



Legal Services Corporation
Office of Program Performance

FINAL REPORT

from the

Program Quality Visit

to

Legal Services of North Florida, Inc.

Recipient No. 610044

October 21, 2013 – October 25, 2013

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Legal Services of North Florida Program Quality Visit

Table of Contents

INTRODUCTION	1
BACKGROUND	1
PROGRAM OVERVIEW	1
SUMMARY OF FINDINGS.....	2
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.	3
PERFORMANCE AREA TWO. Effectiveness in engaging and serving the low-income population throughout the service area.....	5
Dignity and Sensitivity.....	5
Intake.....	5
Engagement, access and utilization by the low-income community.....	7
Limited English Proficiency.....	7
PERFORMANCE AREA THREE. Effectiveness of legal representation and other firm activities intended to benefit the low-income population in the service area.....	8
Legal Representation.....	9
Quantity and Quality of Legal Work.....	10
Staff Training and Support.....	11
Private Attorney Involvement.....	12
Other Program Services	14
PERFORMANCE AREA FOUR: Effectiveness of governance, leadership and administration.....	15
Board Governance.....	15
Leadership	16
Overall Management and Administration.....	17
Internal Communications	18
Technology.....	18
Financial Administration.....	19
Human Resources.....	20
Resource Development	20
Participation in an Integrated Legal Services Delivery System.....	21

INTRODUCTION

BACKGROUND

The Legal Services Corporation's (LSC) Office of Program Performance (OPP) conducted a program quality visit (PQV) to Legal Services of North Florida (LSNF) on October 21, 2013 through October 25, 2013. The PQV team consisted of Angela Thornton (program counsel and team leader), Tillie Lacayo, program counsel¹, and temporary employees Michael Genz and Cynthia Schneider.

Program quality visits are designed to assess the extent to which LSC grantees are providing the highest quality legal services to eligible clients. In assessing the program, OPP relied upon 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 is based upon the four performance areas of the LSC Performance Criteria: effectiveness in identifying the most pressing civil legal needs of low-income people in the service area and targeting resources to address those needs; effectiveness in engaging and serving the low-income population throughout the service area; effectiveness of legal representation and other program activities intended to benefit the low-income population in the service area; and effectiveness of governance, leadership and administration.

The team reviewed internal LSC documents and information previously received from the program, including grant application information and case service reports (CSRs), as well as other documentation provided by the program in advance of the visit, such as writing samples and an on-line survey completed by LSNF staff. The team visited four field offices and interviewed staff, advocates, managers, members of the bench and the bar, community leaders, board members, agency representatives and other partners. Some interviews took place by telephone.

PROGRAM OVERVIEW

LSNF was established in 1976. The program expanded westward in 2004 to encompass Santa Rosa and Escambia counties which continue to be served by both Northwest Florida Legal Services (NWFLS), a non-LSC funded program, and LSNF's Pensacola office. LSNF is comprised of five field offices located in Quincy, Panama City, Fort Walton Beach, Pensacola, and Tallahassee. The offices provide limited and extended services to sixteen counties in the Florida Panhandle, covering 11,305 square miles that are primarily rural with small urban centers.

Three of the five field offices are located in primary hurricane strike zones (Panama City, Fort Walton Beach and Pensacola). There are approximately 167,317 people, or 14.52% of the service area population, living below the poverty line. Of those persons, approximately 59,915 or 35.81% are African American and 6,506 or 3.89% are Hispanic/Latino. Approximately

¹ Ms. Lacayo conducted program interviews by telephone from Washington, DC.

92,807 or 55.47% of the service area's poverty population is white. The largest limited English proficient (LEP) population in the service area speaks Spanish.

The program's main office is located in Tallahassee, the state capital and the largest city in the region. It is home to Florida State University and Florida A & M University. Pensacola is a seaport in Pensacola Bay which connects to the Gulf of Mexico and is, therefore, vulnerable to hurricanes. Devastating hurricanes have led to a severe shortage of affordable housing and undermined the area's tourist base.

The program experienced a reduction in funding from LSC between 2011 and 2013 of approximately \$250,000 coupled with a reduction in non-LSC funds of more than \$160,000 (overall approximately a 10% reduction in funding 2011-2013). LSC funding for the program in 2013 was \$1,360,433, as compared to \$1,373,157 in 2012 and \$1,609,039 in 2011. Non-LSC funding dropped from \$2,707,433 in 2011, to \$2,542,954 in 2013.

LSNF reported that it closed 4,737 cases in 2012 in the following substantive areas: family (48.6%); housing (18.4%); income maintenance (10.1%); and consumer/finance (9.6%). The percentage of cases closed with limited services in 2012 was 83% and 17% with extended services.

SUMMARY OF FINDINGS

LSNF has benefitted from the experienced leadership of the executive director, the director of litigation, the director of development and the program administrator. The chief financial officer of many years who was a certified public accountant and had her masters' degree in public administration resigned within the past year and was replaced in July 2013. The program staff overall consists of experienced senior attorneys, advocates and administrative support. The continuity of the leadership was credited by many as one of the keys to the program's success. The program has maintained a solid and supportive relationship with the bench, the bar and the community that has been cultivated over the years by the program's leadership team.

The program indicated that it conducted its most recent comprehensive needs assessment in 2012. The board, subsequently, approved the program's long range plan for 2013-2014 based upon the needs assessment.

The program has successfully developed a *pro bono* advice line for twelve of the counties in its service area. However, LSNF continues to utilize a general intake process that was found to have substantial inefficiencies and was the subject of several recommendations in LSC's report of its post-reconfiguration visit in 2006. Prospective clients are required to obtain (via Internet, mail, fax or in person), complete (assistance provided upon request) and submit (via fax, mail or in person) an in-depth hard copy application prior to consideration for legal representation. The program provides a variety of intake venues in the community and at each field office location.

Despite funding uncertainties noted above, the program maintained financial and programmatic stability and avoided layoffs and/or retrenchment other than the loss of one attorney and two

paralegal positions. Under the current leadership, the program has maintained written policies and procedures that insure the provision of high quality legal services. Additional effort may be needed to insure uniformity in the application of the case review policies and procedures.

As one of the highlights of the PAI program, LSNF has been able to fully staff its advice line with volunteer law students, government lawyers, professors and the private bar. In so doing, the program utilizes its case management system (CMS) and relies upon the resource development staff to closely monitor, review, recognize and reward the *pro bono* participants. The Florida government allows its lawyers to utilize up to five hours of administrative leave per month to assist with the advice line.

The program maintains a close working relationship with the domestic violence community and recently received recognition from the U. S. Air Force Commander of Hurlburt Field in Okaloosa County for training the base's family advocacy staff.

The LSNF board created a separate entity in 2007 to handle work restricted by LSC regulations. The North Florida Center for Equal Justice (NFCEJ) is housed in the same building with LSNF but has a separate entrance, location and signage. LSNF has a 21 member board which mirrors the NFCEJ board. Although there is a general policy for addressing conflicts of interest on the board, there is no specific policy to address conflicts which may arise between LSNF and NFCEJ.

The board president resides in Florida but works in Thomasville, Georgia and no longer has an active practice but she frequently visits the Tallahassee office for official business. The vice president is a client board member. The attorney board members, including former presidents of the Florida Association of Women Lawyers and the Florida Government Bar Association, participate on the LSNF *pro bono* panels and make financial contributions. The executive director is evaluated annually and is highly regarded by the board, the bench and the bar. The program is led by example and is fully engaged in collaborative activities in the legal community and with the local government, law schools, homeless shelters, domestic violence shelters, senior citizens and veterans.

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.

FINDING 1: LSNF conducted a Legal Needs Assessment in 2012 that forms the foundation of their priorities.

The most recent legal needs assessment was conducted in 2012 and included a survey of applicants for services, existing clients, social service organizations, and members of the private bar; a focus group with LSNF staff; meetings with program staff and the board; and interviews, by telephone or in-person, with community organizations, the courts, and the private bar. As part of the survey process, LSNF sent the survey to 50 attorneys who participate on their *pro*

bono panel and to all of its board members. Only four of the 50 attorneys responded while eight of their board members participated. Due to a low response rate from judges in the past, LSNF did not include them in the assessment. However, the program is committed to taking additional steps to encourage and insure better participation from the judges and the attorneys in the next needs assessment. Otherwise, the program will miss an opportunity to gain useful insights and observations concerning the needs of the low income population.

In addition to the survey results, the program received narrative comments in the needs assessment. Relatively high numbers of respondents indicated that the low-income population was in need of more information about legal rights and responsibilities and that more than fifty percent of eligible persons were unable to obtain legal services.

LSNF prepares an annual Long Range Plan each year that includes input from staff, the board, clients and the community. In the 2013-2014 Plan, which was provided in advance of the visit, the following priorities were identified from the programs' needs assessment and are used by the program as benchmarks to insure that their objectives are met:

- Supporting family relationships (custody, guardianship, child/spousal support, dependency, visitation)
- Preserving the home (foreclosure, consumer advice regarding contractors, natural disasters with respect to housing and insurance)
- Maintaining economic stability (bankruptcy, collections, income maintenance, consumer protection, taxes, child/spousal support in domestic violence cases, predatory lending referrals)
- Enhancing safety, stability and health (domestic violence related dissolutions, changing identification, sexual assault, immigration related services to victims of domestic violence, Medicaid, wills and advance directives).

At its February 20, 2013 regularly scheduled meeting, the board approved the “2013-2014 Long Range Plan”, the “Development Department Strategic Plan 2013-2015 ” (primarily geared towards fundraising, resource development and developing legal and community partnerships) and the strategic plans for advocacy and technology.

FINDING 2: LSNF engages in an ongoing evaluation process and makes adjustments to its priorities and delivery system when necessary.

LSNF relies upon client satisfaction surveys and data analysis, as well as regular engagements with their staff, the board and community representatives to determine the need for adjustments in services. LSNF concluded in their annual review of priorities in 2012 that the issues identified in the comprehensive needs assessment and subsequent developments did not warrant any change to its “Long Range Plan.”

Client satisfaction surveys are mailed to PAI clients and those who received full representation. They are periodically reviewed by the director of development. The cumulative results are submitted to the executive director and the board on a quarterly basis.

Recommendations:

I.1.1.1² *The program is encouraged to formally and directly engage more members of the bench, the bar and the board in its next comprehensive legal needs assessment.*

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

Dignity and Sensitivity

FINDING 3: LSNF's staff are dedicated and committed to providing civil legal aid to the service area.

LSNF staff members spoke passionately about their clients. Throughout the interviews, it was clear that individual staff members, managers and administrators were credited for working well beyond their normal 40 hour work week in order to meet the legal needs of the program's clients. The community organization representatives, agencies and judges spoke highly of the program's affirmative commitment to its clients.

Intake

FINDING 4: LSNF maintains a coordinated approach to intake but requires the submission of a comprehensive written application prior to consideration for legal assistance.

In order to be considered for services, each applicant must obtain an application by mail, fax, Internet or in-person. The team expressed strong concerns that the requirement of submitting a paper application prior to consideration for legal services may result in a significant delay in the time that it takes an applicant to obtain, complete and submit the application. Moreover, the requirement that a written application form be submitted can create a barrier to those members of the client-eligible population who may not be able to communicate their legal needs in writing. Applicants are only screened for a conflicts check prior to submission of a completed application. Financial eligibility is not determined until the application is reviewed by a senior attorney. Subject matter screening is not conducted routinely but applicants may be told by the receptionist that the program does not handle certain types of cases, i.e., traffic or criminal

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, 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 intended to have a direct and major impact on program quality and/or program performance. 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.

matters. The completed application must be reviewed by a senior attorney and discussed in the field office's weekly case acceptance meeting, all prior to a case acceptance decision.

Nevertheless, it was clear that LSNF staff is making every effort to inform those in their service area about their procedures in order to meet the community's legal needs. The field offices for the program are generally open for intake Monday through Thursday from 8:30 am until 5:15 pm. Emergencies are brought to the attention of the senior attorney. Sixty-four percent of the program's regular intake is by walk-in, twenty-six percent is by telephone, and six percent is by mail.

FINDING 5: The intake application form for full service is both time consuming and challenging to applicants in its in-depth requirement for details and the need for an understanding of legal terminology.

LSNF has made little progress addressing several findings and recommendations in LSC's November 2006 Post-Reconfiguration Visit Report, which concluded that the "...intake system is not client friendly and does not ensure a thorough assessment of the factual basis of the applicant's legal problem. It involves a multi-step process that often requires applicants to come to the offices and has built in delays." (Report, Finding 10, p. 8).

The application is daunting, at the very least, for those whose reading and writing skills are limited and discourages some applicants from seeking the program's legal representation regardless of eligibility. The application form includes the following: four pages of instructions, a client intake information form, an intake fact sheet (applicant is asked to check the type of case and explain the "legal situation or problem"); a client questionnaire that solicits information relevant to their situation as it relates to physical or sexual violence; a questionnaire regarding the applicant's prior knowledge of or use of the program's website; and a query regarding whether the applicant was impacted by the Gulf oil spill. If the applicant is seeking a divorce, bankruptcy, or a social security appeal, additional forms must be completed and returned to the office.

The application form includes questions about the applicant's assets, income, home equity, and household size – concepts which are not self-evident. Upon request, program staff assists the applicant with completing the form. The availability of assistance is indicated in the instructions. Prior to acceptance of the case, program staff contact the applicant if the response in the application is not clear or complete. The applicant may inadvertently provide incomplete, misleading or inaccurate information in the application leading to what may be a premature or inappropriate rejection of the applicant's case based solely upon a review on paper. In the course of the time that it takes the applicant to obtain, complete and submit the intake application form, by mail or hand delivery, critical time may have been lost. It takes more time when the program has to get back to the applicant to fill in blank answers or clarify ambiguous answers. Moreover, LSNF does not have clear case acceptance criteria that would allow early screening of applicants prior to completion of the application process.

In all of the counties except for the four western-most counties, the program refers applicants who say that they are only seeking advice to the *pro bono* advice line. Applicants call the advice

line directly. Applicants who call the advice line are checked for conflicts and screened for eligibility. In approximately one week, the applicant will be called back by a volunteer who will discuss the client's issue and give advice. Where the volunteer attorney feels that the client needs more help, the file is referred to the office where the client lives, thus building in more delays.

LSNF indicates that it will consider a centralized telephone intake system, once its expansion to *SharePoint* is in place. It is examining the possibilities and will review other models being used by similar civil legal aid programs. The program administrator and the executive director indicated that the program is not in a position to hire more staff to implement a centralized intake system. As indicated in the 2006 LSC Report, however, the program may be able to re-configure its current staffing structure, policies and procedures, as has been done successfully by several other civil legal aid programs and transition to a more comprehensive and efficient telephone intake system.

Engagement, access and utilization by the low-income community

FINDING 6: The five offices are strategically located throughout the sixteen county service area and are reasonably accessible by the client population.

The field offices that were visited (Tallahassee, Ft. Walton Beach, Pensacola and Panama City) have appropriate exterior signage identifying their locations. The Panama City office, however, lacked any visible signage of designated handicapped parking. The field offices are located in areas that are accessible by public transportation and within close proximity to businesses, local and government agencies and the courts. The reception areas are functional and include informational brochures, some in Spanish. There was some concern expressed regarding the lack of privacy and confidentiality in the Tallahassee reception area when clients/applicants were discussing their cases.

Over the years, the Pensacola office has fallen into disrepair and has become technologically outdated. However, as a result of the purchase of a new building, those problems will be addressed. The new Pensacola office building was expected to be ready for staff in January 2014.

Limited English Proficiency

FINDING 7: LSNF has a Language Access Policy that is in need of updating and revision.

The language access policy, entitled, "LSNF Policy on Serving Clients with Limited English Proficiency," is very bare bones and lacks information on the program's outreach efforts with respect to the LEP community. LSC has posted existing LSC grantee LEP policies on its LRI website at www.lri.lsc.gov and has also included examples of successful approaches to the challenges of appropriately serving LEP communities.

The program has identified two Spanish speakers on staff: a lead secretary in Tallahassee and the executive director's legal assistant. Another staff member was identified as being fluent in Hindi and Bangla and one was identified as being fluent in French and Arabic. In addition, the

lead secretary in the Panama City office speaks Tamil and the PAI program assistant speaks Portuguese. Staff is directed to use Language Line services if bilingual staff are not available. The program does not provide cultural competency training.

Recommendations:

II.1.5.1* *LSNF is encouraged to form a committee to proactively review the program's intake system and consider ways to address the issues identified in the findings and in these recommendations. LSC has intake experts on staff who can assist and provide consultation.*

II.1.5.2* *LSNF should include in its review a comprehensive assessment of the efficiencies of streamlining the intake process with a more client-friendly focus. Specifically, the program should make an effort to track and quantify the length of time that passes between the applicants' first contact with LSNF and the final determination of the provision of legal services and take steps to reduce the existing inefficiencies.*

II.1.5.3* *The program should examine having the regional offices conduct eligibility screening over the telephone and make contemporaneous entries into the case management system in order to make the intake process more efficient, avoid delays and make it more convenient for those who cannot easily get to the office. Financial eligibility should be determined at the first point of contact, as should case type. This would also avoid the duplication inherent in helping applicants fill out their applications, getting back to them to correct omissions and mistakes and then entering the information into the case management system. Alternatively, the program should consider distributing eligibility screening among the receptionists or other designated staff throughout the program via an updated telephone system or protocol.*

II.1.5.4 *LSNF should consider fully integrating the pro bono advice line into a comprehensive telephone intake system, including contemporaneous data entry and utilizing the same telephone numbers. This expansion of the advice and brief services pro bono hotline would permit LSNF to serve a larger number of callers where advice only would be deemed appropriate. LSNF should make the determination of whether advice is appropriate and not leave it to the client's request.*

II.1.5.5* *LSNF should identify ways that applicants can be informed sooner rather than later that they will not receive legal services. As part of this process, LSNF should develop refined case acceptance guidelines that will permit the rejection and referral at the initial point of contact of applicants with problems that the program does not handle.*

II.3.7.1* *The program's LEP policy should be updated to include the program's outreach efforts with respect to the LEP community. LSC has posted existing LSC grantee LEP policies on its LRI website at www.lri.lsc.gov and has also included examples of successful approaches to the challenges of appropriately serving LEP communities.*

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

Legal Representation

FINDING 8: LSNF has an experienced staff, particularly as it relates to leadership at the top.

The program's executive director has been with LSNF for thirty five years – nineteen years as the executive director. The program has five senior attorneys, a director of litigation, and eleven staff attorneys covering five field offices. The director of litigation has thirty-six years of civil legal aid experience and has served as LSNF's litigation director fifteen years. Their combined experience and dedication were consistently commended by the bench, the bar and staff and perceived to be key to the overall success of the program.

A senior attorney is assigned to manage each field office. The director of litigation meets with the senior attorneys quarterly to discuss major litigation, emerging issues, training opportunities, legislative and case developments, as well as office matters in general. He remains engaged in the program's more complex litigation and works with the attorney of record on any such case. Advocates welcome his expertise, wealth of experience, and knowledge.

The senior attorneys have three to nine years of experience at LSNF: Tallahassee (4 years); Quincy (3 years); Panama City (9 years); Ft. Walton (8 years) and; Pensacola (9 years). Staff advocates noted that the senior attorneys are accessible, knowledgeable, experienced and helpful. Members of the bench and the bar expressed the same sentiment. The years of experience for staff attorneys ranged from three to twenty years.

FINDING 9: LSNF has adequate case handling protocols, including a tickler system, however, the actual application of the protocols varies by office.

Each advocate and his supervisor are required to meet a minimum of every six months (more often for less experienced staff) to review the status of the advocate's open cases, in accordance with the "Litigation Manual," in each of the field offices. A minimum of ten cases are to be selected and thoroughly discussed. However, staff in the Tallahassee office indicated that case reviews take place on an informal and "as needed" basis. The frequency of the case reviews, in general, appears to depend in part upon the experience level of the case handler. One staff attorney with twenty years of experience indicated that she does not have formal case reviews, rather there are informal meetings. Case reviews of senior attorneys' open cases are conducted by the director of litigation at least once per year. Notes are maintained for all reviews in the CMS.

Substantive interoffice case reviews are conducted twice per year. The director of litigation and the senior attorneys select the substantive areas and a substantive "expert" for the review. The results of the case reviews are maintained as minutes by the director of litigation. The meetings are co-chaired by the senior attorneys in each office. The director of litigation attends each meeting. The protocols provide that case reviews are to be conducted pursuant to the guidelines and principles set out in the Standards for Providers of Civil Legal Services to the Poor adopted by the American Bar Association (ABA)³. All advocates are required to review the standards.

³ The ABA Standards were revised and published in 2007 as The Standards for the Provision of Civil Legal Aid.

Managing attorneys work closely with advocates to discuss and strategize around the more difficult cases. Managing attorneys pay particular attention to cases that have been open for more than a year. Staff attorneys must report periodically on the status of those cases. The CMS is also used to oversee caseload size.

The program has a tickler system and insures that cases are covered during staff absences, files are maintained properly and closed in a timely manner, and outcomes are recorded in accordance with the program's case handling standards.

LSNF's "Litigation Manual" was revised in November 2011 and updated in June 2012; however, it still references the outdated ABA Standards. The manual contains policies that cover case acceptance, case reviews, case assignment, supervisory standards and duties, oral argument preparation, staff training, transfer of cases upon termination of employment and protecting confidential client information.

Quantity and Quality of Legal Work

FINDING 10: Overall the quality of LSNF's legal work is good.

LSNF has four substantive law units – housing/consumer, domestic violence, family, and elder law. An experienced attorney chairs each group. The groups meet quarterly to share information and discuss developments. They also discuss complex cases and receive training. The director of litigation attends all of the meetings and insures that the meetings are scheduled with a full agenda. Notes are taken and distributed. The director meets with the groups in the fall to discuss potential impact litigation or projects. Specific issues are targeted and monitored throughout the year. All cases receive supervisory review prior to closure to insure compliance with LSC requirements. Once a year, the grants administrator provides senior attorneys with a list of files that have been opened for two or more years. Twice a year the grants administrator checks lists of pending cases to ensure that they have been properly opened, rejected, deselected, or closed.

The director of litigation coordinates execution of the program's litigation plan and visits Quincy once per week to assist with and oversee the bankruptcy and IRS cases. He spends significant time co-counseling cases in the Panama City office and visits that office up to six times per year. He speaks with the Pensacola senior attorney at least once a week about his cases and visits both the Pensacola and Ft. Walton offices twice a year. The director of litigation and the senior attorneys carry relatively heavy caseloads that ranged from 70 to over 100 cases covering a wide range of substantive areas: family, tax, bankruptcy, property, probate, landlord tenant, foreclosures, domestic violence, housing and juvenile/dependency.

The program engages in written discovery, defending and taking depositions and utilizes outside experts. In so doing, advocates frequently prepare written memoranda for motions. The writing samples that were submitted ranged from basic to complex; several were exceptional and worthy of note⁴, including a very detailed "Memorandum of Law" (Florida Circuit Court), filed in

⁴ Several writing samples were notably in need of a second review which might have captured formatting, grammatical, and spelling errors.

opposition to a bank's Motion for Summary Judgment in a foreclosure proceeding. An appeal filed before the Re-Employment Assistance Appeals Commission was particularly well-written. The program represented an appellant who had received imperfect interpretive assistance by agency staff, who inadvertently failed to report the appellant's part-time hours. The case was significant because it addressed an appellant who had limited English proficiency (LEP) but was never offered the assistance of an interpreter. Other writing samples included another memo opposing summary judgment in a foreclosure proceeding (Circuit Court of the First Judicial Circuit) and a "Memorandum of Law" supporting a claimant's Gulf coast claims facility appeal. Both memoranda involved significant issues of fact and law.

The director of litigation reported that LSNF filed over 1,000 Gulf oil spill claims and recovered approximately \$1 million on behalf of its clients. The program boasts that it has one of the most productive and effective Low Income Tax Clinics (LITC) in the nation. The program has developed a 2013-2014 advocacy strategic plan which defines its commitment to engaging in high impact affirmative advocacy as well as responding to individual needs. Advocates interviewed indicated their awareness of the program's commitment to addressing systemic issues, which is reflected in many of the writing samples.

FINDING 11: The program's total case closings were above the national median for the past three years but slightly below the national median for extended and contested cases. The case numbers were well above the national average for family law cases.

LSNF closed 4,737 cases in 2012 – 48.6% of the cases closed were in family law. The national average for this period was 34.8%. Approximately 76.9% of the family law cases were closed with limited services. The significant number of family law cases is largely attributable to the number of family cases closed with advice by the *pro bono* hotline.

LSNF closed 301 cases per 10,000 poor persons in 2012 – above the national median of 245. LSNF closed 51 extended cases per 10,000 poor persons in 2012 which was slightly below the national median of 57. The percentage, as well as the actual number, of the program's extended case numbers has fallen from 27.8% in 2009 to 22% in 2010, 21.3% in 2011, and 17% in 2012. During 2012, the program closed 26 contested cases per 10,000 poor, which was also slightly below the national median of 28. There were corresponding declines in the percentage of contested cases closed per 10,000 poor persons.

Staff Training and Support

FINDING 12: The program provides adequate training, legal research and support with minimal costs to the program.

The director of litigation, with senior attorneys, establishes training goals for each advocate and approves all requests to attend trainings based upon the program's resources and a variety of other factors, including case priorities, experience level, retention of staff, and competitive skills needed. A variety of training opportunities are provided to staff, including monthly "lunch and learn" sessions, which typically involve outside expert presentations. Attorneys also have the option of attending the Florida Bar and Florida Legal Services training events. Staff attorneys take full advantage of their training opportunities, but due to funding concerns, they are unable to

attend training events that require significant travel costs with a few exceptions. Florida has mandatory CLE requirements for attorneys and certified paralegals.

Support staff received little training other than technology training, which has been minimal to date. Supervisors are required to attend management training comparable to training offered by the Management Information Exchange at least once every four years, in accordance with the Litigation Manual.

The program's recent efforts to move to *SharePoint* (see Technology at Performance Area Four) will improve the staff's access to pleadings, briefs, and other litigation materials. Staff participates in task forces and on group email lists as well.

Case handlers all have access to desktop Internet legal research, which includes Westlaw, multiple practice manuals, and subscriptions to newsletters and poverty updates. The program receives legislative updates from Florida Legal Services (FLS), National Legal Aid Defender Association (NLADA) and Center for Law And Social Policy (CLASP). Administrative and judicial developments are distributed to staff by the director of litigation, and Florida Law Week is available online in all offices.

A few staff attorneys indicated that they were in need of greater administrative support, and some support staff indicated that they were overwhelmed with responsibilities.

Recommendations:

III.1.9.1* *The program should insure that case supervision policies are clearly and consistently implemented throughout each field office.*

III.1.12.1 *The program is urged to consider additional training and professional development opportunities for support staff.*

Private Attorney Involvement

FINDING 13: The program has a robust and well supported PAI program that includes a highly successful *pro bono* legal advice and tax hotline.

The director of development has primary oversight of LSNF's PAI program and supervises the program's PAI assistant, who is responsible for the *pro bono* advice line. The program was actively seeking a part-time PAI assistant to assume responsibility for placement of direct representation cases. This will allow LSNF to expand its use of *pro bono* volunteers.

The PAI program is comprised of a variety of *pro bono* legal services activities: direct representation; *pro bono* advice line; small claims clinic; landlord/tenant clinic; homeless intake programs; family mediation; senior citizen advice clinic; rural legal advice clinic; and expert advice panel. Members of the private bar spoke highly of one particular PAI program, the "First Saturday" clinics, which are held at the Gulf Coast State College on the first Saturday of each month. An LSNF paralegal, assisted by a volunteer, sets up and organizes the clinics. Each of the three largest firms in the Panama City area provides at least one attorney each month for the clinics. The clinics begin at 8:30 a.m. and end at 11:00 a.m. There are on average 20 to 25

attendees each Saturday and the cases are primarily domestic relations. Between five to ten attorneys participate in the clinic each Saturday.

The PAI assistant manages the *pro bono* advice line that is operated in the Tallahassee office. The *pro bono* advice line serves 12 counties covered by the Tallahassee, Quincy, and Panama City offices. The advice line telephone number is widely publicized throughout the counties that are served. Advice line hours are Monday through Thursday from 2:00 pm until 5:00 pm. The advice line is staffed by approximately 70 volunteer attorneys who sign up in two-three hour increments. If the advice line is busy, the call goes to voicemail – there are no calls in a queue. In all of the counties except Escambia, Santa Rosa, Okaloosa and Walton, applicants may call Monday through Thursday from 8:30 am to 5:15 pm and leave a message to receive a callback within the next few days. The average wait time was noted to be one week. There are sometimes problems with reaching applicants. If the call is an emergency, the caller will be told to contact the branch office. For those callers who need more than advice, the development director will refer the applicant to a managing attorney or a PAI attorney. A concern raised by the PQV team was that callers who request advice and brief service are told to contact the advice line without any preliminary review of whether in fact the applicant would be better served by full representation. Staff estimated that only one in nine calls results in an advice case.

A LSNF staff person and a long term volunteer paralegal screen the advice line calls. Approximately one month of training is required. These staff/volunteers handle a combination of half “live” calls and half call backs from “voice messages.” The volunteer paralegal collects data from applicants to determine “LSC” eligibility. LSNF staff collect information to determine whether there are any conflicts and categorize the type of problem which is the subject of the call. If a caller is eligible for the tax clinic or an oil spill case, an application is provided, as well as a survey and the caller is placed on an attorney call list (caller’s name, contact information and identification of the adverse party).

Government attorneys and members of the private bar provide advice. They select the types of cases to call back. They are provided a manual, last updated in 2012, that provides short descriptions of advice on a variety of substantive areas and outlines typical responses. Volunteers can type their advice into a folder which two volunteer retired professors later cut and paste into the CMS. The director of litigation pointed out that due to the *pro bono* advice line, the program’s staff attorneys are able to focus more of their time on more complicated cases.

Government lawyers are provided five hours of administrative leave per month to help on the advice line. The pool of government lawyers includes attorney volunteers from the City of Tallahassee and the Department of Environmental Protection. LSNF coordinates with the Florida Department of Transportation and the Florida Department of Business and Professional Regulations to obtain additional government volunteers. The board agreed to have the Government Bar represented on the board in September 2012 in recognition of the value they add to the program’s *pro bono* work.

LSNF coordinates with up to five volunteer expert tax attorneys under a *pro bono* service agreement to respond to client tax questions from the hotline attorneys. In the event that the PAI assistant is ill or on vacation, the hotline will be closed, unless there is an experienced volunteer

to take over. The director of development closes the advice line cases and reviews each file. Prior to closure, a final case closure form is prepared and forwarded to the managing attorney (Tallahassee) and the Director of Litigation (other than Tallahassee) for final review.

The senior attorneys refer PAI cases to the director of development for placement. Approximately 1,772 cases were referred in 2012, inclusive of the advice line. The director of development oversees the open PAI cases by sending an email to the volunteer attorney quarterly requesting a status report and a report on the time spent on the case to date. If no response is forthcoming, a call will be placed for follow-up. In 2012, there were approximately 2,085 attorneys practicing in the service area. Of those, 374 (17.9%) were involved in PAI projects and approximately 301 actually accepted *pro bono* cases or participated in the advice line. The program expended 15.4% of its resources on PAI expenses in 2012. Seventy-five percent of the attorney board members serve on the PAI panel or make financial contributions to the program.

LSNF's executive director is the former chair of the Florida Project Director's *Pro Bono* Committee. LSNF's *pro bono* coordinator serves on the Florida *Pro Bono* Coordinators Association. The group meets quarterly to share information and to seek training opportunities for the volunteers. The program uses a variety of recruitment efforts to obtain *pro bono* participation, including ongoing written and oral solicitations to the state and local Bar associations, recruitment announcements on the web, offers to co-counsel cases, soliciting distant law firms in rural areas, offering CLE credit and training in exchange for *pro bono* assistance, and initiatives to identify and target newly admitted attorneys.

Volunteer attorneys are offered access to reference materials, support staff, litigation funds, and malpractice insurance. They can attend LSNF's CLE trainings at no charge. Volunteer attorneys are recognized on the program's website, in recognition ceremonies, and at free or low-cost trainings. LSNF publishes a list of all of its volunteers in local newspapers on Law Day. Volunteers are occasionally provided commemorative pins or coffee mugs to thank them for their participation.

LSNF closed 1,730 PAI cases in 2012: 1,280 of the cases closed were in Tallahassee; 34 in Ft. Walton; 267 in Panama City; 57 in Pensacola and; 92 in Quincy. Of those cases, 51% were family cases, 14.7% were housing matters, and 13.2% were consumer/finance cases. In 2012, the program closed 110 PAI cases per 10,000 poor persons – well above the national average of 29. The number of extended cases closed in 2012 per 10,000 poor persons was 4 – below the national average of 9. The number of contested PAI cases closed in 2012 per 10,000 poor persons was 1 – again below the national average of 4. The high level of limited service cases results from the high numbers of cases closed by the advice line.

Other Program Services

FINDING 14: The program's extensive community outreach efforts have particularly targeted oil spill victims, domestic violence victims, senior citizens, veterans, and the homeless.

The program conducted extensive outreach to service area workers and small businesses who suffered losses related to the oil spill in 2010 through 2011. Those efforts continue.

The program responded to an elevated level of domestic violence in Escambia and Santa Rosa counties by designating two attorneys to dedicate significant amounts of time representing those victims. As a result, the number of injunctions handled by LSNF in those counties rose. An LSNF advocate received the Okaloosa-Walton County Domestic Violence Coordinating Council Shining Light Award last year. The program maintains a close working relationship with the local domestic violence shelters and advocates in the area. One staff attorney sits on the Florida State University Social Work board and provides family violence training. Two LSNF attorneys sit on Fatality Review Boards in their respective counties.

The program continues to assume responsibility for the Family Law Assistance Program (FLAP) which has been on-going since 2005. FLAP provides a valuable service to *pro se* litigants in the Second Circuit and assists the family law judges by ensuring that *pro se* cases have met the procedural requirements. The program calculates that it has served more than 1,035 *pro se* litigants over the past few years. Staff assists the *pro se* litigants with determining which pleadings are appropriate for their use and review the completed paperwork. *Pro se* litigants who are not able to complete the forms or navigate the process are referred to the *pro bono* advice line to obtain advice, or alternatively, to the Legal Aid Foundation in Leon County. In 2013 FLAP services were transferred to the Legal Aid Foundation in Leon County; LSNF continues to provide FLAP services in Gadsden County.

LSNF recently launched a “Lawyers in the Library” program, a forum in which volunteer attorneys see clients and provide assistance in the evenings annually at several locations in neighborhood libraries. The program routinely engages in community outreach in Franklin County to conduct intake related to its oil spill work. Staff hand out fliers and conduct intake at the local senior centers and courthouses.

Clinics are conducted at senior centers. In Quincy, outreach is conducted at senior centers once a month, and in the Panhandle Area Consortium outreach presentations are conducted regarding taxes. In addition, there are small claims advice clinics. Presentations are made which include “landlord tenant” matters and the Pensacola office coordinates the program’s involvement in an annual Veterans Stand Down, a “one stop” service event.

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

Board Governance

FINDING 15: The program appears to have a strong, committed and responsive board.

The program is supported by a diverse 21-member board of directors. Board members serve three- year terms. The president has served on the board for the past eight years, the last two as president. She no longer practices law in Florida though she continues to be a Florida resident. She serves as a health care administrator in Georgia which is approximately 30 miles away. She frequently visits the Tallahassee office in her official capacity. The vice president is a client

board member who is serving in that capacity for a second term. The secretary/treasurer is the chair of the board's Finance Committee. LSNF's board mirrors the NFCEJ board. Although there is a general policy for addressing conflicts of interest on the board, there is no specific policy to address conflicts which may arise between LSNF and NFCEJ.

One attorney board member is the immediate past president of the Florida Government Bar Association. During her tenure as Government Bar president, in July 2013, she spearheaded a CLE event for administrative litigation training. No costs were associated with the training but the program was provided with the unrestricted proceeds from the fees (\$60 or more per attendee). Over 300 attorneys attended the training. LSNF was given the flash drive from the training to be used as a tool for future *pro bono* work.

Although the program indicates that it provides an orientation to new board members and provides each board member with a written description of the specific responsibilities of board committees, board members and officers, the board members have not participated in any recent or ongoing board development.

The board's Financial Oversight Committee obtained training from LSNF's former Chief Financial Officer on internal controls. The Finance Committee is responsible for selecting the program's auditor.

Interviews with board members revealed that the program has an emergency succession plan in place but that LSNF is in need of a succession transition plan that addresses any future changes in the program's long term leadership.

The board is provided with detailed reports from the executive director regarding the development and achievement of the program's goals and objectives, strategic plans and activities that are approved each year. The board approved the purchase of the new Pensacola office in 2013.

The board evaluates the executive director annually with the input of staff and key stakeholders, most recently in 2013. Members are, also actively engaged in the program's fundraising, bench, bar and community activities.

The LSNF board president and the secretary/treasurer are both active members of their state and local bar associations and facilitate a supportive, proactive working relationship between the bar and the program.

Recommendations:

IV.1.15.1* The board should prioritize the development of written guidance addressing how conflicts of interest that may arise with the overlapping NFCEJ board will be resolved.

IV.1.15.2 The program and the board should take steps to insure ongoing board development and training, especially for client board members.

Leadership

FINDING 16: The executive director has shown outstanding leadership in insuring the programmatic and financial stability of LSNF despite funding uncertainties.

The executive director has received the highest praise from the bench, the bar, the board, program staff, and key state and local stakeholders. The executive director sets the tone for the program's commitment to the client community and is respected for her accessibility and transparency regarding the program, its finances, and the budget.

As previously stated the director has managed to maintain staffing and budget stability despite funding decreases from major funding sources. During her tenure, the program has successfully purchased each of its field offices. The director has had the benefit of several decades of continuity and stability in her leadership team, including the development director of 25 years (31 years with LSNF), the director of litigation of 15 years (19 years with LSNF and 35 years in legal services work), and the program administrator of 36 years all with LSNF. Each is recognized by staff, the bench, and the bar as committed to the success of the program.

Overall Management and Administration

FINDING 17: The program benefits from an experienced management and administrative staff.

The management of the organization by LSNF's experienced management team has insured the program's overall success with grant compliance, facilities maintenance, program administration, and resource development. The executive director meets each month with the senior management team and discusses funding, training, and grants.

The Chief Financial Officer (CFO) prepares the proposed budget each year with input from the executive director. The previous CFO, who resigned in March 2013, was a certified public accountant with a master's degree in public administration. The current CFO is only recently on board but has prior experience with a non-profit organization.

The program administrator coordinates the applications for the programs' two primary grants, including LSC's, and ensures that appropriate information and reports are submitted. He also assists with monitoring visits, oversees technology, and ensures maintenance and improvements for the program's office buildings. Senior attorneys for each field office are responsible for their day to day operations and utilize their administrative staff for assistance.

To the credit of the program's executive director, board, key staff and bar support, the program minimized staff reductions despite recent federal, state and private funding reductions and funding uncertainties. The board and program leadership monitored the funding closely, sought new sources of funding to cover other reductions and made budgetary adjustments timely.

In order to maintain staff and avoid layoffs and/or retrenchment, however, the program had to shift a substantial amount of work from its typically prioritized services. As a result, services were cut in various categories that are now reflected in the reduction of extended cases as noted in Performance Area Three. Funds were received to assist service industry workers with oil spill

claims with the majority of that work being advice and brief services. Many of the extended service cases related thereto remain pending.

Internal Communications

FINDING 18: The program's management team meets regularly with staff and communications are consistently provided in a transparent manner.

The executive director convenes mandatory management team meetings each month and "All Staff" meetings three times per year. Discussions of changes in policies and practices are discussed at the program-wide meetings. In December, the "All Staff" meeting becomes a celebratory holiday gathering in the Tallahassee office. Minutes of all of the meetings are maintained and distributed to all pertinent staff. The director of litigation visits each office regularly to meet with senior attorneys (rotating between the offices), to conduct case reviews, as co-counsel on cases and as a signatory to bankruptcy and tax filings, as needed. The program administrator frequently visits the field offices to address technological and building maintenance issues.

Communication occurs in person and through video conference meetings, email distributions, conference calls, inter and intra-office memos. The program is now establishing *SharePoint* intranet portals to share general program information, orientation materials, manuals, personnel and fiscal updates.

Technology

FINDING 19: LSNF is currently engaged in overhauling its technology infrastructure.

The program administrator has overseen maintenance of the program's technology infrastructure throughout most of his tenure at LSNF. Most recently, he has been tasked with launching the initiative to bring in *SharePoint*. The program administrator has acquired the necessary technological expertise over the years to properly perform his duties. He regularly participates in LSC's Technology Initiative Grant (TIG) conferences. A firm specializing in technological support for legal services supplements his efforts. LSNF staff has the technological tools necessary for their work, including work stations, access to legal research, and remote access to the network in some cases. Firewalls are in place, and the program's intranet has a suite of policies and procedures that are maintained and up to date. The program administrator addresses problems when they arise.

Staff members spoke favorably concerning the work and responsiveness of the administrator. He meets regularly with the director of litigation to obtain his input in technology and the delivery of services. The office dealing with the most critical technological issues is Pensacola, but those problems should be addressed with the move to a new building scheduled to occur in January 2014. Basic technology training is provided to staff but more is desired. LSNF has a policy requiring staff to enter the advice provided (either through notes or through attached letters) into

the case management system per its Litigation Manual. LSNF does not have a mandatory policy of entering all pleadings into the case management system.

With the assistance of a TIG grant, *SharePoint* and *Office 365* are being implemented to allow the program to store and share documents and pleadings. The move to *SharePoint* will accomplish several infrastructure goals. The software and hardware, including CPU's, will be updated or replaced as appropriate. A server in the Tallahassee office will serve as an archive, and all active documents will be transferred to *SharePoint*, which is hosted on *Microsoft Cloud*. Microsoft maintains redundant copies of their customer's data on multiple servers and runs its own internal backups to provide reliability and access to users. Documents will be synched up at the time of transfer so there will be no loss of access during "cutover" of documents. This new configuration will reduce IT administration costs of maintaining multiple routers and firewalls, as well as the cost of patching and upgrading software on individual workstations.

By adding *SharePoint*, the program will improve its ability to save and share pleadings, briefs, and other useful material. At the present time, the amount of case material that attorneys save in *Legal Server* varies. With *SharePoint*, it will become mandatory that legal work files remain up to date with all case notes and pleadings.

Recommendations:

IV.3.19.1 *LSNF should adopt a policy requiring that all case notes and pleadings be entered into Legal Server when the move to SharePoint is complete.*⁵

IV.3.19.2 *LSNF is urged to engage in robust training and communication regarding SharePoint and the future integration of LegalServer so that staff will be comfortable with the new tools as they are rolled out.*

IV.3.19.3 *LSNF is urged to consider moving its Exchange Server to the Microsoft Cloud in order to fully integrate Office 365 and SharePoint.*

Financial Administration⁶

FINDING 20: The program has developed and maintained a consistent track record of fiscal stability.

The current CFO was hired in July 2013 and is assisted by a fiscal/HR specialist and an administrative secretary. The program administrator and a grants administrator/litigation paralegal assume key oversight responsibilities and insure compliance with the program's grant funders. The CFO is relatively new to the program but has already earned high praise from the

⁵ As a result of the contract between *Legal Server* and LSNF, *InLigo* (the program's *SharePoint* consultant) and *Legal Server* will create a protocol that will link documents created in *SharePoint* to their respective *Legal Server* files and *Legal Server* documents will have a similar link to a *SharePoint* library.

⁶ 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.

executive director, board members and staff. He was commended for his innovative approaches and efforts to streamline the administrative and fiscal processes.

The program's CFO prepares a detailed proposed budget in consultation with the executive director at the beginning of the year and it is presented to the board's financial oversight committee. The board is presented with a budget for the current year and a preliminary budget for the following year. Modifications are made throughout the year as needed to reflect significant changes in revenues or expenses. Any changes are distributed to the board on a monthly basis.

The program's fiscal manual was last updated in 2013. The program received a clean audit in 2012 - there were no significant findings in the audit report. The board unanimously approved and accepted it in the May 2013 meeting.

Human Resources

The program promoted a staff person to Human Resources (HR) specialist in 2011. She has received some HR training. As the HR/fiscal specialist, she assists with fiscal matters, payroll and assumes responsibility for administrative and personnel related matters. The program, also, retains an employment law specialist.

The executive director recommended salary increases for staff in the proposed 2013 budget after a careful analysis of the program's financial status. The executive director pointed out that the Florida Bar Foundation (FBF) avails the program of approximately \$220,000 annually to provide market rate salaries for the attorneys. The FBF allowed the civil legal aid programs that they fund to freeze salaries in 2012 and again in 2013 due to the state of the funding crisis but will require their funded programs to "catch back up" by 2015. As of the PQV visit, salaries were no longer frozen and three percent salary increases went into effect for non-attorneys. Attorney increases varied based upon their seniority and experience.

Staff is evaluated annually - more frequently for new staff in their first year of employment (3-6 month periods). Evaluations are based on goals assigned to each staff member and are intended to address professional development. Trainings are provided throughout the year, some of which are grant-driven and include professional development.

The program has several favorable features for attracting and retaining attorney staff: a flexible work week, payment of Florida Bar and local bar dues, payment for required CLE hours, leave for bar examination study time, and loan repayment assistance with law school debt. The program also tries to accommodate case-handler requests to work in subject areas that are of interest to them. Non-attorney staff expressed an interest in being provided with the opportunity to work in subject areas of interest to them, as well.

Resource Development

FINDING 21: LSNF has been successful in its resource development efforts, which have fully supported its mission.

The program's resource development staff consists of the director of development and the resource developer. The resource developer has twenty-three years of fundraising experience. Under LSNF's leadership team the program's funding has grown from total funding at \$3,494,977 in 2003, to \$4,318,649 in 2011, at its highest point. As previously noted, total funding for LSNF has dipped to approximately \$3,900,000 in 2013.

LSNF has aggressively sought resources that have allowed it to expand its legal services to a wide array of clients in need, including funding for victims of sexual abuse, domestic violence victims, the senior citizen population, foreclosure cases, income tax cases, victims of the oil spill, and veterans assistance projects. The program receives approximately a third of its grant funding from LSC; other sources include VAWA, VOCA, the IRS, Title III, and the Florida Justice Administrative Commission, Statewide Guardian Ad Litem, the Attorney General's Foreclosure funding, Oil Spill Settlement funding and funding from 14 counties in the service area. The program has received four *cy pres* awards since 2009. The program received private contributions totaling \$197,112 in 2011. The program raised \$54,000 (\$48,000 net) in its annual "Jazz for Justice" fundraiser in 2013.

In 2010, LSNF launched its social media presence on Facebook, YouTube, and Twitter, and continues to regularly publish and widely distribute its annual reports and newsletters to volunteers and donors throughout the service area via its website, through outreach, and at fundraising events. Donors are recognized in the program's annual reports and during recognition events, and are also publicized on the program's websites, on event programs, on tee shirts, and posters. Other donor recognition options include naming opportunities for LSNF offices and buildings, wall plaques, and building signage.

Participation in an Integrated Legal Services Delivery System

FINDING 22: The program is an integral part of the legal services delivery system throughout the service area.

The executive director is a member of the Florida Project Director's Association's (PDA) *Pro Bono* Committee which coordinates the sharing of information and initiatives of the Florida *Pro Bono* Coordinators Association. The director is an active participant with regard to the Florida Bar Foundations' efforts to revise the statewide delivery system particularly in light of what the FBF considered "significant" state bar funding decreases for the foreseeable future.

In 2007, the LSNF board launched a separate legal services program, NFCEJ with grant funding. NFCEJ was to serve as a "non-restricted funding" source for referrals. It is now funded by the Florida Bar Foundation, IOLTA, oil spill funds and other grants. Although they are separate entities, LSNF and NFCEJ share the same office building with separate entrances and share the same board. NFCEJ primarily focuses on housing and consumer problems. NFCEJ is essentially comprised of four staff, including the executive director and two staff attorneys. LSNF rents space to NFCEJ and regularly reviews the rental market to determine market rates.

LSNF coordinates with other legal services providers in the service area to enhance client service. The program routinely makes referrals to the other entities in the region, the NFCEJ and the Legal Aid Foundation of the Tallahassee Bar Association (LAFTBA). LSNF was a subcontractor of a foreclosure defense grant secured by the NFCEJ. LSNF and its staff participate on Florida Legal Services' task forces and are encouraged to join statewide umbrella (substantive area) groups with the approval of the executive director or the director of litigation.

An initiative by the FBF in 2012 to discuss the possibility of merger of LSNF, NWFLS, LAFTBA and NFCEJ, or other ways of collaborating in light of continuing FBF funding reductions, did not result in the desired objectives. Until 2012, LSNF's priorities focused on extended representation to domestic and sexual violence victims, recognizing that family law issues in less complicated matters are handled by LAFTBA in Leon County and by NWFLS in Escambia and Santa Rosa Counties. NWFLS provided intake services in Escambia and Santa Rosa counties and referred housing and consumer cases to LSNF. Subsequently, coordination between NWFLS and LSNF has deteriorated and both programs are now performing similar services for the client population in Escambia and Santa Rosa Counties. The areas of coverage overlap greatly. There is no longer a clear understanding of appropriate referrals.

Recommendation IV.9.22.1* LSNF should continue its efforts to re-establish a positive working relationship with NWFLS in order to serve the best interests of the low income population.