

Program Letter 05-1

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TO: All LSC Program Directors

FROM: Helaine M. Barnett, President 

DATE: January 13, 2005

RE: Self-Inspection of 2004 CSR Data

The purpose of this Program Letter is to inform all grantees that we will again be requiring them to conduct a Self-Inspection of a sample of closed cases prior to submitting 2004 Case Service Reporting (CSR) data to the Legal Services Corporation (LSC). The Self-Inspection must be completed, and the enclosed Certification and Summary Forms signed and mailed to LSC, no later than March 1, 2005.

Introduction

LSC is committed to providing the United States Congress and the public with the most accurate information possible. Closed case statistics are a major component of the data on program activities collected by LSC and a critical measure of the impact of federal funding on the civil legal problems of people living in poverty. Therefore, it is essential to assure the accuracy of the 2004 CSR data.

This Self-Inspection will be very similar to those conducted over the last four years. Indeed, we have made a conscious effort to minimize changes so the process will be familiar and the procedures LSC programs used previously can again be used this year with the least possible expenditure of time and effort. One adjustment that may be of benefit to you is that if you have had a recent visit (since October 1, 2004) from the Office of Compliance and Enforcement (OCE) that included a CSR review, it may be possible to modify the sampling procedure to use the samples OCE used for some or all of your sample and thereby reduce the burden of the Self-Inspection. Please contact John Meyer at 202-295-1505, e-mail meyerj@lsc.gov if you want to request such a modification of the sample procedure.

All cases reported in the CSR's must have both financial and citizenship/alien eligibility documentation, without exception. However, Program Letter 03-2 provides that the total number of cases funded under Titles III and IV of the Older Americans Act that lack financial eligibility documentation, but would otherwise be eligible, should be reported separately in the CSR's. Such cases do not count as part of the "total cases reported" for the purposes of the Self-Inspection. If any such cases occur in the Self-Inspection sample, they are to be counted as exceptions for lack of financial documentation. LSC will, however, keep a separate total of such cases for programmatic and reporting purposes.

Standards for Accuracy

Standards for accurate reporting of CSR data are contained in the 2001 CSR Handbook. §§3.2, 3.3, and 5.2 of the Handbook contain specific guidance on single recording of cases, timely closing of cases, and documenting client eligibility. Section VI of the Handbook contains guidance on the reporting of different levels of case services, and Section VII contains guidance on the reporting of referrals.

The Self-Inspection Process

The purpose of the Self-Inspection process is to give programs a means to verify, by reviewing a sample of cases, that their 2004 CSR data meets LSC standards for accuracy. The enclosed Case Review Form contains a list of questions which identify key requirements that need to be met in order to report a case to LSC. If the answers to the questions in the Case Review Form are generally "Yes", then the sampled cases generally meet the requirements for reporting cases to LSC, and no further inquiry is necessary, unless program staff have reason to believe that the sample selected was not representative of the total number of cases to be reported to LSC or, for other reasons, problems outside the sample would affect the accuracy of the 2004 CSR data.

If there are "No" answers to applicable questions in 10 percent or more of the cases sampled in the Self-Inspection process, then the sample of cases tends to indicate that there are overall problems which may affect the accuracy of the 2004 CSR data. In the event that the Self-Inspection process does reveal such problems, then consultation with LSC is appropriate to determine whether to initiate corrective action to find and correct problems in cases not included in the Self-Inspection sample. If general corrective action is not taken before submission of the CSR's for 2004, any corrections in the sample cases **MUST** be carefully documented and that documentation preserved with the case files, so the sample is preserved for any future review.

Sample Selection

To reach a level of absolute confidence that every 2004 closed case is accurately reported to LSC, program staff would need to review each individual case. For most programs, such a review would be impractical. Therefore, the Self-Inspection process relies on the selection of a

sample of cases from which programs can draw some inferences about the overall number of cases reported to LSC. In order for the inferences to be reliable, however, the sample must be reasonably representative of the total number of cases reported to LSC. If the sample is not representative, its unrepresentative character would undermine the integrity of the Self-Inspection results.

The enclosed Sample Selection Procedure details a process for selecting a sample of cases for review. The Procedure requires programs reporting over 1,000 total closed cases to select a sample of approximately 150 closed cases, and more in some large programs with multiple offices. Programs reporting fewer than 1,000 total closed cases will need to select a sample of 75 closed cases. Each grantee should document the steps taken in the Selection Procedure, and should clearly indicate any departures from the Selection Procedure. To consult with an LSC staff member about the sampling procedure, please contact Bert Thomas at (202) 295-1528, e-mail thomasb@lsc.gov.

Review of Sampled Cases

For each case in the sample, the enclosed Case Review Form must be completed, and a “Yes” or “No” answer must be recorded for all applicable questions. Not all questions will be applicable to all cases. Upon completion, each Case Review Form must be retained for audit purposes.

Several questions in the Case Review Form require a determination whether a “notation” is present in the case file or in the case management system record. The following standards apply to these questions:

Questions (1) and (3) – Notation indicating no income or assets

A notation indicating that a client household has no income or assets may be the number zero, the word ‘none’ or a similar descriptive term to that effect, or a checkmark or a line drawn through the applicable section of an intake sheet.

Question (3) - Receipt of government benefits

A notation indicating that a client receives government benefits which required testing for assets may be the name of the government agency, or a brief description of the type of benefits received.

Question (4) – Citizenship or alien eligibility – telephone cases

A notation indicating that a client in a telephone case is a citizen or an eligible alien may be the word “Yes”, the letter “Y”, or a checkmark or other written indication in the appropriate section of an intake sheet.

Question (5) – Attestation of citizenship

The attestation may consist of a signature on an intake sheet, retainer agreement or other document containing language stating that the client is a United States citizen.

Use of Case Management System Queries

LSC encourages programs to use their case management systems to augment the Self-Inspection process. Case management system queries and reports can easily provide useful information about all 2004 closed cases, not just a sample of cases. For example, a case management system query could readily identify 2004 cases which lack either income or assets information. For assistance with case management system queries, contact your vendor or LSC staff member Glenn Rawdon at 202- 295-1552, e-mail grawdon@lsc.gov.

Whether to Initiate Corrective Action

If there are “No” answers to one or more of the applicable questions in 10 percent or more of the cases sampled (look to the Certification Forms, not the Summary Forms to calculate the 10% figure), or if the use of case management system queries reveals problems in a larger number of cases, then program staff will need to make a determination whether to initiate corrective action to remedy the problems identified.

For some problems, such as untimely closing of cases or duplicate reporting of cases in a particular branch office or unit, the expenditure of effort needed to identify the total number of affected cases may be justified. Case management system queries and reports could provide an easy means of detecting such cases. In the interest of achieving accurate reporting of 2004 closed cases, further effort to correct problems might also be justified, provided doing so would not have a disproportionate impact on client services. While the decision to undertake corrective action rests with the program, LSC strongly encourages consultation before initiation of any corrective action. To consult with LSC as to whether corrective action is advisable or for other Self-Inspection questions (except sampling or case management queries), please contact John Meyer at 202-295-1505, e-mail meyerj@lsc.gov

Certification Process

All programs must mail the enclosed Self-Inspection Certification and Summary Forms to LSC by March 1, 2005, regardless of the results of the Self-Inspection (mailing address is: 3333 K Street, N.W., Third Floor, Washington D.C. 20007). The Certification Form requires submission of information about the number of cases found to have one or more problems in the Self-Inspection, as well as information about whether action was taken before, during, or after the Self-Inspection either to remedy problems found or not to report some cases at all. It also includes a report on the number of cases that were excluded (removed) from the CSR report

because of corrective action taken **after** the Self-Inspection. The purpose of collecting this information is to enable LSC to determine the accuracy of CSR submissions and the frequency with which programs are unable to report cases because they do not meet LSC reporting requirements. **Please be sure to enter all requested information, especially inserting the number of cases reviewed and exceptions found, before submitting the Certification Form.**

The Self-Inspection Summary Form collects information about the types and frequency of exceptions noted during the Self-Inspection process. The eleven categories listed in the Summary Form correspond with the eleven questions in the Case Review Form. The “Numbers of Cases” column in the Summary Form should accurately reflect the numbers of sampled cases for which exceptions were noted (by “No” answers) in the completion of the Case Review Forms for cases sampled. The collection of this information will enable LSC and program staff to identify those areas where LSC reporting requirements have been difficult to meet, as well as to indicate where programs should focus their efforts to achieve further improvements in the accuracy of their case reporting.

The Summary Form also collects information as to whether programs undertook any corrective action, as a result of the Self-Inspection process, which resulted in adjustments to the 2004 CSR data submitted to LSC. If corrective action is undertaken, it must apply to all affected cases, not just to cases in the Self-Inspection sample. Programs undertaking corrective action which resulted in adjustments to the 2004 CSR data submitted to LSC should note the categories in which they have taken corrective action in the Self-Inspection Summary Form. This information will enable LSC to determine the extent to which programs have been able to correct problems identified during the Self-Inspection process.

- Enclosures: (1) [Self-Inspection Certification](#)
(2) [Self-Inspection Summary Form](#)
(3) [Self-Inspection Case Review Form](#)
(4) [Self-Inspection Sample Selection Procedure](#)
(5) [Self-Inspection Unreported Non-LSC Case Form](#)