

NORTHWESTERN LEGAL SERVICES

*Renaissance Centre
1001 State Street, Suite 700
Erie, Pennsylvania 16501-1828*

(814) 452-6949 Ext. 123
Toll Free (800) 753-5704

www.nwls.org
Fax: (814) 452-3734

Robert A. Oakley, Executive Director

Matthew W. McCullough, Board President

February 26, 2014

John C. Eidleman, Program Counsel
Office of Program Performance
Legal Services Corporation
3333 K Street, NW 3rd Floor
Washington, DC 20007-3522

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PROGRAM PERFORMANCE
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**RE: Comments to the Draft Report - Program Quality Visit
November 18-22, 2013
Recipient #339111**

Dear Mr. Eidleman:

This letter will serve as our comments to the above referenced draft report.

Summary of Findings, page 2, third paragraph

NWLS does use outcome measurements which we call main benefits for all cases not just SSI, unemployment and housing practices. In the Prime client data base, the "outcomes" reflect if a case is won, lost, settled, etc. This probably caused the confusion. A listing of the mail benefit form is appended hereto as Attachment 1. T closure, this form is completed for all cases.

Summary of Findings, page 3, first paragraph

Collaborations, outreach and meetings also include housing counselors and mortgage foreclosure assistance workers.

Summary of Findings, page 3, first paragraph

NWLS has fifteen attorneys including the executive director.

Summary of Findings, page 4, fourth paragraph

NWLS has a 31 person board.

Summary of Findings, page 4, fifth paragraph

The NWLS executive director has been in legal services 37 years including 19 years as the NWLS executive director.

Findings and Recommendations, Performance Area One, Criteria 3, Finding 3, page 7

NWLS does use outcome measurements which we call main benefits for all cases not just SSI, unemployment and housing practices. This was discussed above. A listing is appended hereto as Attachment 1.

Findings and Recommendations, Performance Area Two, Criteria 1, Finding 5.1, page 8

Client surveys are sent to all clients. The online intake clients are sent the survey form as opposed to a survey monkey type survey.

Findings and Recommendations, Performance Area Two, Criteria 1, Finding 5.2, page 9

The CIU staff does receive regular, informal feedback about their performance.

Findings and Recommendations, Performance Area Two, Criteria 2&3, Finding 6, page 9

NWLS also works with housing counselors and other providers that interface with our client community.

Findings and Recommendations, Performance Area Three, Criteria 1, Finding 8, page 10

Please correct NLSA to NWLS.

NWLS has 15 attorneys including the executive director. The executive director has 37 years experience.

Findings and Recommendations, Performance Area Three, Criteria 1, Finding 10.2, page 13

This recommendation will offer a significant challenge as the “experts” are located all around the service area. Further, it would increase administrative time and further limit time spent on their own caseloads. The Recommendation III.1.10.1 may be the better method of development.

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Findings and Recommendations, Performance Area Three, Criteria 1, Finding 12.1, page 14

PLAN will not provide separate funding to send NWLS attorneys to national substantive training events.

Findings and Recommendations, Performance Area Three, Criteria 2, Finding 13, page 15

In the third full paragraph, the last sentence, the NWLS managing attorney in Warren County was the former president of the Warren County Bar Association.

If any further clarification is necessary, please feel free to contact us.

Thank you for your attention to this matter.

Very truly yours,

NORTHWESTERN LEGAL SERVICES



Robert A. Oakley, Esq.
Executive Director

ATTACHMENT #1

MAINBENEFIT	PCODE	MAINBENEFITNAME
0		0 No Main Benefit for Client
101		1 Obtained federal bankruptcy protection
102		1 Debt Payment Negotiated
103		1 Debt Avoided/Money Saved
170		1 Bankruptcy file for mortgage in arrears
171		1 Avoided foreclosure or other loss of home
172		1 Extended time in the home for reasons other than avoiding foreclosure
173		1 Obtained advice and/or limited services about mortgage foreclosure
174		1 HEMAP assistance received
201		2 Stopped debt collection harassment
301		3 Overcame illegal sales contracts and/or warranties
401		4 Overcame discrimination in obtaining credit
501		5 Prevented or overcame utility termination
601		6 Loans/Installment Purch.
701		7 Prevented or overcame utility termination
801		8 Unfair Sales Practices
901		9 Obtained advice, brief services or referral on Consumer matter
1101		11 Overcame suspension or expulsion
1102		11 Obtained right to special education
1103		11 Obtained advice, brief services or referral on an Ed. matter
1104		11 Educational Program Obtained/Preserved
1105		11 Educational Appropriateness Improved
2101		21 Overcame job discrimination
2201		22 Obtained wages due
2901		29 Prevented wrongful discharge
2902		29 Prevented illegal taking of employment benefit, e.g., pensions
2903		29 Obtained advice, brief services or referral on Emp. matter
3001		30 Successful Adoption
3101		31 Obtained or maintained custody of children
3102		31 Obtained or preserved right to visitation
3201		32 Obtained a divorce, legal sep., or annulment
3301		33 Guardianship / Conserv.Obtained guardianship for disabled adult
3302		33 Obtained guardianship for adoption for dependant child
3401		34 Name Change
3501		35 Prevented termination of parental rights
3601		36 Established paternity for a child
3701		37 Obtained protective order for victim of domestic violence
3801		38 Obtained, preserved or increased child support
3901		39 Obtained advice, brief services or referral on a Family matter
4101		41 Delinquent

4201	42 Obtained benefits of emancipation
4202	42 Obtained child protective order
4203	42 Obtained advice, brief services or referral on Juvenile matter
4901	49 Other Juvenile
5101	51 Gained access to Medicare or Medicaid provider
5201	52 Obtained/preserved/increased Medicare or Medicaid benefits/rights
5901	59 Obtained benefits of EPSDT program
5902	59 Prevented premature hospital discharge
5903	59 Prevented nursing home abuse or assured nursing home quality care
5904	59 Overcame denial of admission to emergency room
5905	59 Stopped harmful medical treatment
5906	59 Obtained health or disability insurance
5907	59 Obtained advice, brief services or referral on a Health matter
5908	59 Medical Benefits Obtained/Preserved
5909	59 Medical Treatment Obtained/Preserved/Improved
6101	61 Obtained access to housing
6201	62 Avoided foreclosure or other loss of home
6272	62 Extended time in the home for reasons other than avoiding foreclosure
6274	62 HEMAP assistance received
6275	62 Cured arrears other than through HEMAP assistance
6276	62 Client agreed to leave house
6277	62 Client forced to leave house-sheriff sale or other reason
6285	62 Counseled and/or referred to other agency
6301	63 Prevented eviction
6302	63 Overcame illegal charges by landlord
6303	63 Overcame denial of tenant's rights under lease
6304	63 Enforced tenant's rights to decent, habitable housing
6305	63 Obtained repairs to dwelling
6306	63 Housing/Shelter Preserved
6307	63 Housing/Conditions Improved
6401	64 Prevented denial of public housing tenant's rights
6701	67 Avoided foreclosure or other loss of home
6772	67 Extended time in the home for reasons other than avoiding foreclosure
6773	67 Obtained advice and/or limited services about mortgage foreclosure
6774	67 HEMAP assistance received
6775	67 Cured arrears other than through HEMAP assistance
6776	67 Client agreed to leave house
6777	67 Client forced to leave house-shefiff sale or other reason
6778	67 National mortgage settlement used
6779	67 Mortgage refinanced (includes reverse mortgage)
6780	67 Mortgage modified with HEMAP

6781	67 Mortgage modified with reduction of payment/PITI <32% income
6782	67 Mortgage modified with PITI >31% income or higher payment
6785	67 Counseled and/or referred to other agency
6801	68 Avoided foreclosure or other loss of home
6872	68 Extended time in the home for reasons other than avoiding foreclosure
6873	68 Obtained advice and/or limited services about mortgage foreclosure
6874	68 HEMAP assistance received
6875	68 Cured arrears other than through HEMAP assistance
6876	68 Client agreed to leave house
6877	68 Client forced to leave house-sheriff sale or other reason
6878	68 National mortgage settlement
6879	68 Mortgage refinanced (includes reverse mortgage)
6880	68 Mortgage modified with HEMAP
6881	68 Mortgage modified with reduction of payment/PITI <32% income
6882	68 Mortgage modified withPITI >31% income or higher
6885	68 Counseled and/or referred to other agency
6901	69 Prevented illegal discrimination in obtaining housing
6902	69 Obtained advice, brief services or referral on a Housing matter
7101	71 Obtained/preserved/increased AFDC/other welfare benefit/right
7201	72 Black Lung
7301	73 Obtained/preserved/increased food stamps eligibility/right
7401	74 Social Security
7501	75 Obtained/preserved/increased SSI/SSD benefit/right
7601	76 Obtained/preserved/increased Unemployment comp. benefit/right
7701	77 Obtained/preserved/increased Veterans Benefits
7801	78 Obtained/preserved/increased Worker's Compensation
7901	79 Obtained advice, brief services or referral on an Income M. matter
8101	81 Immigrant avoided deportation
8102	81 Undocumented immigrant obtained legal status
8103	81 Immigrant family unit kept intact
8201	82 Mental Health
8301	83 Prisoner's Rights
8401	84 Obtained/preserved/increased benefits/rights of disabled persons
8402	84 Obtained/preserved/increased benefits/rights of instit. persons
8901	89 Obtained advice, brief services or referral on an Ind. Rights matter
9101	91 Obtained incorporation/tax exempt status
9102	91 Obtained assistance with other structural or governance issues.
9201	92 Indian / Tribal Law
9301	93 Overcame illegal taking of or restriction to a driver's license
9401	94 Defended a Torts action
9501	95 Obtained a will

9502	95	Obtained a living will or health proxy or power of attorney
9900	99	Illegal Activity Stopped (Non-PFA)
9901	99	Obtained other benefit
9902	99	Income Obtained/Preserved
9903	99	Essential Property Regained/Preserved
9904	99	Right/Privilege/Benefit Obtained/Preserved
9905	99	Money Won for Clients
9906	99	Money Won/Saved for Government
9907	99	Community Education Provided
9908	99	Individuals Advised/Informed
9909	99	Individuals Represented

OUTCOME	OUTCOMEN	upsiz_e_ts
A	Advice	
L	Lost	
M	Mixed Result	
N	Not Apply	
W	Won	