



Legal Aid of  
Western Ohio, Inc.

**Center for  
Equal Justice**

525 Jefferson Avenue  
Suite 400  
Toledo, Ohio 43604

(419) 724-0030  
(877) 894-4599

(419) 321-1582 fax  
(888) 554-7415 TTY

[www.lawolaw.org](http://www.lawolaw.org)

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October 28, 2011

By E-mail and Mail Delivery

Althea J. Hayward  
Program Analyst  
Office of Program Performance  
Legal Services Corporation  
3333 K. Street, NW 3<sup>rd</sup> Floor  
Washington, D.C. 20007-3522

Re: Draft Report -- Program Quality Visit  
Recipient Number 436183

Dear Althea:

I have received and reviewed the draft report of the program quality visit the Office of Program Performance conducted on June 27 – July 1, 2011. I offer the following comments on the draft report:

1. Page 3 of the report refers to a deputy director and a litigation director. LAWO has a litigation director, but no deputy director.
2. At the top of page 4, the report states that in 2003 LSNO assumed responsibility for the provision of LSC funded services from the Western Ohio Legal Services Association (WOLSA) and the Legal Aid Society of Dayton (LASD). I believe only WOLSA was funded by LSC; LASD was a non-LSC funded entity. LSNO assumed responsibility for LSC funded services only from WOLSA.
3. The description of the services LAWO contracts with ABLE to receive indicates those services include the services of a PAI director. The PAI director is an LAWO employee and that title should be deleted from the list of positions (top of page 5).
4. The staff numbers noted in the middle of page 8 differ from the numbers given on page 4. I believe the numbers on both pages should be: 39 attorneys, 9 paralegals, and 14 administrative and support staff. Also, we have 8 full time offices, not 9.
5. On page 9, the report lists the staffing for Legal Aid Line. I believe the reference to 9.25 FTE paralegals should be deleted as Legal Aid does not have any paralegal staff members.

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6. On page 10, the name of the bar association in Findlay is the Findlay/Hancock County Bar Association; the community foundation also is the Findlay-Hancock County Community Foundation. Finally, the administrative assistant position in the office is part-time.
7. The revised management structure was implemented in 2009, not 2008 (page 12). Also, the fourth sentence in Finding 10 should read: “The strategic advocacy managing attorneys are supervised directly by the deputy director for advocacy”. I supervise the program performance managing attorneys. In the next sentence, insert the phrase “program performance” after the word “regional”.
8. Also on page 12, the first part of the second sentence in the second full paragraph should read: “They include a regional strategic advocacy managing attorney for housing, one for domestic relations...”
9. In the middle of page 13 the date should be 2009, not 2008. I also would ask that the sentence be revised to read: “The LSC team has some concern that with the loss of attorney staff following the 2009 reorganization, the ratio of legal work supervisors to advocates became high.” We actually reduced the number of supervisors in 2009; the ratio changed because we started losing attorneys.
10. On page 14, the second sentence of the first full paragraph should read: “Currently focusing on the needs of children and families, the project has developed an expertise advocating for children in special education issues.” The special education advocacy has been a fairly recent part of the project.
11. On page 15, the PAI subgrants are provided to the Toledo Bar Association for its Pro Bono Legal Services program and the Greater Dayton Volunteer Lawyers Project – which is not part of the Dayton Bar Association. Also, the LAWO PAI program has one staff member in addition to the director (not two).
12. As we discussed, I request clarification of the recommendation – found on page 16 of the report -- that LAWO “should expand the opportunities for private attorneys to participate in its activities on behalf of clients such as co-counseling in major and complex litigation, transactional work, and community legal education”. Does this recommendation apply to our private attorney involvement activities in the Dayton and Toledo areas, in which LAWO contracts with other entities to conduct private attorney involvement activities, as well as our own PAI program?
13. At the bottom of page 16, the Family Justice Center was developed in 2005, not 2002.

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14. On page 25, LAWO has received LSC migrant funding since 1999 (not 1998).

Thank you for this opportunity to comment on the draft report. Please let me know if you have any questions, or need additional information.

Sincerely,

A handwritten signature in blue ink that reads "Kevin C. Mulder". The signature is written in a cursive style with a large initial 'K'.

Kevin C. Mulder

cc: David J. Coyle, Chair  
Board of Trustees