



Neighborhood Legal Services
of Los Angeles County

Changing lives and transforming communities since 1965.

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December 13, 2013

Nancy J. Glickman
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Legal Services Corporation
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RE: Neighborhood Legal Services of Los Angeles County's (NLSLA) Response to the LSC Office of Program Performance (OPP) Draft Program Quality Visit Report ; September 9-13 LSC OPP Team Visit.

Dear Nancy:

Thank you for sending us the draft Program Quality Visit (PQV) Report from the LSC team's visit on September 9th for our review. This letter sets out NLSLA's response to the report.

GENERAL COMMENTS

NLSLA found the PQV to be a positive, valuable exercise that provided thoughtful observations about the program's structure, delivery systems, client services and performance over the past two years. As a whole, the issues identified in the PQV were insightful and accurate and the recommendations are appropriate. We also want to compliment the OPP Team whom our staff found well prepared. It was evident they immersed themselves in the documents NLSLA submitted and were quite knowledgeable about our legal work and program operations.

The process of preparing for the PQV proved to be useful for our management staff identifying areas where NLSLA could improve its operations and where we excel. While quite time consuming, gathering materials and data about our work, taught us much about our strengths and areas where improvement is warranted.

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RESPONSES TO RECOMMENDATIONS

Performance Area I – Effectiveness in identifying the most pressing civil legal needs

Recommendation I.1.1 – Needs Assessment

NLSLA agrees that it is important for the program to complete a new, comprehensive needs assessment in 2014. Consistent with the Report's recommendation, at the December 12 NLSLA Board of Directors meeting, the Board explicitly committed to undertake the study in 2014. We strongly endorse the importance of a quality legal needs study to help the program determine priorities for its work. To that end, the NLSLA Board and staff have always devoted substantial time and resources to that task.

Recommendation I.2.3.1 - Planning

NLSLA also agrees that it would be useful to undertake a longer term strategic planning process in conjunction with current restructuring efforts. The program's goal is to develop a well-designed longer-term strategic planning process during 2014 and have it in place by the end of the year.

Recommendation I.2.3.2 – Outcomes

NLSLA believes that it is important to continue to explore methods to accurately measure the outcomes resulting from the program's advocacy. The program has tried to be among the national leaders in that effort, as reflected by our Deputy Director, Yvonne Mariajimeenez, participation on LSC's outcome committee.

It is also important to be efficient, thoughtful and productive in that process to avoid wasting effort on data collection plans that are neither technologically achievable, nor useful for funders, legislators or donors. Currently, several legal services funders, including LSC and California's IOLTA program, are independently developing outcome measure systems for similar legal services work. It is cost effective for NLSLA to develop its outcome measures in conjunction with the state and national efforts.

Performance Area II – Effectiveness in engaging in and serving the low-income population throughout the service area.

Recommendation II.1.4.1 – New coordinated intake system

Developing and implementing NLSLA's new coordinated intake system is an enormous task. The team of advocates working on the new system is invested in the process and anxious to ensure the full staff is aware of and committed to the new system. NLSLA has already begun to provide details and updates to all program staff. In September, a week after the Team's visit, NLSLA held a program-wide informational training about the new intake plans at its quarterly all staff meeting. In addition, staff involvement on the planning committees was also increased. Those special communication efforts will continue throughout 2014 as the new systems and structures are beta tested and rolled out.

Recommendation II.1.4.2 – Case Management Software

NLSLA agrees with the Report's recommendation that in conjunction with implementing its new intake model the program should enhance its technology capacity to carry out and manage its work. Since LSC's visit, NLSLA has decided to purchase a new, state-of-the-art case management system that will improve its legal work management and facilitate implementation of the program's new intake system. Funds for purchasing the case management software are included in the 2014 NLSLA budget that the Board approved on December 12.

Evaluation of available case management systems commenced in December 2013 and should be completed by February 1, 2014. We expect to select and purchase case management software in February and will push for a quick installation.

Recommendation II.2.5.1 – Antelope Valley

NLSLA agrees that it is important to find an effective way to expand the program's workshop services and outreach in the Antelope Valley (AV). NLSLA has a deep commitment to the poverty communities in the AV. We are especially sensitive to the geographic and social services isolation of the area, as well as the tragic history of racial discrimination that permeates those communities. We have recently successfully represented AV organizations and residents in a major federal court lawsuit charging the Cities of Lancaster and Palmdale and Los Angeles County with racial discrimination in their administration of the Section 8 Housing program which forced poor black and Latino families out of the AV. See *The Community Action League v. City of Lancaster*, (US Dist Ct, CD Cal, No. 11-CV-4817)

We know the absence of viable social services providers and partners in the AV will also make it difficult to establish and maintain those new NLSLA services. However, the difficulties will not deter the program from moving forward. NLSLA is absolutely committed to undertake these efforts. NLSLA's goal is to have a plan for expanded AV services and outreach in place by March 1, 2014.

Performance Area III – Effectiveness of legal representation

Recommendation III.1.8.1 – Integrate Shriver, Self-Help and MLCP into the core program

A long-term goal of NLSLA has been to develop effective systems, policies and procedures that promote the integration of the work at its innovative alternative delivery projects into the central, core advocacy of the program. Over the years, NLSLA has particularly struggled to find the right mechanisms that will easily connect the courthouse based self-help centers with the work of advocates in the Glendale, Pacoima and El Monte offices. Similarly, NLSLA's housing and health staff are already focused on integrating the newer Shriver courthouse eviction representation center and the three Medical Legal Community Partnerships (MLCPs) into the program's daily advocacy.

NLSLA has set a six month time line to develop and put into place a plan that will better integrate our special signature projects: Self-Help, Shriver Housing- LA and the MLCPs with the program's core advocacy. It will coincide with the projected changes to the program's advocacy structure and its plans to provide more holistic assistance to its clients.

Recommendation III.1.9.1 – Using the skills and expertise of staff

NLSLA also accepts this recommendation, which is one of most important in the Report. A critical goal of NLSLA's current advocacy practice group restructuring is to: (1) facilitate program lawyers handling more substantial, significant and transformative legal work; and (2) for virtually all brief services and counsel/advice cases to be handled by the intake team staff. As the Report notes, the restructuring effort is already well underway and scheduled to be rolled out in early 2014.

Recommendation III.1.10.1 – Ensure adherence to the NLSLA legal supervision standards

The quality of legal supervision has been a critical focus of NLSLA senior management over the past two years. The management team suffered a severe blow in 2011 when three leaders (2 Managing Attorneys and one Supervising Attorney) left the program to become administrative law judges, the most senior Managing Attorney retired and another Supervising Attorney moved to a national support center. Since then, NLSLA's Executive and Deputy Directors have been working diligently to rebuild a high quality management team (NLSLA Leadership Team) to oversee and lead the program's substantive advocacy and to better mentor its talented group of advocates.

Those efforts led to the development of the program's comprehensive legal supervision standards. As the LSC Team recognized, the Standards establish appropriate policies, procedures and protocols for the supervisors to follow. NLSLA has also been successful in replacing some of the lost staff by adding two new quality Managing Attorneys to the Leadership Team and recruiting two new Supervising Attorneys. However, there remains a legal supervision gap that needs to be closed.

Since the PQV, NLSLA has taken additional steps to close the supervision gap. The program has engaged Beverly Weise of Leadership Talent Solutions, to advise and train its management team on supervising and mentoring skills, techniques and practices. Ms. Weise is a nationally known, well-respected management consultant and coach who works with both private and non-profit companies. NLSLA has contracted with her in the past to help the program develop and implement a Performance Management evaluation program and to provide individual coaching and mentoring to several managers to help improve their staff supervision.

Under Ms. Weise's direction, NLSLA has commenced a long term plan to reinforce the importance of the programs Standards for Legal Practice, as well as the need for consistent use and application of the standards by NLSLA managers and supervisors. In the future, at twice-a-month management team meetings, NLSLA expects to have regular discussions and training directed by Ms. Weise on best practices for following the NLSLA legal supervision standards.

Recommendation III.1.10.2 – Manager to oversee legal work

NLSLA agrees that the program should create clear lines of authority for supervision of legal work consistent with its Standards for Legal Supervision. The Team's observations about need for better uniform oversight of legal work are well-taken and appreciated. NLSLA's senior management staff is exploring the best way to provide that support given the program's limited resources. Ideally, NLSLA would create an additional Managing Attorney position to fill this function and provide additional mentoring support to NLSLA's lawyers. Indeed, NLSLA had such a position in 2011, but lost the staff and no longer has sufficient resources to add an additional senior manager to the program.

With the staff expansion option off the table for now, senior staff is exploring the best way to meet this legal work management need in conjunction with the restructuring of advocacy practice groups that is already under way. NLSLA will ensure that built into the new structure, when it is operational in the first quarter of 2014, will be a designated manager to oversee the substance and management of each lawyer's work, as well as caseload assignments.

Recommendation III.1.10.3 – Performance Management Training

NLSLA agrees that training in the development and implementation of its new performance management evaluation system is essential. As noted above, the training will be conducted by the program's outside consultant Beverly Weise, an expert on Performance Management systems. Staff have already been trained on how to do a good self-assessment. And, at the December 11 NLSLA Leadership Team meeting, Ms. Weise conducted a formal training of supervisors on best evaluation practices and how to effectively utilize the new system. Additional trainings will be regularly scheduled to coincide with the timelines of the performance management system. NLSLA has committed to timely complete a 2013 performance management evaluation of every NLSLA staff member by February 2014.

Recommendation III. 2.11.1 Expand and enhance PAI

As the Report notes, NLSLA has made it a high priority for the program to increase its work with private pro bono lawyers. The program's management and Board are committed to that goal and agree with the Recommendation that the program should expand and enhance its PAI efforts throughout NLSLA's delivery systems and in all of its advocacy projects. Our initial step of hiring a well known and highly respected Pro Bono Director has been accomplished. To help ensure that pro bono support is always a considered option, NLSLA has also included her in all aspects of the program's advocacy management and delivery of legal services discussions.

The success to date has been considerable. NLSLA is rapidly expanding its pro bono foothold and image in the Los Angeles private bar and legal services community. We have worked closely with large firms, like the Los Angeles office of Latham & Watkins, one of the most prominent firms in the country and the home of an NLSLA Board member. During the course of the year, we have trained more than 50 associates on how to handle VAWA and SSI cases and they have already taken on 10 new pro bono cases. We have also created specialized pro bono pipeline to several private firms to help NLSLA clients access unemployment insurance benefits and several large firms have taken complex property and benefits cases.

Another PAI priority for NLSLA has been enhancing the pro bono participation in the Shriver Housing project at the Mosk Courthouse. In order to process the thousands of litigants needing assistance at the Shriver Eviction Assistance Center, NLSLA needs the help and support of pro bono lawyers from the larger LA firms. Consequently, NLSLA's Pro Bono Director has been at the forefront of working with a dozen private firms to train and support their lawyers so they can effectively participate in the project. NLSLA is also about to launch a special Shriver Pro Bono quarterly newsletter to help keep the Shriver Pro Bono core firms involved and recruit more members to the project. (Note that previous NLSLA PAI reports to LSC have not included all of NLSLA's Shriver PAI efforts.)

Recommendation III.2.11.2 – Capture PAI data

NLSLA agrees it is important to collect accurate PAI data, to communicate that information to LSC and other funders, and to utilize that data to help expand and improve pro bono services to NLSLA clients. The program's efforts to capture PAI data, prior to the hiring of the Pro Bono Director, was quite limited and has probably resulted in underreporting of NLSLA PAI activities over the past few years. As a result, consistent with this recommendation, NLSLA has made development of a quality PAI data collection and reporting system a high priority for the Pro Bono Director. NLSLA's decision to purchase new case management software will also facilitate the Pro Bono Director's ability to create the systems necessary to capture the needed data.

Recommendation III.2.11.3 – PAI referrals from intake

NLSLA's goal is to include consideration of PAI in all aspects of its delivery system, including intake. Consistent with this recommendation the NLSLA Intake team will be directed to evaluate whether direct referral at the intake stage is appropriate or practical. To aid in that consideration, NLSLA has added its Pro Bono Director to the staff team designing the new intake system.

Recommendation III.2.11.4 – PAI administrative staff

NLSLA prides itself on its ability to provide comprehensive, effective and efficient client services with minimal levels of support staff. On the other hand, where assistance is warranted, the program makes the required adjustments and augments its staff. Following this recommendation, as NLSLA pro bono services increase, NLSLA will evaluate whether additional administrative assistance for case placement and oversight is required.

Recommendation III.3.12.1 – Referrals from Self-Help Centers

Since the NLSLA self-help center network was created more than a decade ago, the program has developed effective and efficient mechanism to refer litigants that call the NLSLA offices to the courthouse based centers. On the other hand, it has proven more difficult to develop sound and effective systems for referring litigants from the centers to the substantive advocacy staff in the program offices.

Thus, developing better mechanisms to integrate the self-help centers' referrals into the programs intake remains an important priority for NLSLA. The new coordinated intake and new advocacy structure should make the referral process much simpler to accomplish than the old multiple subject matter focused system.

Recommendation III.3.12.2 – Streamline self-help process and copiers

The hallmark of the NLSLA self-help center model is individual assistance – NLSLA's centers are, as the Team noted, a highly successful and effective model, one of the best in the country. Historically, NLSLA has not relied heavily on technology to meet the growing demands for assistance at its centers. However, with the program's Hot Docs experience through its TIG grant, NLSLA has learned more about ways technology can be a valuable tool to improve and streamline self-help assistance, while maintaining the personal contact that is at the heart of the NLSLA self-help model. Consistent with this recommendation, the NLSLA self-help staff will review its

processes to evaluate where the systems can be further streamlined through the use of automated document production software.

As the LSC Team recognized, providing copy services in the self-help centers or within the courthouse is essential for self represented litigants to effectively access the courts. Unfortunately, the administration in some of the courthouses that host the NLSLA centers have not been attentive to this need. Pursuant to this recommendation, NLSLA will take immediate steps to address this issue with the court and pledges to do whatever it can to solve the “copier problem” by March 1, 2014.

Performance Area Four – Effectiveness of governance

Recommendation IV.1.14.1 – Board Fundraising

NLSLA agrees that it is important for its Board to develop its fundraising capabilities. NLSLA also understands that to develop a more effective private donor program will require the involvement and support of the entire NLSLA Board of Directors. The Board expects to continue to seek assistance from experienced fundraising consultants in its efforts to grow its fundraising capabilities and to put a high priority on those skills when recruiting new Board members.

Recommendation IV.1.14.2 – Strategic Planning

NLSLA also agrees that it is valuable for NLSLA to engage in an effective long-term strategic planning process, which requires the active involvement of NLSLA’s Board of Directors. The Board is very supportive of having the program undertake that planning process and looking forward to playing a significant role in it.

Recommendation IV.1.14.3 – Succession Planning

The NLSLA Board has expressed its interest in succession planning, which is an area of particular interest of Richard Tom, the incoming President of the NLSLA Board of Directors. The Board has also been involved in succession planning for the Board itself and has taken active steps to provide leadership opportunities for its newer and younger Board members. In addition, the Board has urged the program’s leadership to begin exploring the succession process. Following the Board’s direction, the Executive and Deputy Directors have engaged John Tull, a well-known national legal services consultant, to advise them on succession planning.

To ensure the program’s succession planning efforts are effective and successful, NLSLA believes it will be important to have an outside consultant to help facilitate and direct that effort. NLSLA will contract with Mr. Tull or another appropriate consultant by April 1, with the goal of having a succession planning process developed and underway by July 1.

Recommendation IV.4.17.1 – include two year projections for budgets

NLSLA already follows this recommendation. The 2014 NLSLA budget process included consideration of the 2015 projected NLSLA budget. It was particularly useful to the Board and management as it identified that financial stability for 2015 appears highly dependent on NLSLA ability to renew three large state contracts that terminate in 2014. As a result, NLSLA will place a high priority on seeking to renew those contracts.

Recommendation IV.4.17.2 – monthly reports to the finance committee

NLSLA agrees that it is a good practice to have the Board Finance Committee receive monthly reports, regardless of Board or Committee meeting dates. The program will implement that practice beginning January 2014, when the program's Chief Financial Officer returns from parenting leave.

Recommendation IV.5.18.1 – filling the HR Director Vacancy

It is NLSLA's desire to promptly fill the vacant Human Resources Director position. Following the PQV, NLSLA did offer the position to a highly qualified candidate, but she declined because we were unable to meet her salary demands. As a result, in early December, NLSLA engaged its management consultant Beverly Weise to assist the program recruit a good pool of applicants for the HR position, as well as, to help NLSLA program continue to meet its HR obligations during this period of transition. Ms. Weise has re-drafted the HR job announcement and expanded its distribution; she is also reviewing written HR policies and procedures and mentoring the program's HR assistant. NLSLA is hopeful that this increased attention to filling this vacancy will be fruitful and the vacancy will be filled in early 2014.

Recommendation IV.5.19.1 – timely evaluation of staff and managers

NLSLA also agrees with this recommendation. As noted above the program already has in place a timeline and process to complete the 2013 evaluation of 100% of the staff (including managers by February 2014), as well as a timeline to commence the program management process for 2014 evaluations. This enhanced effort to meet the evaluation recommendation is being driven by NLSLA Managing Attorney, Caron Smith with the support of NLSLA's management consultant.

Recommendation IV.4.20.1 – greater use of existing technology

NLSLA has made considerable efforts over the past few years to grow and maintain the program's technology capacity. Most of our equipment and systems are state-of-the art and are constantly reviewed and updated by our expert IT Consultant, Richard Fujio.

Management agrees with the LSC Team, that the program can make better use of that technology. The LSC Team's suggestions for utilizing video conferencing for client outreach and education, more automated document assembly and intranet for staff and knowledge management are well-taken and great places to start. Implementing this recommendation will be a high priority for the new NLSLA internal IT Staff Manager that starts right after the first of the year. (See discussion below.)

Recommendation IV.4.20.2 – purchasing new commercial case management software

As previously noted, NLSLA has already decided to replace its current proprietary system with commercially available case management software designed for legal services programs. The cost of the software is included in the program's 2014 budget approved by the Board of Directors.

Recommendation IV.4.20.3 – hiring of internal IT staff

NLSLA has also fulfilled this recommendation. In December 2013, it hired a new, outstanding IT Staff Manager, Barnaby Chiong. He officially begins work on January 6, but has already been meeting with staff to begin developing his work plan.

Recommendation IV.4.20.4 – connection to California Law Help (CLH) website

NLSLA is dedicated to maintaining its commitments to CLH and accepts the Team's recommendation that it appropriately link CLH to the NLSLA website and that an NLSLA staff member be specifically assigned as the program's liaison to CLH. Consistent with this recommendation, NLSLA has assigned Supervising Attorney, Kate Meiss as its CLH liaison – she is one of NLSLA's most experienced managers with a wide range of substantive expertise. NLSLA will also be making several changes and corrections to its website in the next few weeks and will include in that effort an improved NLSLA link to CLH.

Recommendation IV.4.21.1 – staff communication

NLSLA program leadership is attentive to staff's concerns about the program changes and operations as evidenced by the many thoughtful mechanisms it has used to provide staff with program information and opportunities to express their views. Prime examples of that are the monthly staff "cafecitos" and the quarterly all staff, all day meetings. Both have proven highly successful in keeping staff apprised of program developments and giving them a chance to have direct personal contact with the program's Executive and Deputy Directors in an informal setting.

The Team's visit to NLSLA came at a particularly difficult time for many NLSLA staff. There was anxiety over the future financial stability of the program – other large legal services programs in Los Angeles (LAFLA and Bet Tzedek) were undergoing significant downsizing, lay-offs and furloughs, collective bargaining was about to commence and NLSLA had just learned it would suffer large, unexpected LSC reductions in 2013 and 2014 due to the Census redistribution formulas.

Moreover, the program was also just beginning its most significant delivery systems changes in over a decade. Discussions and planning were underway for both the intake and advocacy group restructuring, but were centered in a small number of impacted staff. The concepts behind the pending changes were known, but its likely impact on individual staff was unclear, thus increasing staff anxiety and concerns about the program's direction.

Since the visit, several developments have already begun to address those staff concerns. First, one week after the Team's visit, NLSLA held a quarterly all staff meeting where the intake and restructuring changes were explained and discussed in detail by the program staff that are members of the design teams. Second, the membership of the design teams was expanded to ensure a broader staff participation in the design and roll-out of the changes.

In addition, the financial stability of NLSLA and its capacity to weather another loss of LSC funding without additional lay-offs became clear. There are no longer rumors about imminent lay-offs. Collective Bargaining over 2014 wages was completed in one session resulting in 2014 salary increases for all staff that were included in the 2014 program budget approved by the Board on December 12. In sum, anxiety levels within the staff are considerably reduced.

Nevertheless, program leadership is always interested in finding new and better forums for staff communications. The program will be establishing the recommended intranet as soon as the new IT Staff Manager is on board in January. And, the NLSLA management team has decided to introduce external and internal "newsletters" to keep the staff and the public better informed about developments at NLSLA. To facilitate that effort, in early December NLSLA applied for a Taproot Foundation grant to help it design the newsletter. NLSLA was informed on December 12 that it made it through the initial Taproot proposal review and will soon be scheduled for an interview.

Recommendation IV.4.21.2 – informing staff of restructuring and program's financial status

As described above, NLSLA is committed to keep staff informed about both the program restructuring and NLSLA's financial status. Efforts on both counts have been well underway during October, November and December. The expanded restructuring committee now includes most of the advocates who will be directly impacted by the changes and they are intimately involved in the design and practical changes that come with the new advocacy structure. The committee meets in person weekly in the Glendale office. Working with the staff committees is the primary responsibility of Managing Attorney, Caron Smith.

Recommendation IV.7.22.1 – hiring a Development Director

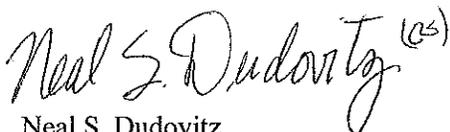
NLSLA agrees that it must promptly fill the vacant Development Director position. Although the program's contributions for 2013 were 20% higher than the previous year, NLSLA has a long way to go to meet its long-term goal of raising a \$1 million per year through a private donor program. Of course, it will be impossible to meet that goal without leadership and help from a strong and capable Development Director.

Given the difficulty most legal services programs and non-profits have in finding and hiring a Development Director and the importance of the role to the program, NLSLA has decided to engage a consultant, Martin Shirley & Associates, to help it recruit and interview qualified Development Director applicants. Mr. Shirley is an expert in recruiting development directors for Los Angeles area non-profits and has worked successfully with many prominent non-profits in the community.

The costs of engaging Mr. Shirley can be absorbed within the funds NLSLA has already set aside for the Development Director salary in 2014. Thus, the hiring will not impact NLSLA's budget. Mr. Shirley will begin work immediately and by mid-February will have a pool of 6-8 applicants for NLSLA to consider.

Thank you for visiting NLSLA and for providing thoughtful feedback and recommendation in the PVQ Report. We appreciate you taking our comments and responses under consideration.

Sincerely,



Neal S. Dudovitz
Executive Director



Yvonne Maria Jimenez
Deputy Director