The following is an overview of actions LSC has undertaken to implement the three goals and related initiatives identified in LSC's 2012-2016 Strategic Plan.

Goal No. 1: Maximize the Availability, Quality, and Effectiveness of Legal Services (Strategic Plan pp. 5-11)

Initiative One: Identify, promote, and spread best practices in meeting the civil legal needs of the poor

- 1) Highlighted best practices at LSC's quarterly Board meetings, White House forums, and 40th Anniversary events. Captured presentations on video, posted links to them on LSC's website and on social media, and included links in *LSC Updates*.
- 2) Expanded collection of useful practice and operational tips in the Grantee Resources section of LSC's website, which includes many examples of best practices from LSC grantees and other sources. Recent updates include overviews of Geographical Information Systems (GIS) mapping and organizing data through the use of Google Fusion Tables; these were also subjects of webinars for LSC grantees. LSC is currently recruiting for a researcher/writer to compile additional resources on best practices and add them to the website.
- 3) Continued to maintain LSC's prominent role at the largest conferences for legal aid providers including the Equal Justice Conference, the annual conference of the National Legal Aid and Defender Association (NLADA), and the Management Information Exchange (MIE) conference. For example, in 2015, Office of Program Performance (OPP) staff presented sessions on using LSC's Technology Baselines, LSC's Pro Bono Task Force recommendations, lessons learned from Hurricane Katrina, integrating resource development into program management, innovations in legal aid, client board member responsibilities, and technology tips.
- 4) OCE held a live webinar outlining key compliance considerations for recipients of Technology Initiative Grant and Pro Bono Innovation Fund awards.
- 5) In 2015, the Office of Program Performance (OPP) conducted 27 on-site grantee visits and one "capability assessment visit" to two applicants for the Detroit service area. Through these visits, OPP educated grantees about best practices and provided advice about improving legal practice and program operations. OPP tracked and followed up on grantees' implementation of recommendations from prior visits through the Post Program Quality Visit grant application process and through regular contact with grantees. The Post Program Quality Visit grant application inquires about compliance with prior LSC recommendations by grantees that have had a program quality visit in the last two years.
- 6) In 2015, OCE conducted 25 on-site oversight visits. These visits included 17 compliance reviews, two follow-up reviews focused on fiscal issues, four technical assistance reviews, one targeted fiscal review, and one fiscal capability assessment. OCE also conducted three Executive Director orientation webinars and participated in two webinars related to the annual competition process.

- 7) The American Samoa service area was funded for the first time since 2007. American Samoa Legal Aid (ASLA) is the new LSC grantee and received a grant of \$222,417. In addition to the field grant for 2015, LSC provided ASLA start-up funds that had been reserved for the service area. ALSA has a fully operational board, an executive director and two other staff, and is now providing service.
- 8) In 2015, LSC awarded 36 TIG grants. Through its TIG grants, LSC has improved grantee efficiency, and has increased access to the courts and legal information. For example, a grant to the Volunteer Lawyers Project of the Boston Bar Association of \$137,200 will be used to enhance mobile access to information and guidance for volunteer lawyers handling pro bono cases. LSC has been a leader in funding online intake solutions that allow prospective clients to apply for assistance conveniently through the web. Following some early successful pilots, the TIG program has encouraged replication and improvement of online intake systems across the country. For example:

Pine Tree Legal Aid in Maine: This grant builds on several earlier TIGs to develop an online legal triage tool to help users more quickly find resources to address their needs, and direct users to an online application to request assistance. Programs operating Drupal-based websites will be able to easily adapt and incorporate this core Drupal-based architecture for online triage and intake.

Three Rivers Legal Services in Florida: An earlier TIG to the Legal Aid Society of Kentucky funded a project to create embeddable content widgets into the LawHelp statewide website template so that libraries could deliver the content of the statewide websites to their patrons. As part of this training, webinars were conducted to train librarians nationally on statewide websites that LSC has funded. Over 40 Florida librarians participated in that training, more than any other state. Because of this response, Three Rivers is increasing access to online legal information and self-help resources in Florida through a statewide outreach and partnership initiative targeting Florida public libraries. The project will include a webinar series for library staff on free legal information and resources available to library patrons, development of customized legal information satellite sites for up to four public library partners, and enhanced technical capacities that allow librarians and other partners to keep up-to-date on new resources available through Florida's statewide legal information website, FloridaLawHelp.org.

- 9) Used Pro Bono Innovation Fund (PBIF) grants to support innovative ways to engage more pro bono lawyers in the delivery of legal services and to enhance the quality of pro bono programs at LSC grantees. LSC awarded 15 PBIF grants in 13 states in 2015.
- 10) Inaugurated a process for including clients in some program quality visits to improve client service.

- 11) Arranged to make Ravel Law, an innovative, online legal research tool, available free to LSC grantees.
- 12) OPP staff presented webinars to grantees and applicants for basic field grants, TIGs, and PBIF grants. These webinars addressed best practices that LSC looks for in grantees.
- 13) Used regional meetings of grantee Executive Directors in the Southeast, Midwest, and Mountain West to spread information about best practices.

Initiative Two: Develop meaningful performance standards and metrics

- Created a new Office of Data Governance and Analysis and hired a director for it. The new office will allow LSC to improve its collection and analysis of data from grantees and to develop new performance standards and metrics.
- 2) Completed an online tool-kit for collecting data on case outcomes. Conducted an informational session at the annual NLADA conference and two webinars to educate LSC grantees about the toolkit and to prepare them to collect outcomes data.
- 3) Began developing e-learning materials on outcomes measurement to supplement the toolkit. The e-learning project, like the development of the toolkit itself, is funded by the Public Welfare Foundation.
- 4) Announced a requirement that LSC grantees will need to collect outcomes data in all extended service cases as of June 1, 2016.
- 5) Arranged for Professor Deborah Rhode of Stanford Law School to work with the Alaska Legal Services Corporation on evaluating outcomes in brief service cases.
- 6) LSC President participated in meetings at the University of South Carolina Law School and the U.S. Department of Justice to stimulate academic research on civil legal aid.
- 7) Introduced a new online portal to serve as a central LSC data and document repository for all staff to use. The portal will allow enhanced analysis of and reporting on grantee performance.
- 8) Retained a consultant to develop a new grants management system that will permit easier generation of reports and data regarding grantees and improve LSC's ability to track grantee performance.
- 9) Improved LSC's system for responding to complaints relating to grantee services. Revised LSC's standard forms relating to complaints to make them clearer to clients.
- 10) Began process of revising LSC's Performance Criteria for grantees. Prepared a revision schedule for consideration by the Delivery of Legal Services Committee at its January 2016 meeting.

11) Continued to implement performance standards for LSC staff. Managers created Employee Performance Plans for each of their employees. The Employee Performance Plan identifies the work, consistent with the employee's position description, that the employee is expected to perform and how that work relates to the office performance plan and to LSC's strategic goals. The Employee Performance Plan identifies performance standards expressed in terms such as quantity, quality, timeliness, process, product, or other measure of performance. Employee Performance Plans also identify areas for training and development that can be used to help the employee improve performance and grow.

Our first full-cycle assessments under the revised performance management process are currently under way. All assessments for 2015 will be completed and discussed with staff by the close of March.

Initiative Three: Provide legal practice and operational support to improve measurably the quality of civil legal services to the poor

- 1) Continued to use program visits by OPP to educate grantees about best practices and to provide practical advice about improving legal practice and program operations. Through the Program Quality Visit process, OPP discusses findings and recommendations at an exit conference, formalizes recommendations in a written report that is posted on LSC's website, and follows up through subsequent grant applications and through discussions with the grantee.
- 2) Continued to host and facilitate quarterly webinars featuring staff of the Federal Trade Commission's Bureau of Consumer Protection. The webinars, developed for LSC grantees, provide substantive training on consumer protection issues relevant to legal aid programs and identify free resources for grantees to access.
- 3) Introduced the privately-funded Vieth Leadership Development Grant program to improve leadership and service delivery at LSC grantees. LSC awarded seven grants in 2015.
- 4) Office of Compliance and Enforcement (OCE) staff made presentations at the annual NLADA conference, including an overview of recent regulatory and fiscal findings from reports of the OCE and Office of Inspector General and a primer on proper direct and indirect cost allocations. OCE also made a presentation regarding fiscal oversight at the annual Southeast Project Directors meeting. LSC's annual compliance advisory was released on August 17, 2015.

Other Activities to Promote Goal 1:

1) Continued the Midwest Legal Disaster Coordination Project with private funding. The subgrantees (Iowa Legal Aid and Legal Aid of Nebraska) have started building relationships with disaster service providers, lawyers, community organizations, and legal services programs to build a network of stakeholders that will ensure coordinated disaster preparedness and relief efforts. They have developed community legal education training materials. Iowa has had more than five governordeclared state disaster declarations during the grant period. Following the first disaster, the

- subgrant enabled Iowa Legal Aid to create a written Disaster Declaration Checklist for its response to state declared disaster declarations.
- 2) Continued expanding outreach to Members of Congress (MOCs) to increase prospects for LSC's funding. In 2015, 32 MOCs provided quotes for LSC press releases regarding TIG and PBIF grants. Six MOCs participated in press conferences related to TIG and PBIF grants. Four MOCs attended LSC Board meetings in 2015.
- 3) Representatives Joe Kennedy and Susan Brooks announced the formation of the bipartisan Access to Civil Legal Services Caucus.
- 4) Continued to work with grantee Executive Directors to develop appropriate educational outreach to federal and state legislators and staff regarding constituent service.
- 5) Made additional improvements to LSC's formal budget request to Congress, LSC's Annual Report, and LSC's By the Numbers (formerly LSC's Fact Book) to make a stronger case for funding. The 2014 Annual Report used a new design to optimize display of photos and multi-page layouts, incorporated more multi-media, and continued to broaden its focus on constituent services. The 2014 LSC By the Numbers received more upgrades in its design to make it more user-friendly.
- 6) Conducted three Executive Director Orientation (EDO) sessions. Began developing an orientation program for new Chief Financial Officers of grantees.
- 7) OCE worked with an outside consultant, Barker & Scott, to assess its on-site review process in order to develop and implement the use of standardized processes and templates. These will guide OCE's visit-selection process and its pre-visit, on-site, and post-visit activities. The final documents are currently undergoing review. OCE's procedures manual will be revised once the project is complete.
- 8) The Office of Legal Affairs assisted in promulgating regulations relating to recipient fund balances (Part 1628) and the proper use of federal funds (Part 1640); developed a rulemaking agenda; and coordinated internal risk management, including regular reporting to the Board.
- 9) In 2015, LSC's Herbert S. Garten Loan Assistance Repayment Program received 147 new applications from attorneys at 70 grantee offices in 35 states, the District of Columbia, and Micronesia. In 2015, LSC provided loan repayment assistance to 80 new applicants.
- 10) Continued to improve OCE's report-writing process for on-site compliance reviews to provide more timely, clear, and effective communication of findings and required corrective actions. Engaged consultants to revise OCE's report structure to allow for more timely and streamlined reporting of OCE findings.
- 11) Introduced a new LSC website. Enhanced search and content listings to make content relevant to the user easier to find. Critical information has been migrated from PDF format to plain HTML. In the coming months, as we continue to properly tag all existing web pages, the searching and

- content referral will continuously improve. We oversee postings to ensure consistency in messaging across the website.
- 12) Inaugurated a Rural Summer Legal Corps fellowship program using private funds. The program will place 31 law students with LSC grantees serving rural areas in the summer of 2016. LSC has partnered with Equal Justice Works, which has relationships with approximately 200 law schools and extensive experience managing fellowship programs, for administrative assistance and orientation for the fellows.

Goal No. 2: Become a Leading Voice for Access to Justice and Quality Legal Assistance in the United States (Strategic Plan pp. 11-15)

Initiative One: Provide a comprehensive communications program around a compelling message

- 1) Continued to provide effective and rapid response to congressional and media inquiries.
- Continued to implement effective congressional strategy by meeting with staff and Members of the House and Senate Appropriations Committees. Continued to identify potential allies in advance of the budget votes.
- 3) As part of the strategy to reach Members of Congress, increased Board member engagement in Hill meetings.
- 4) Continued active participation in Voices for Civil Justice, the "communications hub" funded by the Public Welfare Foundation and the Kresge Foundation, which is using survey research and communications expertise to expand public awareness of the role and importance of civil legal aid in the United States. LSC President serves on the hub's advisory committee. This project is a collaboration with a number of stakeholders, including the National Center for State Courts, the U.S. Department of Justice's Access to Justice Initiative, and the American Bar Association.
- 5) Organized Senate briefing with four state Supreme Court Chief Justices to educate Congressional staff about the impact of pro se litigants on state courts.
- 6) Organized House of Representative briefing on the legal needs of low-income veterans and the work LSC grantees do to meet those needs.
- 7) Board Chair and Vice Chair arranged for multi-day symposium on "Making Justice Accessible" at the American Academy of Arts and Sciences.
- 8) LSC President and Chairman were both interviewed for an *American Lawyer* story on big law firm support for legal aid. LSC President was also interviewed by *New York Times* and *Bloomberg* for stories on legal technology. The 2015 Board meetings received solid local coverage of the judicial panels and the pro bono awards.
- 9) Increased targeted press releases to local markets with success placing stories related to Technology Initiative Grants (TIG), Pro Bono Innovation Fund (PBIF) grant awards, and Congressional

appropriations. Organized press events with Members of Congress and grantees for TIG and PBIF grant awards in New York City; Albany, NY; Kansas City, MO; Chicago, IL; Seattle, WA and Boston, MA. These press releases and events resulted in more than 30 stories on PBIF grants and 15 on TIG grants in local papers.

- 10) LSC organized a press event with the Chairman in Omaha to announce disaster grants and the Rural Summer Legal Corps, which resulted in four stories in local press.
- 11) Placed op-eds in local papers in conjunction with Board meetings in Miami, Washington, and Minneapolis, as well as in publications in St. Louis and Detroit.
- 12) The Chairman and the President of LSC continued to seek and accept opportunities to speak to multiple audiences such as law students, law firms, bar associations, pro bono groups, community leaders, and state access-to-justice convenings.
- 13) LSC President serves on the ABA Commission on the Future of Legal Services and spoke at the ABA's National Summit on the Future of Legal Services at Stanford Law School in May 2015.
- 14) Continued to expand use of social media to amplify and promote LSC activity and practices. Facebook followers increased from 510 to 795 in 2015, Twitter followers grew from 3,700 to 4,735, and Linkedin followers expanded from 722 to 1,180. LSC Launched social media campaign to promote our client success stories. Live-tweeted judicial panels and our House and Senate briefings, with the House briefing garnering 250,000 impressions.
- 15) LSC's "story bank" of success stories was updated, edited, and posted best 100 stories covering each state from our 1,000-story bank. The stories are now displayed two ways: (1) by state, on an interactive map; and (2) by theme, as "impact stories" on the web site.
- 16) Expanded the use of analytics. Used social media to drive traffic to web pages and highlight specific messaging campaigns, e.g., the 50-state display of client success stories and the PBIF and TIG awards. Deepened our analytics to include monitoring of how people interact with LSC's social media, e.g., impressions, engagements. Continue to provide quarterly updates to the Board of Directors on the increasing role of social media, and our increased use of analytics to determine which campaigns are most successful.

Initiative Two: Build a business case for funding civil legal services

1) Expanded LSC's library of studies of the economic benefits of legal aid for communities and for government. Studies in several states illustrate that civil legal aid grows economies, positively affecting the housing market, homeless shelter costs, foreclosure and eviction rates, incidence of domestic abuse, and employment. In 2014 and 2015, seven states – Massachusetts, Montana, New York, North Carolina, Pennsylvania, Tennessee, and Virginia – released economic studies highlighting the benefits of civil legal aid. LSC is including this information in its FY17 budget justification to Congress.

 Continued to work with the Public Welfare Foundation to build a business case for private funding for civil legal aid. The 2016 annual meeting of the Council on Foundations will include a focus on civil legal aid.

Initiative Three: Recruit and enlist new messengers and sources of funds to increase private support for civil legal services

- 1) Have secured grants, contributions, or pledges now totaling \$5,128,782.02 million from law firms, private foundations, and individuals.
- 2) Continued convening panels of justices and judges to address access to justice issues at quarterly Board meetings. Panel videos are posted on LSC's website and highlighted in LSC Updates. Continued working with individual judges on access to justice issues. Promptly provided information on messaging to state Chief Judges and Justices, as requested.
- 3) Continued working with the Conference of Chief Justices (CCJ) and the Conference of State Court Administrators (COSCA) to encourage judges and court administrators to address the access to justice crisis in America. CCJ and COSCA passed resolutions recommending funding for LSC "at the level necessary to enable legal services providers to furnish critically-needed legal assistance and advice to low-income and vulnerable Americans" and supporting "the aspirational goal of 100 percent access to effective assistance for essential civil legal needs." This aspirational goal derives from the report of LSC's Technology Summit.
- 4) Established relationships with private foundations interested in exploring funding opportunities in civil legal aid.
- 5) Secured five new grants from private foundations totaling \$650,000. Secured a \$100,000 family foundation multi-year pledge for unrestricted work. Held second year-end appeal to individual donors.
- 6) Expanded projects for private funding, building on the Campaign for Justice case statement.
- 7) LSC was featured by DLA Piper in their law school recruiting materials in 2015.

Initiative Four: Institutional advancement and grantee development support

- 1) The Chief Development Officer spoke to grantees at the Equal Justice Conference and the annual NLADA meeting regarding sustaining programs through private fundraising.
- 2) LSC has made subgrants available to grantees in the Midwestern Disaster project.
- 3) The Rural Summer Legal Corps and the Vieth Leadership Development Project support grantee development.

Initiative Five: Enhanced Strategic Collaboration

- 1) Continued working with the Department of Justice's Access to Justice Initiative and the White House Legal Aid Interagency Roundtable (LAIR) to expand awareness of civil legal aid in federal government agencies and to increase sources of funding for legal aid using grants by federal agencies that serve clients of legal aid programs. LSC President is a member of the Roundtable. President Obama signed a Presidential Memorandum formally establishing the Roundtable.
- 2) Continued strong working relationships with state IOLTA programs and state bar foundations funding civil legal aid. LSC President participated in and spoke at biannual meetings of IOLTA funders and state bar foundations. Consulted with state funders on data collection and reporting, grant applications, and legal aid program oversight.
- 3) Collaborated regularly with the American Bar Association's leadership, Standing Committee on Legal Aid and Indigent Defendants, Standing Committee on Pro Bono and Public Service, and Resource Center for Access to Justice Initiatives.
- 4) LSC President participated in and spoke at multiple annual convenings of state access to justice leaders.
- 5) Coordinated regularly with the Conference of Chief Justices.
- 6) Participated actively in Voices for Civil Justice, the communications hub.

Goal No. 3: Ensure Superior Fiscal Management (Strategic Plan pp. 15-17)

- 1) LSC received an unmodified audit of its FY2014 annual financial statements.
- 2) Under the leadership of the Vice President for Grants Management (VPGM), the Directors of OPP and OCE continue to focus on maximizing communication, coordination, and cooperation between their offices. The new Director of the Office of Data Governance and Analysis will now be included in regular meetings with the VPGM and the Directors of OPP and OCE.
- 3) In 2015, LSC instituted joint regional teams of OCE and OPP staff to share information about grantees with which staff in both offices work and to educate each office about the other's work. This integration of OCE and OPP staff will provide a more holistic perspective on grantee activities and improve oversight, consistent with the recommendations of the Fiscal Oversight Task Force.
- 4) OCE continued to revise and improve upon the Fiscal Compliance Analysts' (FCA) review of grantees' grant applications during the LSC Grants Competition and Renewal Process. The grant application was revised to require applicants to submit various policies, procedures, and charters that are required by LSC regulations and guidance. Applicants that submitted insufficient documents were provided an opportunity to cure the deficiency; those that were unable to address the noted concerns will have their 2016 funding subjected to Special Grant Conditions. For grantees in renewal status, the FCAs reviewed/assessed historical fiscal information and performance to assess the current fiscal health of the grantee.

Over the last two years, LSC has increased the number of documents each applicant is required to submit in conjunction with the fiscal component of the funding application, as well as the review conducted of those documents.

For the 2016 funding cycle, 29 applicants submitted applications that were either missing required fiscal policies or where the fiscal policies provided were insufficient. OCE staff worked with the applicants to reduce that number to 11. OCE has improved efficiency by attempting to resolve grantees' fiscal documentation problems informally through grantees' submission of compliant documents while the application process is still open, rather than by imposing special grant conditions requiring submission of the documents after the beginning of the new grant year. For 2016, 15 grantees have OCE Special Grant Conditions.

- 5) LSC's President and the Inspector General meet every two weeks. OCE, along with OPP and the VP for Grants Management, continued to hold monthly meetings with representatives of the OIG staff to discuss issues of concern and share information.
- 6) LSC Management has begun reviewing open OIG recommendations to grantees to see if the recommendations should be made Special Grant Conditions, as OIG does not have its own enforcement mechanisms.
- 7) Continued to improve sharing of information between management and OIG to expedite investigations, avoid duplicative work, and provide early notice to management of potential problems with grantees.
- 8) OCE, along with members of the OIG staff, continued to make quarterly presentations to the Audit Committee of the LSC Board of Directors regarding fiscal oversight and communications between OIG and LSC Management and LSC Management's activities in responding to referrals from the OIG. As part of this process, target time frames for resolving OIG referrals that involve potential questioned costs were developed and implemented by LSC Management. OCE, along with OIG staff, report on compliance with the time frames at each quarterly Board meeting.
- 9) The Delivery of Legal Services Committee received a panel presentation on internal controls best practices, which included grantee Executive Directors, Chief Financial Officers, and an OIG staff member.
- 10) The Office of Information Technology worked to implement new software to ensure that all LSC staff have access to LSC information and documentation relating to grantees.
- 11) Continued using outside reviewers in the grant application process to ensure objectivity in the process.
- 12) Continued rotating review of grant applications by Program Counsel to ensure objectivity in the process.
- 13) Continued the use of short-term funding to address fiscal concerns.

- 14) Began an overhaul of the grants management system to improve access to and management of all information LSC maintains on grantees.
- 15) During 2015, OCE brought six questioned cost referrals from the Office of Inspector General's Audit Division to resolution. This was accomplished by engaging in informal negotiations with four grantees, which resulted in \$502,865 being restated to the LSC funding line at the grantee level and \$969 being returned to LSC. In addition, two questioned cost proceedings were initiated, which resulted in \$3,842 being restated to the LSC funding line at the grantee level and \$21,521 being recouped by LSC. During 2015, OCE brought two referrals from the Office of Inspector General's Investigation Divisions to resolution and two additional referrals are pending. As a result of a questioned cost proceeding initiated at the end of 2014, during 2015 LSC issued a decision by which it recouped \$139,190 from a grantee.
- 16) For the 2015 funding cycle, 18 grantees had Special Grant Conditions imposed which required OCE review and/or follow-up. With the exception of one grantee, each grantee's responses addressed OCE's concerns.
- 17) Increased the use of Technical Assistance Reviews (TAR) as a vehicle for providing grantees with practical guidance on regulatory and fiscal compliance issues. TARs focus on subjects such as intake, accurate case tracking and reporting, internal controls and segregation of duties, and compliance with regulatory restrictions and guidelines. During 2015, OCE conducted 4 TARs; by comparison, in 2014, 3 TARs were conducted and, in both 2012 and 2013, one was conducted each year.
- 18) In response to recommendations from the Office of Inspector General, LSC modified the subgrant approval request process to require the submission of specific subgrantee fiscal documents as part of the application process. LSC also requested additional information on each applicant's procedures for subgrant oversight.
- 19) New procedures were implemented for the audited financial statement (AFS) review process, which will allow LSC to better assess the fiscal health/stability of a grantee based on the information contained in the AFS.
- 20) LSC issued its annual compliance advisory to grantees. The advisory outlined the most significant regulatory and fiscal issues noted as a result of OCE on-site and desk reviews during the previous 15 months, as well as the most frequent findings referred to LSC Management by the Office of Inspector General.
- 21) Implemented a development database to track private donor prospects, interactions, and gifts that integrates with LSC's new document management system.
- 22) Created systems to track private grant spending and gift processing. Created a protocol and procedures for processing private funds and establishing systems to track expenses and time against private funds.

- 23) The Development Office and OLA collaborated on contracts and RFPs using private funding.
- 24) Provided project management for each private grant to ensure funds are collected and reported in accordance with the corresponding funder agreements.
- 25) The Office of Legal Affairs (OLA) developed and finalized a new Procurement and Contracting Protocol and provided enhanced procurement/contract coordination services under the new Protocol
- 26) OLA revised and helped roll out LSC's revised Code of Ethics and Conduct, including multiple officewide training sessions
- 27) OLA revised and finalized LSC's Records Management Policy and began implementation of the new policy.