

**Response of Legal Aid of Western Missouri to the
Draft Report from the Program Quality Visit to LAWMO of
June 6-10, 2011**

Legal Aid of Western Missouri greatly appreciates the time and effort of the Office of Program Performance team that visited our offices on June 6-10. We plan on making substantial changes to our program consistent with the team's recommendations. Many of those efforts are already underway.

There are, however, a number of factual assertions that are made in the draft report that we believe are inaccurate. This response addresses those inaccuracies, some of which are relatively minor and others deal with important issues.

We welcome the opportunity to work further with LSC on the changes recommended by the OPP team to make sure that they result in substantially better service for our clients and a better place to work for our staff.

Factual Inaccuracies That We Ask Be Corrected In The Final Report

Summary of Findings: In its Summary of Findings, the team states that LAWMO has an under-investment in technology. When the OPP team was at LAWMO, we specifically asked that the team compare LAWMO's investment in technology to other comparably sized organizations—both in terms of our financial investment and our staffing. After the visit, the OPP team let us know that LAWMO's investment in technology is comparable, both in terms of funding and staff resources allocated, to other comparably sized Legal Aid programs. Accordingly, we would respectfully submit that LAWMO is not under-invested in technology.

With this said, LAWMO is committed to making upgrades in its IT resources to improve our representation of our clients and to improve the work environment for our staff.

Another statement in the Summary of Findings that we respectfully submit is inaccurate is that our most recent strategic plan process was not focused on in-depth analysis of community and client challenges or mission-related questions. The foundation of our strategic planning process was a needs assessment that involved numerous focus groups including staff, community stakeholders and clients. Before conducting this needs assessment, we conferred with several other high functioning Legal Aid programs and, from those discussions, reached the conclusion that the needs assessment we conducted was the most meaningful and accurate means of assessing client needs that we could reasonably conduct.

Furthermore, the entire plan is, in-fact, mission driven and the changes that we have made as a result of the plan are helping us serve more clients, more effectively and retain high quality staff—all of which are mission driven outcomes.

Please also note that recently reported census data shows that there are now more than 340,000 people living in poverty in our service area (rather than 280,000 as stated in the first line on page 2).

Finding 3: This finding states that the work of the Resource Allocation Committee thus far has consisted of intake data review and meetings and quarterly written reports about "client need" from supervisors and managers. This overlooks the most important work of the committee, which has been to organize and gather information from stakeholder meetings to determine legal needs of clients on an ongoing basis.

In late 2010 and early 2011, the Resource Allocation Committee organized one-on-one staff interviews of the leadership of more than 50 stakeholder agencies throughout western Missouri. The committee gathered and distilled notes from all of these meetings, which provide excellent insight into the many diverse needs of our client populations. The Resource Allocation Committees work is a reflection of the client-centered approach that LAWMO has in its work and of our dedication to making sure that we are closely tracking the changing needs of our clients and have the ability and willingness to adjust our services to meet those needs.

Finding 6: We agree that intake is a challenge for our organization, particularly in the central office, where the volume of calls that we receive every day is tremendously challenging. We welcome the opportunity to learn about any more effective intake systems that are available.

A number of statements in the draft report, however, are not accurate. "Intake is supervised by the office computer specialist who spends 10% of her time supervising intake." It is correct that, in LAWMO's central office our Computer Supervisor oversees the initial screening of client calls. Substantive intake, however, is supervised by each of the supervising and managing attorneys for the respective teams and offices to which the calls are referred for full intake. For example, intake for landlord-tenant cases is supervised by the supervising attorney for LAWMO's Housing team.

Each office has implemented their intake procedures in the method that the managing attorney for the office believes to be most efficient for the office. In the central office, for example, a centralized intake system requires that all initial information be entered at the point that the client calls us. Other offices have developed different approaches to obtaining client data due to their office choices. All offices and remote users have the capability of entering new client records and maintaining them. We have determined that the method of obtaining and maintaining client records is the most efficient for our offices. However, we will be reviewing other options to determine if other methods may provide us with more efficiency.

Finding 6 in the draft report also states that Zasu (which the draft report mistakenly refers to as "Zazu") does not allow middle managers and front line staff ease of access to data. This is incorrect. Everyone who is involved in civil representation at LAWMO has full access to the data that is in Zasu and any staff member can review any civil file at any time. It is true, however, that the ability to prepare cumulative reports about case results and client demographics is limited to a small number of staff members. This is an issue that we hope to address in the relatively near future.

Finding 6 of the draft report refers problems encountered by LAWMO's MLP team in tracking data. It is true that Zasu was not originally designed to track the many levels of data-- like source of a referral and the primary diagnosis of patients-- that are needed for a high functioning MLP. This led to the hand-tracking of client data for the MLP. The MLP team leader brought this issue to the attention of LAWMO's Technology Director in late 2010 and, working, closely with the MLP Director, the Technology Director has made major changes to the Zasu system used by the MLP team. This process was well under way at the time of the OPP visit and the conversion should be complete by the end of the year. With these changes, the MLP team will readily be able to track all of the data that is useful for its work. While the frustration of the MLP team at having to hand-track client statistics prior to these changes is understandable, the omission of discussion of these major changes in the system makes an area of major tech improvement for our program inaccurately look like an example of a failed tech system and does not accurately reflect the actual circumstances in our program.

We also note that the vast majority of LAWMO staff members use Zasu and the vast majority of supervisors require their staff to do so. Furthermore, all cases are closed and opened in Zasu. A small number of attorneys, most of whom are highly respected veteran attorneys, have admittedly had difficulty in adapting to any form of CMS and some have been allowed leeway in not entering notes from their day-to-day casework in Zasu.

Finally, the report states that, to close a case, administrators are required to refer to large three-ring binders. This simply is not the case. Outcome codes are maintained on a single two-sided sheet of paper. While it is true that, in rare circumstances, a staff member might need to refer to detailed CSR compliance instructions, that would be true regardless of whether staff were offered drop-down boxes. From a practical perspective, LAWMO staff, who are regularly involved in the case closing process, know the applicable codes and do not need to refer to anything to enter the correct codes. At most, they may need to refer to a single sheet of paper. Nonetheless, we will look at the possibility of adding more drop-down boxes to our CMS as part of our intake review and improvements.

Finding 7: The draft report states: "the program is implementing plans to move to a referral-only model of intake in Kansas City". This is inaccurate. LAWMO has implemented a process to substantially increase the number of referrals that we receive in domestic violence cases from domestic violence shelters. LAWMO will continue to take direct intakes from potential clients for Protective Order cases and, where appropriate, to refer Protective Order clients in-house for representation in divorces and child custody cases. We will also continue to accept calls from clients who are victims of domestic violence and have been sued for divorce or child custody. Only in situations in which a domestic violence victim already has a Protective Order and has not been sued for divorce or child custody are we requiring that cases be referred from domestic violence shelters. Our front line staff, working in collaboration with the domestic violence shelters, have determined that this change in our intake system will: allow LAWMO to serve more victims of domestic violence; assure that we are serving the victims that are in the greatest need; increase the likelihood that we are serving victims in difficult to serve populations, such as clients who do not speak English or may have mental health issues; and decrease the likelihood that clients will withdraw from representation before their case has been completed. We are excited about this change and believe that it will greatly improve our ability to serve our clients. LAWMO has no current plan to expand this change beyond our domestic violence prevention team. For all other practice areas, for the foreseeable future, we plan on continuing to accept cases directly from clients who call in or come in to our offices seeking assistance.

Finding 9: As discussed in our response to the team's summary findings, we believe that LAWMO's commitment to technology is neither under-funded nor under-staffed when compared with comparable Legal Aid programs. With this said, in light of the team's findings, we are seriously considering ways to improve our tech system to improve our ability to serve our clients and improve work place quality for our staff.

We would note that there are several factual inaccuracies contained in Finding 9. First, all case handling attorneys and paralegals have 24 hour access to Westlaw, which is unlimited, to State and Federal research data bases. In addition, staff have access to "Fast Case" and "Loislaw." In no way is their online legal research limited.

All of our computers have a CD drives, at minimum. All computers purchased in the last four years have writable DVD drives and the majority of our current computers have writable DVD drives.

Our staff members participate in webinars on a weekly basis. Some webinars may require the installation of software to view the webinar. When this happens, the necessary software can be installed with the assistance of the tech staff.

Finding 14: Although LAWMO uses open source technology, none of the systems are outdated or obsolete. LAWMO's technology infrastructure is based upon traditional Microsoft software which is not outdated or obsolete. Of the three primary network servers, one is less than a year old and the other two are approximately two and one-half years old. They have been installed and maintained by outside consultants who are Microsoft certified engineers. The installation was done at low cost by utilizing software available from Tech Soup. LAWMO also has a complete program-wide network, which includes our CMS system. All of our staff has access to this system. Case data for our Muni Court team is segregated from other LAWMO case data for conflicts purposes.

The report correctly states that LAWMO lacks a complete program-wide backup system for pleadings and other word documents and similar files. We agree there is a need to regularly backup and secure these files. We are working with outside consultants to determine alternatives to our current system.

Firewall and security patches are promptly and systematically applied for all components of our network. Our firewalls are Cisco ASA devices which are maintained by an outside network security firm. They regularly apply necessary patches to the Cisco devices in order to assure that our network is secure.

Similarly, security and Microsoft software updates are automatically installed on all workstations through a Microsoft WSUS server. This update server was installed by a Microsoft certified engineer and remotely and silently updates all computer workstations. Many end users do not realize that their computers are updated since updates are installed automatically without their knowledge. We have recently upgraded our entire virus protection system.

LAWMO has two email systems which serve different purposes. For all general information and public communication, LAWMO has a traditional email system which can be accessed internally and can also be accessed outside the office using a web interface. This email is hosted by a cloud-based email service. LAWMO has also developed an internal email system for the communication of client-related data which can be only accessed within LAWMO's network. This system is implemented to comply with the Missouri Rules of Professional Responsibility. These rules prohibit unencrypted email communication regarding client information unless the client has agreed to this individually, following a one-on-one discussion with the client about the risks involved. The internal email system used for client data cannot be inadvertently routed over the internet; therefore, it satisfies the Missouri Rules of Professional Responsibility.

Some of our staff attorneys do need laptops for work responsibilities, and those identified have been provided with new laptops. We will revisit this issue with supervisors to determine if there is a greater need for laptops.

We agree that all offices should have basic scanning ability. We have recognized this as a need and are in the process of replacing all of our office copy systems, so all offices will have state of the art network scanners. This process should be completed by the end of the year.

The draft report states that when the deputy director worked in LAWMO's Joplin office in the aftermath of the tornado, she had no access to email the entire time in the midst of the crisis. This is inaccurate. She did have access to her external email and had the opportunity to ask LAWMO staff to send their non-confidential e-mails to her through the external e-mail system. It is not uncommon for staff to use the external e-mail system for e-mails to staff they know to be out of the office. Some staff members have their internal e-mails forwarded to their smart phones or other accounts for ease of access.

While some attorneys, units and offices use paper calendars, that is a matter of staff choice. We have fully functional calendar systems that can be used for docketing and other scheduling available to all staff. Some staff believe it is more effective to use paper calendars. We have, admittedly, not forced staff to convert to computer only calendaring.

As mentioned above, LAWMO's network system was set up by outside consultants who are certified in Microsoft technology. The consultants we have worked with for the past few years are completely familiar with our system and have assisted us with implementation of improvements to our core network. All of our workstations are traditional Microsoft workstations using typical office software which is utilized by the vast majority of corporations. Our primary email system is maintained by a cloud-based service. While the departure of any IT staff member would cause inconvenience, there are computer professionals readily available who can fulfill all of our technology requirements.

The case management system does have a module to create reports and statistical computations for administrative purposes. This is utilized by IT and the development section but has not been provided to all supervisors. We will review this with supervisors and make sure that all have access to necessary reporting functions.

The draft report states that our two part-time IT staff members each have other near full-time jobs that are unrelated to IT. This is incorrect. Our Computer Supervisor devotes 90% of her time to IT.

Finding 16: The Medicaid recovery project generates approximately \$700,000 per year in funding for LAWMO, as opposed to the \$300,000 reported.

Migrant Finding 1: Contrary to the draft report's statement, LAWMO's 2009 strategic planning process did include a comprehensive legal needs assessment that emphasized focused groups composed primarily of major service

providers for low-income people who are likely to need civil legal assistance, LAWMO staff members, LAWMO clients and other community stakeholders. The fact that no migrant clients were included in the focus group discussions was an oversight, which we will correct in our next round of strategic planning.

Migrant Finding 3: This finding states that LAWMO has limited presence in all areas of the state where migrant farmworkers are present during the harvesting season and, accordingly, states that LAWMO should be doing more outreach throughout the state. This finding overlooks the fact that LAWMO receives relatively little funding for this work. Our total Migrant grant from LSC for 2010 was \$93,790. With this relatively small amount of funding, LAWMO handles hundreds of migrant cases in the two largest migrant areas in the state. We also conduct substantial outreach in many other areas of the state where smaller migrant communities may be found. The reason that we are able to handle so many cases is that we greatly leverage LSC funding, with grants, private contributions and volunteer work. To increase our targeted outreach substantially throughout the year, when we already have excellent connections with a broad array of organizations that serve migrant farmworkers throughout the state, as well as with the workers themselves, would require us to reduce the highly effective services that we are providing. Accordingly, we respectfully submit that Migrant Finding 3 does not reflect the reality of LAWMO's MFP.

Migrant Finding 4: This finding states: "Employment issues and employment related legal needs are not program priorities and therefore are not addressed by the project." This is simply not the case. LAWMO's MFP staff are committed to providing holistic legal services to migrant farmworkers in Missouri to address any legal issue that the farmworkers may face.

In Lafayette County, where we do the bulk of our work, 75-80% of the migrant farmworkers who harvest the apple crop have been to the county in prior years. Many have been coming back with their families for many years. From our work with the staff from other migrant farmworker projects, we understand that this is unusual and the high return rate for the farmworkers may well be an indication of the relatively good working conditions in the county. We also hear from the farmworkers themselves that the housing and employment conditions for the Lafayette County apple harvest are much better than at the other places to which they travel during the year.

LAWMO's migrant staff have handled immigration cases for approximately 150 of the farmworkers in Lafayette County. Our staff spend a great deal of time with them, both at migrant camps and away from migrant camps. They tend to speak openly with our staff and we

believe that if there were wage or work condition issues that they were facing, they would have brought them to our attention and they have not done so.

One thing that is unusual about the Lafayette County camps is that all of the orchards pay the workers by check, rather than in cash and pay the workers directly rather than providing payments to their respective crew leaders. Cash payments are common in migrant camps in other states, particularly where a high percentage of the work force is not legally in the United States. The cash payments make it much easier for farm owners and crew leaders to short their workers the money they owe them. Payment by check, and directly to the worker, makes it much easier to confirm that payments are accurate and that there is no inappropriate coercion from the crew leaders. LAWMO staff have many occasions in our legal work to see and make copies of pay check stubs from the workers from all of the orchards.

In terms of workplace conditions, our staff are generally aware of the requirements of the Migrant and Seasonal Farmworker Protection Act regarding housing, labor contractor rules, spraying pesticides and chemicals and potable water standards. We distribute Department of Labor Spanish booklets and bookmarks with information about the protection standards and contact information for DOL and for Legal Aid. Our DOL contact is Grant Wallace, investigator: (913) 551-5724 ext. 231. We do not have much regular contact with Mr. Wallace other than to obtain the materials to hand out. We also have plastic cards from the Mexican Consulate office in Kansas City and have contact with Protection Division (Adriana Villarreal, 816-556-0800). Although we have not had workers talk to our staff about violations in Lafayette County, the DOL materials and Mexican Consulate materials both have 1-800 numbers to reach them if the workers find violations in any location where they work and travel and the DOL and consulate both know to refer any such cases to our staff.

Our migrant staff also conduct training for all Lafayette County migrant farmworkers about pesticide safety. We do this with permission from all the orchard owners and with materials from the state of Missouri pesticide enforcement staff, as well as federal EPA materials. The orchards allow us to do the training on-site and we specifically show the workers the chemicals that some of them will be using and talk with them about appropriate use and safety precautions. In all of this work, we have not seen or been told about any actions by the orchards that are in violation of applicable law. We are also at the orchards often enough to see that they are complying with water availability requirements for workers.

With this said, if we were made aware of wage or condition issues, we stand ready, willing and able to address those issues. We would welcome LSC staff to come to Lafayette County and witness for yourselves the conditions that we have worked hard to create for the migrant farmworkers there. Another source who you might talk with is Paul Andre, from the Missouri Department of Agriculture, Pesticide Division. We work with him on a regular basis for information and materials for our pesticide training and his inspection of sites in Missouri. You can reach him at (573)751-9334.

While the migrant farmworker population in Lafayette County for the apple season includes about 500 workers and we are the primary service provider in direct contact with those workers, the migrant population in Missouri's Bootheel, has about 3,000 workers. Those workers tend to stay for much shorter periods of time than do the workers in the apple orchards. Workers in the orchards tend to stay in Lafayette County for approximately 3 months each year.

In the Bootheel, with a much larger migrant population, there are also several other frontline service providers that deal with access to medical care and education for farmworkers and their children in that part of the state. Even with the work of these other organizations, LAWMO still handles about 50 cases per year for migrant farmworkers in the Bootheel. As in Lafayette County, we do not see and are not aware of many issues involving unlawful wage or work conditions in the Bootheel. We are in frequent phone contact with members of the Alliance for Farmworkers' Concerns in the Bootheel and believe that if they were aware of compensation or work place violations, they would let us know about them. You are welcome to have your staff talk with AFC members about the conditions there. We suggest you speak with Sandy Self at UMOS (United Migrant Opportunity Services ((573)888-5266)) or Ludy Lopez at MWHO (Migrant Whole Health Outreach ((573)888-9044)).

In all of this, we note that we are not saying that the conditions for farmworkers in Missouri are ideal or even good. As you know, there are no wage and hour laws for farmworkers who are in the fields. So, the effective hourly wage of farmworkers is very low and the hours that they work are often long, but they are not unlawful. We pride ourselves in our close and regular contact and high level of trust with Missouri's farmworkers and the other supporting organizations that provide services to them. We believe that if there was unlawful conduct, we would know about it.

We also note that there are not many other migrant farmworker labor camps in Missouri. We stay in contact with the much smaller camps that we are aware of by phone and make sure that the churches and others in

those areas know how to reach LAWMO when legal needs of workers in those camps arise. These include: small orchards near Osceola, St. Joseph, Marthasville; tobacco barns in Platte County; and, fruit tree farms in Lincoln County.

Action Plan in Response to LCS's Recommendations

Recommendation 1.1.3.1: Where possible, the implementation of the current strategic plan should incorporate an in depth analysis of client and community needs. The development of future plans should include a process to crystallize a shared mission and vision for the organization.

Action Steps:

1. LAWMO plans to begin the process of either reviewing and revising its current strategic plan or developing an entirely new strategic plan in 2012. In preparation for the planning process, we will conduct multiple focus group sessions with a broad range of other service providers to low-income individuals throughout LAWMO's service area. We will also continue the process of having one-on-one interviews with other service providers. We will also conduct focus group meetings with clients and potential clients in a broad array of practice areas, including migrant farmworkers.
2. In its next strategic planning process, LAWMO will specifically review the mission and the vision of our organization to assure that all of our staff have a shared mission and vision.

Recommendation 11.1.6.1: LAWMO should establish a program-wide effort to analyze intake across the organization and consider how it could be better coordinated and streamlined in a manner that reinforces a client-centered approach and is sensitive to their individual circumstances.

Action Steps:

1. LAWMO has already requested that LSC identify one or two Legal Aid programs from around the country that have highly effective intake systems. We made this request at the close of the OPP inspection in June. Once we have received these referrals, we will closely analyze the intake systems of these other programs and do our best to adopt the best practices that they use that are suitable for our program. We will also seek similar information from NLADA and/or MIE.
2. By December 1, 2011, LAWMO will form a program-wide intake review team to analyze problems with LAWMO's intake system and best practices in other programs. By May 30, 2012, the intake review team will propose and, after discussion and feedback from all staff, the board will adopt a strategy for improving LAWMO's intake system to better serve our clients. The strategy will include specific action steps and deadlines for implementing the changes.
3. LAWMO has already secured a \$92,780, one-time grant to replace its existing phone system. LAWMO will use the information we obtain from other programs

to make sure that the new phone system is as effective of a tool as possible to improve our intake system.

Recommendation III.1b.10.1: LAWMO should review its legal work and technology systems to develop a more uniform and efficient approach that meets its need to build long term advocacy capacity.

Action Steps:

1. LAWMO has already requested that LSC identify one or two Legal Aid programs from around the country that have highly effective tech systems. We made this request at the close of the OPP inspection in June. Once we have received these referrals, we will closely analyze the tech systems of these other programs and do our best to adopt the best practices that they use that are suitable for our program. We will also seek similar information from NLADA and/or MIE.
2. By November 1, 2011, LAWMO will reactivate a program-wide tech review team to analyze problems with LAWMO's tech system and best practices in other programs. By May 30, 2012, the Tech review team will propose and, after discussion and feedback from all staff, the board will adopt a strategy for improving LAWMO's tech system to better serve our clients. The strategy will include specific action steps and deadlines for implementing the changes.
3. LAWMO will work with its staff and supervisors to develop a system to consider ways to improve communications among attorneys in shared practice areas to make sure that they are keeping track of best practices, changes, common issues and opportunities for high impact litigation within that practice area.
4. In 2013, LAWMO's Work Place Quality committee will work on identifying and implementing best practices and uniform program standards in the area of new attorney training and development.

Recommendation IV.2.13.1: LAWMO's leadership and management should make a focused effort to work more cohesively as a team, based on a shared vision for the program. This includes increasing communication, trust and support for each other and for staff.

We respectfully submit that LAWMO's leadership and management already works cohesively as a team, based on a shared vision for the program, in the vast majority of issues we address. Nonetheless, we will continue to work to strengthen the team bond and shared vision by:

1. Continuing to engage a management consultant to improve the cohesiveness and teamwork of the management team.

2. Investigate the possibility of adding a managing attorney from outside of the Kansas City area on the administrative leadership team. A decision in this regard will be made by February 1, 2012.
3. In its next strategic planning process, LAWMO will specifically review the mission and the vision of our organization to assure that all of our staff have a shared mission and vision.

Recommendation IV.3.14.1: LAWMO should retain a technology consultant to review and audit their current technology systems and report to LAWMO and LSC critical areas for immediate investment and longer term technology investments over the next five years

Action Steps:

In addition to the actions steps discussed in regard to Recommendation III.1b.10.1 above, LAWMO will:

1. Retain a tech expert before January 1, 2012 to review and audit our current technology systems and report to LAWMO and LSC any critical areas for immediate investment and longer term technology investments over the next five years.

Migrant Recommendation I.1.1.1: Where possible, the implementation of the current strategic plan should incorporate more in depth analysis of migrant client and community needs, placing a primary emphasis on these interests. The development of future plans should include a comprehensive legal needs assessment which includes the perspective of migrant farmworkers throughout Missouri and especially in the Bootheel region.

Action steps:

1. In LAWMO's upcoming strategic planning process, we will include the perspective of migrant farmworkers, including farmworkers in the Bootheel region. The focus group will be led by a person who is fluent in Spanish and has a high level of cultural competency and familiarity with the farmworkers in the region, so they will feel comfortable expressing their interests and concerns.

Migrant Recommendation II.2.3.1: To address some of these potential barriers, LAWMO should consider increased and targeted outreach to the farmworker population in the various crops during the season and inform migrant farmworkers and the organization that work with this population in the Bootheel that MFP can assist with employment-related legal problems.

Action steps:

1. Since the OPP site visit in June, LAWMO staff has made 6-8 presentations, primarily in the Bootheel area, about services that are available through LAWMO. These presentations included detailed discussion about LAWMO's ability to assist with employment-related legal problems. LAWMO will continue to have similar outreach sessions every year.

Migrant Recommendation III.1c.4.1: LAWMO should build its capacity to address the legal needs of migrant farmworkers in employment-related areas such as wages, working conditions and farmworkers housing.

Action Steps:

1. Since the OPP site visit in June, LAWMO staff has made 6-8 presentations, primarily in the Bootheel area, about services that are available through LAWMO. These presentations included detailed discussion about LAWMO's ability to assist with employment-related legal problems. LAWMO will continue to have similar outreach sessions every year.
2. LAWMO will seek out any National Farmworker Law trainings dealing with employment-related issues and will have the MFP leader or other high-ranking staff on the project attend such trainings where reasonably feasible.

Migrant Recommendation III.1a.5.1: As the opportunity arises and to build staff capacity, LAWMO's staff should attend Farmworker law training that focuses on employment-related problems of migrant farmworkers.

Action Steps:

1. LAWMO will seek out any National Farmworker Law trainings dealing with employment-related issues and will have the MFP leader or other high-ranking staff on the project attend such trainings where reasonably feasible.