

# LAND OF LINCOLN

LEGAL ASSISTANCE FOUNDATION, INCORPORATED

REGIONAL OFFICES:

EASTERN:  
CHAMPAIGN  
SATELLITE: CHARLESTON

NORTHERN:  
SPRINGFIELD  
SATELLITE: DECATUR

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SATELLITE: MT. VERNON

WESTERN:  
ALTON

CENTRAL:  
EAST ST. LOUIS

June 18, 2013

Ms. Janet LaBella  
Director  
Office of Program Performance  
Legal Services Corporation  
3333 K Street, NW 3<sup>rd</sup> Floor  
Washington, DC 20007-3522

Dear Ms. LaBella:

Enclosed is Land of Lincoln's Response to the LSC Draft Report from our program quality visit.

Thank you again for the respectful and engaging way that you and your team conducted the visit.  
Thank you also for the helpful recommendations.

Please let me know if you have any questions regarding our response.

Sincerely,



Lois Wood  
Executive Director

LW:JT  
Enclosures  
Cc: Christy Fisher  
Ann Hatch, Board Chair



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PROGRAM PERFORMANCE  
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**Land of Lincoln Legal Assistance Foundation, Inc.**

**Response**

**Legal Services Corporation  
Office of Program Performance**

**Draft  
Program Quality Report  
for  
Land of Lincoln Legal Assistance Foundation, Inc.**

Recipient No. 514050  
April 22-26, 2013

# COMMENTS

## Program Overview

The Program and Service Area Overview section of the Report is generally accurate; however, there are several minor corrections. Land of Lincoln Legal Assistance Foundation's (LOLLAF's) total revenue for 2012 was \$7,475,037, of which \$5,076,524 was non-LSC revenue. With regard to 2012 non-LSC income, the grant from the U.S. Department of Justice to support domestic violence work was awarded effective October 1, 2012 and was a total of \$504,000 over three years. (page 3) In the next paragraph, there was no filing fee enacted in 2012 that will benefit legal services programs. (There was a filing fee add-on for residential foreclosures, but it will not benefit legal aid programs.) Also, as of this writing, a \$10 filing fee add-on is included in the Access to Justice Act of 2013 that has passed both houses of the Illinois Legislature, but is not yet signed into law. It would fund pilot programs of the Commission, but not general legal services.

At the time of the PQV visit, LOLLAF staff did total close to 100, but total attorney staff was 59, totaling 55.05 FTE's, and that includes the three attorneys in the Administrative office (Executive Director, Deputy Director, and Development Associate), as well as two VISTA attorneys and three Legal Fellows. (One attorney on the staff roster, Sheila Burton, mistakenly showed as full-time, when she is actually .4 FTE.) Also, on page 4 first full paragraph, it was after receipt of the mortgage settlement funds and renewal of our VAWA grant, that we hired 14.5 FTE's (only one part-time attorney, not two as stated).

**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. LOLLAF conducted a thorough assessment of the legal needs of the residents of its service area in 2011.***

No comment, except the 2005 legal needs study was conducted by the Lawyers Trust Fund (the Illinois IOLTA program), not LOLLAF.

***Finding 2. The program recently made efforts to articulate its vision and mission, and to develop priorities which enhance its goals while also addressing client needs.***

No comment, except the process to develop the new mission and vision statement was slightly different than described. Office meetings were held before drafts of several versions were prepared and then a menu of choices was presented for review during the conference at which Board members participated. The final versions, after discussion at the conference and

later review and adoption by the Board, were different than any of the drafts originally proposed for discussion.

***Finding 3. Land of Lincoln regularly engages in strategic planning, which involves both its staff and board.***

No comment, except LOLLAF agrees with the finding.

***Finding 4. LOLLAF is responsive to the pressing legal needs identified by its clients.***

No comment, except LOLLAF agrees with the finding.

***Finding 5. LOLLAF utilizes many opportunities to review its legal work and evaluate the results it is achieving, including self-assessments for funders and feedback from clients.***

No comment, except LOLLAF agrees with the finding.

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

***Finding 6. LOLLAF has taken steps to ensure that it is accessible to clients throughout its service area.***

No comment, except LOLLAF agrees with the finding.

***Finding 7. Land of Lincoln has made efforts to cultivate the diversity of its staff.***

No comment, except of the recently-hired foreclosure advocates, one is Asian-American and two are African-American.

***Recommendation II.1.7.1:***

***LOLLAF should continue to provide diversity and other appropriate training to its entire staff. In the process, Land of Lincoln should also continue encouraging minority and other staff, particularly those new to the program, to build and expand their working relationships.***

No comment, except LOLLAF agrees and has begun planning for a diversity or other appropriate training for its entire staff.

***Finding 8. LOLLAF's language access efforts are appropriate for its non-English speaking client population.***

No comment, except that LOLLAF does make an effort to create "plain language" materials for clients and reviews all of its fact sheets and brochures for reading level using the Flesch-Kincaid grade level measure of readability, with a goal of a level of less than 7<sup>th</sup> grade.

***Recommendation II.1.8.1\*:***

***LOLLAF should assess the readability of its posted information, as well as all its other client materials.***

LOLLAF is already doing this for written client fact sheets and brochures, and will review its website for readability, too.

***Recommendation II.1.8.2\*:***

***The program's LEP plan should be reviewed and updated to reflect more recent census data, as well as changes in the program's systems, such as its installation of Legal Server.***

No comment, except LOLLAf agrees and will be presenting an updated LEP to the Board for its approval at the June 28, 2013 meeting.

***Recommendation II.1.8.3:***

***As resources permit, Land of Lincoln should make efforts to include non-English content on its website so that individuals with language access issues understand how to obtain legal services.***

LOLLAF agrees. We will include a Spanish language page on our website about our services and how to apply. Since the statewide ILAO website has a Spanish version, we will also create a link from LOLLAf's website to that site.

***Finding 9. Land of Lincoln has a centralized telephone intake system, which is supplemented by regional office intake as well as intake conducted at outreach sites.***

No comment, except the following. In the first paragraph, the foreclosure hotline is open from 9:00 a.m. to 4:00 p.m. Also, at the top of page 13, the intake specialists do handle calls for callers with homeownership issues: eligible clients who may qualify for extended representation are transferred to the regional offices, and those eligible for advice only, are transferred to the LARC queue. As time permits, the intake specialists also conduct intake in other areas of law, and eligible callers are transferred to the LARC queue to speak to an attorney.

***Recommendation II.1.9.1\*:***

***Land of Lincoln should explore ways to enhance the intake staff's connection with the rest of the program staff. LARC staff should continue to regularly attend task force meetings. LOLLAf should also consider assigning one LARC attorney to each regional office; this would not only give each of the regions a specific contact at LARC but it would provide that there is a LARC staff person responsible for being aware of the particular legal needs of the service area.***

LARC staff will continue to attend task force meetings. In the past, LOLLAf has explored assigning LARC attorneys to be 'liaisons' with particular offices, but the part-time hours and offsite locations of the LARC attorneys did not make this practical as the point of contact for regional office staff and LARC. The LARC Managing Attorney and Senior Staff Attorney are in the office and available to regional office staff. They are also in regular contact

with the regional offices, and the offices do not hesitate to contact either of them as needed. All LARC attorneys contact regional office staff (usually the Managing Attorney) about specific cases regarding whether to refer the case.

***Recommendation II.1.9.2\*:***

***LOLLAF's intake staff should meet on a more regular basis; perhaps as an intake task force. The regional office staff who conduct intake should also participate in this group, whether in person or remotely. All intake staff would benefit from the chance to review issues and learn about substantive law changes. Such regular group discussions would also allow all the intake staff to benefit from the questions and comments of their peers. These meetings could periodically include presentations from advocates regarding the results of a specific intake.***

LOLLAF agrees that periodic meetings with appropriate staff to review intake issues would be beneficial and ensure consistency in eligibility determinations. During the 2011 planning process, LOLLAF did have an Intake Committee composed of a range of staff from LARC and regional offices. The Committee reviewed intake procedures of other programs and made recommendations, including piloting the use of intake specialists.

***Recommendation II.1.9.3\*:***

***LOLLAF should expand LARC hours to include some afternoon coverage. This could be achieved by staggering the working hours of existing staff.***

LOLLAF will evaluate the feasibility of expanding to afternoon hours, including reviewing call flow patterns by time of day for current hours and determining whether any existing LARC attorneys would be interested in working later hours. At this time, LOLLAF does not contemplate increasing the allocation of resources to LARC, so any changes would have to be made within current budgetary constraints. Increasing afternoon hours would mean fewer attorney hours available during morning hours.

***Recommendation II.1.9.4:***

***LOLLAF should review its Case Acceptance Policies with a goal of simplifying and streamlining them, and achieving greater consistency across the regions.***

LOLLAF generally agrees with this principle and has worked to address it, recognizing that different regional offices have different funding sources available for different types of services. We have reviewed the bankruptcy and divorce Case Acceptance Policies (CAP's) (see below) and will begin reviewing and streamlining more CAP's later this summer.

***Recommendation II.1.9.5:***

***LOLLAF should assess whether LARC could more efficiently conduct divorce intake; this assessment should include a determination as to whether a separate telephone queue devoted solely to divorce intake would benefit both clients and staff.***

LOLLAF had already planned to centralize divorce intake again after the intake specialists were trained on homeownership issues and we determined whether they would have the capacity to handle divorce intake, too, or whether we would need to add more intake

specialists. LARC has set up a separate divorce intake queue in the phone system and will begin handling calls from applicants seeking to file for divorce on June 26, 2013. This should free up some support staff time in the regional offices. We also standardized the format of the divorce case acceptance policies across all regions.

***Recommendation II.1.9.6:***

***LOLLAF should engage in a deliberative process to assess certain LARC processes, including how technology could improve internal communication of changes in Case Acceptance Policies and client survey response rates. The program could also determine whether it would benefit from having trained paralegals, students, or pro bono attorneys assist the LARC attorney staff in handling calls, whether in the central office or remotely. The managing attorney should also continue to reach out to the staff of the other hotlines being run in Illinois, including Prairie State, LAF, and the Coordinated Advice and Referral Program for Legal Services (CARPLS).***

As part of its review of an intranet and/or document management solution discussed below, LOLLAF will review the LARC intake process, including CAP's and client surveys to determine whether any efficiencies or improvements in the processes can be achieved. LOLLAF did engage in a deliberative process to review LARC processes as part of its 2011 planning process. That process did result in the addition of intake specialists (who are trained paralegals) to LARC. The LARC Managing attorney will continue to reach out to the other hotlines in Illinois.

***Recommendation II.1.9.7:***

***Land of Lincoln should determine how its existing intake process can best interface with the statewide online triage and intake system the program is developing.***

The Managing Attorney of LARC is on the LOLLAF Online Access Working Group and has been actively involved in the planning and decision making process for that project. The hotline managers for PSLS and LAF are also involved in that Working Group, and this has been a very good opportunity for sharing ideas, as well as moving toward some common practices as they relate to the interface of ILAO and the three LSC programs. LOLLAF has decided that LARC will be the point of intake for the applications that come through the statewide online access system.

***Finding 10. LOLLAF makes a concerted effort to engage with many segments of its client population throughout its service area.***

No comment, except LOLLAF agrees with the finding.

***Recommendation II.3.10.1:***

***As part of its effort to diversify its caseload, LOLLAF should identify more opportunities for outreach activities to community-oriented groups. The program should also re-examine its existing advisory councils and determine whether there are ways to re-invigorate them.***

LOLLAF is continually evaluating ways to improve and increase outreach. Areas of need have been identified as part of strategic planning, and outreach efforts continue to be spelled out in regional office work plans. LOLLAF did re-examine its existing advisory councils within the last several years and made efforts to re-invigorate them, including adding a broader range of participants in one office (such as other local agency representatives); recruiting younger community residents; and reaching out to working clients. This is an ongoing challenge. We will have our managing attorneys reach out to other local social service agencies serving the low income community to identify agencies that have client board members or advisory groups, and to ask for any strategies they have used to increase participation.

**PERFORMANCE AREA THREE. Effectiveness of legal representation and other program activities intended to benefit the low-income population in its service area.**  
**Legal Representation.**

***Finding 11. Land of Lincoln staff possesses the capacity and resources needed to provide high quality legal assistance.***

No comment, except LOLLAF agrees with the finding.

***Recommendation III.1.11.1\*:***

***LOLLAF should develop a program-wide knowledge management system that can facilitate the sharing and promotion of key practice resources, documents, and other information. This system, which could be part of the program's cloud solution, discussed in the Technology section, would only enhance the quality of client representation.***

LOLLAF's strategic plan provides that in the next eighteen months, LOLLAF will "monitor the experiences of LSC Technology Initiative Grant recipients using SharePoint to inform our decision-making on implementing SharePoint for document management and internal communications." LOLLAF's 2012 TIG Letter of Intent for use of SharePoint did not proceed to the full application. However, LAF has now been invited to submit a 2013 TIG application for use of SharePoint, replicating the project at Northwest Justice Project. LOLLAF's Deputy Director has discussed the proposed project with LAF's Director of Technology for Advocates. LOLLAF's updated 2013 strategic plan calls for the Technology Committee to review a program wide knowledge management system again late in 2013 or early 2014.

***Recommendation III.1.11.2:***

***The program should determine whether it should invest in laptops and other mobile devices to expand the work of its advocates outside of the office. It probably makes sense for LOLLAF to purchase a limited number of smartphones or tablets, or to provide a small subsidy to some staff for the purchase of such equipment.***

LOLLAF will evaluate this recommendation in developing its 2014 technology plan. Legal Server is coming out with a mobile app later this summer, and that could impact potential use of smartphones.

***Finding 12. LOLLAF has developed standards and systems, including individual and***



*office work plans, to carefully outline what is expected of individuals and of offices and to encourage all staff to perform quality work.*

No comment, except LOLLAF agrees with the finding.

***Recommendation III.1.12.1:***

***The program should consider establishing a mid-year review of individual work plans to ensure that substantive law goals are met and that adequate outreach is being conducted. This will support the program's efforts to decrease its emphasis from family law cases.***

LOLLAF agrees that articulating a specific expectation for at least a mid-year review of individual and office work plans by managing attorneys would be a good idea. Right now, the managing attorneys do review the plans; some on a quarterly basis, others at mid-year, and one at the end of the year. Also, LOLLAF's 2012-2014 Strategic Plan calls for the administrative office to review after June 30, 2013 how attorney time was spent during the first six months of 2013 to determine whether we are making progress on increasing service in areas such as housing, consumer, education, and public benefits and low-wage worker issues.

***Finding 13. LOLLAF staff are offered comprehensive training opportunities, both when they are new members and throughout their careers.***

LOLLAF agrees with the finding, but notes that the MCLE Coordinator is the Family Law Task Force Chair, not co-chair; and the Illinois Advocates Conference is held every third year, not every other year.

***Recommendation III.1.13.1\*:***

***Given the program's broad service area, LOLLAF should provide a more uniform and comprehensive orientation on internal policies and practices to newly hired staff.***

While LOLLAF has updated all of its policies and procedures and has a "Guide to Program Folders", LOLLAF agrees that the sheer number of policies can be overwhelming for new staff and regional office orientations may vary. LOLLAF administrative staff will begin identifying the most important internal policies and practices for inclusion in a program wide orientation, with a goal of completing an orientation format and materials by January 2014.

***Finding 14. Land of Lincoln generally maintains a strong culture of supervision of legal work, and managers follow system protocols, although practices vary among offices.***

No comment except that LOLLAF agrees with the finding.

***Recommendation III.1.14.1\*:***

***LOLLAF should ensure that the procedures followed for achieving senior attorney status are consistent throughout the program.***

No comment, except LOLLAF agrees with this recommendation.

***Recommendation III.1.14.2\*:***

***LOLLAF is encouraged to create an advocacy director position that would coordinate, develop, and oversee advocacy across the entire program.***

LOLLAF leadership is aware of this issue and plans to address it as part of succession planning for the current positions of Deputy Director of Programs and Advocacy and the Litigation and Training Specialist who is also a Senior Supervisory Attorney. The staff members in these positions have indicated their intention to retire within the next eighteen to twenty-four months. Responsibility for litigation skills training; supervision and approval of appeals and major litigation; systemic advocacy efforts; and analysis of program advocacy are currently split between these positions. The Senior Supervisory Attorney also has a significant family law caseload, and the Deputy Director has development, grants management, compliance and other responsibilities. LOLLAF recognizes that an Advocacy and Litigation Director can be more effective in leading program advocacy without also having other significant responsibilities.

***Finding 15. LOLLAF's advocates are knowledgeable and energetic about pursuing efforts on their clients' behalf.***

LOLLAF agrees with this finding, but there are some inaccuracies in this section. First, at the bottom of page 21, LOLLAF only has one state-funded long term care ombudsman in its Central Regional Office, covering a seven county service area. Second, LOLLAF has engaged in work on behalf of domestic violence victims since it was founded in 1972. In 1997 and 1998, LOLLAF significantly expanded that work with two new grants: the VOCA grant for orders of protection and a VAWA grant for other legal representation for victims. The VOCA grant has continued without interruption. LOLLAF's first VAWA grant ran from 1998-2005 and focused on rural services. LOLLAF was awarded a new VAWA grant in 2006, which has just been renewed through 2015. The current VAWA grant is a collaboration of three LOLLAF offices with three law schools to use clinical students on extended service cases for victims. All of our offices serve rural victims of domestic violence.

In the middle of page 23, the description of the farm law project is not accurate. The last sentence of the paragraph should say: "They work with farmers and non-profit organizations involved with local foods, providing transactional legal work, education, and assistance with general legal issues."

At the top of page 24, the description of LOLLAF's medical debt work confuses the Medical Debt Relief brief services project at LARC with the Medical-Legal Partnership (MLP) project in the Champaign office. The LARC attorney in the Medical Debt Relief project only handles hospital debt cases, while the Champaign MLP fellows provide a full range of services. All budget counseling for homeowners in default is now being handled by our Legal Help for Homeowners staff funded by the national mortgage settlement funds. It is the LARC attorney who has problems with follow-up by her medical debt clients, which may be, in part, because they originally called in about something else that was more emergent.

***Recommendation III.1.15.1\*:***

***LOLLAF should encourage advocates to undertake more extended representation, as well as***

***more complex litigation, with an emphasis on achieving lasting results for the client population.***

LOLLAF does encourage advocates to undertake more extended representation and is already engaging in a process to identify how to increase extended representation in non-family areas. It is not clear what types of complex litigation are contemplated by this recommendation. (We do agree that some of the writing samples submitted by senior staff were simple letters or form-type pleadings, however upon review, in many cases, those writing samples were not actually reflective of the attorney's overall quality and complexity of work.) Many LOLLAF attorneys are engaging in complex mortgage foreclosure cases (and have been for many years); public and subsidized housing issues, such as demolition, reasonable accommodations, and systemic housing authority problems; adversarial litigation for domestic violence victims and lengthy contested custody trials; special education cases; and a variety of consumer cases. We would agree that in a few cases, experienced attorneys could use some additional support or mentoring to increase their ability to handle more complex cases or advocacy.

The finding notes that despite a wide range of innovative projects to serve clients, much of LOLLAF's legal work tends to be fairly routine in nature. Despite the routine nature of many requests for service, LOLLAF's leadership actively encourages all advocates to identify systemic issues, and the task forces review and identify systemic issues at their meetings and in their annual work plans. The legal problems experienced by our client population may, in fact, be routine, such as orders of protection, divorce, eviction, public housing utility allowances, etc. But, in handling these client legal needs, LOLLAF advocates strive to address the issues presented in a way that will not only achieve lasting results for that client, but others affected by the same issue, whenever possible. LOLLAF's advocacy on the debtor's prison issue is a good example of identifying and addressing a broader issue that came out of very routine collection cases.

***Recommendation III.1.15.2\*:***

***LOLLAF should use Legal Server to indicate if an applicant was referred for medical debt relief so that attorneys representing them in other capacities can encourage them to pursue such relief. Legal Server should also alert the medical debt relief project attorney when an applicant already has an open file at LOLLAF.***

No comment, except LOLLAF agrees with the Recommendation.

***Finding 16. LOLLAF's statistics demonstrate that the program is productive.***

No comment, except LOLLAF agrees with the finding.

***Finding 17. LOLLAF has taken a number of steps to increase the involvement of private attorneys in its work.***

No comment, except LOLLAF agrees with the finding. The reference on the top of page 26 about PAI referrals is only pro bono referrals (not compensated PAI).

***Recommendation III.2.17.1\*:***

***LOLLAF should work to diversify the types of cases that are referred to private attorneys, including bankruptcies, Orders of Protection, wills, advance directives or powers of attorney, adoptions, security deposit returns, and other cases requiring limited representation.***

LOLLAF agrees with the Recommendation and has been working to diversify its private bar referrals. For 2013, it allocated a portion of its judicare referrals to be used specifically for foreclosure and other non-family cases. In addition, the LOLLAFF Pro Bono Task Force is seeking to identify concrete steps to diversify pro bono referrals.

***Recommendation III.2.17.2\*:***

***LOLLAF should diversify the non-representational opportunities available to pro bono attorneys, including their participation in community education events (at senior centers, DV shelters, and other venues), advice clinics, and pro se assistance.***

No comment, except LOLLAFF agrees with the Recommendation and will ask LOLLAFF's Pro Bono Task Force to help regional offices identify ways to implement it.

***Recommendation III.2.17.3\*:***

***Given the recent Illinois Supreme Court rule changes, LOLLAFF should make an effort to recruit retired and corporate attorneys who are living or working in its service area.***

After the Supreme Court rule change, LOLLAFF did apply and was certified to use retired attorneys. There are not a lot of corporate attorneys in the LOLLAFF service area, but LOLLAFF will research their availability.

***Finding 18. The program actively collaborates on a number of levels with other members of the legal community to meet client needs.***

LOLLAF agrees with this finding, but notes this section includes only a sampling of the state and local bar leadership positions currently held by LOLLAFF attorneys, and the current president of the Illinois State Bar Association (John Thies) is a LOLLAFF Board member.

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

***Finding 19. LOLLAFF has an involved board of directors whose life experience makes them well-suited to developing the program's resources and promoting awareness of its work.***

LOLLAF agrees with this finding, except the reference to involving the new Board treasurer in new Board member orientation is a proposal by our current Director of Development and has not yet been put into practice.

***Recommendation IV.1.19.1\*:***

***Land of Lincoln should develop a written succession plan for executive leadership that includes the appointment of interim leadership as well as a search committee. The plan should***

***specify the composition (board members, management, staff, and other constituencies) of the search committee and should outline a timeline for the succession process.***

LOLLAF agrees with this Recommendation. The Board will consider adoption of a written succession/transition plan for the Executive Director position that includes the elements suggested by LSC at its September 2013 meeting. Currently, the Annual Operating Resolution specifies which staff members shall assume Executive Director responsibilities in the event of an unplanned vacancy. The current Succession and Transition Strategy simply provides that the Board of Directors shall develop a transition/succession plan for the Executive Director position 12 months prior to a planned retirement.

***Finding 20. The program's by-laws are atypical in a number of respects.***

No comment, except that the Audit and Financial Oversight Committee is an ongoing separate committee from the Executive Committee, and has somewhat different membership. LOLLAFF officers do serve on both committees.

***Recommendation IV.1.20.1:***

***LOLLAF should consider amending the by-laws to create a standing committee, whether a client grievance committee or a quality of practice committee, which would have a fairly in-depth knowledge of the client grievance procedures and how to handle the review of such issues.***

LOLLAF's Board Agenda for its June 28, 2013 meeting includes a discussion of possible by-law revisions to address this issue, the possible need for other standing committees, and other board structural issues.

***Finding 21. Land of Lincoln is led by dedicated and highly respected executive director.***

No comment, except LOLLAFF agrees with the finding.

***Finding 22. LOLLAFF's management team effectively administers the agency and ensures that it competently utilizes systems to meet client needs.***

No comment, except LOLLAFF agrees with the finding.

***Recommendation IV.3.22.1:***

***The program should continue making affirmative efforts to build on its success in attracting, nurturing, and retaining positive and effective leaders.***

LOLLAF leadership agrees and will continue its efforts in this area.

***Finding 23. LOLLAFF maintains an information technology (IT) environment that, subject to a few exceptions, meets user needs.***

No comment, except LOLLAFF agrees with the finding.

***Recommendation IV.3.23.1\*:***

***LOLLAF should explore adopting a cloud solution such as Office 365 or Google Apps to eliminate its reliance on Remote Desktop Services and the program-wide MPLS network. Connecting to Legal Server and other key applications directly through the Internet should improve access and could reduce overall costs and maintenance needs. In the meantime, staff should receive training on the best ways to access Legal Server and shared files.***

LOLLAF agrees and will review this recommendation with its IT consultant, Acropolis Technology, in developing its 2014 technology plan.

***Recommendation IV.3.23.2:***

***LOLLAF should consider standardizing its desktops on Windows 7 and continue to cycle out older workstations.***

LOLLAF agrees and has already begun to cycle out older workstations.

***Recommendation IV.3.23.3:***

***As resources permit, Land of Lincoln should take steps to make certain that the telephone system throughout the program meets staff needs. It should upgrade all of its telephones, and endeavor to connect phones between offices with extensions.***

LOLLAF has already upgraded the telephone system for LARC, as well as the Northern and Eastern regional offices. All of those offices now use compatible Toshiba VOIP systems. LOLLAf will review upgrading the other offices.

***Finding 24. Land of Lincoln's financial operations appear to be well-managed.***

LOLLAF agrees with the finding, but notes that LOLLAf's auditor for the 2011 audit has a pending appeal regarding the disapproval of the 2011 audit.

***Recommendation IV.4.24.1\*:***

***LOLLAF should aim, as expeditiously as possible, to fill the open accounting department position.***

LOLLAF agrees and the position has already been filled.

***Recommendation IV.4.24.2\*:***

***Land of Lincoln should promptly complete the revisions it is currently making in the program's accounting handbook.***

LOLLAF agrees and the Accounting Manual revisions will be complete by June 25, 2013.

***Finding 25. LOLLAF's human resources administration is a shared responsibility. As a program, it has established policies designed to recruit and retain high quality staff.***

No comment, except LOLLAF agrees with this finding.

***Recommendation IV.5.25.1:***

***The program should consider having one staff person serve as the point person for the administration of human resources. This would ensure that all staff members receive the same message regarding this important aspect of their work.***

LOLLAF is reviewing the administration of human resources as part of its reorganization of responsibilities in the administrative office in light of the retirement of the long term Deputy Director for Finance and Administration at the end of 2013.

***Finding 26. Land of Lincoln effectively maintains and enhances its staff-management communications.***

No comment, except LOLLAF agrees with the finding.

***Finding 27. Land of Lincoln has implemented an effective system for resource development and successfully diversified its funding sources.***

No comment, except LOLLAF agrees with the finding.

***Recommendation IV.7.27.1:***

***Land of Lincoln should review the corporations that are based in its service area and make an effort to involve corporate attorneys in some of its program operations, including board membership and its Young Friends Group.***

LOLLAF agrees and will review corporations in its area, since it has been a few years since this has been done.

***Finding 28. Land of Lincoln, an active participant in the legal community, is respected throughout the service area and the state.***

No comment, except LOLLAF agrees with the finding.