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Design of an On-Site Evaluation System for the Office of Legal Services

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FOREWORD

The Legal Services program was established in 1965 as a part of the Office of Economic Opportunity's Community Action Program. Its purpose was to mobilize the nation's legal profession to support an aggressive program of legal representation for the poor. Over the past six years, Legal Services lawyers have demonstrated that the legal system can be used as a vehicle for constructive change. The Legal Services Program has had a history not only of dedicated and able lawyers in its projects, but also of federal administrators committed to highest quality legal services.

One of the basic tools used by federal officials in improving the quality of the Legal Services Program has been evaluation. In December 1969, the Office of Legal Services contracted with the Urban Institute to develop a new on-site evaluation system for our use in assessing performance of individual Legal Services projects across the country. The Institute staff worked in concert with the Office of Legal Services to develop the on-site evaluation system described in this report. Because of the Office of Legal Services staff involvement, because of our need for a systematic approach to evaluation, and because of the applicability of the system recommended, the Office of Legal Services has implemented this evaluation system.

Since April 1970, the basic approach of this on-site evaluation system has been used by the Office of Legal Services to evaluate every local Legal Services project. Projects are now being evaluated with much closer scrutiny and in a more uniform way than before introduction of the system.

The work done by the Urban Institute is a significant aid in the difficult job of managing and upgrading our program.

Winston R. Webster
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   Assistance and Evaluation Division
Office of Legal Services

Washington, D.C., 1971

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PREFACE

This report was prepared pursuant to a contract with the Office of Economic Opportunity's Office of Legal Services to:

design an on-site evaluation system for the Legal Services Program which will provide periodic assessments of the performance of individual projects in order to aid OLS management in monitoring field projects, to provide individual assessments of project performance for use in making yearly refunding decisions and to generate uniform data on project characteristics.

The contract called for the expenditure of twenty man-weeks of professional staff time over a period of four months to design the system and conduct preliminary field tests.

This report describes the system, its rationale, and the way it can be used by OLS management. The system was first described in an Interim Report submitted to OLS on February 26, 1970, and field-tested in four locations between March 2 and April 2. The Institute and OLS contemplate that further testing and refining will be done by OLS.

Urban Institute staff members Hugh Duffy, John Scanlon, Joseph Wholey, Bayla White and Leona Vogt collaborated in the design of the system presented, with important contributions from Garth Buchanan. Hugh Duffy worked on the project full-time, and the other staff members contributed portions of their time. They were materially assisted by the advice and comments of a Technical Advisory Group, whose members were Peter Bloch, Garth Buchanan, Gerald Caplan, Charles Edson, Betsy Levin, Jeff Schiller, William Walker, and Winston Webster. Invaluable support services for the project were provided by Mary Sarley and Claudia Sargeant.

We would like to express our appreciation to the staff of the Office of Legal Services for their close cooperation during the course of this study. This was an important factor in designing a system relevant to the needs of OLS management.

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I. STATEMENT OF THE PROBLEM

The Office of Legal Services (OLS) is interested in developing a system which will enable it to monitor and evaluate the activities of a large number of field projects that vary widely in size and setting.[1] As the terms are used in this report, monitoring means (a) determining whether projects are complying with national OLS guidelines and grant conditions, and (b) identifying needs for technical assistance in either management or in substantive legal areas; evaluation means assessing (a) the managerial efficiency of local projects and (b) the results they are achieving.

OLS has historically tried to achieve these objectives in four ways:

1. Regional staff have tried to informally monitor project operations through brief site visits, phone calls and correspondence. Inadequate staffing patterns and a high rate of staff turnover have been a problem here.

2. OLS operates a Management Information System (MIS) consisting of quarterly narrative and statistical reports submitted by local projects. The data yielded by the MIS are of low utility for management purposes, and project compliance with MIS reporting requirements is so low that the data are now largely ignored.

3. The Grant Application Process requires projects to submit information on their progress and plans. This provides some information but has limited usefulness as a monitoring device.

4. OLS has operated an on-site evaluation system with varying degrees of success. The system has used ad hoc teams of consultants and OLS staff members who made on-site visits to projects and forwarded reports of their impressions to OLS. These reports have provided OLS with the most useful information it has been able to get on local project operations. The system has been

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[1] See Appendix I for a brief description of the Legal Services Program.

plagued with problems, however:

    a. GAO's 1969 audit of OLS pointed out that the on-site evaluations were having little actual impact on the decision-making process at OLS. Staff shortages, management lapses and periodic shortages of funds for consultants often resulted in a failure to schedule on-site visits to many projects, and a failure to follow up on evaluations which were completed.

    b. The system as presently structured has some inherent deficiencies.

        (1) It is too subjective.

        (2) Evaluators receive no special orientation or training.

        (3) The assessment is made wholly on the basis of impressions gathered during unstructured local interviews.

        (4) There is no agreed-upon format for reporting the evaluation findings to OLS in a usable manner.

        (5) Comparisons among projects are not possible.

In essence, the system relies completely on choosing the right evaluator who correctly sizes up the local environment, asks the right questions of the right people and draws the right conclusions. While this kind of system might work well occasionally, it cannot be counted on as a reliable input to important decisions.

OLS has thus been unable to effectively monitor large numbers of projects, and has been unable to fairly and reliably evaluate project performance as a major element in making refunding decisions. Equally important, there is presently no system for organizing the information OLS does have or could get on individual projects so that such information could be used to inform program-wide policy decisions.

II. DESCRIPTION OF THE PROPOSED EVALUATION SYSTEM

Current and past evaluations of OLS projects have concentrated on monitoring (grant and guideline compliance) and the assessment of managerial and operational efficiency. No formal or systematic look has been taken at project impact. The proposed on-site evaluation system will extend the scope of the traditional on-site monitoring to include assessment of project results. The proposed system estimates the relative effectiveness of different local projects in achieving OLS objectives.

This chapter presents a summary description of the on-site evaluation system proposed for adoption by the Office of Legal Services and discusses the system in some detail.

A. Overview

The proposed evaluation system will center around on-site visits to projects by teams of trained evaluators. The evaluators will collect data, conduct interviews, record impressions of project performance by "those in the best position to know," and record their own judgments on a list of critical factors. A summary reporting format will present the evaluation findings to Legal Services program managers in a form useful for decisions on individual projects and on broader policy questions.

The proposed on-site evaluation system consists of (1) a system for classifying Legal Services projects into classes of projects operating in similar environments, (2) a system for pre-site-visit collection of project data through a pre-evaluation project profile to be completed by the OLS or contractor staff, and a project self-analysis to be prepared by the local project in advance of the evaluation team's arrival, (3) an on-site monitoring system for gathering information on the quality and quantity of the work being done by staff attorneys and the project director and estimating the results achieved by the project toward OLS goals, and (4) a system for rapid feedback

of results to OLS management to assist decisions on project refunding and to point to the areas in which technical assistance is needed. The system should provide for continuing efforts to estimate and to improve the validity and reliability of the ratings obtained, to enhance the usefulness of the system to the OLS management.

The system we are proposing is designed to produce the following types of information on Legal Services projects:

1. Environmental--collection of information on each project's resources and the environment in which it operates. The purpose here is simply to collect comparable data across projects and organize it for easy use in informing broad policy decisions and in day-to-day management of the program.

2. Monitoring--inspection to determine whether an individual project is complying with grant conditions and OEO guidelines on project organization and financial accounting.

3. Management Efficiency--assessment of the efficiency with which a project organizes and uses its human and physical resources to meet the goals of OLS. Project professional staff will be evaluated here.

4. Project Results--assessment of the degree to which individual projects are achieving the goals of the Legal Services program.

5. Special Information--ad hoc collection of information for OLS management as special needs arise.

Because of OLS staff limitations, we recommend that the system proposed should be carried out by an outside contractor and conclude that, in the early stages of use of the system, OLS would probably benefit by having two or more contractors involved, each responsible for evaluating a set of Legal Services projects.

B. Components of the Proposed System

   1. A Project Classification System

      This section describes the proposed project classification system and provides background on the requirements for such a system.

      a. Background

         A particular Legal Services project will succeed or fail for any number of reasons. A quick way to size up a project is to make a judgment on the abilities of staff attorneys. No doubt this is a critical factor, but it does not alone always determine how productive the project will be. It is quite possible that two groups of attorneys, equally competent and aggressive but operating in different circumstances, will vary widely in effectiveness. Local political pressure may inhibit the attorneys' activities. A very conservative court system may make law reform difficult.

         The project budget and the target group also have an impact on the project. Clearly, there is some inherent difference in task between an Indian project and a large urban project. One would also expect them to exhibit differences in project organization, workload, staffing patterns and, possibly, performance. This suggests that, while each project is to some degree unique, there may exist several general characteristics which can be used to group similar projects. With these factors in mind, we make the following distinctions among three types of explanatory variables affecting project results: environment, project resources, and project management. In day-to-day operations, the project has little or no influence over "environmental" and "resources" factors, while it does have considerable control over "management."

      b. The proposed project classification system

         Projects will be separated into a number of classes so that projects operating in similar circumstances can be compared with and rated against

one another. The same evaluators will ordinarily visit projects within the same class, to enhance the prospects of making valid comparative judgments among projects.

Two types of classifying variables are proposed:

Environment: the political-economic-social condition of the community, which determines the difficulty of the task facing the LS project.

Resources: the money and staff available to the project, which determine the magnitude of the effort the project can mount.

(1) Environmental variables

Five distinct types of environmental variables have been identified: project setting (urban, rural, etc.), poverty level, and the political, legal, and economic development climates. (Various indicators are listed in Chapter VI.) The strongest indicators to use in defining classifications will not be known until the system has been operating for some time. Collecting information on the first two variables, project type and poverty level, offers no problem; one being a matter of definition, the other readily available from local sources (the project, CAA, CDA, or local government). Specifying the other three depends for the most part on the judgment of OLS and the evaluation team. Various indicators will have to be tested.

During the initial organization of the on-site system, projects will be classified by project setting, total population, and project budget (a resource variable). This information is readily available (e.g., through a telephone or mail survey of OLS projects, and is a good first approximation to a more detailed classification (see Table I and Appendix II)). It allows projects to be divided among what experience dictates to be "natural" groupings.* Project types are set as Urban, Rural, Mixed, Indian/Migrant.

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* OLS may find it useful to make the initial classification by funding quarter, and then classify by setting, population, and project.

Levels of budget and population are each divided into 4 intervals. This gives 64 possible classes; however, many will not contain any projects and the actual number of classes will be much less.

(2) Resources

Here, the primary focus is on the project's budget and staff levels. Most of the information requested is self-explanatory and can be obtained prior to the site visit. (In any case, it should be validated during the visit.) This data allows OLS to determine budgeting and staffing patterns for individual projects, project classes, and the program as a whole. Table II shows the distribution of OLS projects by budget.

c. Example

For the sake of clarity, an example of a project classification and rating is given in Tables III and III.A. To keep the example simple, Table III uses as an output measure--or measure of project success--the "overall rating" of project performance described in Table VI. Table III.A uses what we consider the more appropriate measures--"project results."

TABLE I

SAMPLE PROJECT CLASSIFICATION (See Appendix II)

U R B A N - (Budget $225,000 - 475,000)

POPULATION

10,000 - 49,999	50,000 - 499,999	Over 500,000
San Fernando Valley NLS, Inc. Pacoima, California	Long Beach, Calif.	San Diego, Calif.
	Oakland, Calif.	Cook County LAF, Inc. Chicago, Illinois
	LAC of San Mateo County Redwood City	New Orleans, Louisiana
	Contra Costa County LSF Richmond, Calif.	Baltimore, Maryland
	LAS of Santa Clara County San Jose, Calif.	Saint Louis, Missouri
	New Haven, Conn.	Essex Cty LS Center, Orange, New Jersey
	Atlanta LAS, Inc. Atlanta	Nassau Cty Law Svcs. Comm., Inc. Mineola, New York
	Emory Community LSC Atlanta Ga.	Pittsburgh, Pennsylvania
	Indianapolis, Indiana	Dallas, Texas
	Newark, New Jersey	San Antonio, Texas
	Passaic Cty. LAS Paterson, New Jersey	LAF of Los Angeles Cty Los Angeles, Calif.
	Onandaga Cty, Syracuse, N.Y.	

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TABLE II

DISTRIBUTION OF OLS PROJECTS BY BUDGET*

($000's)		No. of Projects		($000's)	No. of Projects
$25		3		$ 550-999	7
25-49	128 projects	39		1,000-2999	4
50-74	fall in this	48		2,999-3,999	1
75-99	range	41		Total	269
100-124		25			
125-149		14			
150-174		6			
175-199		12			
200-224		13			
225-249		6			
250-274		7			
275-299		7			
300-324		3			
325-349		6			
350-374		2			
375-399		7			
400-424		4			
425-449		0			
450-474		0			
475-499		2			
500-550		2			

* Total federal funds, including amounts carried forward from previous year; 12-month budget (based on best information available from OLS as of January 15, 1970).

TABLE III

EXAMPLE OF PROJECT CLASSIFICATION AND RATING*

PROJECT CLASS 1**		PROJECT CLASS 6**		PROJECT CLASS 9**	
Project	Rating***	Project	Rating	Project	Rating
E	12	K	10	S	10
A	9	F	9	T	10
B	8	L	8	N	9
D	6	G	8	U	8
C	2	H	5	O	7
		M	4	P	6
		I	2	V	6
		J	2	Q	5
				Y	2
				R	2
				X	2
				Z	1
				W	1

* Not all classes are listed here.
** Class 1 - Urban; Budget: less than $100,000; Population: less than 50,000.
   Class 6 - Urban; Budget: $100,000-$224,999; Population: over 500,000.
   Class 9 - Rural; Budget: less than $100,000; All Populations.
*** Represents score from Table II.

TABLE III.A

EXAMPLE OF PROJECT CLASSIFICATION AND RATING*

An alternative way of arraying the projects would be to show both the overall rating and ratings on results.

PROJECT CLASS 1**		PROJECT CLASS 6**		PROJECT CLASS 9**	
Project	Rating	Project	Rating	Project	Rating
E	Overall: 12*** Results:	K	Overall: 10*** Results:	S	Overall: 10*** Results:
	Services 5		Services 5		Services 4
	Law Reform 5		Law Reform 4		Law Reform 5
	Econ. Devel. 4		Econ. Devel. 3		Econ. Devel. 4
	Comm. Ed. –		Comm. Ed. –		Comm. Ed. –
	Grp. Rep. 5		Grp. Rep. 4		Grp. Rep. 4
	Other –		Other –		Other –
A	Overall: 9 Results:	F	Overall: 9 Results:	T	Overall: 10 Results:
	Services 4		Services 4		Services 5
	Law Reform 4		Law Reform 4		Law Reform 5
	Econ. Devel. 3		Econ. Devel. 3		Econ. Devel. 3
	Comm. Ed. –		Comm. Ed. –		Comm. Ed. –
	Grp. Rep. 3		Grp. Rep. 4		Grp. Rep. 3
	Other –		Other 4		Other 4
B	Etc.	L	Etc.	N	Etc.

* Not all classes are listed here.
** Class 1 - Urban; Budget: less than $100,000; Population: less than 50,000.
   Class 6 - Urban; Budget: $100,000 -$224,999; Population: over 500,000.
   Class 9 - Rural; Budget: less than $100,000; All Populations.
*** Represents score from Table II.

2. Output Measures

OLS has five stated goals:

-- to provide high-quality individual legal services,

-- to reform laws and administrative practices which adversely affect the poor,

-- to assist in the economic development of the community served,

-- to engage in programs of preventive legal education,

-- to provide advice and representation to organized groups in the community, to become involved in the life of the community, and to involve the community in the operations of the project.

How effectively a project delivers legal services to meet these goals will be taken as the measure of project effectiveness. Two factors will be considered: the workload and the quality of the legal work. This system does not try to measure the impact of OLS on poverty nor the economic and social benefits associated with a particular law reform or action. The five goals are taken as good in themselves, regardless of their poverty consequences. Therefore, a short-term measure of output (or proxy for poverty impact) is the quality of the legal service provided.

Evaluators will be asked to formalize their qualitative judgments on project efficiency, staff, and results, by assigning numerical ratings to a variety of factors. The purpose of the ratings is to organize the evaluators' judgments in a manner which will be most useful to OLS management.

"Quality" is, of necessity in this case, a judgment made by a trained expert observer thoroughly familiar with the purpose of the Legal Services program. It is a judgment made on the appropriateness of the action, the legal competence of the work, and the effectiveness of representation. Assessing the "competency," "appropriateness," and "effectiveness" of legal services implies a set of established standards. The on-site evaluation system will rely on the

existing norms within the legal profession in making these qualitative judgments. The evaluator bases his judgment primarily on a sample of case files and interviews with staff attorneys about particular cases. Interviews outside the project allow the evaluator to better judge the project's work.

By delineating the various factors associated with performance, the proposed evaluation system gives OLS the flexibility and means for developing more formal standards at a future time. The next several pages indicate how the evaluators would go about rating the quality of legal services provided, in terms of the goals of the program.

a. "Providing high-quality individual legal services"

(1) Determine best estimates of staff caseload and amount of time(%) allocated to handling individual cases.

(2) Take a sample of attorney case files and make a judgment on the competency of advice given, negotiations concluded, and handling of litigation, appellate work, and administrative actions.[1] Form impression by questioning attorney about cases he has handled and hypothetical cases.

(3) Judge appropriateness and effectiveness of representation by determining if the attorney provided aggressive representation, spotted opportunities for test cases, devised innovative non-legal solutions to problems, etc. Get impressions from other project attorneys, private practitioners, judges before whom the attorney has appeared, and any other good source of information located. Ask community leaders and CAA staff for the community's impressions of quality of services.

b. "Law Reform"

Law reform means changing laws and institutions to make them more responsive to the needs of the poor. This could mean (1) litigation challenging court decisions, statutes, and administrative regulations and practices; (2) advocacy before Congress, State legislatures, or city councils of new legislation (drafting bills, testifying before committees, getting community support); and (3) negotiating changes in practices for the benefit of the poor (negotiating an arbitration agreement between a landlord and a tenants council, or negotiating changes in local welfare regulations).

(1) Estimate the caseload and allocation of attorney time to law reform (man-years).

1/ There may be confidentiality problems in sampling case files. GAO and OLS agreed late in 1968 that LS projects would keep an extra carbon of client case sheets on file which omitted client identifying information. It was discovered during field-testing that this agreement has not been implemented.

(2) The evaluators would use a separate list of the major substantive legal problems in each field of relevant law as defined by OLS' national back-up centers (Welfare, Housing, Consumer, etc.). They would then determine (by asking project staff and other knowledgeable sources) which of the problems exist in this community, and find out what the project has done or plans to do about them through lawsuits, drafting of legislation, or other strategies (see project "Self-Analysis").

(3) After listing the major administrative agencies in the community (e.g., Welfare Department, Public Housing Authority, U.S.E.S.), the evaluators would determine whether they employ practices which adversely affect the poor (using a list of "bad practices" compiled by OLS' national back-up centers) by questioning the same people. The evaluators would then find out what the project has done or plans to do about the practices.

(4) Peculiar local problems (e.g., a loan-shark operation) would then be isolated through asking the same people. The project's actions and plans for actions would then be determined.

(5) The evaluators would then take an inventory of law reform actions already undertaken and come up with a quality rating taking into account these factors:

-- the competency of the legal work (by examining pleadings, draft of legislation)

-- the timeliness of the actions (were they important relative to other issues which could have been raised?)

-- the amount of law reform activities as compared to the local potential for raising issues

-- the degree of innovation and imagination displayed in law reform activities.

c. "Economic Development"

This goal involves making the skills which lawyers have traditionally used in business activities available to individuals or groups in the community served. This might include technical help in incorporations and financial transactions, representation before local, State, and Federal agencies, advising on laws and administrative regulations, advising on the legality of planned courses of action, and assisting in getting an entre to the business and financial community.

(1) Estimate the workload and allocation of staff time to economic development activities.

(2) Determine what local resources are already being devoted to the economic development of the community served, and what the local potential is.

-- viable indigenous groups interested in forming businesses, housing co-ops, etc.

-- good technical assistance program conducted by SBA or EDA

-- business opportunities, such as for service companies (Auto Diagnostic Center, landscape service), supermarkets, spin-off work from local industries (finishing work, manufacture of small parts).

Evaluators would talk to the project director, staff attorneys, community leaders, professionals working in economic development activities, and other knowledgeable people who can be located.

(3) The evaluators would then take an inventory of the project's activities in this area.

-- Number of new businesses (or, e.g., housing co-ops) advised or represented and the extent of the advice and representation.

-- Number of interested groups or individuals being worked with.

(4) The evaluators would then give the project a rating on the quantity and quality of the work done, taking into account the local resources and potential.

d. "Preventive Legal Education"

This goal was derived by analogy to preventive medicine. The theory was that if people have a general idea of what their legal rights are: (1) they will get into less legal trouble ("don't sign a contract unless you've read it") or (2) will recognize situations where they should seek the advice of a lawyer. The preventive legal education goal seems to have been given a low priority by OLS. Measuring the impact of such a program would not be feasible during an on-site evaluation, but would be possible using household surveys. The evaluators should thus simply record the level of effort and the kind of program being employed. OLS can use this information in designing a later evaluation of different kinds of community education programs.

(1) Estimate the number of man-years devoted to achieving this goal.

(2) Describe the techniques used (lecturers, radio, TV, handbills, bus cards).

(3) Record any data the project has which might bear an impact (e.g., intake forms may ask how client heard about the project).

e. "Group Representation/Project Involvement in Community/Community Involvement with Project"

The evaluators would measure the extent to which the project has become involved with and advocates the interests of the community served through (1) involving the poor in the operation of the project itself, (2) providing advice and representation to organized groups, and (3) involving itself in the life of the community.

(1) Is the project well known in the community? Ask community leaders.

(2) Does the project provide employment to poor people? How many and in what positions? Ask project director.

(3) Are the poor represented on the Board of Directors? Do the poor participate in the formulation of policy? Ask representatives of the poor on Board, and other Board members.

(4) Do neighborhood offices have neighborhood advisory councils? Do they have a voice in running neighborhood law offices? Ask people on the councils, staff attorneys, project director.

(5) By asking "reliable informed sources" and community leaders, take an inventory of the organized groups in the target community (tenant groups, NWRO, neighborhood block clubs, broad-based community organizations, Panthers, entrepreneurial groups).

(6) Record the number of groups advised or represented by the project and the kind of advice or representation given, such as

-- legal advice on the consequences of planned actions

-- technical help (e.g., how to get an OEO grant, or apply for an SBA loan, or how to incorporate)

-- representation/advocacy (e.g., legal counsel during rent strike, advice to welfare demonstrators).

(7) Talk to community leaders, heads of organizations, CAA staff, staff attorneys. Estimate number of man-years devoted to representing groups. Give a quality rating for community involvement/group representation.

f. "Other Goals"

Describe any other goals the project may have set for itself.

Estimate the degree of progress toward these goals (as above).

3. Pre-Site-Visit Data

A Pre-Evaluation Project Profile will organize relevant information obtainable from original funding applications, refunding applications, past evaluation reports, M.I.S. data, regional staff inputs, and other sources in a summary manner for use by on-site evaluators. Much of this information can be stored on tape for easy access by OLS management.

A Project Self-Analysis will be prepared by each local project in advance of the evaluation teams's arrival. It has three purposes:

(1) To supplement the information contained in the Project Profile.

(2) To give projects "due process" by allowing projects to organize and present their case in advance of the evaluation team's arrival.

(3) To spur projects to rethink their local goals and strategies (or think about them for the first time). OLS should make consultants available to local projects to help them through this process and ensure that it is a meaningful exercise.

This Self-Analysis form could conceivably be incorporated into the OLS refunding application forms.

4. The On-Site Team

We recommend that OLS hire an outside contractor to schedule and carry out the various parts of the on-site evaluation process. This recommendation simply recognizes OLS' historical and prospective manpower limitations and also the usefulness of building the objectivity of an outsider into the system.

Manpower requirements for the on-site evaluation system have been incorporated by OLS into a draft RFP for prospective evaluation contractors.

Some of the work to be accomplished during the on-site visits can be done better and at less cost by non-lawyers. Trained representatives of the Clients Council and minority group members presently working as project community

aides may be able to do a far better job of interviewing in the target community. Analysts can collect data, conduct interviews, and perform some of the monitoring functions that do not require a lawyer's training and experience.

Participation by OLS staff members and successful LS project directors will add to the usefulness of the system.

5. Outputs of the Proposed Evaluation System

The evaluation system is designed to serve two purposes: (1) provide information for project refunding and technical assistance decisions and (2) provide information for overall program management. Based on the results of the on-site evaluation, OLS will decide what changes should be made in that project, what its funding level should be, and what technical assistance is required. To make such decisions, OLS must rely heavily on the judgment of the evaluation team. OLS should therefore have a summary of the evaluator's conclusions and recommendations, a narrative telling how those conclusions and recommendations were reached, and the supplementary data collected during the visit.

Evaluators will report their findings through a combination of point-scale ratings, check-offs, and a narrative report. Key information for making decisions on projects will be summarized for efficient use by OLS management. A narrative report will be included to ensure that the individual perceptions (or dissenting views) of evaluators are brought to the attention of OLS management.

In addition to the project-by-project data, OLS requires a more aggregated type of information to effectively manage the program nationally. CAP-MIS, the current source of such data, has failed to meet OLS' needs in this area. The only easily obtainable information OLS now has is project budget figures. The on-site system must provide OLS with a range of comparable descriptive and evaluative information on all projects, from which OLS can

describe the national program, determine its current status and the emphasis and gaps in programming, and develop standards for projects. (See Table IV for the summary reporting form developed for this purpose.)

TABLE IV

POST-EVALUATION PROJECT PROFILE*

Name: _____   Grant No. _____   Director: _____

Address: _____   Refunding Date: _____

Environmental Factors	Project Resources	Good Local Contacts

Environmental Factors

1. Project Type
   (urban, rural, mixed, indian, migrant)

2. Poverty Level
   Total Population Size _____

   Target Population Size _____

   Ethnic Comp. _____

3. Political Climate**

4. Legal Climate**

5. Economic Development Climate**

Project Resources

1. Date First Funded
2. Budget History 1969 $_____
   1968 $_____ 1967 $_____
   $_____
3. Project Budget (Current PY)
4. Budget Distribution ($)
   Director _____
   Lawyers _____
   Support (Staff) _____
   Physical Plant _____
5. Staff Level (Numbers)
   Full-time
   Staff Lawyers _____
   Experience
   (average) _____ yrs.
   RHS Fellows _____
   VISTA Lawyers _____
   Law Students _____
   Support Staff
   Professionals _____
   Clerical _____
6. Degree of Specialization
   (e.g., Law Reform Units)
7. Local law school _____
   State or Regional Back-
   up center _____

Good Local Contacts

Name   Address

Evaluation Results

(quality ratings)

Overall Rating _____

Management   _____
Staff   _____
Results:

	Man-Years	Case-load	Rating
Individual Svcs.	___	___	___
Law Reform	___	___	___
Economic Dev.	___	___	___
Community Ed.	___	___	___
Group Rep./ Comm. Involv.	___	___	___
Other Activities	___	___	___

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* Summary of data from "Pre-Evaluation Project Profile," "Project Self-Analysis," and data collected during on-site visit for storage on tape for use by OLS management. The kinds of information included may be changed by OLS management in the future.

** Definitions and method of reporting need further development; we are hypothesizing that these factors affect results.

Project effectiveness is being rated in two ways to meet the different needs of the system. Evaluators will be asked to assign numerical ratings to (1) quality of project results (see Table V) and (2) overall project performance (Table VI).

The quality rating of project results along with workload data is the measure of output. The following scheme will be used to record project results:

Project Goal	Man-Years	Caseload	Quality Rating
Individual Services			
Law Reform			
Etc.			

The bases for making the ratings required here were developed during field testing and appear in Chapter VI.

The second rating considers "results" but is also closely tied into the team's final conclusions and recommendations for the project. Consequently, it also takes into consideration local conditions, project management, and project performance compared to the performance of projects in similar circumstances. This is, in fact, a summary of the information upon which OLS bases individual refunding decisions.

TABLE V

EVALUATION OF PROJECT RESULTS AND ALLOCATION OF STAFF TIME

Activities	Estimated Man Years	Caseload	Quality Rating
1. Providing Individual Legal Services			
2. Law Reform			
3. Economic Development			
4. Community Education		////////	////////
*5. (a) Group Representation (b) Project Involvement with the Community (c) Community Involvement with the Project			
6. Management		////////	
7. Other Project Activities (see narrative report)			

* This breakout developed during field tests; method of rating not fully tested.

TABLE VI

OVERALL PROJECT RATING

Based on the evaluation of project results, rate the project on the following scale. Four categories are specified by the recommended action for OLS management to take. Within each category rate the urgency of the situation as you perceive it.*

1 2 3	4 5 6	7 8 9	10 11 12
"Poor." Project has critical deficiencies which cannot be overcome with available additional resources or assistance. Close down or cut back the project.	"Fair." Project has internal problems which impair its performance: poor management, inadequate resources, etc. Requires Technical Assistance or other follow-up. Fund at PIP** level.	"Good." Project is producing results and operating efficiently. Project could benefit from Technical Assistance. Fund at PIP ** level.	"Excellent." Project is producing results and operating efficiently. A strong force in the war on poverty. Expand if the project can effectively handle additional resources.

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* Attach narrative description of conclusions and recommendations. Give detailed information to support conclusions and recommendation.

** Program in Place, or amount necessary to refund a project without changes.

C. Validity and Reliability: Present Status and Next Steps

C. _Validity and Reliability_: _Present Status and Next Steps_

In considering the appropriate use of measuring procedures such as the one employed in this evaluation and monitoring system, it is important to consider what degrees of validity and reliability can be demonstrated.

1. Feasibility of a project rating system

The _critical factor_ in establishing a project rating system is the availability of measurable short-term indicators of project output. The goal here is to rate all projects on their results and then compare those projects operating under the same conditions. In this manner, we identify best and poorest projects within each project class.

Based on the findings of past on-site evaluators, we are hypothesizing that reliable and valid short-term measures do exist for OLS projects. Workload data and ratings on the quality of "legal" output provides a realistic and useful indicator of project success. However, since quality ratings rely on the judgment of an expert observer, care must be taken in structuring the reporting system and interpreting the results. The nature of such a system raises questions as to the _reliability_ and _validity_ of the measures.

Here, _validity_ means the extent to which the measurement procedure measures what it is supposed to measure. Continuing research (in particular, independent measures) will be required to determine to what extent the estimates obtained in a 3-4 day site visit actually reflect the quality of the work being done in Legal Services projects and the degree to which OLS objectives are actually being achieved in each project.

Reliability, on the other hand, means the extent to which the measurement procedure produces the _same_ results _each time_ it is applied (assuming the thing being measured does not change). Using a "yardstick" as an analogy,

the same yardstick applied repeatedly to the same individual or object should provide the same results on each repetition if the thing being measured has not changed. An _unreliable_ yardstick is a "rubbery" yardstick which provides different results every time it is used. Obviously, if the results obtained from a measurement procedure are sufficiently unreliable in this sense, the data obtained for judging project or individual performance are of doubtful value, because too large a part of the variance one finds between projects or between individuals is caused by the measurement process rather than by true differences.

In this system, we are using people (judges) with a set of instructions (rating sheets) as our yardstick. Judges will differ in their interpretation of instructions, in their reaction to the people being judged, etc. Consequently, this yardstick may be "rubbery" in a variety of ways.

The basic problems are stated in the following questions:

(a) Will different evaluators rate the same project differently?

(b) Will familiarity with the rating scale cause shifts in ratings over time?

(c) Will familiarity with more projects of a particular type cause evaluators to interpret and weigh information differently? Or, in other words, will project ratings be comparable among project classes?

2. Present status

The system as proposed attempts to achieve as much reliability as possible through "quality control." These control measures are:

(a) the use of as many full-time evaluators as possible

(b) careful selection and training of consultant evaluators

(c) uniform on-site procedures (same classes of persons interviewed, same data collected, same issues explored)

    (d)   uniform reporting formats designed to maximize
          reliability

    (e)   follow-up evaluations of selected projects as a
          continuing check on the reliability of findings

    (f)   continuing research to refine the system and to
          check on the reliability of findings.

The more quality control OLS exercises over the evaluation system the less of a
problem these questions become.

    3. Next Steps

        However, reliability cannot be insured through the use of such
control measures by themselves. From the results of the field tests just
completed, a number of reliability coefficients were computed between different
judges and between sets of judges, and the coefficients obtained indicated that
more work should be done to improve the reliability of the system. Unfortunately,
such work requires a more systematic gathering of data than was possible with
the time and funds available for this project. Consequently, the contractor
selected to run the system should be tasked with improvements of this kind.

        In order to be more specific about what the contractor should be
required to do, it is necessary to discuss the concept of reliability on a
somewhat more technical level.

Concept of Reliability

        The reliability of any set of measurements is defined as the proportion of
their variance that is true variance. The score given to an individual or
project on a particular trait by a judge, therefore, can be considered as made
up of two parts:

$$X = t + e,$$

where X = obtained score
           t = true score
           e = a variable error of measurement,
                positive or negative

        The usual procedure to obtain an estimate of e is to compute a correlation
coefficient between any two sets of scores. With the data from the field test,
we computed several correlation coefficients and found that they ranged from about
$r = .30$ to where r was above 90. The square of these correlation coefficients can
be interpreted as representing the proportion of the variance of the obtained score
(X) which is due to the variance of the true score (t). Conversely, $1-r^2$ gives the
proportion of the variance which is due to _errors_ of measurement (e).

        These reliability coefficients have certain descriptive value and are
very useful when there is only one distinguishable source of random error.
This procedure is inadequate, however, when several sources of random error
may be distinguished (such as with this system). In order to use the infor-
mation to improve the reliability of the measurement procedure, one must be
able to differentiate between the different sources of variance inherent in e.
With independent estimates of these different sources of variance, one would
then know what parts of the system needs the most improvement. Also, one could
better determine such things as what number of observations per observer would
result in the most efficient measurement at a given cost, or the most reliable
mean score per subject for a given expenditure.

        One way to obtain estimates of these different sources of variance is
through an analysis of variance design. The concept of reliability when there
are a number of observers making independent judgements on a number of traits
for a number of subjects can be expressed as follows:

$$X = t + o + i + v,$$

where X = obtained score
           t = true score
           o = systematic bias on the part of the observer
                (a bias constant for all subjects)
           i = variable bias which varies from subject to
                subject
           v = variations in subject's performance from
                observer to observer

If one can obtain unbiased estimates of these different sources of variance, then one knows what part of the measurement procedure produces the largest source of variance and thus where the most improvement is needed. In order to obtain estimates of these sources of variance, one needs independent observations on a number of traits (T) by a number of judges (J), on a number of subjects or projects (S). These scores can then be entered in a three-dimensional table in which columns correspond to judges ($J_1 J_2 -- J_k$), rows to subjects or projects ($S_1 S_2 -- S_m$), with observations on a number of traits ($T_1 T_2 -- T_n$).

With these data, and using an analysis of variance technique,[1] one can obtain information on each of the sources of variance. We would strongly recommend that the contractor selected to administer the system be required to run these kinds of studies early in the implementation phase in order to obtain better estimates of the reliability of the system and to improve the measurement procedures based on this information.

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[1] Lindquist, E. F., Design and Analysis of Experiments in Psychology and Education, Houghton Mifflin Co., Boston, 1953, pp. 357-382.

III. FIELD TESTS

A. Introduction

The system described in the Interim Report to OLS was field-tested during March 1970, in Corpus Christi, Texas; Harrisburg, Pennsylvania; Roanoke, Virginia; and Albany, New York.

Field test participants were:

Urban Institute

   Hugh Duffy - Institute representative on all four field tests

   John Scanlon

   Leona Vogt

   Joseph Wholey

Office of Economic Opportunity

   Winston Webster - OLS Evaluation Branch - OEO representative on
                     all four field tests

   Roger Detweiler - OLS Evaluation Branch

   Francis Duggan - OLS Chief of Operations

   Troy Overby - OLS Special Assistant to the Director

   Shirley Bean - OLS Program Analyst

   Carla Carbaugh - OLS Program Analyst

   Rosemary Hill - OLS Program Analyst

   Phyllis Kornov - OLS Program Analyst

   Jeffrey Schiller - OPR&E, Evaluation Division

Legal Services Projects

   Richard Buckley - Director, New Orleans Legal Assistance Corporation

   John Clough - Director of Litigation, Portland Legal Services Project;
                 Member of Board, Project Lawyers for Effective Advocacy

   Thomas Fike - Director, Oakland Legal Services Project; Chairman,
                 Project Advisory Group

Other Participants

    Charles Ehlert - Seattle Model Cities Program

    Martin Nathan - Private practice, Miami, Florida

    Mrs. Maryellen Hamilton - President, National Clients Council

    The field test notes are being made available to OLS in separate volumes. Completed evaluation reports and ratings for the four projects visited are also being made available separately. This is being done because these documents contain confidential information gathered during interviews on-site.

B.   Organization of the Site Visits

    The field tests were intended to:

        (1) test the feasibility of rating projects and project staff, results, and management;

        (2) explore the environmental factors in the project classification system;

        (3). test the use of non-attorneys on evaluation visits;

        (4) test the usefulness of the Project Profile, Project Self-Analysis, and case-sampling techniques recommended in the Interim Report; and

        (5) develop parts of the system more fully, such as pre-site visit work, reporting formats, on-site procedures, and, primarily, the methods to be used in making ratings.

    Since an attempt to rate attorneys was bound to cause controversy, the ratings were conducted without publicity, and key OLS and project people were asked to participate in the field tests so that they could observe the process first-hand and actually participate in it.

    The projects themselves were selected on the basis of information supplied by OLS. We selected four projects, two pairs of which were similar in some respects. Corpus Christi and Harrisburg, for example, had budgets of similar size and the same number of staff attorneys. All four projects seemed to be

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operating in differing political and legal climates, however, and the characteristics of the client community seemed to differ in each.

C.   Testing the Feasibility of Making Ratings

    Seventeen staff attorneys and four project directors were rated on a variety of factors during the field tests. Each was interviewed by a least two evaluators, each of whom later made his ratings privately, without prior discussion, and dictated the bases for his ratings. Evaluators also rated the project director, project results, project management, and gave each project an overall rating.

    Table VII is illustrative of the various combinations of evaluators used and the ratings each independently arrived at during one of the field tests. This table and the results of the other field tests demonstrates rather conclusively that it is _feasible_ to rate attorneys: a large number of attorney evaluators have now gone out and have made ratings, and have felt very comfortable in doing so. The ratings were made by evaluators of widely varying backgrounds, were made in private without any prior discussion, and yet all fall within a fairly narrow range. It should be stressed here that serious problems of validity (are we actually measuring what we purport to measure?) and reliability (are the measurements consistent?) nonetheless remain, and must be seriously addressed by OLS and its contractor.*

    As to other ratings, during the last field test a team of ten evaluators was able to reach a clear consensus on numerical ratings for each staff attorney, the project director, project results, project management, and an overall project rating. Results here varied somewhat from test to test, but the reasons for the mixes in _reliability_ problem variations seemed to be controllable:

        (1) Evaluators made ratings in some tests without the benefit of information developed from sources other than their own interviews. (This

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* See Discussion in Chapter II, Part C.

TABLE VII

RATINGS OF STAFF ATTORNEYS*

	#001		#002			#003		#004		#005		#006		#007	
	J.W.	J.C.	J.C.	H.D.	J.W.	J.C.	C.E.	C.E.	H.D.	W.W.	C.E.	J.C.	W.W.	J.C.	W.W.
Empathy	2	2	5	3	5	3	3	3	2	2	3	4	5	5	5
Interaction	1	1	4	3	4	3	3	3	2	2	3	4	5	5	4
Commitment	2	3	5	4	5	4	3	4	3	3	3	5	4	4	4
Routine Comp.	3	4	5	4	5	5	3	3	3	3	3	5	5	3	3
Sophist. Comp.	2	2	4	4	4	4	2	2	3	3	3	4	4	3	3
Morale	2	3	3	3	3	1	2	4	3	2	2	4	3	1	1
Overall Eff.	2	3	4	4	4	4	3	3	2	2	2	5	4	3	2
Overall Rating**	2	2	4	4	4	4	3	3	3	2	2	4	4	3	3

* See Staff Attorney Rating Forms in Chapter VI.
** This is a separate rating, not an average of the ratings above.

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problem is controllable by nightly debriefings.)

(2) Evaluators were applying different standards and giving different weights to rating factors. (This problem is controllable by training and by clear specification of standards to be used.)

Once the ratings had been made and the reasons for them had been discussed on-site, the evaluators were quickly able to reach a consensus on the ratings.

Further field tests, under more controlled conditions than we were able to achieve during our tests, will be necessary to demonstrate the reliability of ratings.

We should note here the apparent utility of the major technique used in rating staff attorneys, which was the sampling technique. Attorneys were asked to select every fifth case of their last one hundred up to a total of twenty, and describe the nature of the case and its disposition. The evaluators then asked the attorney to describe five or six of the cases in great detail, and then asked the attorney to describe any other interesting cases he had worked on during the past year. This approach enabled the evaluators to make a fairly systematic assessment of the attorneys competence and legal output.

It was interesting to note that almost none of the attorneys objected to this process. In fact, attorneys who were rated "satisfactory" or "good" seemed pleased at the chance to display their work to outsiders, while attorneys who were rated "unsatisfactory" were somewhat embarrassed during the process, although they thought the procedure was fair. The potency of this technique in spurring attorneys to raise the quality of their work on individual cases year-round seems obvious.

D. Exploring Environmental Factors

A great deal of effort was expended in exploring the factors that should go into a description of the local legal and political climate (and, to a lesser

extent, the local economic development climate), and the effect these should
have on project operations. The general approach was to get detailed descrip-
tions of the bar, the bench, the city government and administrative agencies,
and to pose hypothetical questions such as the following: "Suppose the project
filed several suits against the welfare department, the public housing authority,
the police department, etc. How successful would they be in the local State or
Federal Court? Would the city government cut off its local share or take other
action against the project? Would the local bar become hostile, cut off its
volunteer attorney time, ostracize project lawyers and hamper your recruitment
efforts?" The evaluators then discussed these at length and tried to get at
the extent to which the local climate should affect project operations.

The political and legal climate in all four sites varied widely, and
we were unable to develop on the basis of these few visits clear descriptive
categories into which OLS projects could be confidently distributed. We did,
however, develop several useful indicators (see Chapter VI. B.) for these vari-
ables. While we cannot say at this point what the effect of these variables
should be on a project, they did seem to exert a powerful influence on the
operations of the four projects visited. OLS and its contractor should continue
exploring these variables during the first year of operation of the system.

E. Use of Non-Attorneys in Evaluations

Analysts from the OLS staff, a representative of the Clients Council
and non-attorney professionals from the Urban Institute participated in the
field tests.

The analysts did the pre-site work specified in the evaluation manual,
performed monitoring functions on site (compliance with grant conditions and
guidelines, examination of intake procedures, filing systems, etc.), interviewed
clerical staff, community aides, and conducted a variety of interviews with non-
attorneys (e.g., ministers, CAA staff, representatives of the poor).

The usefulness of OEO analysts in on-site evaluations was clearly
demonstrated during the field tests. Analysts were able to execute the above
tasks with great competence, and reported that several interviewees confided
that they were more at ease and had been more candid than they would have been
with an attorney evaluator.

The Client's Council representative concentrated on getting an assess-
ment of the project within the target community. This evaluator visited beauty
shops, restaurants, stopped people in the streets, discovered former clients of
the project, and talked to the project's neighborhood aides and CAA staff. She
was able to uncover a surprising amount of information about the project that
attorney evaluators would have had little chance of getting. The attorney evalua-
tors found her views as a client representative of great value as they discussed
the project during nightly debriefings. More Clients Council representatives
should be included on future field tests to fully evaluate their potential role
in evaluations.

The Urban Institute participants were drawn from different disciplines:
law, history, mathematics, and chemical engineering. The non-attorneys conducted
a wide range of interviews and participated in some of the attorney ratings.
They had no difficulty in functioning as integral parts of the evaluation team,
and their knowledge of urban problems from viewpoints other than those of lawyers
provided a more balanced view of the projects' accomplishments.

F. Testing Other Parts of the System

The Pre-Evaluation Project Profile was very useful in systematically
presenting to the evaluators the information OLS already had on the project to
be visited. A few changes were made in this form and a number of other pre-site
procedures were developed (described in Chapter VI).

The Project Self-Analysis was tested during the last two field visits
(it was omitted during the first two because of time constraints). One project

did a very competent job, but the director commented that he would have had
some difficulty completing it were it not for the fact that he happened to be
in the process of gathering information for his refunding application. The
evaluators found it highly useful since it summarized the projects past efforts,
included pleadings and briefs in past cases, and attempted to lay out where the
project was going.

The second project prepared a bulky self-analysis which was of limited
usefulness. It contained dozens of newspaper clippings, some very useful descrip-
tions of cases handled by the project, but the "analysis" part was regarded by
the field test participants as a "sales pitch" or "snow job".

Both project directors thought the self-analysis process was a good
idea in terms of their own operations, and thought they could get more benefit
out of it if outside assistance were furnished. We discussed the self-analysis
with the directors of the projects where it was not tested, and both thought
that their projects could benefit from this process.

The case-sampling technique mentioned previously worked well. It will
work much better when the GAO/OLS/ABA agreement to maintain sanitized carbons of
case intake forms is implemented.

The Interview Note Sheets worked well and were extensively revised
during the field tests. These enabled the evaluators to systematically collect
data, and systematically review their notes as they prepared to make ratings.

G. Developing Other Parts of the System

Besides the work done on exploring environmental variables, a great
deal of developmental work was done to devise a monitoring checklist and to
specify indicators and instructions for assessing management and results. The
results of these efforts appear in Chapter VI and were on the whole successful
(although further refinements need to be made), with the exception of a monitor-
ing checklist for compliance with guidelines. A decision was made to await

the completion of the Price Waterhouse administrative management manual before
completing this part in detail.

The rating formats were changed extensively after the first field
test. By far the greatest amounts of time were expended in making ratings,
debating the standards to be used and the factors to be taken into account, and
in trying to get at the reasons for variations in ratings. The results of these
efforts appear both in Chapter VI and in the field notes separately furnished
to OLS.

IV. Using the On-Site Evaluation System

    A. Making Individual Refunding Decisions

The primary purpose of the system is to provide OLS management with reliable information on project accomplishments to assist the making of a large number of individual refunding decisions. Its operations should be integrated into the OLS grant-making process as follows:

For a project whose program year ends on November 1, for example:

July 1 - OLS receives project refunding application, containing grantee's summary of past year's activities, funding request for coming year, and project Self-Analysis. A Pre-Evaluation Project Profile is prepared (or updated). The evaluation team is selected and furnished with the refunding application, Self-Analysis and Project Profile. Hotel and travel arrangements are made, and the project makes appointments for local interviews per instructions from OLS (or its contractor).

August 1 - The on-site evaluation takes place over a 3 - 5 day period. Tentative findings are discussed with the project, and a report is forwarded to OLS within two weeks. OLS then has 9 weeks before the project's program year ends to officially transmit the findings to the project, give the project an opportunity to comment on them ("due process"), and make a refunding decision (follow-up, negotiate, restructure, process grant, begin termination proceedings, etc.).

November 1 - Project's program year ends. Refunding decision has been made by OLS effective this date.

OLS will have to decide as a policy matter how much weight to give to "results achieved" in making refunding decisions. This has not been the key factor in making refunding decisions over the history of the Legal Services program.

B. Planning OLS's Annual Allocation of Resources:

At the end of the eighth month of FY 70, OLS had still not received
it's appropriation from Congress. While expecting an appropriation of $58.0
million, it has been operating under a continuing resolution limiting it to
spending at last year's rate of $43.5 million. Allocating resources among 269
local projects whose refunding dates are staggered over a 12-month period is a
difficult job in these circumstances.

Even if OLS could be fairly certain of its appropriation early in the
fiscal year, it has at present only a limited capacity to plan a rational dis-
tribution of funds among field projects:

1. There is no way to compare among projects to determine whether
the appropriation is being distributed equitably (an average quality project in
Region I serving a population of 200,000 may have a budget 50% higher than an
average quality project in Region IV serving the same size population). The
initial allocation of funds is made by region, mainly based on PIP (program
in place, or cost to refund a project as is) levels of existing projects.
This is adjusted up or down for projects within regions depending on evaluation
results, and can be adjusted further to carry out new OLS policies (e.g., more
programs in the South, more funds for big cities).

2. There is no easy way to track the dollar flow to projects and to
plan expenditures over the entire fiscal year. OLS now gets two computer runs:
the first shows funds obligated in the preceding month by region and project,
and the second is a monthly printout showing whether individual projects are
over or under their planned monthly expenditure rates. OLS maintains a chart
projecting expenditures over the fiscal year at PIP levels. This chart is kept
by hand; maintaining it on an up-to-date basis is time-consuming and cumbersome.

When the on-site system has been in operation for a sufficient period
of time, OLS can begin to move away from annual regional allocations and begin
to project future funding levels across regional lines (i.e., within broad
project classes). This should result in a far more effective funding process.

OLS must have strong control over its dollar flow to insure that its
resource allocation process operates (1) efficiently and (2) flexibly, i.e.,
it should be readily adjustable as the decisions flowing from on-site evalua-
tions are fed in, or as expected appropriations fall short.

Using already available OEO computer facilities, OLS should keep track
of its expenditures in somewhat the following manner (see Table VIII).

TABLE VIII

SAMPLE FUNDING CHART
($000's)

Region I		(a) Funds Obligated in Last FY [1]	(b) PIP (taking expected COB [2] into account)	(c) Rec. by Region for Refunding	(d) Funds Actually Obligated [4]	(e) Monthly Surplus or Deficit [6]	(f) Rec. Obligation Against Increased Appropriation	(g) CAP 28 Monthly Expenditure + or -
July Findings								
Project	A	100	90	90	90	-	-	-1.5
	B	200	210	275[3]	210[5]	-	65	+ .1
	C	50	50	Close Down	0	+50	-	-
	D	75	80	90	90	-10	-	-2.5
Region I Totals		425	430	455	390	+40	65	-3.9[7]

(1) This should be printed out by region showing each project.

(2) There should be a printout of sub-totals for all regions, summed for a national picture (monthly and cumulative).

[1] OLS must spend at the last fiscal year's rate if operating under a continuing resolution.
[2] Carry-over balance.
[3] Based on results of on-site evaluation.
[4] Signed off by OLS national office.
[5] Refunded at PIP because operating under continuing resolution. An option would be to apply funds saved by closing down project C to increase project B.
[6] Available for transfer to another region.
[7] Indicates projects are spending below expected levels and raises possibilities of transferring some funds to other projects.

C. General Management Purposes

The on-site evaluation system will gather a range of data on project characteristics which can be stored on tape for day-to-day management decisions and program control. Except for gross statistics on caseload, OLS has never been able to get information on project operations on a program-wide basis. This information can be used as a major input to broad policy decisions, for reporting to OEO, the Congress, and the Executive Branch, and for public information purposes. The potential use of the data is limited only by the imagination of OLS management.

The evaluation system can also be used to gather new kinds of information OLS is interested in. It would simply be a matter of building in an added reporting requirement (e.g., a report on how each project visited handles uncontested divorce cases to discover the most efficient practices).

D. Technical Assistance

1. An indication of the extent to which national support (training and technical assistance) services are being used in local projects will be provided. This information will be useful in shaping OLS' future support services effort.

2. Evaluators will report on the kinds of technical assistance needed by a local project, in terms of what TA they know is available. This might include help in planning (self-analysis), on management problems or on substantive legal problems. Evaluation reports will contain specific recommendations on the kinds of technical assistance which should be provided.

3. Technical assistance should be provided during a separate visit. Although there should be strong ties between the evaluation system and a technical assistance effort, their roles should not be confused. One is to judge past performance as part of making a refunding decision, and the other is to help projects to better achieve the goals of OLS; the same people cannot simultaneously perform both roles effectively.

V. IMPLEMENTING THE SYSTEM AT OLS

1. OLS plans to issue a Request For Proposals to operate this system within a few weeks of the date of this report. The Institute has provided advice and comments on the specifications in this RFP, and we refer the reader to that document for details on cost estimates, personnel requirements, etc.

OLS is currently considering our recommendation that two or more contractors be selected to operate this system on a pilot basis, with the award for full implementation of the system going to the contractor who performs best.

The work of the contractor finally selected to run the system should be closely monitored, to assure that the system remains continually relevant to the needs of OLS, and to assure that the system is well-executed, since execution is critical to its success.

2. At some point OLS must re-examine the five goals it has stated for the program, determine whether they are still relevant as stated, and attempt to assign priorities among them. OLS might request position papers from a wide spectrum of local projects on this issue to get a debate started.

Evaluators found it difficult to rate projects on results when there was clear disagreement as to which goals were more important and whether some goals were important at all. For example, one project visited was expending a great deal of effort on a group counselling project, and another on a community education project, taking away resources which some evaluators thought should have been expended on direct legal services to clients. It is unfair to begin rating projects on results without clear agreement on what is expected of them.

3. OLS is currently engaged in designing its technical assistance and follow-up effort. This system is intended to identify needs for technical assistance, but not to provide it. The field tests indicate that three kinds of technical assistance or follow-up should be provided:

a. Follow-up by OLS staff where a site-visit reveals failure to follow guidelines or non-compliance with grant conditions, or a recommendation is made to cut back, increase, or otherwise affect the project's operations.

b. Management assistance follow-up - two of the four projects visited were operating with obviously inefficient procedures or other management problems which clearly impaired their operations. Assistance in going through the Self-Analysis process would be included here.

c. Substantive technical assistance, such as that which could be provided by teams from the national resource centers.

4. OLS should decide what role, if any, its MIS system will play in its monitoring activities. Institute staff did not address themselves to this question, but noted during the field tests the substantial amount of project staff time devoted to gathering MIS data. These data appear to be almost never used by OLS management; collection of such data appears to be a waste of valuable resources.

5. The agreement between OLS, GAO and the ABA to maintain sanitized carbons of case intake forms should be implemented. To avoid the problems inherent in trying to implement a uniform case intake form system at this time, projects could be told to modify whatever system they use now to produce the sanitized carbon. This, of course, will facilitate the use of the case-sampling technique for interviewing attorneys.

6. This system is intended to get evaluation reports to OLS quickly so that OLS can react to the findings quickly. This raises the issue of whether something is lost by not giving evaluators two or three weeks to mull over their findings before writing their report. Field test participants debated this question at length and seemed to reach a consensus that our approach of dictating reports on-site was preferable:

a. Ratings are made very systematically and evaluators felt in good conscience that they were able to fairly consider the range of information they had collected, and

b. whatever might be gained by extending the report-writing period would be lost by long delays in filing reports and resulting long delays in OLS follow-up. A possible compromise is to allow evaluators to amend reports they dictate on-site within ten days of the completion of the evaluation.

7. As indicated previously, this system needs further field-testing to develop and refine it further, and to test its reliability under more controlled conditions. The contractor should expend a good deal of effort in studies to test and improve the system's reliability and validity.

8. We were unable to test the use of a checklist of law reform issues to be supplied by OLS's national back-up centers. This list should be obtained from the five resource centers, covering eight areas (Economic Development, Housing, Welfare, Employment, Aged, Consumer, Education, Health), and a way should be devised to come up with issues in other substantive areas, such as police issues and Juvenile issues. The use of these lists, as specified in Chapter VI, should then be tested by the contractor selected to operate the system. They should also be distributed to local projects to give them ideas for their own law reform programs.

9. The evaluation contractor should place a great deal of attention on the training of attorney and laymen evaluators in the detailed use of this system and in interviewing techniques. This is so critical to the successful operation of the system that it is mentioned separately here. Attorneys with previous experience as Legal Services attorneys or extensive private practice experience should be given preference as attorney evaluators since judgments must be made on the legal competence of cases handled. OLS and its contractor should consider the utility of recruiting as evaluators Reginald Heber Smith Fellows who have completed their year of service.

A. EVALUATION PROCEDURE

1. Advance Work:

In order to prepare the evaluators for their site visits, to give them objective information on the city and legal services project, and to insure that the evaluators time in the field will be spent most effectively and efficiently, the following steps should be taken in advance of the site visit:

a. Pre-Evaluation Project Profile.

An analyst will prepare this form for the use of the evaluators. It summarizes relevant information obtainable from original funding applications, refunding applications, past evaluation reports, M.I.S. data, regional staff inputs and other sources. It also contains special instructions for the evaluators asking for extra information which may be requested by OLS. The information in the profile should be validated by the evaluators during their site visits. The information gathered here and amended through the site visit will be recorded on the "Post-Evaluation Profile" and some of it will be stored later on tape at OLS.

PRE-EVALUATION PROJECT PROFILE
(Page 1 of 3)

Project Name: _____

Main Office Address: _____

_____

Main Telephone Number: _____

Director: _____

==

Geographical Area Served:
(Name of City, County, State) _____

Predominantly: urban _____
                rural _____
                mixed _____
                Indian _____
                migrant _____

Total Population: _____ Est. Poor Population: _____

==

Budget History by Program Year 1969 $ _____ 1968 $ _____ 1967 $ _____

Grant #: _____ Project financed by OEO since (date) _____

Under Current Grant: (12 mos.)
                        Requested for next
Federal Funding Level: $ _____   grant period: $ _____

==

Auth. Positions: Attorneys: _____ ( )
(Indicate num-   RHS Fellows: _____ ( )
ber presently   VISTA Lawyers: _____ ( )
filled in   Law Students: _____ ( )
parentheses)   Other Non-attorney (specify kind): _____ ( )
               (Investigators, Social Workers, etc.)
               Clerical: _____ ( )

Salary Ranges: Director: $ _____
               Supervisory Attorneys: $ _____
               Staff Attorneys: $ _____

==

No. Branch Offices: Full-time: _____
                   Part-time: _____
Address:
(1) _____ Attys: _____ Other Prof. _____ Clerical _____
(2) _____ Attys: _____ Other Prof. _____ Clerical _____
(3) _____ Attys: _____ Other Prof. _____ Clerical _____
(4) _____ Attys: _____ Other Prof. _____ Clerical _____

Special Organizational Units (e.g., Law Reform unit)

Name: _____ No. Attys. _____

Name: _____ No. Attys. _____

Caseload Statistics (supply figures for latest 12-mos. period, or for nearest
                       12-mo. period for which information is available).

Project Total _____   Main Office _____

                              Branch Office (1) _____

                                       (2) _____

                                       (3) _____

                                       (4) _____

                                       (5) _____

Special Conditions Under Current Grant Which Should Be Checked:

(1)

(2)

(3)

Summary of Last On-site Evaluation

Date:

Duration:

Team Members:

Major Findings:

Recommendations:

(Attach copy of last "summary of evaluation" letter sent to project)

Dates of Previous On-Site Evaluations of this project: _____

_____

OLS Staff Comments about this Project:

(Observed strengths, weaknesses, and special problems which the evaluators should be made aware of.)

Special Instructions to Evaluators
(This is reported in a summary reporting form, "Special Information Requested by OLS".)

b. Community Profile. (Telephone Advance Work).

An analyst will be assigned to write a short paper to include background information on the characteristics of the community which the legal program serves.

To accomplish this, the analyst should first check the Statistical Abstract and the Municipal Yearbook for the following information:

- population estimates (with racial and ethnic background)

- form of government (Mayor-council; city manager; etc.)

- name of the Mayor and years in office

- name of police chief

- police department data

Second, knowledgeable people in Washington and in the city to be visited should be contacted by telephone to discover:

- political party of Mayor (if not known)

- political composition of city council

- names of the most influential and of the most dissident members of council

- most significant issues and problems in city

- key individuals in private power structure

- key businesses or industry in city

- judicial climate

- key community leaders

- most important community groups

- personal opinions on the local Legal Services program and/or director

Some of the possible groups or individuals the analyst should contact by phone are:

- OLS regional staff

- CAP field representatives

- Field Service Division, U. S. Commission on Civil Rights (to find out if they have people in the city; if so, they should be called)

- Community Relations Service, Department of Justice (to find out if there are field people in the city; if so, they should be called)

- National Urban Coalition (to find out whether there is a local coalition in the city to be visited; if so, the director of local coalition should be called)

- Urban Centers of local universities (check Urban Institute publication: University Urban Research Centers, 1969)

- City editor; various reporters of local newspapers (police, education); "stringer" reporters for Wall Street Journal, New York Times, etc.

- Local A.C.L.U. Chapter

- Local chapters of NAACP, CORE, Urban League

- Black elected officials

Third, a short summary of the local judicial system should be included in the community profile. The best information sources for this will have to be developed in the future, and could include both the local project and some of the sources listed above.

    c. Project Self-Analysis.

The local project director will be asked to prepare this document to be submitted approximately a month before the arrival of the evaluation team.

OLS should, if possible, make consultants available to local projects to help make this a realistic and meaningful exercise in setting goals and planning strategies.

PROJECT SELF-ANALYSIS
(Page 1 of 3

Dear _____:

    Your project will be visited by a Legal Services evaluation team during the week of _____. Final details concerning the mechanics of the visit will be worked out with you a week or so before the team arrives.

    The main purpose of the visit is to assess the accomplishments of your project, and determine the extent to which it is meeting the goals of the Legal Services program. The evaluators will also assess the management of your project and compliance with OEO guidelines and special grant conditions. Finally, they will try to identify areas where other OEO-funded organizations can be of special assistance: this may include management assistance, assistance on substantive areas of the law or specific law reform and economic development strategies, for example, depending on your project's peculiar needs.

    We would like to furnish the evaluators with as much information as possible about your project before their visit to ensure that their assessment is thorough and fair. Comments about local problems and progress from the project's viewpoint are very important in this process, and we are asking you to prepare a limited "self-analysis" for use by the evaluators. This will assist the evaluators in getting a sense of the environment your project operates in, the range of problems facing the poor in your community and your project's strategy for dealing with them, what you feel your project's significant problems and achievements have been, and your plans for the future. The information should be organized under the following headings and submitted to: _____ no later than _____ /four weeks before the evaluation team arrives on-site/.

1. What are the critical problems facing your project:

   (This might cover a broad range of matters, such as manpower shortages, lack of training for staff attorneys, problems with your local CAP or with OEO, inability to achieve a rapport with the community you serve, lack of expertise to meaningfully assist in the economic development of your community, etc.)

2. Have the training programs and other support services (e.g., the national back-up centers, CCH Reporter, Clearinghouse Review, etc.) provided by OEO helped your project? Do you have special needs for technical assistance which OEO could provide on an ad hoc basis?

3. What are the significant accomplishments of your project in attaining the following goals of the Legal Services program?

   (a) Law Reform* - Describe the most significant changes your project has already been able to effect, and other efforts currently underway (changes in administrative practices, test case litigation, and other activities you deem significant).

   (b) Economic Development - Describe your project's strategy for assisting in the economic development of the target community and your accomplishments thus far.

   (c) Community Involvement - List the organized groups in the area served by your project and the nature of your project's involvement, if any, with them. Describe your project's overall effort to involve itself in the community served.

   (d) Individual Legal Services - To what degree has your project been able to provide high quality individual legal services on a consistent basis?

   (e) Community Education - Does your project have an active community education program? Do you feel it has been useful?

   (f) Other activities involving the use of legal skills to upgrade the quality of life of poor people.

* Attach a list of appeals taken to your State appellate court, with a copy of the brief filed in each, and a list of cases filed in United States District Court, with a copy of the pleadings filed in each.

4. What are the goals you have set for your project for the next (a) year, (b) two years, (c) three years? You should discuss here the significant problems of the poor served by your project and your strategy for dealing with them.

Your cooperation is appreciated.

Yours sincerely,

Office of Legal Services

d. Scheduling of Appointments.

The local project director should aid in the scheduling of appointments for the field team and submit the schedule at least one week before the on-site visit. The director should be alerted that:

(1) the required interviews be set up by the local project office.

(2) the interviews with the director and staff attorneys should be scheduled for the first day. However, interviews can be set up with community people for the analyst on the team on the first day.

(3) the schedule should be flexible enough to allow the evaluators to set up their own interviews as necessary.

(4) addresses and phone numbers of interviewees should be furnished to facilitate rescheduling needs if they arise.

e. Map of City.

The director will be asked to send the evaluators a map of the city marking the major sites, poverty pockets, etc.

2. Site Visit Procedures:

a. In General.

The evaluation team will visit project offices and conduct interviews using interview sheets in the Interview Note Book to record their findings. Section B defines the critical factors to be covered in more detail and gives instructions as to what judgments have to be made. Each member of the team should be familiar with Section B since he is required to collect information on all the variables outlined. The Interview Note Book (Section C) does not contain specific questions to be asked but rather will list the broad areas on which information must be secured. Section D contains rating forms and instructions for using them.

Table IX "Evaluation Organization" gives an organizational outline for data collection during the on-site visit. Columns list potential sources of information on a particular factor; rows represent the factors that must be covered in an interview.

TABLE IX

EVALUATION ORGANIZATION

INFORMATION SOURCES	Collect Budget Data	ASSESSMENT OF ENVIRONMENTAL FACTORS — Political, Legal, Economic	ASSESSMENT OF MANAGEMENT — Guidelines	Records	Organization	Administration	EVALUATION OF PROJECT STAFF	EVALUATION OF PROJECT RESULTS
Project Board Members		✓	✓				✓	✓
Project Director and Deputy Director	✓	✓	✓	✓	✓	✓	✓	✓
Supervisory and Staff Attorneys (incl. RHS Fellows & VISTA Law.)		✓			✓	✓	✓	✓
Administrative Officer (if any)	✓		✓	✓	✓			
Physical Plant (Inspection)			✓	✓				
Case Files								✓
Non-Attorney Professional Staff (Law Students, Social Workers, Investigative Aides)							✓	
Clerical Staff			✓		✓			
CAA Staff		✓					✓	✓
Model Cities Staff		✓					✓	✓
Bar Association		✓					✓	✓
Judges		✓					✓	✓
Private Practitioners		✓					✓	✓
Law School		✓					✓	✓
Target Group Representatives		✓					✓	✓
Other Informed Sources		✓					✓	✓

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b. List of Interviewees.

The following persons or groups must be interviewed during the course of the evaluation. The final report should note whether any of these interviews were not accomplished. The number of interviews and kinds of people and groups seen can be expanded beyond the minimums listed here at the option of the evaluation team.

1. Project Board - Chairman and two attorney members
                  - two representatives of the poor

2. Project Lawyers - Director
                      Deputy Director
                      Supervisory Attorneys - all
                      Staff Attorneys - at least 75%
                      RHS Fellows - all
                      VISTA Lawyers - at least 50%

3. Other Project Staff - Project Administrative Officer (if any)
                          Investigative or Community Aides - 25% sample
                          Social Workers - 25% sample
                          Law Student Assistants - 25% sample
                          Clerical - 25% sample

4. CAA Director or designee

5. Model Cities Staff Director or designee

6. Local Welfare Department

7. Local Bar Association President

8. Local Public Housing Authority

9. Judges - two (before whom project attorneys have appeared)

10. Private Practitioners - two to four, selected from "Optional Interviews;"
                          include attorneys in favor of and opposed to project
                          (identified if possible during pre-site work).

11. Law School Dean or designee

12. Target Group Representatives

    a. Interview a sample of leaders of target community organizations (e.g.,
        block clubs, tenant councils, neighborhood associations, economic
        development groups)

    b. Interview a sample of CAA neighborhood workers

13. Optional Interviews:

Evaluators should seek out a large number of individuals or groups who may have special knowledge of the community served and the activities of the local project, e.g., Mayor; Members of City Council; Board of Aldermen; other elected officials; President, Chamber of Commerce; the CAA Board Chairman; representative from the Junior Bar Association; Chairman of Lawyers' Referral Committee; representative from the minority bar association; Chairman of the Legal Aid Committee; plaintiffs' lawyers (call clerk of court to find out who they are); Lawyer's Committee on Civil Rights; ACLU; NAACP; NWRO; MAYO; MAPA; Panthers; Urban League; local newspaper reporters; former RHS Fellows (if in town). The final report should contain an inventory of active groups in the target community and a list of those contacted by the evaluation team.

The team captain will make interview assignments to team members when the team arrives on-site.

c. Length of Interviews.

Interviews with staff attorneys normally take about two hours. Evaluators should begin staff attorney interviews with a brief explanation of what the interview is going to include, including a description of how his case records will be sampled. It's easier for an attorney to prepare himself mentally for a long interview if he knows what is going to be covered.

The time to be allotted to interviews varies with the individual interviewed: project director, four hours, scheduled throughout the visit; staff attorneys, two hours; judges, twenty minutes; all other interviews, approximately one-half to one hour each.

d. Analyst's Role.

Analysts should perform the following functions to get information on the management factors specified in Section B, "Description of Variables" (see other instructions there).

• examine records as specified in Section B

• check intake process by sampling 20 intake cards to see if eligibility standards are being met

• observe the treatment of clients while in office

• interview clerical staff about lawyer referral system, social service referral system and follow-up, assignment of responsibilities, guideline compliance, etc.

Analysts should conduct interviews outside the project as assigned by the team captain.

e. Debriefing and Rating.

Debriefing sessions should be scheduled every evening. These meetings are valuable for sharing information learned in the day's interviews. They can serve two purposes: to prepare for the subsequent interviews and to help in making the final ratings. Each member of the team should give a report on who he saw and what he learned. A discussion period should follow. (NOTE: Judgments about individual staff attorneys should be withheld as they could prejudice the ratings to be completed on the final day).

No interviews should be scheduled on the final day of the field trip to allow for:

- final interviews which an evaluator feels he should conduct to reveal pertinent information not yet uncovered.

- individual completion of rating sheets (Section D) with narrative reports giving detailed reasons for each rating. (This can be performed as a group or privately, at the convenience of the team). The order of the ratings made should be: staff attorneys, staff director, project management, project results, overall project rating.

- after the rating forms are completed and each team member has dictated his ratings and a narrative setting out the detailed bases for each, the team members should try to reach a consensus on the ratings of staff attorneys, staff director, project results and the project (overall rating). The team captain will record the consensus or lack of one and note dissents to any of the ratings.

- the team captain will then conduct the final interview with the project director to give him the preliminary findings of the team.

3. Preparation of Final Report for OLS:

Within a day after the completion of the field trip (on-site if possible), the team captain will dictate a Final Report, which will include:

- the names of the evaluation team members.

- a list of interviewees.

- a narrative describing the environmental factors of the community (political, legal, and economic development climate).

- completed summary reporting forms (project attorneys, project director, project management, project results, overall project rating), together with a detailed narrative report of the bases for the teams' findings (noting any dissents).

- a summary of the team's recommendations for the project.

- the individual ratings* of the field team along with their narrative explaining the ratings (for OLS files).

- letter to the local project summarizing the findings and recommendations of the team, and specifying the management actions that OLS intends to take with respect to the project. (This letter should not include individual staff attorney ratings).

* These ratings and supporting narratives will be sanitized to eliminate the names of the individual attorney. Code numbers will be assigned and inserted wherever the names are used, e.g., 001, 002, etc.

B. DESCRIPTION OF VARIABLES

Introduction

Three types of data are being collected.

1. Descriptive: generally statistical in nature, such as staff levels and workload data. These data are recorded on the final reporting forms, Section D.

2. Qualitative: generally the evaluator's assessment of a certain factor. Requires looking at a specified project function, activity or product and making a judgment as to its appropriateness, effectiveness and/or quality. The final reporting forms record this data and ask for narrative descriptions of the information supporting these judgments.

3. Compliance: check list in nature. Determine whether the project is meeting grant conditions and national guidelines on project organization and financial accounting.

/Validate information contained in Pre-Evaluation Project Profile/

1. Project Resources

(Analyst transfers to "Post-Evaluation Project Profile" when data are collected)

1. Project Budget History by Program Year (PY)

    1969 _____

    1968 _____

    1967 _____

    _____

2. Budget Distribution ($, current PY)

    Director   _____

    Lawyers   _____

    Support Staff

        Professional   _____

        Clerical   _____

    Physical Plant_____

3. Staff Level (numbers, current PY)

    Lawyers (full time)   _____

    Experience (average)   _____ yrs.

    RHS Fellows   _____

    VISTA Lawyers   _____

    Law Students   _____

    Support Staff

        Professional   _____

        Clerical   _____

---

2. Environmental Factors

Variables	Indicators	Instructions
1. Project Type	(a) Project Setting*: (Pre-dominantly urban, rural, mixed, Indian, migrant)	(∂ indicates who is responsible for collecting the information)
	(b) Total Population in City/County Served _____	<u>Statistical Abstract</u>, Special Census, OEO Community Profile, Project Director.
	(c) Target Population Estimate _____	∂ Analyst

---

2. Poverty Level (target population if available; alternatively use city/county served; indicate which is used)	(a) Median Income _____	Sources - Same as above.
	(b) Subemployment Rate: ____ (if available)	∂ Analyst
	(c) Unemployment Rate: ____ (if available)	
	(d) Ethnic Composition (%)	

---

3. Political Climate	(a) Political affiliation of Mayor, political composition of City Council, etc.	Check analyst's community profile, project self-analysis, project profile.
	(b) Racial ~~~ last Mayoralty election, Presidential election.	Interviews with project staff, city officials, CAA Director, etc.
	(c) Attitudes and relationships of city administration to poor, minority groups, local CAA.	∂ Analyst and Attorneys
	(d) Attitudes and relationships of city administration to Legal Services project.	
	(e) Community attitudes towards poor; racial attitudes.	

---

* Definitions: Urban - city or town
Rural - large geographic area, sparsely populated
Mixed - serves both a city or town and a large surrounding sparsely populated area

Variables	Indicators	Instructions

3. Political Climate (Cont'd)

(f) Likelihood of support in community for vigorous and effective project.

(g) degree and kinds of organization in target community; militancy.

(h) Characterization of news media: conservative, moderate, liberal. Attitudes towards poor, towards project.

---

4. Legal Climate

(a) Judicial Climate - receptivity to change; degree of conservatism; attitude towards project; inhibiting force or neutral.

(b) Bar attitude towards project; support or opposition.

(c) Bar contribution of cash, space, volunteer time.

(d) Composition of bar: rough estimate of percent of those who (1) actively oppose, (2) are neutral, (3) actively support and defend project.

(e) Ability of law firms, law schools, & Legal Services program to attract and hold good attorneys.

(f) Likelihood of support from bench or bar for vigorous project pushing law reform.

(g) Degree of activity in community of lawyers affiliated with ACLU, NAACP, LCCR, etc.

Instructions (for 4):

Same as #3. Concentrate interviews on project staff, attorneys on board and in private practice, judges, law school dean and faculty

Attorneys

Variables	Indicators	Instructions
5. Economic Development Climate	(a) Cooperation of the local government in granting licenses, changing zoning laws, and in helping to attract private or federal money for economic development.	Same as #3 ● Attorneys and Analyst
	(b) Attitude of Chamber of Commerce, financial institutions and the private sector toward economic development of target community.	
	(c) Potential for economic growth; existing businesses, rate of population growth.	
	(d) Interest in target community in economic development. Number of groups already working.	
	(e) Resources already available: local coalitions of businessmen, SBA and EDA activities, foundation activities.	

3.(a) Management - Guidelines*

Monitoring Checklist

(Place OK to indicate that project is complying satisfactorily with grant condition, guideline or policy. Place NC to indicate non-compliance and attach a narrative explanation and recommendation; identify needs for technical assistance).

1. Were changes recommended during last evaluation made?

    (a) _____

    (b) _____

    (c) _____

    (d) _____

2. Are special grant conditions being complied with?

    Special Condition #1 - _____

    2 - _____

    3 - _____

    4 - _____

3. Written personnel policies established in accordance with OLS

    Guidelines. _____

4. No criminal representation except as allowed by OEO guidelines. _____

5. Etc.

    *This section should be expanded to include important guidelines or
    "minimums" for project operations, to be adapted from the adminis-
    trative management manual being prepared for OLS by Price Waterhouse and
    Company. We were unable to obtain a list of OLS guidelines to use to
    complete this checklist. With the exception of #4; can be completed
    by an analyst. An attorney should check #4.

3.(b) Management - Records*

Factors	Indicators	o Analyst Instructions
Financial Accounting	Accounting system operating in accordance with OEO Guide for Grantee Accounting	Check last audit of project; some records need not be checked; e.g. time records, non-federal share.
Case Files and Records	Efficiency with which project handles paper flow (Intake procedures, filing systems)	Physical inspection; interview clerical staff & project administrative officer.
Status of MIS Data	Accurate data maintained for MIS reporting requirements	Interview clerical staff or project administrative officer; inspection.

* This part will eventually become a checklist against the procedures recommended
in the administrative management manual being prepared for OLS by Price
Waterhouse and Company.

3.(c) Management - Project Organization

Factors	Indicators	Instructions
Accessibility of Services	Location in target neighborhoods. Evening and weekend office hours. Professionally adequate office (private attorney office, private intake area).	On-site inspection, question attorneys and community people. ● Analyst and Attorneys
Intake Process	Eligibility standards meet OLS guidelines and are observed. Courteous treatment of client. Client waiting period for service.	Analysts should interview each secretary separately. Observe client intake interviews. Sample 20 intake cards to see if eligibility standards are being met. ● Analyst
Referral	Lawyer referral system with follow-up. Social Service referral system with follow-up.	Check copy of Lawyer Referral Service Plan. ● Analyst Interview staff attorneys. ● Attorneys Clerical staff and community people. ● Analyst
Services	Restricted caseload. Restrictions on types of cases. Breakdown of types of cases.	Interview project director and staff attorneys. ● Attorneys
Support for Legal Staff	# of non-professional staff. Library, dictating machines, office equipment. Investigative services. Back-up services existing; needed.	Should be based on the Price Waterhouse Manual. ● Analyst and Attorneys
Recruitment Program	Active recruitment program for staff attorneys.	Ask project director how he has recruited in past; how he intends to recruit in future. ● Attorneys

Factors	Indicators	Instructions
Outreach	Publicity	Ask all interviewed what they have heard about the program; how well-known it is. ● Analyst and Attorneys
Board of Directors	Commitment to LS goals. Participation of poor on Board. Degree of control over project. Election procedure for Board, tenure of members.	Ask director, members of board, staff attorneys. ● Attorneys

3.(d) Management - Administration

Factors	Indicators	Instructions
Forward Planning Ability	Existence of forward work plan.	Check project documents: grant application, project self-analysis. Question project director. • Attorneys
Staff Utilization	Assignment of attorneys given age and experience. Staff training provided, availability of CCH and CR, opportunity for staff to attend conferences.	Question project director and staff attorneys. • Attorneys
Utilization of Outside Resources (local and OEO-provided).	Use of national resource centers, CCH, CR, attendance at national training conferences. Use of volunteer attorneys, local law schools, local businessmen.	Question project director and staff attorneys. • Attorneys
Staff Morale	Staff communication, staff meetings. Project leadership. Caseload. Availability of secretarial, research, investigative assistance.	Interview project director, staff attorneys, other professional and clerical staff. • Attorneys and Analyst
Project Leadership	Director's relationship with staff; degree of personal supervision; staff turnover; staff's assessment of director.	Same as above. • Attorneys and Analyst

4. Project Staff

Factor	Indicators	Instructions
Project Director	Refer to Rating Forms in Section D.	Interview project director, staff attorneys, other staff, members of Board, community people. • Attorneys
Staff Attorneys	Refer to Rating Forms in Section D.	Same as above. • Attorneys
Professional Support (Investigators, Social Workers, Community Aides)	Effectiveness; benefits to Project. Morale. How well utilized.	Interview director, staff attorneys, professional support. • Analyst and Attorneys
Clerical Support	Competence. Morale. Attitude toward clients.	Interview clerical staff, community people. • Analyst

5. Project Results

The evaluators here should look for results achieved in terms of the goals of the Legal Services program. The statement of goals is derived from the original "Guidelines for Legal Services Programs" and succeeding policy statements. No priorities are set among them here since none have been explicitly set by OLS. The goals are broken down into the kinds of actions which would indicate progress toward achieving the goal, and data sources are specified for the evaluators. See the Instructions for Making Ratings in Section D for additional details.

Goal	Indicators	Instructions
Providing high quality individual legal services to the poor	Legal competency of work. (advice, negotiations, litigation, appeals, admin. cases).	Record impressions of judges, private practitioners, other project attorneys.
	Amount (caseloads)	Sample attorneys' case files by taking every fifth case out of his last 100 & discuss action taken. Discuss 5 or 6 in great detail. Question attorney about interesting cases he's had.
	Community impressions of quality of services	Interview community leaders. Get caseload data. Identify factors accounting for low quality services.
Law Reform	Competence, timeliness, innovativeness and amount of law reform work. Special organizational unit. Forward planning for future work.	Interviews, examination of pleadings, briefs, case files. Use lists of issues and practices supplied by national resource centers. Take inventory of work accomplished and rate quantity and quality; assess projects plans and strategies for future. Estimate number of man-years devoted to law reform work.

CONTINUED

1 OF 2

Goal	Indicators	Instructions
Economic Development	Number of organizations or individuals advised or represented; extent and results of such advice and representation. Project organization: special units or training courses. Planning and programming.	Interview staff, community leaders, other professionals. Take inventory of local resources and local potential. Take inventory of project activities; assess quantity and quality of work, taking into account local resources and potential.
Preventive Legal Education	Specific methods used by project: pamphlets, advertising, speeches to community groups.	Record level of effort and describe program.
Group Representation/Community Involvement	Number and type of groups advised or represented, kind and extent of representation, and results.	Interviews: director, staff attorneys, community leaders, Board members.
	Project well-known in community. Poor employed by project. Poor represented on Board, actively participate in policy decisions. Neighborhood advisory councils for law offices.	Interview community leaders, heads of organizations, staff attorneys, other good sources.
	Project attorneys attend community meetings, seek to get actively involved in the problems of the community served.	Take inventory of organized groups in the target community, and inventory of project's activity. Assess quantity and quality Estimate number of man-years involved.
Other Project Activities	Use of legal skills in any other way which raises the quality of life of poor people.	Interviews.

C. EVALUATORS INTERVIEW NOTE BOOK

NOTE

The following forms are summary notation forms to enable evaluators to keep track of the information being collected for inclusion in the Final Report. They are broken out into broad categories of information for easy review when evaluators are preparing to make ratings towards the end of the site visit.

(Check off)

_____ Judge
_____ Member of Board
_____ Private Practitioner
_____ Law School Faculty

Name of Interviewee _____

ATTORNEY INTERVIEW SHEET

ASSESSMENT OF STAFF
(Indicate basis for assessment)

ASSESSMENT OF RESULTS
(Expectations; assessment of results; indicate basis for assessment)

POLITICAL CLIMATE
(Community attitudes toward poor; racial attitudes; political structure)

LEGAL CLIMATE
(Judicial climate, degree of conservatism; bar attitude towards project; like-
lihood of support for vigorous and effective project pushing law reform)

ECONOMIC DEVELOPMENT CLIMATE
(Local potential; interest in community served; current resources, e.g., EDA,
SBA, local funds, etc.)

BOARD ROLE IN PROJECT (for Board Members only)
(Participation of lay members; commitment to all LS goals; degree of control
over project; evaluator should assess Board's positive or negative influence)

Name of Interviewee _____

NON-ATTORNEY INTERVIEW SHEET
(Page 1 of 2)

BACKGROUND OF INTERVIEWEE
(Title, position, or affiliation e.g., Rep. of Poor on Board, CAA Director,
NAACP president, target community leader, etc.)

ASSESSMENT OF STAFF
(Attorneys, other professionals, clerical--treatment of clients; attorneys:
empathy, interaction with community; competence, general effectiveness).

ASSESSMENT OF PROJECT RESULTS
(Expectations for project; assessment of results; community involvement in the
project; project involvement in the community).

ASSESSMENT OF POLITICAL CLIMATE
(Community attitudes toward poor; racial attitudes; political structure).

(Page 2 of 2)

CHARACTERISTICS OF COMMUNITY SERVED
(Degree and kinds of organization; militancy).

LEGAL NEEDS OF COMMUNITY

LEGAL CLIMATE
(Attitudes of lawyers on board toward poor; knowledge of judges' attitudes and
other attorneys' attitudes).

ECONOMIC DEVELOPMENT CLIMATE
(Existing E.D. groups; interest in the community; what local resources, e.g.,
EDA, SBA, foundations, volunteer groups).

EFFECTIVENESS OF INTERVIEWEE ON BOARD (for lay Board members only)
(How selected; who does person represent; how does person participate; any
impact on operations of Board or project).

PROJECT DIRECTOR
(Page 1 of 4)

BACKGROUND
(Legal experience; Legal Services experience)

POLITICAL CLIMATE
(Community attitudes towards poor; racial attitudes; political structure;
news media)

LEGAL CLIMATE
(Judicial climate, degree of conservatism; bar attitude towards project; like-
lihood of support for vigorous and effective project pushing law reform and other
goals)

ECONOMIC DEVELOPMENT CLIMATE
(Local potential; interest in community served; current resources in community)

CHARACTERISTICS OF COMMUNITY SERVED
(Degree and kinds of organization; militancy)

MANAGEMENT EFFICIENCY - ORGANIZATION

A. Accessibility (location, evening hours, adequate office space)

B. Services (restrictions on types of cases)

C. Back-up Services (provided internally for staff attorneys)

D. Role of Board (commitment to all OLS goals; degree of control; participation of poor)

MANAGEMENT - ADMINISTRATION

A. Forward Planning Ability

B. Staff Utilization

C. Utilization of Outside Resources (local and OEO-provided)

RESULTS

A. Individual Services

B. Law Reform

(Page 4 of 4)

C. Economic Development

D. Community Education

E. Group Representation/Community Involvement with Project/Project Involvement
with Community

F. Other Project Results

Time Allocation (Est. %)

1. Individual Services
2. Law Reform
3. Economic Development
4. Community Education
5. Group Rep./Comm. Involv.
6. Management
7. Other Project Activities

Attorney No. _____

STAFF ATTORNEY
(Page 1 of 3)

BACKGROUND
(Legal experience; Legal Services experience)

POLITICAL CLIMATE
(Community attitudes towards poor; racial attitudes; political structure;
news media).

LEGAL CLIMATE
(Judicial climate, degree of conservatism; bar attitude towards project; like-
lihood of support for vigorous and effective project pushing law reform and
other goals).

ECONOMIC DEVELOPMENT CLIMATE
(Local potential; interest in community served; current resources in community).

CHARACTERISTICS OF COMMUNITY SERVED
(Degree and kinds of organization; militancy).

USE OF OUTSIDE RESOURCES (Local and OEO-provided).

STAFF UTILIZATION (how he's used).

ASSESSMENT OF HANDLING OF INDIVIDUAL CASES
(Sample 20 cases; discuss 5 in depth; discuss hypothetical cases).

ASSESSMENT OF OTHER ACTIVITIES (Law Reform, Economic Development, Community Education; involvement with community and organized groups; begin by asking about interesting cases or activities).

TIME ALLOCATION (Est. %)

1. Individual Services _____
2. Law Reform _____
3. Economic Development _____
4. Community Education _____
5. Group Rep./Comm. Involv. _____
6. Management _____
7. Other Project Activities _____

D. SUMMARY

INSTRUCTIONS FOR MAKING RATINGS

1. Overall Project Rating

   a. Standard - The following standard should be applied in overall rating for the project: "taking into account the political and legal climate here, and the size of the population to be served and the size of this project, rate this project relative to projects of similar size in similar environments."[1]/

   b. Use of Rating Scale - A twelve point scale is used to assign an overall project rating. You should make a rating within one of the four recommended management actions specified on the rating forms. Some examples:

   1) Project A has a hopelessly poor staff, has produced almost no results, handles even routine cases poorly, and could not benefit from outside help. Rating would be 1 or 2.

   2) Project B produces limited results but provides some useful individual services, even though of a low quality; the project is barely worth keeping; Rating: 4.

   3) Project C has a lot of potential, but has an inexperienced staff and a weak director. It has produced some results but has fallen far short of its potential because of inexperience and management problems. Technical assistance could turn it into a good project. Rating: 6.

   4) Project D provides good individual services and has made an effort to meet the other goals of OLS. It has management problems, and it's inexperienced

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1/ Since this is the rating upon which refunding decisions are primarily based, environmental conditions should be taken into account.

attorneys have been unable to mount much of a law reform effort. Project is good but should be doing a lot more; it is able to operate fairly well as is, but could improve with technical assistance. Rating: 7.

5) Project E provides good individual services and has mounted an impressive law reform program. The staff is highly motivated but could produce even more with better management and some technical assistance from the national back-up centers. Rating: 9.

6) Projects F and G are well-managed, have a staff of superior attorneys, produce substantial results across the whole range of legal services goals, are a moving force in the communities they serve, and are clearly exemplary projects. Would consider using project staff for technical assistance to other projects. Their ratings would fall in the range of 10 - 11.

2. Other Ratings

A five point scale is used to make ratings of project results, project management, the project director and staff attorneys. The scale is:

1 Poor

2 Fair

3 Satisfactory

4 Good

5 Excellent

With a rating of 3 meaning "satisfactory," 1 and 2 are different degrees of "less than satisfactory," and 4 and 5 are different degrees of "more than satisfactory."

A rating of 5 means "the best, OLS couldn't expect any better."

A rating of 4 means "more than satisfactory, clearly better than average, but not the best that could be expected."

A rating of 3 means "adequate, could use some technical assistance."

A rating of 2 means "unsatisfactory, clearly below average, OLS should do something about this."

A rating of 1 means "clearly deficient, far below average."

a. Staff Attorney Ratings

1) Standard - The following standard should be applied in making staff attorney ratings: "Rate on an absolute scale[2] for attorneys in Legal Services projects around the country." The extent of legal experience should not be taken into account. The attorney should be rated on results (again, providing individual services is a "result"), since lack of experience is accounted for under one of the rating factors, "potential." Your rating will be made on the basis of your interview with the attorney, a sampling of his cases, and any other information you or other evaluation team members discover during other interviews. (Refer back to Section B.5., "Project Results.")

2) Rating Factors

a) Empathy with Community Served

here we are trying to get at the attorney's attitude towards his clients and the community served, based on what he says during the interview, on the way he handles his cases, and on what you pick up from interviews in the community. Is he fulfilling the traditional lawyer's role of sympathetic counselor, or does he treat his clients with contempt or make moral judgments on their legal needs?

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[2] There are generally accepted standards of professional performance which should not be affected by environmental factors.

b) Interaction with Community Served

Here we want to know what actions flow from his empathy: paternalism; non-involvement; or an attempt to get involved in the life of the community by going out to community meetings, getting to know its legal problems, and seeking to apply his legal skills to their solution.

c) Commitment to OLS Goals

This means commitment to all of the goals of OLS, but a strong commitment to one of the goals may offset a weak commitment to others. Thus an attorney strongly committed to law reform might receive the same rating as another attorney strongly committed to individual services, even though both might be skeptical of the goal given emphasis by the other.

Commitment is incomplete without actions, and you should look for some accomplishments here.

d) Competence in Routine Legal Matters

Here we are looking at competence in handling fairly routine legal matters, as opposed to Federal court litigation, appellate litigation, or highly technical legal work. Competence means more than processing cases in a rote manner. High ratings should go only to attorneys who take an imaginative approach to cases and in general provide high quality services to clients.

e) Competence in Sophisticated Legal Matters

A good criterion here would be: "Would I put this attorney in a law reform unit?" We mean creativity, innovation, an ability to grasp novel issues, a good tactical sense, and the requisite technical skills for handling complicated matters.

f) Potential

How well would this attorney do with more experience, more supervision, better project management or other changes?

g) Morale

This is an information item for OLS which has some bearing on how well the project is being managed. It should be ignored when you are deciding on an overall rating for the attorney. Size of caseload, project leadership, availability of secretarial, investigative and research assistance would be some of the factors here.

h) Overall Rating

The question here is, "How effective is this attorney as a Legal Services attorney." The rating here is tied into a recommended OLS management action.

b. Project Director Rating

1) Standard - The standard is the same[3/] one used for staff attorneys. i.e., "rate on an absolute scale for directors of Legal Services projects around the country."

2) Rating Factors

a) Empathy - same as for staff attorney.

b) Interaction - same as for staff attorney.

c) Commitment - same as for staff attorney.

d) Legal Competence - same as for staff attorney, but judgment here may be based only on interviews if director does not carry a caseload.

e) Management - (Refer to Section B. 3(c), "Management - Project Organization," and 3(d), "Management - Administration.")

(1) Leadership Ability

This is a critical management factor, especially in small and medium-sized projects. Here we are assessing the director's

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3/ Here again there are generally accepted standards of professional and managerial performance which should not be affected by environmental factors.

relationship with his staff, as indicated by the degree of personal supervision, staff turnover, staff training, staff communication, and the staff's assessment of the director.

(2) Political Acumen

This gets at whether the director has _correctly_ assessed the political and legal environment in terms of how far the project can go and how far the community can be pushed.

(3) Use of Outside Resources

Here we are looking at whether the director has seen to it that his project uses the support services provided by OEO. Does he provide for every staff attorney having the CCH Poverty Law Reporter and the Clearinghouse Review and encourage their use? Do his staff attorneys attend national training programs? Does he see to it that the national back-up centers are used by staff attorneys?

(4) Use of Local Resources

How well has he tapped local resources to help the program, e.g., students and faculty at a local law school, private attorneys willing to volunteer time, businessmen and architects willing to help in economic development projects?

(5) Forward Planning Ability

Does he use a formal or informal forward work plan to allocate the project's resources to deal with the legal problems of the poor? The Project Self-Analysis is an important indicator.

(6) General Administrative Competence

Take into account here leadership ability, staff utilization, utilization of local and outside resources, staff morale, and forward planning ability.

f) _Results Achieved_ (Refer to Section B.5, "Project Results")

These are the same factors listed in the summary rating form, "Evaluation of Project Results and Allocation of Staff Time."

Here we are looking for results attributable to his leadership and the emphasis he's given to the various goals of OLS. For example, the project may get a good rating on law reform because of the work of a few aggressive staff attorneys. They may have been successful in spite of the lack of interest or opposition by the director, and the director would get a low rating.

g) _Overall Rating_

The question here is "How effectively has this director _managed_ this project and produced _results_?"

c. _Rating of Project Results_

This is done on the summary reporting form, "Evaluation of Project Results and Allocation of Staff Time."

1) _Standard_ - The following standard should be applied in rating project results: "taking into account only the size of the project, rate results produced relative to projects of similar size."[4] Here you will be rating the director and staff attorneys as a unit.

2) _Allocating Staff Time_ - Here we are interested in how _attorney_ man-years are allocated. For example, a project with a staff of a director, deputy director, two supervising attorneys, and seven staff attorneys would

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[4] Since we are not sure of the effect of environmental factors on project results, we want evaluators to _describe_ results without making their own interpretations of how these factors affected the project. We are trying to deal with the problem of biases that evaluators might have, and lay the groundwork for eventually finding out what the effect of environmental factors is.

have eleven man-years to be allocated. Allocations are made on the basis of estimates summed from the last page of the project staff interview sheets.

3) Rating Factors (Refer to Section B.5, "Project Results")

a) Providing High Quality Individual Legal Services

This does not mean merely an absence of incompetence in handling routine matters. What we mean is taking an imaginative approach to caseloads, being able to spot important issues and potential test cases, and competent handling of routine matters. Caseload is for a twelve-month period.

b) Law Reform

Caseload is the number of law reform matters handled by the project within the past twelve months, including litigation, administrative actions, and issues being currently developed by the project.

Law reform means changing laws and institutions to make them more responsive to the needs of the poor. This could mean (1) litigation challenging court decisions, statutes and administrative regulations and practices, (2) advocacy before Congress, State legislatures or city councils of new legislation (drafting bills, testifying before committees, getting community support), and (3) negotiating changes in practices for the benefit of the poor (negotiating an arbitration agreement between a landlord and a tenants council, or negotiating changes in local welfare regulations).

c) Economic Development

Caseload is the number of organizations or individuals engaged in economic development activities with which the project has worked with in the preceding twelve months.

This goal involves making the skills which lawyers have traditionally used in business activities available to individuals or groups

in the community served. This might include technical help in incorporations and financial transactions, representation before local, state and federal agencies, advising on laws and administrative regulations, advising on the legality of planned courses of action, and assisting in getting an entre to the business and financial community.

d) Community Education

Estimate man-years and describe program in narrative. No rating.

e) Group Representation/Community Involvement

Make a composite rating based on three activities:

(1) Group Representation - Number and type of groups advised or represented, kind and extent of representation, and results.

(2) Project Involvement with the Community - These are generally the same factors as in "Interaction with Community Served."

(3) Community Involvement with the Project - This would include employment by the project of community people, active representation of the poor on the project's board of directors, neighborhood advisory councils for law offices, and the degree to which the project is known in the community.

Caseload is the number of groups represented in the preceding twelve months.

f) Management

Estimate the number of man-years devoted to management, and give an overall rating based on the summary reporting form, "Evaluation of Project Management."

g) Other Project Activities

Include here activities (such as marital counselling projects) which do not fall within the five stated goals of OLS.

d. Rating Project Management

This is done on the summary reporting form, "Evaluation of Project Management."

    1) Standard - The standard to be applied here is "rate on an absolute scale[5/] for legal services projects across the country."

    2) Rating Factors - The factors are specified in Section B.3 (a), (b),(c) and (d).

5/ There are generally accepted standards for project management.

Attorney No. _____
Evaluator _____

STAFF ATTORNEY RATING

Excellent	Good	Satisfactory	Fair	Poor
5	4	3	2	1

1. Empathy with Community Served

2. Interaction with Community Served

3. Commitment to OLS Goals

4. Competence in Routine Legal Matters

5. Competence in Sophisticated Legal Matters

6. Potential

7. /Morale/

Overall Rating _____

Excellent	Good	Satisfactory	Fair	Poor
5	4	3	2	1
Clearly Superior; use for T.A. to other projects or for evaluations	No Action	Needs Training or T.A.	Needs reorientation or training	Recommend Removal

(Specify Additional Recommended Management Actions).

NOTE: Make a tentative set of ratings immediately after interview with staff attorney. Final ratings should be made after completion of all scheduled trip interviews. The ratings should be accompanied by a narrative report setting out in detail the bases for each rating.

EVALUATION OF STAFF ATTORNEYS

Project _____

Excellent	Good	Satisfactory	Fair	Poor

NO. OF PROJECT ATTORNEYS _____

Distribution of Individual Ratings of Staff Attorneys

As compared to other projects within class _____, what is your overall rating of the staff assembled by this project?

Evaluator _____

PROJECT DIRECTOR - RATING

Excellent	Good	Satisfactory	Fair	Poor
5	4	3	2	1

1. (a) Empathy with Community Served _____
   (b) Interaction with Community Served _____
   (c) Commitment to OLS Goals _____

2. (a) Competence in Routine Legal Matters _____
   (b) Competence in Sophisticated Legal Matters _____

3. Management

   (a) Leadership Ability (Staff) _____
   (b) Political Acumen (Correct assessment of how far the project can go) _____
   (c) Use of Outside Resources (OEO Resources) _____
   (d) Use of Local Resources (Law School, Volunteer Attorneys) _____
   (e) Forward Planning Ability _____
   (f) General Administrative Competence _____

4. Results Achieved (in terms of the degree of emphasis he has given to the various goals, and results attributable to _his_ leadership).

   (a) Individual Services _____
   (b) Law Reform _____
   (c) Economic Development _____
   (d) Community Education _____
   (e) (1) Group Representation _____
       (2) Community Involvement in the Project _____
       (3) Project Involvement in the Community _____

Overall Rating _____

Excellent	Good	Satisfactory	Fair	Poor
5	4	3	2	1
Clearly Superior; use for T.A. to other projects.	No Action	Needs Training or T.A.	Needs reorientation or training	Recommend Removal

NOTE: The above ratings should be made only after completion of all scheduled trip interviews, and should be accompanied by a narrative report setting out in detail the bases for each rating.

EVALUATION OF PROJECT MANAGEMENT

Record your conclusions about the adequacy of the following functions based on the information collected (using the various checklists as a guide):

		Excellent	Good	Satisfactory	Fair	Poor
1.	Guideline Compliance	____	____	____	____	____
2.	Record-Keeping	____	____	____	____	____
3.	Project Organization of Resources	____	____	____	____	____
4.	Project Administration	____	____	____	____	____

EVALUATION OF PROJECT RESULTS AND ALLOCATION OF STAFF TIME

Project _____

Evaluator_____

Activities	Estimated Man Years (Attorneys)	Caseload	Quality Rating
1. Providing Individual Legal Services			
2. Law Reform			
3. Economic Development			
4. Community Education		////////	////////
5. (a) Group Representation (b) Project Involvement with the Community (c) Community Involvement with the Project			
6. Management		////////	
7. Other Project Activities (see narrative report)			

Project _____

Evaluator _____

Based on the evaluation of project management and results, rate the project on the following scale. Four categories are specified by the recommended action for OLS management to take. Within each category rate the urgency of the situation as you perceive it.

<u>1</u> <u>2</u> <u>3</u>	<u>4</u> <u>5</u> <u>6</u>	<u>7</u> <u>8</u> <u>9</u>	<u>10</u> <u>11</u> <u>12</u>
"Poor." Project has critical deficiencies which cannot be overcome with available additional resources or assistance. Close down or cut back the project.	"Fair." Project has internal problems which impair its performance: poor management, inadequate resources, etc. Requires Technical Assistance or other follow-up. ·Fund at PIP level.	"Good." Project is producing results and operating efficiently. Project could benefit from Technical Assistance. Fund at PIP level.	"Excellent." Project is producing results and operating efficiently. A strong force in the war on poverty. Expand if the project can effectively handle additional resources.

* Attach narrative description of conclusions and recommendations. Give detailed information to support conclusions and recommendation.

<div align="right">106</div>

KINDS OF TECHNICAL ASSISTANCE NEEDED BY THIS PROJECT:

Summary of Evaluation Team's Recommendations for this Project

SPECIAL INFORMATION REQUESTED BY OLS

<div align="right">107</div>

POST-EVALUATION PROJECT PROFILE*

Name:
Address:

Director:
Refunding Date:

Grant No.

Good Local Contacts

Name	Address

Project Resources

1. Date First Funded
2. Budget History 1969 $
   1968 $
   1967 $
3. Project Budget (Current PY)
4. Budget Distribution ($)
   Director
   Lawyers
   Support (Staff)
   Physical Plant
5. Staff Level (Numbers)
   Full-time
   Staff Lawyers
   Experience
   (average)   yrs.
   RHS Fellows
   VISTA Lawyers
   Law Students
   Support Staff
   Professionals
   Clerical
6. Degree of Specialization
   (e.g., Law Reform Units)
7. Local law school
   State or Regional Back-up
   center

Evaluation Results
(quality ratings)

Overall Rating ____

Management ____
Staff ____
Results:

	Man-Years	Case-load	Rating
Individual Svcs.			
Law Reform			
Economic Dev.			
Community Ed.			
Group Rep./			
Comm. Involv.			
Other Activities			

Environmental Factors

Project Type
(urban, rural, mixed, indian, migrant)

Poverty Level

Target Population Size

Ethnic Comp.

Political Climate**

Legal Climate**

Economic Development Climate**

* Summary of data from "Pre-Evaluation Project Profile," "Project Self-Analysis," and data collected during on-site visit for storage on tape for use by OLS management. The kinds of information included may be changed by OLS management in the future.

** Definitions and method of reporting need further development; we are hypothesizing that these factors affect results.

APPENDIX I

Description of the Legal Services Program

The first local legal aid society in America was founded in 1876 to provide legal help to immigrants. Legal aid societies were begun in several large cities over the next several decades, usually supported by local United Funds, and they dispensed legal advice and representation to the poor as a charitable service. The legal aid movement became firmly established in the 1920's with support from the organized bar associations, and began to grow at a steady pace.

By 1965, there were 252 legal aid offices providing legal services in civil matters and 136 public defender offices providing representation in criminal matters. Some offices were manned by a salaried staff and some by part-time volunteers. The legal aid societies provided representation in 426,000 civil matters during 1965 at a cost of $5.4 million. The typical society was under-financed, carried a huge caseload, paid very low salaries, and was forced to concentrate on "band-aid" legal services.

OEO began its Legal Services program in 1965 as a part of the Community Action Program. It embraced the basic concept of the legal aid movement, thus sharply multiplying the manpower and financial resources available to local communities to provide legal services to the poor (OLS will spend $58.0 million in FY 1970, as compared to the $5.4 million being spent by all legal aid societies in 1965). It greatly increased the scope of the old legal aid concept, however, by requiring that projects:

1. Decentralize their operations and open easily accessible neighborhood law offices in poor neighborhoods;

2. Provide high quality individual legal services in every case;

3. Engage in a broad program to reform laws and administrative practices which adversely affected the poor;

4. Assist in the economic development of the community served by the provision of legal skills to local enterprises;

5. Engage in programs of preventive legal education;

6. Provide advice and representation to organized groups in the community served.

By the end of 1969, OEO had funded 265 local legal services projects in 49 states (including 46 (48?) of the 50 largest cities), the District of Columbia, Puerto Rico, and the Virgin Islands. The projects employ 1800 attorneys and are operated in some cases by pre-existing legal aid societies (about one-half), and in others by newly-created non-profit corporations or law schools. Most operate as delegate agencies of local community action programs and have a combined annual caseload of 600,000 - 700,000.

OLS provides 80% of the costs of a local project's budget, the remainder being furnished locally in the form of cash or donated services and equipment. The 265 projects are on an annual refunding cycle; project fundings are staggered over a twelve-month period by OEO to avoid funding rushes.

OLS provides national support services to local projects in the form of training programs, research and law reform centers (e.g., a Welfare Law Center, Housing Law Center, Consumer Law Center), and general technical assistance in the form of substantive law manuals, a poverty law reporter, and a national clearinghouse for poverty law materials.

OLS operates the program through seven regional offices (soon to be increased to ten along with the rest of OEO), with strong direction from a headquarters office in Washington. The headquarters office now has a staff of ten professionals, and another eighteen professionals are spread among the seven regional offices. The new administration plans to at least double this staff in the next six months.

OLS's organization chart looks like this:

```
                      ┌─────────────────────┐
                      │      DIRECTOR       │
                      │                     │
                      │   DEPUTY DIRECTOR   │
                      └─────────────────────┘
```

| Support Services Branch | Research and Experimentation Branch | Field Operations Branch | Evaluation Branch | Advocacy Branch |

(TR +TA Programs)   (R&D Programs)

```
                              ┌─────────────────────┐
                              │  7 Regional Offices │
                              └─────────────────────┘
```
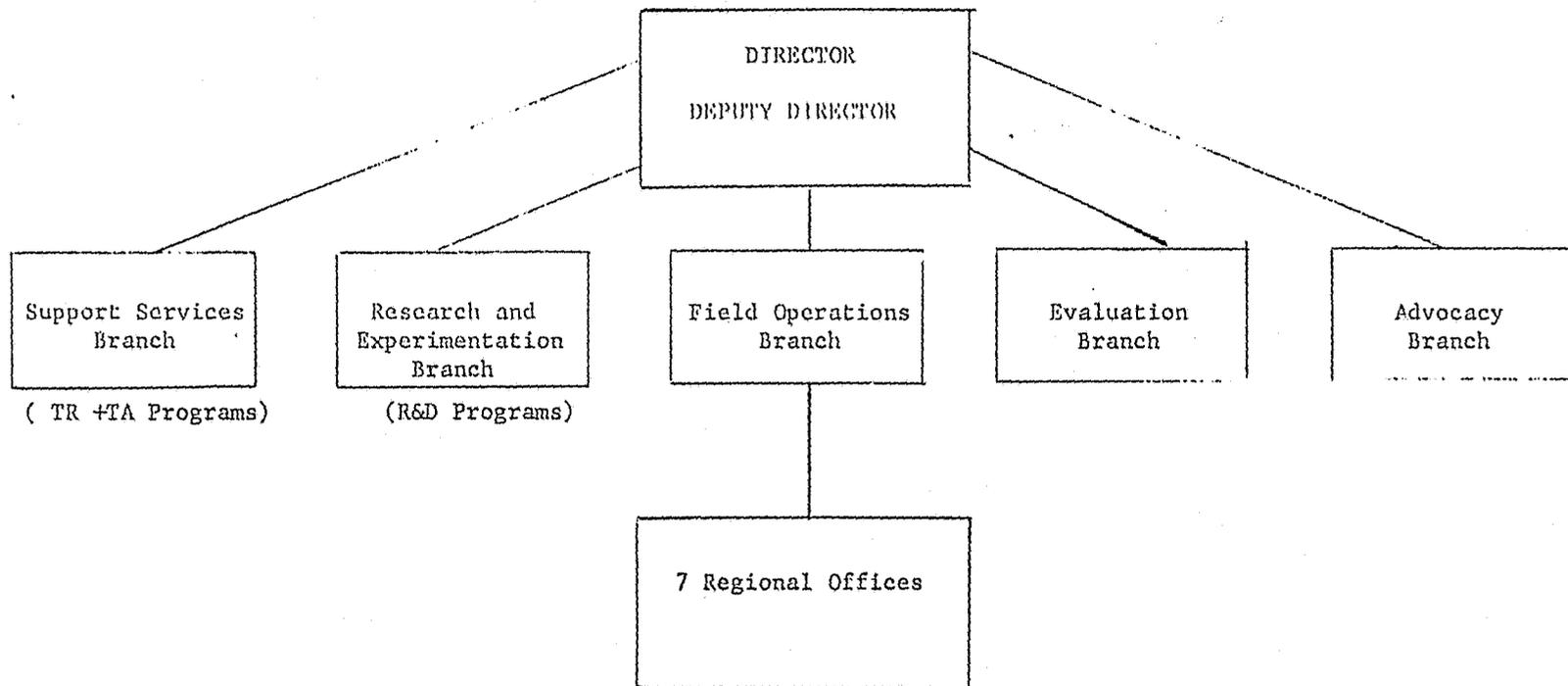
APPENDIX II

Project Classification System

Data were collected for all LSP projects on three variables:

        Budget Size (listed in thousands)

        Population Served

        Setting: urban, rural, mixed, Indian

The data for the first variable are accurate, but the data collected for the second and third are of questionable accuracy. What follows is a distribution into classifications for illustrative purposes only. The data base would have to be improved and other adjustments made before a final tentative classification could be made.

During the first year of operation, data will be collected on the political, legal and economic development climates of projects visited. These data will then be used to construct the final classification for succeeding years.

Population

10,000 - 49,999   50,000 - 499,999

Flagstaff, Arizona   Little Rock, Arkansas   Dayton, Ohio

LAC of Ventura Cty   Fresno, Calif.   Toledo, Ohio
 Oxnard, Calif.
                                LAS of Orange Cty, Inc.   Mahoning Cty LA Assoc.
Santa Cruz, Calif.   Santa Ana, Calif.   Youngstown, Ohio

Monterey Cty LAS   Wilmington, Delaware   Tulsa, Oklahoma
 Seaside, Calif.
                                Savannah, Georgia   Dauphin Cty LS Assoc.
Cameron Cty LAS   Harrisburg, Pa.
 Brownsville, Tex.   Peoria, Illinois
                                                              Columbia, South Carolina
                                LAS of St. Joseph Cty, Inc.
                                 South Bend, Indiana   Chattanooga, Tenn.

                                Wyandotte Cty LAS, Inc.   Nashville, Tenn.
                                 Kansas City, Kansas
                                                              Laredo, Texas.
                                Wichita, Kansas
                                                              Waco, Texas
                                Caddo-Bossier LAS
                                 Shreveport, La.   Spokane, Washington

                                Lynn, Massachusetts   Pierce Cty LA Foundation
                                                               Tacoma, Washington
_____   Genesee Cty LAS, Flint, Mich.

population data not available   Broome LA Corp. Binghampton,
for: New York

Shawnee Cty, Topeka   LAS of Rockland Cty
                                 New City, N.Y.
Southwest Louisiana LSS
 Lake Charles, La.   LAS of Mecklenberg Cty
                                 Charlotte, North Carolina

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URBAN - (Budget $100 - 224)

Population

10,000 - 49,999

50,000 - 499,999

San Gabriel NLO
El Monte, Calif.

Norwich, Connecticut

Over 500,000

Union Cty, LS Corp.
Elizabeth, N.J.

LAS of Suffolk Cty
Bay Shore, N.Y.

Buffalo, N.Y.

Cincinnati, Ohio

Seattle-King Cty LA Bureau, Inc.
Seattle, Washington

Milwaukee Plan LS
Milwaukee, Wisconsin

Birmingham, Alabama

Pima Cty Bar Assoc. LAS
Tucson, Ariz.

Berkeley, Calif.

Compton, Calif.

Pasadena, Calif.

Riverside, Calif.

Sacramento, Calif.

Denver, Colorado

Bridgeport, Conn.

Hartford, Conn.

Duval Cty LAA
Jacksonville, Fla.

Law, Inc. of Hillsborough Cty,
Tampa, Fla.

LA for Ramsey Cty, Inc.
Saint Paul, Minn.

Omaha, Nebraska

Cape-Atlantic LS Program
Atlantic City, N.J.

Mercer Cty, LAS, Inc.
Trenton, N.J.

North Hudson LS Program
Union City, N. J.

Albuquerque, New Mexico

Albany, New York

LAS of Forsyth Cty,
Winston-Salem, North Carolina

Columbus, Ohio

Oklahoma City, Oklahoma

LAS of the Multnomah Cty Bar
Assoc. Portland, Oregon

Population

Unclassified:	LAS of St. Clair County East Saint Louis, Ill.	Delaware Cty LS, Chester, Pa.
Operation Leap, Phoenix	LAS of Polk County Des Moines, Iowa	Charleston, South Carolina
Gary, Indiana, Lake Cty.		Greenville, South Carolina
"Freedom through Equality" (New Program), Milwaukee	Louisville, Ky.	LA & Defenders Society of Travis Cty, Austin, Tex.
	Baton Rouge, La.	
	Minneapolis, Minn.	El Paso, Texas
	Middlesex LS Corp. New Brunswick, N.J.	Monmouth LS Org. Red Bank, N.J.

POPULATION

10,000 - 49,999	50,000 - 499,999	Over 500,000
San Fernando Valley NLS, Inc. Pacoima, California	Long Beach, Calif.	San Diego, Calif.
	Oakland, Calif.	Cook County LAF, Inc. Chicago, Illinois
	LAC of San Mateo County Redwood City	New Orleans, Louisiana
	Contra Costa County LSF Richmond, Calif.	Baltimore, Maryland
	LAS of Santa Clara County San Jose, Calif.	Saint Louis, Missouri
	New Haven, Conn.	Essex Cty LS Center, Orange, New Jersey
	Atlanta LAS, Inc, Atlanta	Nassau Cty Law Svcs. Comm., Inc. Mineola, New York
	Emory Community LSC Atlanta, Ga.	Pittsburgh, Pennsylvania
	Indianapolis, Indiana	Dallas, Texas
	Newark, New Jersey	San Antonio, Texas
	Passaic Cty. LAS Paterson, New Jersey	LAF of Los Angeles Cty Los Angeles, Calif.
	Onandaga Cty, Syracuse, N.Y.	

URBAN - (Budget Over $475)

POPULATION

<u>50,000 - 499,999</u>

Miami, Florida

<u>Over 500,000</u>

Los Angeles NLSS, Inc.
 Los Angeles, California

Western Center, USC Law School
 Los Angeles

NLAF
 San Francisco, Calif.

Washington, D.C.

Chicago, Illinois

Boston, Mass.

Detroit NLS

Community Action LS
 New York, N.Y.

Cleveland, Ohio

Philadelphia, Pa.

Houston, Texas

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M I X E D   - Budget $ 0 - 99

POPULATION

10,000 - 49,999   50,000 - 499,999

Modesto, Calif.   LAS of San Jonquin Cty   Lincoln, Nebraska
                               Stockton, Calif.
Napa, Calif.   Clark Cty LS Project
                             LAF of Mendocino Cty.   Las Vegas, Nevada
LAS of Marin County   Ukiah, Calif.
  San Rafael, Calif.   Washoe Cty LAS
                             Solano Cty NAC   Reno, Nevada
Volusia Cty LS, Inc.   - Vallejo, Calif.
  Daytona Beach, Fla.   Bergen Cty LS Corp.
                             LSO of El Paso County   Garfield, New Jersey
Lewiston, Idaho   Colorado Springs, Col.
                                                                LS Program of Somerset Cty
Jackson & Williams Cty   LSS of Madison County   Somerville, New Jersey
  LS Bureau, Carbondale, Ill. Edwardsville, Illinois
                                                                Ocean Cty LS Program
Champaign, Illinois   Waukegan, Illinois   Toms River, New Jersey

Iowa City, Iowa   Fort Wayne, Indiana   Chemung Cty NLS, Inc. .
                                                                 Elmira, New York
Muskegon-Oceana LA Bureau, Inc. Dubuque, Iowa
  Muskegon, Michigan   Niagara Falls, New York
                             Black Hawk Cty LAS
Orleans LA Bureau, Inc.   Waterloo, Iowa   Dutchess Cty LS Bureau
  Albion, N.Y.   Poughkeepsie, N.Y.
                             Northern Worcester Cty LAS
Sullivan Cty, LS Corp.   Fitchburg, Mass.   LAS of Oneida Cty
  Liberty, N.Y.   Utica, N.Y.
                             LAS of Calhoun Cty
Southwest Oklahoma LA Council Battle Creek, Michigan   Stark County LAS
  Altus, Oklahoma   Canton, Ohio

                             Wichita, Kansas

POPULATION

10,000 - 49,999

Osage Cty, LAS, Inc.
  Pawhuska, Oklahoma

No. Central W. Va. Fairmont

Casper, Wyoming

Coahoma Cty, LS Comm.
  Clarksdale, Mississippi
Visalia, Calif.

50,000 - 499,999

Licking Cty LAS
  Newark, Ohio

Tuscarawas Cty LS Corp.
  New Philadelphia, Ohio

Scioto Cty LA Association
  Portsmouth, Ohio

Lane Cty Bar Association
  Eugene, Oregon

Marion-Polk LA and Lawyer
  Referral Assoc. Salem, Oregon

Bucks Cty LA Corp.
  Doylestown, Pennsylvania

Berrien Cty LS Bureau, Inc.
  Benton Harbor, Michigan

Lansing, Michigan

Saginaw, Michigan

Weber Cty Bar LS, Inc.
  Ogden, Utah

LS for Laramie Cty
  Cheyenne, Wyoming

Summit Cty LAS
  Akron, Ohio

Pueblo, Colorado

Cenla LAS
  Alexandria, La.

50,000 - 499, 999

LAS of Lorain
  Elyria, Ohio

Butler Cty LA Association
  Hamilton, Ohio

Allen Cty LS Association
  Lima, Ohio

POPULATION

Cambria Cty Ofc. of LA, Inc.
 Johnston, Pennsylvania

Scranton, Pennsylvania

Washington-Greene LAS
 Washington, Pennsylvania

LAS of Luzerne Cty
 Wilkes-Barre, Pennsylvania

University of Tennessee Law Sch.
 Knoxville, Tennessee

LAS of Nueces Cty
 Corpus Christi, Texas

POPULATION

10,000 - 49,999	50,000 - 499,999	Over 500,000
Merced, California	Norwalk-Stamford-Danbury RLS Stamford, Conn.	Oakland Cty LAS Pontiac, Michigan
	Waterbury, Conn.	Monroe Cty Bar La Corp. Rochester, N.Y.
	Washtenaw County LAS, Inc. Ann Arbor, Michigan	
	LAS of Grand Rapids & Kent Cty Grand Rapids, Michigan	
	Macomb Cty LA Bureau Mount Clemens, Michigan	
	Southern New Hampshire LS Assoc. Manchester, New Hampshire	
	Salt Lake City, Utah	
	Roanoke, Virginia	
	Charleston, West Virginia	
	Tolland-Windham LA Williamantic, Conn.	

Population data not available for:

Cape-Cod and Islands LS Program
Hyannis, Mass.

M I X E D

Budget $225 - 475

Population:
50,000 - 499,999

Kansas City, Missouri

Camden, New Jersey

Budget Over $475

Population:
Over 500,000

Puerto Rico

R U R A L   (Budget in thousands)

$ 0 - 99	$ 100 - 224	$225 - 475
Pinal Cty LS, Florence, Ariz.	Upper Peninsula LSP Escanaba, Mich.	North Mississippi Rural LS Oxford, Miss.
Maricopa Cty L.A.S. Phoenix		
	Tri-County LS Program Littleton, New Hampshire	Colorado Rural LS, Boulder
Arizona Rural Effort, Yuma		
		California Indian LS (Berkeley)
Newport, Arkansas	Delaware & Adair Counties LSP Jay, Oklahoma	
		Wisconsin Judicare, Madison, Wisc.
Western Idaho LS, Inc.	Texas Rural Legal Assistance Austin, Tex.	
Centralia, Illinois		
Vermilion Cty LAS, Danville, Ill.		
Northeast Kentucky Area Dev. Council LS - Grayson, Ky.		
Delta Legal Services Tallulah, La.		
Sandoval Cty LSP Bernalillo, New Mexico		
Licking Cty LAS, Newark, Ohio		
Tuscarawas Cty LS Corp. New Philadelphia, Ohio		
Elk Duck LS, Shelbyville, Tenn.		
LS of Mingo Cty, Williamson, West Virginia		
U.S. Virgin Is. LSP.		

STATEWIDE

$ 100 - 224	$ 225 - 475	Over $475
Duke University School of Law Legal Clinic - Durham, N.C.	LAS of Hawaii Pine Tree Legal Assis. Inc. Portland, Maine Montana LS Assoc. Rhode Island LS Vermont LA, Montpelier, Vt.	Alaska California Rural LA Inc.

INDIAN

$ 0 - 99	$100 - 224	Over $475
Papago Indian LS, Sells, Ariz.	Rosebud Siouz Tribe LSP Rosebud, South Dakota	Dinebeiina Nahiilna Be Agaditache Inc, Window Rock, Arizona
Leech Lake Reservation LS Cass Lake, Minnesota		
Mississippi Band of Choctaw Indian LS - Philadelphia, Miss.		
Pueblo of Zuni Zuni, New Mexico		
Cheyenne River Sioux Eagle Butte, South Dakota		

Data unavailable for:

Cochise United Legal Aid
 Bisbee, Ariz.

Lower Brule and Crow Creek Inter-
 Tribal Council - Ft. Thompaston, S.D.

The following projects have not been classified due to insufficient data being available:

LAC of Washington Township
  Fremont, Calif.

Middlesex Cty LAA
  Middletown, Conn.

New Britain, Conn.

S. Florida Migrant LS. Inc.

Allen Parish LSP
  Oakdale, La.

Brockton, Mass

Cambridge LS,
  Cambridge, Mass.

Harvard Law School
  Cambridge, Mass.

Lowell, Mass.

New Bedford, Mass.

Legal Educ. Ass't. Program
  Holyoke-Chicopee, Mass.

Vol. Defenders Comm.
  Boston, Mass.

Berkshire LS Inc.
  Pittsfield, Mass.

North Suffolk LAA
  Revere, Mass.

Springfield, Mass.

Worcester, Mass.

Otero Cty LS
  Alamogordo, N.M.

Bedford-Stuyvesant LS Corp.
  Brooklyn, N.Y.

Fort Greene NLO
  Brooklyn, N.Y.

Brownsville, LS
  Brooklyn, N.Y.

Chautaugua Cty LS Inc.
  Mayville, N.Y.

LAS, N.Y., N.Y.

HARYOU Act
  New York, N.Y.

Morrisani LS Program
  Bronx, N.Y.

Mobilization for Youth,
  New York, N.Y.

LAS of San Francisco
  San Francisco, Calif.

Miss State Bar

South Bronx LS
  South Bronx, N.Y.

Tri Cty LS, York, Pa.

END