

Legal Services Corporation
OFFICE OF INSPECTOR GENERAL

Review of Case Statistical Reports
Grantee: Prairie State Legal Services
Recipient No. 514076
AU99-014
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EXECUTIVE SUMMARY

The 1997 Grant Activity Report submitted by Prairie State Legal Services, Inc. (grantee) overstated both the number of cases closed during the year and the number of cases open at year-end. The grantee reported 13,091 closed cases and 4,686 open at year-end. The reported closed cases were overstated by an estimated 752 cases or

6 percent. Open cases were overstated by an estimated 890 cases or 19 percent. The estimates are based on the results of our review of a sample of reported cases.

Closed cases were overstated because the grantee reported services provided to ineligible clients as cases, and recorded some cases more than once. The ineligible client cases occurred because the grantee provided legal services to individuals whose income was higher than allowed by LSC regulations. Open cases were overstated because the grantee did not close cases in a timely manner. Grantee management attributed the untimely closures to difficulties in the implementation of a new automated case management system.

Other issues, not directly related to case reporting, were also disclosed during the audit. Our testing of case files disclosed that some cases were closed with incorrect closing dates and closure codes, some cases were closed with an incorrect problem code, some case files lacked citizenship attestation forms, and some case files lacked a signed retainer agreement.

On page 8 we make recommendations for corrective action. In commenting on our draft report, the grantee indicated that actions have been taken or were underway to correct the above problems.

BACKGROUND

The grantee is headquartered in Rockford, Illinois and has eight branch offices located in Bloomington, Kankakee, Ottawa, Peoria, Rock Island, Rockford, Waukegan and Carol Stream, Illinois. The offices were staffed with 50 attorneys, 7 paralegals and 33 support staff. In 1997, the grantee received \$4.1 million in funding to provide legal services to the poor in its service areas. The Legal Services Corporation (LSC) provided \$2.2 million or about 54 percent of the grantee's funding. The remainder came from state and local governments and private sources.

The grantee is required to prepare and submit an annual Grant Activity Report to LSC on key aspects of its program including the number of open and closed cases, types of cases handled and the reasons for closing cases. For calendar year 1997, the grantee reported 13,091 closed cases and 4,686 open cases at year-end. In 1997, the grantee began tracking client cases through an automated system called Clients for Windows. Branch office data was sent to the grantee's Rockford office for preparation of the annual Grant Activity Report.

OBJECTIVES, SCOPE AND METHODOLOGY

The objective of this audit was to determine whether the grantee provided LSC with accurate case statistical data in its 1997 Grant Activity Report.

The Office of Inspector General (OIG) performed the on-site review October 5-9; October 25 - 30; and November 4-6, 1998. We reviewed the grantee's 1996 and 1997 proposals submitted in the grant competition process, Grant Activity Reports for 1996 and 1997, and the Program Integrity Certification for 1997. We evaluated the grantee's policies and procedures on eligibility guidelines and staff case maintenance. The Staff Guide for Record Keeping and financial statements for the period ending December 31, 1997 were reviewed. The grantee's Executive Director, Director of Litigation, Controller, Assistant Controller, Director of Program Development, Director of Special Projects, managing attorneys, staff attorneys, paralegals, and support staff were interviewed.

We selected the grantee's main office in Rockford along with two branch offices, Waukegan, Carol Stream, and one subgrantee, Will County Legal Assistance Program for our review of open and closed case files. The audit team visited these locations and reviewed a random sample of 96 closed and 84 open case files. We also

performed analytical procedures on a sample of potential duplicate cases to determine if the same case was reported more than once.

We performed the audit in accordance with *Government Auditing Standards* (1994 revision) established by the Comptroller General of the United States and under authority of the Inspector General Act of 1978, as amended and Public Law 105-119, incorporating by reference Public Law 104-134, §509 (g).

RESULTS OF AUDIT

CASE SERVICE REPORTING

The 1997 Grant Activity Report overstated the number of cases closed during the period and the number remaining open at year-end. Closed cases were overstated because the grantee reported ineligible client cases and some cases more than once. The ineligible client cases occurred because the grantee provided legal service to clients whose income exceeded the amount allowed by LSC regulations. Open cases were overstated because the grantee did not close cases in a timely manner. Grantee management acknowledged that improvements were needed in the reliability of case statistical data submitted to LSC.

Case Services Reporting Requirements

LSC requires recipients to submit an annual Grant Activity Report summarizing the previous year's legal service activity wholly or partially supported with LSC funds. This information in the report includes total number of cases worked on, types of legal issues, number of open and closed cases and the reasons cases were closed. The report also includes information on Private Attorney Involvement cases. The Case Service Reporting Handbook and Grant Activity Report instructions provide reporting criteria for cases. Reported cases must be for eligible clients and within the recipient's priorities. Eligibility is based on income and asset determinations and must be documented.

LSC Uses of Grant Activity Report

LSC uses recipient case statistical information to support the Corporation's annual budget request and as a performance measure in the performance plan submitted in response to Government Performance and Results Act. The compilation of program-wide data on open and closed cases is an integral part of the management oversight process and allows LSC management to keep its Board of Directors and the Congress informed of significant program activities and performance.

Use of Automated Case Management System to Prepare Annual Grant Activity Report

Clients for Windows is a data processing system that allows the grantee to store, retrieve and analyze information about client cases and the organization's delivery of legal services. The grantee has uses Clients for Windows to produce annual case statistical reports on open and closed cases. The data from these reports was then manually entered into the Grant Activity Report system.

In response to the annual reporting requirement, the grantee submitted the following information to LSC for the year ended December 31, 1997.

Type of Legal Problem Closed Cases Open Cases

Consumer/Finance	1,717	579
Education	134	38

Employment	282	19
Family	4,885	2,179
Juvenile	47	4
Health	389	179
Housing	3,398	772
Income Maintenance	1,388	689
Individual Rights	154	24
Miscellaneous	697	203
TOTAL	13,091	4,686

.Overall, the grantee classified 81 percent (10,613) of its closed cases as brief services and 19 percent of them (2,478 cases) as extended services.

Examination of Reported Cases

.The grantee overstated closed cases by 752 (6 percent) in the 1997 Grant Activity Report. The overstatement occurred because ineligible clients were provided legal services and the reported closed cases included duplicate cases. Open cases were overstated by 890 (19 percent) because cases that should have been closed were reported as open.

CLOSED CASES WERE OVERSTATED

Ineligible Clients

.We estimated that about 545 closed cases should not have been reported as closed in the Grant Activity Report because the grantee serviced ineligible clients. These clients had income that exceeded the amount allowed by LSC regulations and should not have been accepted as clients. LSC regulations generally require that legal services be provided only to individuals whose annual income does not exceed 125 percent of the poverty level.

Duplicate Cases

.Based on an analysis of a sample of potential duplicate cases we estimate that 207 cases were reported at least twice in the 1997 Grant Activity Report. In these cases, a telephone counselor opened a case for a client and within a few days another counselor opened a second case for the same client with the same problem. Both cases were closed after legal services were provided. The problem occurred because the case management system did not allow the telephone counselors to determine if a case has already been opened for an individual requesting legal assistance.

OPEN CASES WERE OVERSTATED

.The grantee's reported open case total of 4,686 was overstated by an estimated 890 cases (19 percent). For these cases legal assistance had ceased prior to 1997. The Case Services Reporting Handbook states that a case should be closed when the client's problem is resolved or when it is determined that no further action will be taken on a case. The cases should have been reported as closed in the year when legal activity ended.

.Grantee management told us that the overstatement was related to a consolidation of separate data bases. In early 1998, a consolidated database was created at the Rockford office and used to report the case statistics for 1997. This database was created by merging all branch office databases. The consolidated database included cases that were established by the Carol Stream and Waukegan office and subsequently referred to other branch offices.

These cases were kept open in the Carol Stream and Waukegan databases, even after they were closed in the databases of the offices that handled the case. In the consolidation, the closing dates recorded by the branch office handling the cases did not override the blank closing dates in the Carol Stream and Waukegan databases. As a result the consolidated database showed the cases as still open.

OTHER CASE MANAGEMENT ISSUES

Several internal control problems surfaced during our review. Specifically, (1) some records contained incorrect closing codes and dates, (2) some records contained incorrect problem codes, (3) some case files did not contain signed citizen attestation documents, and (4) some case files did not contain signed retainer agreements.

- The closing dates for 11 percent of the sample cases did not match the closing dates on the source documents. Reasons for closure codes in source documents were different for 6 percent of the sample cases.
- About 7 percent of sample cases had a problem code that was different than the problem matter stated by the attorney and/or paralegal assigned to the case.
- About 4 percent of sample cases files did not contain signed citizenship attestation documents.
- About 9 percent of sample cases did not contain a signed retainer agreement.

These problems indicate that improved internal controls are needed over the process for submitting data to the case management system and the initial paperwork processing for clients. The absence of citizenship attestation documents is particularly significant. Such documentation is vital to establishing client eligibility. Improved supervisory review is one way of providing the needed internal controls.

MANAGEMENT ACTIONS

Grantee management acknowledged that old open cases should be purged from the case management database and recognized the need to improve reporting. Corrective actions have been started. A memorandum was sent in October 1998 to all staff and managing attorneys requesting that they review all old cases that were shown as open in the database. Any cases that were not active were to be purged from the database by the end of November 1998. This is a start, but management must take additional actions to ensure all problems are corrected.

CONCLUSIONS

The grantee needs to improve the accuracy of the case statistics reported in the Grant Activity Report. Its 1997 report overstated both closed and open cases. These closed case reporting problems were attributable to servicing ineligible clients and opening multiple cases for a client with a single legal problem. Management must adopt additional controls to ensure these problems are corrected. The open case overstatement resulted in part from a consolidation of data bases. Overall, grantee management needs to provide additional supervisory review over case statistical reporting processes and systems.

RECOMMENDATIONS

We recommend that grantee management:

1. Review LSC eligibility regulations with staff to ensure that clients accepted do not exceed income limits.
2. Implement procedures to ensure that telephone counselors do not open more than one case per client with the same problem matter.
3. Implement procedures to ensure the closing of cases in the year in which legal assistance ceased.
4. Implement procedures requiring supervisors to periodically select a sample of closed and open cases and compare data in the case management system with data in the case file.
5. Review with staff the instructions in the Case Services Reporting Handbook regarding the recording of

- problem codes.
6. Review with staff members the LSC citizenship attestation regulation to ensure that they understand that clients must attest in writing to their citizenship status.
 7. Review with staff members the LSC regulation on retainer agreements to ensure that they understand that both the clients and attorneys must sign the agreements in cases when services beyond counsel and advice is provided.
 8. Implement procedures for review of case service information for accuracy and completeness by the executive director or a designee prior to submission of the Grant Activity Report to LSC.

SUMMARY OF GRANTEE COMMENTS ON DRAFT REPORT

The grantee's comments on the draft report generally agreed with the factual data in the report. The comments provided explanatory information on how the reported case counting errors occurred. Many of the errors were isolated mistakes by the staff or occurred during the implementation of a new automated case management system. The comments suggested that the Executive Summary be clarified by adding that the error rates discussed were based on projections of errors in sample cases.

The comments stated that the recommendations had been implemented. A manual covering all aspects of client intake and case disposition was provided to each staff member in January 1999. Several training sessions on using the manual were held in February 1999. Most staff members were trained at these sessions. A compliance checklist designed to ensure that LSC regulations are followed has been developed and provided to the staff. A copy of the manual and checklist were attached to the comments. A central database of clients is now operational in each office and should eliminate the duplicate records problem. The grantee's comments, without the attachments, are in Appendix II.

OFFICE OF INSPECTOR GENERAL COMMENTS

The grantee's comments fully addressed the issues discussed in the report. We modified the Executive Summary to indicate that the over stated case counts were projections based on a review of sample cases and that some problems occurred during the conversion to a new case management system. Recommendation 4 was modified to emphasize that both open and closed cases should be reviewed. Recommendation 8 was modified to clarify that top level management should review the cases statistical data before submission to LSC. Other minor changes to the report were made based on the grantee's comments.

The grantee's comments indicate that good progress has been made in implementing our recommendations. We consider all the recommendations closed except for Recommendations 4 and 8.

Recommendation 4 requires supervisors to periodically compare case management system data with case file data to ensure data consistency. The first paragraph on page five of the response states that each quarter closed cases will be sampled and verified. The recommendation covers both open and closed cases and is only partially addressed by the grantee's comments. Also the comments do not indicate when the sampling will start.

Recommendation 8 requires that procedures be implemented for management review of case service information before the Grant Activity Report is submitted to LSC. The grantee addressed this recommendation by stating that the managing attorneys would review and verify case statistical information. This is a necessary step in ensuring accurate case statistical data, however it is important that top level management review the case statistical data. As stated above, we modified the recommendation to make it clear that the executive director or a designee should review the case statistical data. The recommendation is consistent with requirements in the revised CSR Handbook.

Please provide this office a corrective action plan addressing recommendations 4 and 8 within 30 days of the date of this report.

LISTING OF FINDINGS AND ASSOCIATED RECOMMENDATIONS

1. Closed cases were overstated (page 6)
Recommendations #1 through #4 and #8
2. Open cases were overstated (page 6)
Recommendations #1 through #4 and #8
3. Other case management issues (page 7)
Recommendations #5, 6 and 7

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Serving Low Income
and Older People
in Northern and Central Illinois

April 21, 1999

Mr. E.R. Quatrevaux, Inspector General
Legal Services Corporation
750 First Street, N.E., 10th Floor
Washington, D.C. 20002-4250

RE: Audit Report of the Inspector General
to Prairie State Legal Services, Inc.
dated March 30, 1999

Dear Mr. Quatrevaux:

We have received your report of the OIG audit of our Program in October and November of 1998. We have carefully reviewed that report and wish to make the following response:

At the outset, we wish to state that the audit team, led by Reginald Brockington, was cordial, professional, and objective. They appeared sincerely interested in the work we do in representing low income persons with legal problems involving very basic human needs. They also made a number of suggestions which were relevant and useful. In addition, Mr. Brockington has subsequently assisted us in obtaining interpretation of Case Service Reporting rules from the Legal Services Corporation. Since the audit took place relatively soon after the installation of a new database system, it was helpful in assisting us to identify deficiencies in the system of which we were unaware. It also provided us the opportunity to remedy these problems early in the system's use.

The report notes that closed cases and open cases reported on Prairie State's Grant Activity Report for 1997 were overstated, that some cases were closed with incorrect closing dates, closure codes and problem codes, and that some case files lacked attestation forms and retainer agreements. We will address each topic separately.

The Executive Summary, which begins the report, summarizes a number of projections about cases that were problematic. Rather than just giving the raw numbers by themselves, we feel that it would be more accurate to state that these numbers are projections based on the sample cases. Given that many people will only read the Executive Summary, we would hope that this minor change can be made in the final report. We would also appreciate it if the Executive Summary



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reflected our efforts both before and after the audit to achieve compliance with reporting requirements as well as the other areas mentioned in the report.

Overstatement of Closed Cases for 1997

On page two, the report states that Prairie State reported 13,091 cases closed during 1997. In the Executive Summary on page one, the report concludes that closed cases were overstated by 752, or six percent. That figure is explained on page six of the report as consisting of 545 (four percent) cases of serving ineligible clients and 207 cases (two percent) of counting the same service to the same client more than once. As the report notes on page three, the basis for these estimates was a random sample of 96 closed cases from three of the nine Prairie State offices and one subgrantee. Therefore, the estimate of service to ineligible clients is based upon four instances of service to ineligible clients and two instances of counting the same service more than once in the four separate offices audited.

Ineligible Clients - We have examined each of the files concerning service to ineligible clients and wish to note that three of those cases were reported as "Below Poverty Limit" (125 percent of poverty) when the case record indicated that, based upon monthly income and family size, the income was instead between 125 percent and 187.5 percent of poverty. In that category, service could have been provided if the client indicated certain expenses or fixed debts as provided under Federal Regulation 45 CFR §1611.5. We acknowledge that the three case records do not evidence the presence of such expenses or fixed debts. The fourth file indicates that the individual was an "LSC Exception" which means that the individual's income was between 125 and 187.5 percent of poverty and legal assistance could have been provided if the requisite expenses or debts were shown to exist. The case record, however, does not reveal any information to support the categorization chosen. Prairie State's policy has always been to serve only eligible clients and that we would hope that the four instances were isolated mistakes on the part of staff.

Compliance Efforts - [OIG Recommendation #1] - During, before, and subsequent to 1997, each casehandler has been provided a copy of the current eligibility guidelines. Staff often post the guidelines on the wall next to their desks. We met with staff in the Spring of 1998 in a series of meeting in each local office to review with them compliance issues including determining income eligibility. Since the audit, we have prepared a 60-page manual that was provided to every person working for Prairie State in January, 1999. The Manual deals with every aspect of intake and disposition of a case, including the procedures for determining income eligibility. We are continuing to update and revise the Manual as LSC interpretations of CSR reporting are issued and to reflect modifications of our procedures. A copy of the current revision of the Manual is enclosed. We introduced the Manual to staff by holding several training sessions in February, 1999 attended by virtually every staff member in Prairie State Legal Services and the Will County Legal Assistance Program. At those sessions, we discussed reporting and compliance rules. Included in these sessions, which required staff to work through a number of mock problems, was a consideration of eligibility for services. We have also developed a compliance checklist which will become a part of each case file. One of the items on the checklist is income eligibility. A copy of the checklist is enclosed.

Repeat Service to the Same Client - During 1997, several of the local offices, including the three Prairie State offices where samples were taken, utilized attorneys and paralegals to conduct initial interviews of financially eligible callers to determine if the legal problems presented fit within the office's priorities. If the case was not scheduled for an additional interview because the problem was not a priority, in most instances, legal advice would be provided to the caller. In a few instances, the same person would call back on the same problem on different days speaking with different staff members. During a portion of 1997, in each of the offices sampled, there was not an ongoing centralized database that the attorney or paralegal could consult to determine if the caller had been previously served.

Compliance Efforts - [OIG Recommendations #2 and #8] - The problem should be largely eliminated. During 1997, not 1998 as the audit report states on page two, Prairie State began using a case management program, Clients for Windows, to record and track client data. Since that time, each office now has a centralized database which indicates if the caller has previously called and the nature of the problem for which advice was provided or a case opened for more extended service.

Local offices are no longer conducting initial interviews to determine if the caller's problem meets an office priority. That function is now performed by the Telephone Counseling Service. Located in the Carol Stream and Waukegan offices, Counseling Service staff, consisting solely of attorneys, receive telephone calls from throughout our 29-county service area by virtue of an automated call distribution system. They check for conflicts and income eligibility, provide legal advice to eligible clients, or refer cases of eligible persons for extended service to the local office serving the area where the caller resides. Counseling Service attorneys now each work from virtually identical client databases using Clients for Windows. Under current procedures, when a conflict check indicates that we have previously served the same client, the counselor brings up the old record from the database and, if the call concerns the same problem in the same calendar year, the counselor continues to provide service on the old record. In addition, we have instituted a procedure whereby each managing attorney is responsible for running a "Near Duplicates" report each quarter and determining if service to the same client on the same problem during the same calendar year has been provided. If so, the duplication will be eliminated. All of these procedures are set forth in the Manual.

Overstatement of Open Cases for 1997

On page two, the report states that Prairie State reported 4,686 cases open at the end of 1997. In the Executive Summary on page one, the report concludes that open cases were overstated by nineteen percent. What the Executive Summary does not mention is that during 1997, the year that was audited, we began utilizing Clients for Windows

Introducing a new data tracking system during 1997 was not without its difficulties. As the audit report notes on page six, a significant statistical error was created when data was transferred from Carol Stream and Waukegan, the two remaining telephone counseling sites, in early 1998 to the Administrative Office in Rockford for purposes of compiling our CSR Report. The data from Carol Stream and Waukegan reflected the client's record as of the time of intake and did not reflect subsequent action taken by the office where the client resided. That data's presence in the database

blocked modification of the record of subsequent action taken by the office where the client resided including the fact that the case had been closed. That one-time mishap will not be repeated and was the result of our failure to understand fully the new computer program.

Compliance Efforts - [OIG Recommendations #3, #4, and #8] - We have dealt with these problems both before and subsequent to the OIG audit. In February of 1998, we sent staff members to a training session in Atlanta, Georgia for Clients for Windows which has contributed to our understanding of the vicissitudes of this computer program. In the summer of 1998, a staff member was designated to be the full-time coordinator for Clients for Windows. Since her appointment, she has spent most of her time training staff to properly input data into the computer program, conforming Clients for Windows in each office, and developing needed report formats so that we can test the reliability of the data.

As noted on page eight of the report, we had produced and sent a report to each office listing older cases opened prior to the audit that did not indicate a closing date. We have continued those efforts and have subsequently sent offices reports derived from the database that serve as a basis for managing attorneys to verify the accuracy of data they are entering into the database. The Manual provides, consistent with the new CSR Handbook, that during the first six weeks of a year, managing attorneys must ensure that all cases that meet the definition of a closed case as provided in the Handbook are in fact closed. During that six-week period, we will require each managing attorney to complete a form that lists the results of a year-end sample that will test the accuracy of the data, including proper closing of cases. They will submit those forms to Administrative Office staff who are responsible for preparing and submitting the annual Grant Activity Report. In addition, managing attorneys will look for cases that need closing when performing periodic case review with casehandlers.

Closing Dates

On page seven, the audit report indicates that eleven percent of the cases sampled indicated closing dates in Clients for Windows that did not match the closing dates on the source documents. During 1997, the closing date for a case handled by the Counseling Service that was neither rejected nor referred to a local office for possible extended representation was closed on the same day by an entry into Clients for Windows made by the particular counselor. That remains our practice. For cases that were referred to an office for further representation, the closing date was entered into Clients for Windows after work on the case was completed and the managing attorney had reviewed the case to determine if closing was appropriate. The belief was that a case was not closed until the managing attorney had approved the closing. The 1993 CSR handbook, which was in effect during 1997, seemed to support this interpretation by defining a case as closed when "the client's problems are resolved and the case is closed ... or [when] the client's problem is not resolved, but it is determined that no further action will be taken on the case." (Emphasis Added) Casehandlers, however, recorded the closing date on the Intake Summary and Disposition Sheet which accompanied each opened file on the date they sent a closing letter to the client. Thus, there were two dates indicating when a case handled by a local office was closed.

Compliance Efforts - [OIG Recommendations #4 and #8] - The Manual now reflects that in keeping with the present definition of when a case is closed: "when legal assistance has ceased and resuming it is not likely," that the closing date should be the date the telephone counselor or the local office casehandler closes the case." Thus, the staff person entering closing data into Clients for Windows now utilizes that date rather than the date of approval by the managing attorney. In addition, properly recording closing dates was also a topic in the recent training sessions and was included in the hypothetical problems which were a portion of the training material. We are instituting a quarterly sampling of closed case files in each office. The sampling will include verification that closing dates, problem codes, and closing codes are accurate.

Closing Codes and Problem Codes

The report indicates on page seven that closing codes for six percent of the sampled cases differed in source documents. The report also indicates that seven percent of the sampled cases had a problem code that was different than the problem matter stated by the casehandler. It is our understanding that the OIG auditors believe that a substantial portion of this difference is attributable to data entry error when clerical staff entered closing data into Clients for Windows.

Compliance Efforts - [OIG Recommendations #4, #5, and #8] - The Manual provides the rules for data entry on closing codes and problem codes and, as discussed, also establishes a sampling procedure to occur quarterly in each office to test the accuracy of data put into the database. We hope that this procedure will accomplish almost total elimination of input error. As discussed above, we have provided staff with training on the Manual. That training and the problems utilized in the sessions specifically dealt with closing codes and problem codes.

Attestation Forms and Retainer Agreements

The audit report notes that four percent of the sample cases did not contain signed citizenship attestation documents and that nine percent of sample cases did not contain a signed retainer agreement. We make no excuses for these omissions. They were wrong and should not have happened. It has always been our policy to obtain these documents. Attestation forms are to be procured from the client when the client first comes into the office to be interviewed. Retainers are mailed to clients after a client is interviewed and the case accepted at the subsequent group intake meeting detailing the legal services to be provided. On occasion, those forms have not been returned and representation has continued.

Compliance Efforts - [OIG Recommendations #6 and #7] - The Manual instructs staff that representation cannot occur without obtaining an attestation form or otherwise proper alienage documentation and provides that letters must be sent to the client who does not return the retainer agreement informing that person that representation will not be provided unless we receive a signed retainer agreement. Both those topics were emphasized at the recent training sessions and are items on the recently adopted compliance checklist. As discussed above, we will also institute a procedure by which managing attorneys sample case files on a quarterly basis to determine compliance with attestation and retainer requirements.

Recommendations

As detailed above, we believe that we have instituted procedures that follow each of the recommendations stated on pages eight and nine of the audit report. If you have further thoughts after reading our response, we would appreciate you communicating them to us. Prairie State Legal Services, Inc. has always sought to comply with LSC rules and regulations. We believe that our past and current efforts demonstrate this fact.

Sincerely,

Joseph A. Dailing
Executive Director

Enclosures