



Coast to Coast[®]
Legal Aid
of South Florida, Inc.

March 8, 2012

Willie Abrams
Program Counsel
Legal Services Corporation
3333 K Street N.W., 2nd Floor
Washington, D.C. 20007

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Barbara J. Prager
Executive Director

Dear Mr. Abrams:

I am in receipt of LSC's Draft Report on the Program Quality Visit to Coast to Coast Legal Aid of South Florida, Inc. in October 2011. I thought that the Report was a fair assessment of our program's strengths and challenges. We will certainly use the Recommendations in the Draft Report to improve our services to the client community. On behalf of our board and staff, please accept my thanks to you and the members of your team for all of your efforts.

In accordance with LSC's letter of February 13, 2012, our comments to the Draft Report are set forth below:

1. Page 13 of the Draft Report states that the senior and public benefits units allow walk-ins in the broadest sense. That is not completely correct. The public benefits unit does not allow walk-ins unless it is an emergency or there is another factor (e.g., applicant's problem relates to a systemic issue or the applicant has transportation problems) that would dictate seeing an applicant who walks into the office.
2. Page 20 of the Draft Report states that the pro bono projects prescreen cases for merit and financial eligibility. Cases that are referred to the pro bono projects by CCLA and LAS staff are initially screened for merit and financial eligibility by staff. Those matters that are referred for the Advice and Counsel Hotline or for a clinic or referred due to a conflict are screened for merit and financial eligibility by pro bono staff.
3. Page 21 of the Draft Report states that a client satisfaction survey is used by the Collier pro bono project, but not in Broward. That is not correct. The Broward pro bono project also mails a survey to each pro bono client with a closing letter.

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4. Page 21 of the Draft Report states that the Advice and Counsel Hotline will provide advice to clients one to two days per month. The initial goal is to provide advice to clients one day per week and increase the frequency to two days a week, depending upon the number of pro bono attorneys or law firms that agree to participate.
5. Page 21 of the Draft Report states that Collier County has many small towns and there is a very small pool of practitioners to pull from for direct representation and legal clinics. Collier County has a large rural component, rather than many small towns. There is an ample pool of practitioners in some areas (such as, trusts and estates), but relatively few practitioners who handle family law cases.
6. On February 22, 2012, we had a conversation about Recommendation III.2.16.5 on page 22 of the Draft Report. You indicated that there was some concern about CCLA's role with respect to the pro bono projects, since no employee of CCLA was actively involved in the development department, and CCLA is ultimately responsible for pro bono activities. In that regard, please note the following:
 - a. Although the pro bono projects are administered by LASBC, CCLA's executive director is involved in the decision making process with respect to pro bono activities.
 - b. The percentage of LSC eligible clients served by the pro bono projects was 88 percent in 2009, 85 percent in 2010 and 90 percent in 2011 (based on cases closed for each year).
7. Page 22 of the Draft Report states that Family Law Unit attorneys are members of the local domestic violence commission and on the board of Women in Distress. Family Law Unit attorneys are members of the Broward Domestic Violence Council and the Broward Victims Rights Coalition and hold (or have held) board positions for these organizations. The attorneys and other staff in the Family Law Unit work closely with Women in Distress, the local women's shelter. However, none of our attorneys are members of their board.
8. Page 22 of the Draft Report states that the public benefits unit has a unique relationship with the local social service agency wherein joint clients have a special

number to call if there is an issue with their case. Actually, it is the attorneys in the public benefits unit who have access to a special number, not their clients.

9. Page 23 of the Draft Report states that a meeting agenda and a board packet are provided to all members via e-mail and U.S. mail prior to the meetings. Only those board members who do not have an e-mail address are provided a packet by U.S. mail.
10. Page 24-25 of the Draft Report states that members of the CCLA board and the LASBC board serve on the exact same board committees. The membership of some board committees, such as the Audit and Finance Committee, are the same for CCLA and LASBC board members. However, the membership of other committees, such as the Eligibility Committee and the Personnel Committee, are composed of different board members. In addition, CCLA has a Program Integrity Committee, the purpose of which is to ensure compliance with the LSC program integrity regulation. There is no parallel committee on the LASBC board.
11. Page 30 of the Draft Report states that CCLA's executive director serves as Chair of the Florida Project Directors Association retrenchment subcommittee. That statement is not accurate. CCLA's executive director participated on the design committee for a retrenchment seminar sponsored by the Florida Bar Foundation in September 2011. CCLA's executive director is the Chair of the Florida Project Directors Association's LSC Committee.

Thank you again for your efforts on behalf of Coast to Coast Legal Aid of South Florida. Please do not hesitate to contact me if you have any questions.

Sincerely,


Barbara J. Prager
Executive Director