third volunteer attorney project, the court-based and court-funded Early Resolution Project (ERP), which also does not require participants to be screened for LSC eligibility..." we believe this sentence would be more accurate if the word "financial" was inserted before eligibility because the ERP does employ screening to assure that program does not run afoul of the other LSC restrictions.
- On Page 21, in the first sentence of the first paragraph after Finding 16, ends by stating that ALSC's lay members "are appointed by Native Corporations;" this sentence should be changed so that it states "are appointed by Alaska's Regional Native non-profit organizations."
- Lastly, on page 28, the first sentence states "In 2014, the program expects to raise \$145,000, which is \$30,000 more than in 2013." Our 2014 campaign year ended on June 30, 2014 (which coincides with our state's fiscal year), and we are happy to report that we greatly exceeded our fundraising goal for the year. This sentence should now read "In 2014, the program raised \$179,000, which is \$64,000 more than in 2013."

Once again, we thank the OPP team for their professionalism, invaluable guidance and their time. We believe our program learned a great deal from the OPP team's collective expertise and we benefitted greatly from this visit. We are grateful to have had this opportunity to learn about ways we might improve and better serve our client community.

Sincerely,

A handwritten signature in black ink, appearing to read "Nikole Nelson", with a long, sweeping flourish extending to the right.

Nikole Nelson
Executive Director

cc: Greg Razo, ALSC Board President