

FLORIDA'S REPORT TO LSC IN RESPONSE TO PROGRAM LETTER 2000-7

INTRODUCTION

As stated in the 1998 Florida state planning report to the Legal Services Corporation (LSC) and as outlined in more detail in the more recently submitted "Reinvigorating Florida's Legal Services Community - Florida's Plan" (Florida's Plan) the building of a state justice community has a long history in Florida guided by the Joint Commission report in 1991 entitled, "Opening the Doors to Justice – The Quest to Provide Access for the Poor in Florida." In 1999 the Florida Bar Foundation (Foundation) and all of the provider programs in Florida (both LSC funded and non-LSC funded) initiated a comprehensive review of the delivery system which was inclusive of program directors, program staff, client representatives and, through the Foundation, the judiciary and private bar leaders. This comprehensive review and state planning resulted in Florida's Plan being adopted in the fall of 2000.

In 2001 the implementation of Florida's plan was initiated with the formation of eight (8) implementation committees as described in Florida's Plan with kick off meetings being held at a statewide conference in February 2001. A copy of the agenda is attached as Attachment "A." The implementation committees involve over ninety (90) project directors, staff and clients who are currently in the middle of developing their implementation recommendations to be approved by the Implementation Coordinating Committee and ultimately by the Foundation's Implementation Oversight Committee.

In recent months, the efforts of state planners have been dominated by the required reconfiguration of the LSC funded programs in Florida. As a result, the work of some of the implementation committees has been delayed. Since Florida is in the middle of implementation, a comprehensive evaluation as called for in LSC Program Letter 2000-7 is not possible. However, in Compliance with LSC Program Letter 2000-7, the twelve (12) current LSC grantees submit this report on the status of Florida's development of a comprehensive, integrated and client-centered state justice community.

I. To what extent has a comprehensive, integrated, client-centered legal services delivery system been achieved in Florida?

I. Important Client Issues - Low income citizens of Florida face the full range of civil legal problems identified by the Legal Services Corporation in their listing of case codes. Despite diversification of funding sources and coordination of LSC funded programs with over 20 other legal services providers, the needs of low-income Floridians are not being fully met. Exacerbating the problem is the tremendous growth in both the number of eligible citizens and, more particularly, in the number of immigrants in the state. Florida is responding to these issues as best

it can by creating regions throughout the state that will result in greater sharing of responsibility of existing providers for all potential clients.

As a precursor to current regionalization efforts Florida has utilized a mechanism to identify major issues affecting broad segments of the population primarily through coordination by Florida Legal Services, our state support organization, of substantive workgroups. As a result, efforts have been coordinated around title and pay day loans, domestic violence issues, welfare reform and immigrant benefits issues among others that have greatly benefitted low-income citizens.

2. Delivery System - The Florida delivery system is comprised of 38 civil legal assistance providers offering services to low-income citizens. These providers currently consist of 12 LSC providers with multiple funding sources and 26 other providers, all 38 of whom receive IOTA funding through the Florida Bar Foundation. Most of these providers offer a general array of services, accompanied by a number of programs providing specialized services (in areas of representation of prisoners, and immigrants). Florida Legal Services offers state support assistance in areas of training, coordination of workgroups, umbrella groups, dissemination of information on changes in federal and state laws, development of manuals in substantive areas to build local program capacity, and coordination of policy/legislative advocacy.

To maximize efficiency, programs coordinate their services with other programs that are close in geographic proximity and, particularly for referrals, with programs around the state. In addition to coordinating client services, programs participate in regional and statewide efforts to develop and share expertise through participation on workgroups (soon to be umbrella groups) and implementation committees of the state planning process, and through training events and co-counseling arrangements. Programs also participate in state and regional efforts to evaluate and improve other aspects of the delivery system. Many of these efforts are addressed through the Project Directors Association, an organization made up of executive directors of all Florida Bar Foundation funded entities. Its efforts are enhanced through regionalization efforts that are currently underway.

3. Assessment of Performance - As the most common thread running through the 38 Florida providers, the Florida Bar Foundation undertakes performance reviews of programs, assessing not only their individual accomplishments but also their coordination with other providers and their participation in statewide and regional efforts. The Florida Bar Foundation utilizes the ABA standards for providers of civil legal services to the poor in its on-site assessment visits. On-site reviews are staggered around the state and generally cover 10 to 15 programs per year. In addition all programs are required to submit self assessments annually documenting and describing their program efforts and accomplishments and their participation in coordinated events. The self assessment report includes special supplemental questions concerning initiatives in changing areas of law that have broad impact on

client communities, such as welfare reform and public housing, and concerning program affirmation of the vision reflected in the state plan and adoption of the state plan core values.

4. Equitable Legal Assistance Capacities - In recognition of differing degrees of need and resources throughout Florida, our statewide system is working to ensure availability of equitable legal assistance capacities through regionalization efforts and statewide committees formed to implement state plan recommendations. Implementation committees have been formed in the following areas: companion delivery, task forces and umbrella groups; pro bono; regionalization; regional intake pilot projects; general state support; training, technical assistance and technology; and resource development. Their work is guided by the implementation coordinating committee and the oversight committee. As noted in the Introduction, some of the work of the implementation committees has been delayed by forced, and in Florida's view, premature reconfiguration requirements imposed by LSC. However, despite that interference, significant work has been accomplished by many of the committees. See the attached "Approved Recommendations from Implementation Coordinating Committee," Attachment "B."

The regional intake committee selected Region VII, composed of Dade and Monroe Counties, as the site for an urban pilot project to develop a centralized intake system. After several meetings among the Region VII programs, they have agreed to defer to Region IV, composed of Hillsborough, Manatee, Pasco, Pinellas and Sarasota Counties, as the pilot region. Region IV has conducted a review of various centralized intake systems and is poised and ready to participate as Florida's urban pilot program.

The first pilot regional intake program, a cooperative effort among Central Florida Legal Services, Three Rivers Legal Services, and Withlacoochee Area Legal Services, that serve a predominately rural area, has received grants from the Legal Services Corporation and is currently involved in implementing its program. Members of the regional intake committee will participate in upcoming review of their progress to date, to be conducted by the Florida Bar Foundation. Information about the successes and failures of this pilot program should be very useful to those designing the Region IV pilot project.

The Regionalization Implementation Committee which began its work at the statewide meeting on February 21, 2001, established two subcommittees to initially develop recommendations, one on regional agreements and protocols and the other on outreach and special needs groups. An initial draft of recommendations on agreements and protocols was developed but progress was interrupted once the issue of regional boundaries and program reconfiguration were mandated to the front of the planning and implementation process.

The umbrella/task force committee is addressing the issue of implementing a system that will improve the capacity to provide equitable access to quality legal

assistance through formal collaborative agreements by legal advocates throughout the state. The committee focuses on three avenues of collaboration: umbrella groups, regional and statewide task forces, and co-counseling arrangements.

Umbrella groups are statewide substantive groups composed of advocates from programs throughout the state who have an interest in a specific area of the law. Umbrella groups will provide opportunities for networking and communication between advocates, as well as providing services in substantive areas for the use and benefit of all advocates and legal assistance programs throughout Florida.

Each umbrella group will be responsible for provision of training opportunities to its members, as well as non-member legal service advocates; maintaining pleading banks, a web page and an e-group or listserve; networking, collaborating and maintaining expertise within their groups and with issue driven task forces; and reviewing community education materials for use by programs statewide. In addition umbrella groups will evaluate maintaining a substantive technical assistance list, setting up amicus and impact case screening panels, creating and distributing community legal education material, setting up a legislative review committee, and creating and maintaining desk manuals.

In addition to umbrella groups, the capacity of quality legal services throughout Florida will be enhanced by statewide and regional task forces. These issue driven task forces are collaborative projects of several legal services programs and other interested parties created for the purpose of developing and implementing innovative advocacy strategies centered around an identifiable unmet legal need affecting a specified client group. Task forces presently operating throughout the state include such activities as monthly case reviews and discussion among advocates from several regional programs regarding a previously identified set of legal needs; training sessions for local or regional advocates pertaining to a specific legal need with the expectation that these advocates will begin to address this legal problem for clients in their area; administrative advocacy in an attempt to convince state or local agencies to change practices or policies; community education for client groups and/or direct service provider organizations; and complicated litigation (either individual cases or impact litigation).

Finally, in the area of collaboration, providers are working to improve equitable capacity through co-counseling arrangements between legal services programs or between legal services programs and private attorneys or public interest law firms. Although co-counseling will occur in statewide or regional task forces, other co-counseling arrangements will be pursued. The umbrella group/task force committee will assist in the implementation of these co-counseling arrangements by providing written guidelines and model co-counseling agreements.

In addition to work being done by the implementation committees, language barriers are overcome not only by local staff who are multilingual, but by utilization of Language Line, a service providing interpreters who speak a large number of foreign languages, the availability for which is provided by Florida Legal Services. In addition to the collaborative efforts described above, programs throughout the state will have access to a variety of information once the statewide web site (which has been approved in the last TIG grant round) is established.

5. Technology - Technology has been employed by legal services providers in a variety of ways. Listserves have been developed and utilized by substantive task forces and state plan implementation committees (and the umbrella groups that will be replacing workgroups will maintain e-groups and listserves, which will focus on the rapid dissemination of new information involving cases and/or legislation, allow requests for information and assistance to quickly go out to numerous advocates, and maintain networking and collaboration in the absence of frequent meetings). Many provider programs have established a program web site (and a statewide web site will be created with the recently announced grant funded by LSC). In the year 2000, the Florida Bar Foundation obtained funding through an Emma Lazarus grant that placed computers in 33 community based organizations serving immigrants to provide information to those organizations about legal rights affecting their client populations. As described below, similar efforts are planned for the future.

An implementation committee has been established based on Florida's state plan to develop a technology plan for the state. The technology plan is designed to link clients, local non-LSC and LSC programs, and referral agencies together. In relation to the statewide web site, non-LSC and LSC legal services programs and client service community-based organizations will furnish content to and be users of the statewide web site. Each program will designate a computer responsible person (CRP) and will be expected to adhere to minimum statewide technology standards that are being proposed based on a survey of programs' technology capacities performed in spring, 2001. Each program will also designate a training responsible person to coordinate with the CRP in terms of supplying content in designated areas.

As part of the technology plan, as legal services programs upgrade their computer equipment they will donate (as feasible) personal computers and printers/scanners to CBOs, so by the Internet the CBOs can network with legal services providers via the statewide web site and e-mail, and will be able to access other Internet databases. It is also anticipated that legal services providers will link with other anti-poverty partners and agencies with shared values.

As discussed in #4, Florida will sponsor two pilot regional centralized intake programs, one urban and one rural. In the areas served, clients will be able to call

one toll-free number and receive advice, free services or referrals, and possibly interactive pro se materials (that will also be available at the statewide web site via hyperlinks). The regional centralized hotline will develop poverty law substantive law manuals in coordination with umbrella groups and task forces, protocols for hotline interviewers, CLE materials, and FAQs and responses which will be added to the state's web site.

As mentioned previously, with funding from the 2001 LSC TIG, Florida will sponsor an enhanced web site staffed with a content manager. The content manager will work closely with the newly formed statewide training committee with regard to advocacy related content, as well as client legal education content. Additionally, umbrella groups will be responsible for the dissemination of various types of information to advocates throughout the state. Each umbrella group will be responsible to maintain information on the web site to be accessible to legal services advocates. The information will include a pleading bank or other forms commonly utilized in a substantive area, a list of substantive experts who can be contacted statewide for information, advice and guidance, and desk manuals in major areas of practice and other information. The web site will contain the following (in Cold Fusion, HTML and browser independent format, ADA accessible and with as much content in Spanish and Creole as possible): community legal education materials; a searchable pro se knowledge database and links; locations and directions to LSC and non-LSC offices, and types of services by county; hyperlinks to LSC and non-LSC legal services web sites; hyperlinks to LSC and non-LSC regional intake centers (pilot programs in urban and rural areas); and interactive direct e-mail links to local legal services offices. The web site will integrate the 60 legal services delivery program offices, along with 40 identified client service community-based organizations. Clients will be able to directly e-mail local legal services programs from the web site. For advocates, the web site will have restricted access to addresses, e-mail and phone numbers of advocates around the state, training calendars, training materials, a pleading bank, poverty law desk manuals, a fund raising database, and pro bono opportunities.

With projected future funding, two statewide technology resource coordinator positions will be created. The resource coordinators will assist local programs and CBOs identify and procure volume discounts, purchase and distribute computers and printers/scanners for local legal services offices to install at CBOs, review emerging technology advances, help programs develop technology budgets, develop minimum technology standards, serve as a clearinghouse for technology related issues, and coordinate and sponsor technology training.

The state technology committee is also seeking funding for a coordinator who will solicit pro bono attorneys to utilize the state web site, post pro bono opportunities, arrange for law firms to convert data for use on the web site, make presentations to lawfirms, solicit content for pro bono lawyers, gather content from

around the country, and post news items on the state web site. This coordinator will work closely with the training committee to establish technology/web based training opportunities for pro bono attorneys and to solicit training materials from the private bar. The coordinator will also use available technologies (including establishing listserves and e-groups) to help the statewide resource developer and pro bono developer generate funding and recruit volunteers for legal services programs in Florida.

6. Expansion of Resources - In 1998, the Florida Justice Community obtained revenues for civil legal services in total of \$46.2 million. In 2000, Florida obtained \$49.4 million in funding. In two years, Florida increased its total revenues by 7% despite significantly reduced IOTA revenues due to low interest rates. The expansion of Florida's resources from 1998 to 2000 included funding available for "hard to reach" groups. For example, additional funding was obtained through the Victims of Crime Act and the Violence Against Women Act. Such funding included significant funding for victims of domestic violence living in rural areas. Additional Title III funding was obtained to serve the elderly and additional Ryan White funding was obtained to serve people with AIDS. Funding was already in place to serve immigrants through the Florida Immigrant Advocacy Center and the Migrant Farmworker Justice Project (supplemented by SOROS funding) and to serve prisoners through the Florida Justice Institute and Florida Institutional Legal Services. Florida programs also increased general funding primarily through local county filing fee surcharges. Increases in funding occurred throughout the state and were primarily generated at the local program level.

Florida State planners established resource development as an important goal of the state plan. State Planners created a standing Resource Development Committee whose role is to help build on Florida's resource development successes. The Florida Justice Community is working on a number of fronts to increase the resources available in Florida. Some of the activities undertaken and/or underway include:

(a) Florida undertook a successful effort to persuade the Florida Supreme Court to amend the IOTA rule. The amended rule will result in banks paying higher interest rates on IOTA accounts which could yield an additional \$15 million dollars in IOTA revenues.

(b) The President of the Florida Bar is leading a Florida Justice Community campaign to obtain a minimum of \$10 million dollars a year from the Florida Legislature. At present, the Florida Legislature does not fund civil legal services for the poor.

(c) The Resource and Development Committee is planning a resource development "show and tell" day in which uniquely funded Florida projects will be showcased to all Florida legal services programs.

(d) Florida Legal Services contracted with a well-respected NLADA consultant, Bonnie Allen, to gather information and make recommendations concerning a statewide community support team that would offer statewide support to increase pro bono work, to increase funding, and to improve marketing strategies and materials.

(e) Florida Legal Services contracted with a private attorney and with a large Florida law firm to preserve the current local county option to assess a surcharge on filing fees for legal aid programs. Filing fee surcharges yield more than \$6 million statewide. These are threatened as an unintended consequence of a constitutional amendment that was passed to alter the funding of the Florida court system.

In the future the Florida Justice Community plans to share up-to-date resource development information such as grant applications on the statewide web site and undertake a comprehensive Florida legislative education campaign to inform Florida legislators of the local legal services available to their constituents.

7. New Leaders/Diversity - While each program is responsible to identify and nurture new leadership within its staff and client community and to pursue diversity to reflect the community being served, in the state as a whole, the planning and implementation process has been used to pursue these goals. The planning committees included over eighty (80) people and attention was paid to the inclusion of clients, the diversity of staff positions and experience and the diversity of gender, race and ethnic background. Most planning committees formed subcommittees which provided opportunities for new leadership on statewide planning issues. Active and creative members of the planning committees were encouraged to participate on the implementation committees. For almost all of the implementation committees, non-director co-chairs were selected to ensure leadership diversity and to continue the development of new statewide leadership. A diverse group of over ninety (90) people are currently working on the statewide implementation committees. Client representatives from across the state were included in the statewide implementation kick-off conference and these clients have remained active on the implementation committees. The entire planning and implementation process has encouraged innovation, creativity and experimentation to improve the delivery system in Florida. While Florida is not yet at the stage for full implementation, the provider programs in Florida have demonstrated their commitment to the success of improving the delivery system by committing the time of their staff and paying for the expenses of their staff participation. Also, the approval process, through the Implementation Oversight Committee, and the stated commitment of the Foundation to fund the implementation of the state plan and to hold programs accountable for implementation, provide the authority and resources to implement the agreed needed changes.

8. Next Steps - the Implementation Coordinating Committee and the Implementation Oversight Committee have developed target time frames for the

implementation of the committee approved recommendations over the next couple of years. Some recommendations are being implemented currently, like the formation of substantive umbrella groups, while others will take longer, such as the completion of the regional agreements. Most of the current activity is focused on the statewide decision on reconfiguration of the LSC funded service areas and the division of client services within those areas. That task is to be completed by early in 2002. As mentioned before, clients are fully involved in the implementation committees and a client representative serves on the Implementation Oversight Committee so clients are actively involved in working out the implementation schedule.

9. Greatest Obstacle - The greatest obstacle has simply been the scope of the task in a state as large and diverse as Florida. The next greatest obstacle has been how to best manage an inclusive process with a large number of participants to proceed effectively and promptly. Also, an early concern was how to keep all the interested parties informed on the issues being addressed and the progress being made. The scope of the task was made more manageable by gaining the up front commitment from first all of the project directors and then all the participants in the planning process that the entire effort would be grounded in energetic, client-centered, affirmative advocacy. The structure was developed for the planning committees, and now the implementation committees, to be expansive and creative in their work and leave it to the coordinating committee to work out any overlaps and conflicts. The Planning Oversight Committee, and now the Implementation Oversight Committee, provides the accountability to ensure the process is achieving its goals. To resolve the information concern, the minutes, work product and recommendations of the planning committees, the implementation committees, the Planning Coordinating committee and the Implementation Coordinating committee are posted on the Florida Legal Services web site and comments are encouraged. Florida is proud of the work that has been performed and the structure that has been created for our continued work, management, communication, and accountability. In all honesty, Florida is also frustrated that our focus has been diverted from implementation and achievement of improved results for clients to premature consideration of LSC's mandated reconfiguration.

10. Benefit-to-Cost Analysis - since Florida is in the middle of the implementation process, no benefit-to-cost analysis is yet possible. However, the charge to each of the implementation committees is to include in their recommendations standards and evaluation criteria. Effective evaluation, including benefit-to-cost analysis where appropriate, is fundamental to the Florida state plan and the Foundation has committed to assist with such an evaluation.

11. Resources, Technical Assistance and Support - Clearly many of the goals of the Florida Plan require overall additional funding for civil legal assistance. To meet this challenge, the Foundation has led a recently successful effort to modify the

Interest on Client Trust Accounts rule which has the potential of substantial new funding for the delivery system by the year 2003. Also, The Florida Bar is taking the lead in seeking state funding for civil legal assistance in the 2002 legislative session. The assistance of LSC in improving the use of technology through funding of the centralized intake pilot project and the statewide web site is appreciated but we were disappointed that our plan to use technology to better partner with community-based organizations to expand client access and encourage greater client participation in building our comprehensive, integrated, client-centered delivery system was not supported. Florida will benefit from greater exchange with other states on how their delivery systems are being reshaped, what works and what does not and real outcome measures for improved access and client service as those become available.

II. To what extent have intended outcomes of a comprehensive, integrated client-centered legal service delivery system been achieved including but not limited to service effectiveness/quality; efficiency; equity in terms of client access; greater involvement by members of the private bar in the legal lives of clients, and client-community empowerment?

1. Issues Impacting Low-Income Persons - By the very nature of legal services, most issues affecting low-income persons will be communicated through the “front line” advocates in the field programs. In recognition of this “bottom-up approach,” it is necessary to ensure that our “front line” advocates have a resource and support system in place to foster a quality efficient client centered legal service delivery system. As such the core strategies to address the issues impacting upon low - income persons in Florida will be developed primarily through substantive area umbrella groups, issue-oriented task forces, co-counseling arrangements and statewide legislative and administrative protocols. Please see pages 6 through 19 for the umbrella groups and issue-oriented task forces approved protocols and pages 2 through 3 for the legislative and administrative advocacy approved protocols in Attachment “B.” These mechanisms are being developed to bring quality legal service to low income clients regardless of where the program or client exists. The approved protocols for the umbrella groups and issue oriented task forces contain the evaluation process and criteria to be used. The identified expectations/objectives of umbrella groups will always take into consideration that the groups’ ultimate responsibility is to the low income clients that we serve. Through annual self-assessment reports, the umbrella groups will address the respective groups’ achievements and failures in meeting their stated objectives. These reports will also identify projected objectives for the following year. To ensure that the goals and objectives of the umbrella groups are being met, a peer review group, comprised of advocates and PDA members, will review the reports for the purpose of assisting and strengthening individual umbrella groups as well as the entire umbrella group system. Task forces will consistently evaluate their expected goals and objectives and will be encouraged to make revisions as necessary. Individual advocates will be

responsible for keeping their programs and project directors apprised of the progress of the task force. Any evaluation process adopted by a task force will ensure that the ultimate goal of addressing the unmet needs of our clients is being met. Similarly, the success of the legislative and administrative advocacy protocols will be measured by the outcomes achieved for clients with the primary responsibility for capturing that information lying with Florida Legal Services.

2. Coordination/ Expanding Access - In the last several years, the Florida delivery system has initiated several coordinated advocacy projects to expand client access and to improve the delivery of legal services. However, a quantified evaluation of these initiatives has not been done. Some examples of the coordinated advocacy initiatives are:

a) **Emma Lazarus Project -** This was a statewide project to provide legal advocacy and naturalization assistance to the over 150,000 immigrants that were faced with the loss of their public benefits as a result of federal legislation in 1995 and 1996. This project was funded by the Open Society and was administered by the Florida Bar Foundation. The project assisted tens of thousands of individual immigrants and gained systemic change through the federal courts and, in coalition with national groups, in the Congress;

b) **Domestic Violence Clearinghouse -** In collaboration with the Florida Coalition Against Domestic Violence and local domestic violence centers, partnerships were built across the state between legal assistance providers and domestic violence centers to use VAWA funding to expand access of domestic violence victims to legal assistance. This network has materially increased the representation of victims at injunction hearings and has led to systemic changes to improve the courts' treatment of victims;

c) **Child Support Task Force -** This task force is a statewide collaboration between legal assistance providers and ACES, an organization of child support recipients. This is a pilot issue-oriented task force that is focused on the failures of the Florida Department of Revenue to promptly and accurately provide child support the department has collected to the needy recipient families. The task force is developing common protocols for administrative advocacy to recover the child support and is initiating systemic change advocacy with the department;

d) **Special Education Regional Task Force -** A program in North-Central Florida with substantial staff expertise in special education advocacy has been working with three (3) provider programs in the region to materially improve the level and quality of special education advocacy that is available to this largely rural area of Florida. This task force is funded through the Foundation's Children's Legal Services Grant Program. The task force developed outreach plans and substantial new special education advocacy has been initiated. Several rural school districts have changed their treatment of children with special education needs as a result of the task force advocacy;

e) Housing Regional Task Force - In a region from Central Florida to North-Central Florida, six (6) provider programs have come together to form a housing task force to focus on improving advocacy for tenants in public and government subsidized housing. Most of the program advocates had limited expertise in the housing area so initially the task force served as primarily a training and case consultation vehicle. More recently, the task force has brought about co-counseling and more sophisticated advocacy on behalf of tenants;

f) Consumer Regional Task Force - In a region from Central Florida through North-Central Florida to North-East Florida a relatively new task force has been formed with an expert attorney from the statewide Florida Legal Services to improve consumer advocacy in the region. The sharing of information, advocacy strategy and new joint representation of clients has proved so successful that efforts are underway to have the consumer task force replicated in other regions of Florida; and

g) Community Counsel - The very successful Community Counsel Project of Bay Area Legal Services is partnering with the provider programs in the neighboring counties to expand the project into Pinellas, Manatee and Sarasota Counties. This project links community-based organizations with volunteer attorneys from law firms to provide the community-based organizations with needed corporate and transactional legal representation.

In addition to these specific projects, programs have participated for a long time on statewide substantive workgroups that provided advocates with mentoring, information sharing, and co-counseling. Programs have also shared information through day long seminars about resource development activities that have been successful in their areas, leading to increased funding for clients not only in the domestic violence area but also independency representation, filing fee surcharges and other areas.

3. Quality Improvement - The collaborative advocacy examples listed above have clearly improved the quality of advocacy for clients being served through those projects. The ability of advocates to focus on certain client needs and work in partnership with others to address those needs is a proven formula for increasing the quality of advocacy being provided. It is this collaboration and sharing of program expertise that is at the core of the Florida plan and it is these examples that give us confidence that once statewide implementation is completed we will achieve high quality energetic, client-centered, affirmative advocacy.

4. Relative Equity of Client Access - While improvements have been made in the relative equity of client access to needed legal assistance in Florida, this goal will not be achieved until the state plan with the new regionalization is fully implemented. The challenge of providing access to immigrants that do not speak English is particularly acute in Florida. The Emma Lazarus Project has helped us partially address this problem as it has enabled us to build a computer linked network with over 30 community based organizations that serve immigrants so we can keep them and the immigrants they serve informed on new developments that impact eligibility for public benefits, immigration status, education rights, etc. The network also provides easy access to expert legal advice and assistance through the provider programs that serve immigrants. Also, Florida Legal Services has made interpretation services available throughout the state through a statewide Language Line account.

5. Relative Equity to Full Range Delivery - Florida responded to the limitations on full range legal advocacy imposed by Congress in 1996 by developing the “Companion Delivery System.” The Florida Bar Foundation expanded funding to non-LSC provider programs in Florida to ensure continued capacity to provide legislative and administrative advocacy, class action representation, attorney’s fee claims, legal assistance to ineligible immigrants and legal assistance to migrant farmworkers. The state planning process is improving the “Companion Delivery System” and the new regions will improve the ability to have resource rich areas in terms of law firm, corporate and university capacities to be available to relatively resource poor areas.

6. Efficiency of the Delivery System - The recognition that often the current delivery system does not operate efficiently, particularly for clients seeking to access the system, was a major factor in stimulating the current state planning and implementation process. We are confident that the Florida State plan when fully implemented will operate highly efficiently and there will be a minimum of duplication.

7. Expanded and Efficient Use of the Private Bar - One of the great successes of the Joint Commission’s work in 1991 was the adoption by the Supreme Court of Florida of the comprehensive pro bono plan that was recommended. Florida still stands as the only state that has a statewide pro bono committee and a network of local pro bono circuit committees working to build a culture of pro bono legal service for all lawyers in Florida, coupled with a mandatory pro bono reporting requirement that provides the most accurate information on the level of pro bono service being provided as well as an additional catalyst for lawyers to provide pro bono legal services. Florida has developed numerous new projects to respond to client needs and provide new opportunities for lawyers to provide pro bono legal assistance. There is some concern that improvement is stalling, however, so The Florida Bar, three large law firms, the Florida Bar Foundation and the provider programs have

all financially contributed to a new project to build pro bono, financial resources and in-kind resources for delivery of legal assistance. The Florida Bar president has made access to justice the theme of his bar year.

III. Are the best organizational and human resource configurations and approaches being used?

1. Current Configurations of Programs - Please see the attached service area maps of the LSC funded general service programs, Attachment "C," and the non-LSC general service funded programs, Attachment "D." Please also see the attached "Overview of the IOTA Legal Assistance for the Poor Program 2000," Attachment "E," describing the components, funding sources and levels of the delivery system.

2. Other Configurations Considered - In the Florida planning process, many configurations were considered including a single statewide program, regional programs and maintaining the existing programs. The decision was made that clients would best be served by creating regions in which existing programs would work closely together and configuration changes would be pursued as a natural progression from the increased collaboration among programs. However, as implementation began, LSC mandated the configuration be moved to the front of the agenda and the number of LSC funded programs be reduced. Florida is now completing an extensive and inclusive process to provide LSC with a recommendation on service area boundaries for a reduced number of LSC funded programs. In that process many alternatives were considered and measured against client service based criteria. The recommendations with an explanatory report will be provided to LSC by the Implementation Oversight Committee in the near future.

3. Duplication of Capacities or Services in the State - Some duplication is inevitable in order to be able to meet the commitment of the state planners to provide full service representation capacity throughout the state. However, the implementation of the regionalization plan for service delivery will greatly diminish duplication of capacity and service.

4. Innovative Service Delivery - Please see the response to Question II, 2.