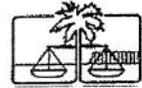




GUAM LEGAL SERVICES CORPORATION
DISABILITY LAW CENTER



MAIN OFFICE

113 Bradley Place, Hagåtña, Guam 96910
Telephone No.: (671) 477-9811/2
TDD/TTY No.: (671) 477-3416
Facsimile No.: (671) 477-1320
E-mail: information@guamlegalservices.com

DISABILITY LAW CENTER (DLC)

“The Protection and Advocacy System of Guam”
Telephone No.: (671) 922-4571/2
TDD/TTY No.: (671) 477-7356
Facsimile No.: (671) 477-4270

Harold F. Parker, Executive Director of Litigation

Staff Attorneys
Renita M. Taimanao
Matthew E. Wolff
Alisha L. Molyneux

June 24, 2010

VIA EMAIL: edelsteins@lsc.gov

Stephanie Edelstein
Program Counsel
Legal Services Corporation
Office of Program Performance

Re: Draft Program Quality Visit Report for GLSC, March 30-April 2, 2010
& April 6, 2010

Dear Ms. Edelstein,

On behalf of Guam Legal Services Corporation-Disability Law Center, I am writing to express our heartfelt appreciation to you and Mr. Watson for your guidance, assistance and recommendations during the remote visit. We appreciate the opportunity to address any factual inaccuracies contained in LSC’s draft report. Upon careful review of the report, we respectfully request that you consider the following as LSC proceeds to finalize GLSC’s Program Quality Visit Report.

Program Overview

This section provides that, “At the time of the visit, it had 18 staff members.” Please be informed that at the time of the visit, GLSC had 17 staff members.

This section further provides that, “In collaboration with the Supreme Court of Guam and a domestic violence shelter, GLSC is using a Technology Initiatives Grant (TIG) to establish computer kiosks for self-represented litigants in the court and the shelter.” Please be informed that TIG funds were not utilized to establish computer kiosks for the shelter. The kiosk for the shelter is being funded by another source of funds.

Summary of Findings

This section provides that, “There has been no all-staff meeting in recent memory.” Upon review of GLSC’s calendar, there have been quarterly general staff meetings, with the most recent meeting occurring January 2010.

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Discussion of Findings

Criterion One

Finding 1: GLSC conducted a legal needs assessment in 2008 and used the results to develop its program priorities. However, those priorities may not be broad enough to address the most pressing legal needs of the low-income community.

This section provides that, "Because consumer issues are no longer considered a priority, GLSC turns away applicants who may have such cases." Because GLSC has other programs, it continues to process applicants if he/she meets its other programs' requirements, i.e. it is related to the individual's disability or abuse as a victim/survivor or domestic violence, sexual assault or stalking."

Finding 5: The GLSC intake system is accessible to potential clients and sufficiently flexible to serve applicants with emergencies and those who are unable to come into the office in person due to incapacity.

This section provides that, "A structured intake system is relatively new for GLSC. Long-time staff report that until two or three years ago, attorneys screened and interviewed applicants and determined whether to accept a case. Even now, the intake system is a work in progress, with the manual still under revision." It is recommended that this section be revised as follows: "A structured intake system is relatively new for GLSC. Long-time staff report that until two or three years ago, attorneys screened and interviewed applicants and determined whether to accept a case when the applicant's legal request was for a protective or restraining order. After that trial period, the intake process has since been stabilized, at least for the past 2 years. Intake staff has been involved in the revision of the intake procedures and anticipates completion very soon."

This section also provides that, "Persons who are ineligible, or who are conflicted out, are immediately referred to lawyer referral and receive a follow-up confirming letter." Please correct to reflect instead that, "Persons who are ineligible, or who are conflicted out, are immediately referred to the lawyer referral service." Confirmation letters are not part of the process.

This section further provides that, "Staff who perform intake have received in-house training on the LSC regulations and the case management system. They have not received any organized training on substantive law issues or interviewing skills." Please be informed that GLSC has provided intake staff (advocates), with opportunities to attend conferences and training on substantive law issues and interviewing skills.

Finding 6: At the time of the visit, the GLSC intake pre-screening form distinguished between applicants younger than 60 years of age and those who are older. As a result, it appears that GLSC is not obtaining income information from applicants who are 60 years of age and older.

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GLSC-DLC's pre-screening and intake processes do ask applicants who are 60 years of age and older for income information. GLSC's intake form retained the distinction in the event it reacquired the Title III Program. GLSC is currently reviewing its intake forms and procedures to ensure consistency with its programs' requirements and to eliminate any redundancy and confusion.

Finding 9: Staff interviews and team review of maps and photographs suggest that the program is centrally located and convenient to public transportation, but that the facilities themselves may need some modifications.

This section provides that, "Staff reports that some office areas are overcrowded and that there is inadequate space for confidential intake interviews." GLSC has two (2) intake rooms in the Advocates Office. At the Main Office, the conference room is used for persons who need accommodations, and there is another intake office on the second floor. These appear to be adequate in number to accommodate for confidential intake interviews.

Finding 10: After experiencing significant turmoil and staff turnover in recent years, GLSC now has the capacity to perform effective legal work.

At GLSC, the Advocates conduct the intake interviews, which include determining eligibility for its programs. They also prepare information for use in legal documents and provide support to the attorneys.

Finding 11: GLSC's closes significantly fewer cases per 10,000 poor persons than other LSC funded programs and the range of issues addressed is very limited.

This section provides that, "OPP does not review case files, but interviews with staff suggested that at the time of this visit, applicants applying for services provided with funding other than LSC were not being screened for LSC eligibility and their cases were therefore not reported in the CSR data. It is not clear how many cases could have been affected. Moreover, while case reporting might provide some explanation for the CSR data, it cannot fully account for such low numbers." Please be informed that we confirmed with staff who conduct prescreening and intake for cases other than LSC that prescreening for LSC eligibility does occur.

Finding 12: GLSC has systems in place to support effective advocacy.

Please be informed that staff have had access to webinars and teleconferences, which oftentimes they have participated in at early morning hours to accommodate the time difference in the mainland USA and to participate in live modes. Webinars and teleconferences that are archived are often viewed on a delayed schedule.

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Criteria Two and Three. Leadership, management and administration.

Finding 19: GLSC leadership and management structure appears to be effective.

The Program Coordinators fall under the immediate supervision of the Administrative Director. The Administrative Director along with the Program Coordinators are responsible for compliance with grant requirements as well as the development of program manuals and procedures.

Criterion Four. Financial administration.

Finding 20: GLSC appears to have sufficient staff responsible for financial administration.

The Administrative Director brings on-the-job experience, and the bookkeeper has a Bachelor of Science in Accountancy.

Criterion Five. Human resources administration.

Finding 22: GLSC Policies and staffing for human resources administration are generally effective.

Training has been offered to the administrative and support staff. Support staff been given opportunities to attend crisis training provided by partner organizations, notary conferences and GLSC's Ticket to Work conference. Administrative and support staff, like the attorneys and advocates, have been offered the opportunities to research training for possible attendance, which is contingent on the availability of funds.

Criterion Six. Internal communications.

Finding 23: Internal communications are generally effective, although there are some areas where morale could be improved.

GLSC has held general staff meetings. Management implemented this practice in 2009, with the intent of keeping staff informed of projects, site visits and operational matters.

Criterion Seven. Resource development and maintenance.

Finding 24: GLSC does not have a mechanism for proactively seeking funding other than the federal grants upon which it has come to rely on.

The Executive Director and Administrative Director are responsible for resource development. One fund raising event was held in 2009 which generated a small amount of funds.

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Again, please accept our appreciation for all your time efforts at learning more about our office and its challenges, and more importantly, providing us the guidance to improve our provision of services. On behalf of our Board of Directors, the staff and management of GLSC, I commit to implementing the recommendations herein some of which we have already begun to do.

Should you have any comments, questions or further clarifications, please do not hesitate to communicate with me at harold.parker@guamlsc.org.

Sincerely,



HAROLD F. PARKER
Executive Director of Litigation

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