

**Legal Services Corporation**  
OFFICE OF INSPECTOR GENERAL

**Review of Case Statistics Report**  
**Grantee: Legal Services of Greater Miami, Inc.**  
**Recipient No. 610040**  
**AU99-013**  
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**EXECUTIVE SUMMARY**

The 1997 Grant Activity Report submitted by Legal Services of Greater Miami significantly overstated the number of cases closed during the year and open at year-end. The program reported 20,487 closed cases but only 4,943 cases qualified to be reported as closed during 1997. Therefore, the reported closed

cases were overstated by over 315 percent. A total of 3,313 cases were reported as open, but the program had 2,664 open cases at year-end.

Closed cases were overstated primarily because 15,160 telephone calls and walk-in contacts were counted as cases. Legal Services of Greater Miami did not accept the individuals as clients and provided no legal services. Therefore, they should not have been reported as cases. An additional 774 limited service cases that dated back several years were reported as closed in 1997 even though legal services were provided prior to 1996. Limited service cases are categorized by LSC as brief services, advice and counsel, and referred after assessment, and are typically closed shortly after being opened. Open cases were overstated by 649 because Legal Services of Greater Miami did not close all cases no longer being serviced. In addition, the Grant Activity Report understated cases classified as Private Attorney Involvement cases by 28 percent.

The accuracy of the Grant Activity Report was also affected by duplicate cases and incorrect closing codes and dates in the automated case management system. We did not estimate the number of cases involved. In addition, the automated case management system did not have the name of an assigned attorney or paralegal for a number of old cases and about eight percent of the files we asked to review could not be located.

Recommendations to correct the above problems are on page 9.

## **BACKGROUND**

Legal Services of Greater Miami is a nonprofit Florida corporation organized in 1966 to provide legal services to indigent individuals who meet established eligibility guidelines. Its priorities include housing, income maintenance, medical, family and consumer issues. The grantee is headquartered in Miami and has branch offices in Dade and Monroe counties. Its staff includes approximately 30 attorneys, 13 paralegals, and 31 other staff who provide computer, accounting, and administrative support services. In 1997, the grantee received funding totaling about \$4.4 million. About 58.5 percent, or \$2.6 million came from LSC. The grantee attempts to meet its Private Attorney Involvement requirement primarily through the Dade County "Put Something Back Project" and six other projects.

The grantee is required to prepare and submit an annual Grant Activity Report to LSC on key aspects of its workload. The report includes statistics for basic field services and Private Attorney Involvement programs funded with LSC funds, including the number of open and closed cases, types of cases, and the reasons for closing cases. For calendar year 1997, the grantee reported 3,313 open cases and 20,487 closed cases to LSC.

The grantee keeps track of client cases primarily through an automated case management system "Revelations," which operated only at its headquarters office in 1997. The Private Attorney Involvement cases are also recorded in the case management system, which is the source of the information used in the Grant Activity Report.

## **OBJECTIVES, SCOPE, AND METHODOLOGY**

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

The Office of Inspector General (OIG) performed this review from November 9-24, 1998, at the grantee's main office and its Monroe County branch office. The OIG obtained and examined the grantee's 1997 and 1998 grant proposals to LSC, its 1997 grant activity report and 1997 Program Integrity certification. During the on-site visit, the OIG interviewed and collected information from the grantee's executive director, managing attorneys, staff attorneys, paralegals, intake staff, information

system specialist, and other support staff.

The OIG also obtained and reviewed the data in the grantee's automated case management system to determine if the case statistical data reported to LSC in the Grant Activity Report was consistent with information in client case files and in compliance with applicable LSC reporting requirements. The OIG randomly selected 85 client cases for detailed review. Thirty additional client cases were randomly selected for review at a grantee branch office, as well as 30 additional cases that appeared to be duplicates.

The OIG obtained and examined data in the case management system to determine if the case statistical data reported for the 1997 Private Attorney Involvement Program was consistent with the data reported in the Grant Activity Report.

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

## **RESULTS OF AUDIT**

### **Case Service Reporting**

The grantees' 1997 Grant Activity Report significantly overstated the number of cases closed during the year and the number remaining open at year end. Most of the overstatement of closed cases resulted from the grantee's practice of counting and reporting brief telephone calls and walk-in contacts as cases. The individuals requesting assistance were not accepted as clients and not provided legal service. An additional overstatement occurred because cases were reported as closed in 1997 when legal service had been provided and the case closed in prior years. Open cases were overstated because cases that were no longer being serviced had not been closed in the automated case management system. Additional problems included: 1) duplicate records; 2) incorrect closing codes and dates; and 3) old cases without a responsible attorney or paralegal named in the automated system; and 4) missing client files.

### **Case Service Reporting Requirements**

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

### **LSC Uses of Grant Activity Report**

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

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

Revelations is a data processing system that allows the grantee to store, retrieve, and analyze information about client cases and the organization's delivery of legal services. It has been in use by the

grantee since 1987 to produce annual case statistical reports to LSC. The grantee used the case records as the basis for its Grant Activity Report.

In response to the annual reporting requirement, the grantee submitted the following information to LSC:

<b>Type of Legal Problem</b>	<b>Open</b>	<b>Closed</b>
Consumer/Finance	254	1,977
Education	65	194
Employment	75	825
Family	390	2,618
Juvenile	32	94
Health	158	469
Housing	835	5,784
Income Maintenance	1,270	5,409
Individual Rights	24	1,444
Miscellaneous	210	1,673
<b>TOTALS</b>	<b>3,313</b>	<b>20,487</b>

#### **Examination of Reported Cases**

The grantee should have reported 4,943 closed cases and 2,664 open cases in its 1997 Grant Activity Report. The overstatement occurred primarily because the grantee classified many non-reportable contacts as cases and also did not close and report some cases in the year legal service was provided. In addition, the program reported 774 limited service cases (counsel and advice, brief services, and referred after legal assessment) as closed in 1997 when they should have been closed and reported to LSC in previous years.

The number of closed cases would be further reduced if duplicate records were removed. The grantee's automated case management system included some duplicate records for both open and closed cases. This duplication could be significant. However, we could not estimate the number of duplicate records because of the way the client records were maintained in the automated system. The duplicate record problem is discussed in more detail on page [8](#).

#### **Non-Reportable Contacts**

The grantee incorrectly reported 15,160 contacts with individuals as closed cases. The contacts were with individuals who sought legal assistance through telephone calls or visits, but were not accepted as clients by the grantee. Intake workers with no formal legal training, reviewed the individuals' applications for assistance. Individuals whose legal problem did not coincide with program priorities or who were ineligible for LSC funded assistance, were not accepted as clients. They received no legal advice but were frequently given the telephone numbers of other legal service providers and on some occasions, self-help materials.

The intake workers concurrently opened and closed cases for the above described contacts in the automated case management system. Under the grantee's procedures, the intake workers closed the cases as either "referred after legal assessment" or "counsel and advice." These contacts should not have been reported as cases because no legal assistance was provided as required by LSC guidance in the CSR Handbook.

### **Old Limited Service Type Cases**

The grantee incorrectly reported 774 limited service type cases (i.e., counsel and advice, brief services and referred after legal assessment) as closed in 1997. These cases should have been closed and reported in previous years. A limited service type case usually requires little professional staff time and all work is usually completed shortly after the case is opened. Therefore, these type cases should be closed relatively close to the date they are opened.

The grantee reported 20,487 closed cases for 1997. As discussed above, 15,160 cases were erroneously reported, leaving 5,327 apparently correct closures. The Grant Activity Report showed that 774 of the 5,327 cases were limited service type cases opened prior to 1996. These cases should have been closed and reported to LSC prior to 1997. In addition, an indeterminate number of limited service cases opened in 1996 likely should have been closed in 1996, and should not have been reported in 1997. One limited service case reported closed in 1997, was opened in 1982. The following chart shows the limited service cases opened prior to 1996.

<b>Year Opened</b>	<b>Limited Service Cases</b>
1995	126
1994	107
1993	232
1992	127
1991	61
1990 & Before	121
<b>Total</b>	<b>774</b>

### **Errors in Reported Open Cases**

The grantee's reported open case total of 3,313 was overstated by 649 cases. The overstatement occurred because limited service cases that should have been closed during 1997 or in prior years were reported as open as of the end of the year. One brief service case that was opened in 1984 was reported as open in the 1997 Grant Activity Report. Early in calendar year 1998, the grantee closed all of the old 649 limited service cases. This would result in an overstatement of 1998 closed cases, because these cases should have been closed in prior years, unless the grantee adjusts its 1998 report accordingly.

### **OTHER CASE MANAGEMENT ISSUES**

Several additional case management system problems surfaced during our review. Specifically, 1) duplicate cases were in the system, 2) some records contained incorrect closing codes and dates, 3) some cases were not assigned to an attorney or paralegal, 4) some case files could not be located, and 5) statistics on closed Private Attorney involvement cases were inaccurate.

### **Duplicate Records**

The grantee's case management system contains duplicate records, i.e., the same case is in the system more than once. We reviewed the records for eight clients with multiple cases recorded in the system and found a 100 percent error rate. Each client had a single legal problem and should have had only one case recorded. The problem occurred because clients made multiple requests for assistance that were recorded as separate cases even though the same legal problem was involved. The duplicate record problem is potentially significant if numerous such records are in the system. We could not make a reliable estimate of the total duplicate records in the system because of the difficulty in establishing the universe of possible duplicates. The grantee should periodically produce a report in client name and legal problem sequence to identify possible duplicate records that should be deleted from the system.

### **Incorrect Closing Dates and Codes**

Case closed dates and reason for closure codes in the case management system were erroneous at a relatively high rate. The closing dates for 17 percent of sample cases did not match the closing dates on the source documents (intake sheets). Reason for closure codes were different for 18 percent of the sample cases. Improved internal controls are needed over the data input process to detect and correct such errors. Supervisors should verify a sample of cases periodically to ensure that the data in the system is consistent with the applicable documentation.

### **Advocates Not Assigned to Cases**

The case management system did not include the names of responsible attorneys or paralegals assigned to some old open cases. About 20 percent of the 394 cases opened prior to 1991 did not have an advocate assigned in the case management system. Grantee management needs to review all open cases without an assigned advocate and close the case if no legal services are being provided or have the system updated to include the name of the current advocate for cases that are active.

### **Case Files Not Found**

The grantee's staff could not locate five files from a sample of 65 cases that were reported as closed during 1997 or were open at year end. Three of the missing files were for closed cases and two were for open cases, an eight percent error rate. Because of a limitation in our sample we could not project the error rate to the universe of open and closed cases. Nevertheless, there are indications of a potential problem that needs attention. Grantee management should review a sample of open and closed files and determine if a significant number of files cannot be located and adopt improved controls over files if warranted.

### **Private Attorney Involvement Closed Case Statistics Were Inaccurate**

The grantee provided a detailed listing to support the number of open, closed and Private Attorney Involvement cases reported in the Grant Activity Report. The listing, with minor exceptions, supported the reported open and closed cases. However, the reported Private Attorney Involvement closed cases were inaccurate. The grantee's Grant Activity Report included 645 closed Private Attorney Involvement cases. The detailed listing had 897 such cases. We were not able to determine the exact cause of the reporting problem. In comments on our draft report, grantee management stated that the problem occurred because some Private Attorney Involvement cases were closed with a 1997 closure date after the Grant Activity Report was sent to LSC. Grantee management needs to review and verify case data before it is submitted to LSC.

## **CONCLUSIONS**

The grantee needs to improve the accuracy of the case statistics reported in the Grant Activity Report. Its 1997 report significantly overstated both closed and open cases. The problem occurred because the grantee reported, as cases, contacts with individuals who were not accepted as clients nor provided legal services. Other errors in the data in the automated case management system indicate that the system is unreliable. Grantee management needs to ensure that the Grant Activity Report only includes cases that meet LSC's definition of a case and needs to improve controls over preparation of data to guard against inaccurate data entering the case management system.

## **RECOMMENDATIONS**

The OIG recommends that grantee management:

1. Implement revised procedures to preclude reporting intake staff contacts as cases in the Grant Activity Report.
2. Implement procedures requiring that limited service type closed cases be reported in the year service was provided.
3. Review cases opened prior to 1999 to determine if legal services are being provided, and close those that are no longer being serviced.
4. Implement procedures for 1) periodically producing a report in client name and legal problem sequence, 2) reviewing the report and associated case files to determine if duplicate records are in the system, and 3) deleting duplicate records.
5. Implement procedures requiring supervisors to review closed cases periodically to ensure that data in the case management system is consistent with data in case files.
6. Implement procedures requiring the periodic review of cases recorded as open in the case management system to ensure all case have an assigned advocate.
7. Select a sample of open and closed cases in the case management system and verify that case files are readily available. If a significant number of files cannot be located, adopt improved controls over the files such as requiring anyone taking a file to sign a control log.
8. Review and verify the accuracy of Private Attorney Involvement data before it is submitted to LSC.

## **SUMMARY OF GRANTEE COMMENTS ON DRAFT REPORT**

The grantee's comments focused on the reporting of services, stating that the draft report contained factual errors and suggested that the grantee reported more services than were provided. The comments stated that the draft report mischaracterized and undervalued the intake screening, advice and referral services and that the services are valuable to clients. The grantee stated that it has an elaborate and comprehensive intake system and that the paralegals conduct in depth interviews with all clients who come to the office. The grantee stated that it properly reported the intake screening and advice and referral services in accordance with the general practice at the time, and any reporting problems were the result of poor LSC guidance. The comments disagreed with the draft report's statement that 1,183 limited service type cases were incorrectly closed in 1997.

The grantee's comments indicated that recommendations 1- 4 and 6 had been implemented and that recommendations 5 and 8 will be implemented. The comments stated that recommendation 7 (covering missing files) was no longer an issue because the inability to locate files was a one time situation that has been rectified. The comments also indicated that not being able to locate eight percent of case files was not an unusual error rate.

[Appendix 2](#) contains the grantee's comments.

## **OIG COMMENTS**

The grantee's lengthy comments did not address in any substantive way the case reporting problems

discussed in the report. The comments focused on the reporting of services rather than the case reporting problems addressed in the report (services and cases are not synonymous). For this reason, the comments were difficult to understand and relate to the report. They appear to challenge the report but do not present factual data to refute any of the report's findings.

The OIG agrees that the intake screeners provide useful and needed services. However, the services provided do not qualify as cases under LSC's reporting guidance and should not be reported. There is no provision in the LSC guidance for reporting brief contacts with potential clients.

The OIG's policy is to specifically address grantee comments that raise substantive issues about draft reports. In this case, no substantive issues were presented. Therefore, the comments are not specifically addressed. Three comments resulted in minor changes to the report. The report was amended to delete the reference to a lack of eligibility screening by the grantee's intake staff. The reference to reporting the brief contacts as "matters" was deleted from the report and the first recommendation. The number of incorrectly reported limited service type cases was reduced from 1,183 to 774.

After the audit exit conference briefing by our staff on the improper reporting, grantee management took action to correct the case statistical reporting problems. The grantee's 1998 Grant Activity Report reported that 5,091 cases were closed during the year, a reduction of 15,396 from the 20,487 closed cases reported in 1997. The reduction was primarily in the referred after assessment and counsel and advice categories. In 1997, the grantee reported 16,835 closed cases in these categories. This number was reduced to 2,009 in 1998. This reduction validates our report.

Please provide the OIG a corrective action plan for the report recommendations. For recommendations 1-4 and 6 the corrective action plan should include documentation indicating when the recommendations were implemented and the specific corrective actions taken. For the remaining recommendations, please provide an implementation schedule and specific actions that will be taken to implement the recommendations. We do not agree with the grantee's assertion that the missing case files were a one-time problem and that an eight percent error rate is acceptable. Therefore we reaffirm our recommendation number 7.

The corrective action plan is due within 30 days of the date of this report.

APPENDIX 1

## **LISTING OF FINDINGS AND ASSOCIATED RECOMMENDATIONS**

Findings:

9. Closed cases overstated  
Recommendations #1 and 2
10. Errors in open cases  
Recommendation #3
11. Other case management issues  
Recommendations #4 - 8

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March 19, 1999



E.R. Quatrevaux  
Inspector General  
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Dear Mr. Quatrevaux:

Attached please find Legal Services of Greater Miami, Inc.'s comments to the draft report on the results of the recent OIG audit of LSGMI.

Please let me know if you have any questions or need any additional information.

Thank you.

Sincerely yours,

Marcia K. Cypen  
Executive Director

MKC/gb  
Enclosure

**Legal Services of Greater Miami, Inc.**

**Comments In Response To**

**Legal Services Corporation  
Office of Inspector General  
Draft Report: Review of Statistical Data**

**SUMMARY**

The Office of Inspector General Draft Report (hereinafter "OIG Draft") contains factual errors regarding the services provided by Legal Services of Greater Miami, Inc. (hereinafter "LSGMI"), and suggests that LSGMI reported more services than were in fact provided. The OIG Draft also suggests that LSGMI did something wrong by reporting services according to the accepted and customary practice at the time, and attempts to hold LSGMI accountable to standards only recently adopted and implemented by the Legal Services Corporation (LSC).

In fact, the CSR Handbook in effect at the time did not give adequate guidance as to how services should have been characterized when reported to LSC, and the case closing codes were not adequate to capture information about the scope of services provided by LSC programs.

The OIG Draft also gives undue emphasis to the timing of closing cases. The Grant Activity Report is really only a snapshot of the program's services as of a particular date, and cannot in isolation give a 100% accurate picture of a program's work. If the number of cases reported as open as of December 31 is overstated because some cases should have been closed in 1997, then the number of cases reported as closed in 1997 is understated. Yet the net result is the same. The date the cases are reported as closed does not change the fact that the services were provided.

The following comments will respond to the OIG Draft point by point.

**1. Closed Cases**

**a. OIG Draft**

According to the OIG Draft, LSGMI overstated the number of cases closed during 1997 because LSGMI reported the services provided to 15,160 clients by intake paralegals.

The OIG Draft states that these clients (who were screened by intake workers "with no formal legal training") were not accepted, no eligibility checks were performed, and no

legal services were provided, although they "were frequently given the telephone number of other legal services providers and on some occasions, self-help materials."

The OIG Draft also states that these services should have instead been reported as matters because they were "contacts that do not result in the provision of legal services."

**b. LSGMI Response**

The OIG Draft mischaracterizes and undervalues the intake screening, advice and referral services reported by LSGMI, which are very basic, necessary, and valuable services to clients. LSGMI submits that these services were properly reported, in keeping with what was the general practice of LSC programs at the time.

LSGMI further submits that the 1993 CSR Handbook which was in effect in 1997 did not clearly address how these services should be reported to LSC. The available CSR closing codes were (and still are) not sufficient to take into account the wide variety of services provided by LSC programs. There were no closing codes which were more appropriate for these services. Accordingly, LSGMI reported these services in the categories which seemed most appropriate and customary.

The value of these services must be viewed in the context within which they are provided. LSGMI has an elaborate and comprehensive intake system which serves as a single point of contact for the tens of thousands of poor people seeking assistance from the multiple legal services providers in Dade County. LSGMI's intake paralegals conduct an in depth interview of all clients who call or come to the office in order to determine whether the client should see an LSGMI attorney.

In all cases, relevant information is reviewed by the intake paralegal. Utilizing the computerized Switchboard Help Pages (which detail the specific services provided by all legal and social services providers in Dade County), the intake paralegal provides clients who do not see an LSGMI attorney with specific information about where they can go for help. In many (not "some") cases, clients are given self help materials and counseled on action they can take to resolve their problem.

An attorney is often consulted by the intake paralegal while the client is still in the office regarding what information should be provided to the client. All of the intake paralegal contacts with clients are recorded in detail and reviewed for accuracy by an LSGMI attorney for quality control and malpractice prevention purposes .

Contrary to what is stated in the OIG Draft, all clients are, in fact, screened for financial and case eligibility. (The OIG Draft recognizes this on page 6 where it states that "Individuals...who were **ineligible** for LSC funded assistance were not accepted as

clients.”) And although they have no formal legal training, LSGMI’s intake paralegals receive on-going training and close supervision from LSGMI legal staff.

As to the statement that these services should have been reported as matters, LSGMI has never been advised to do so, nor is this mandated by the CSR Handbook.

**c.     OIG Draft**

According to the OIG Draft, LSGMI also overstated the number of cases closed during 1997 because LSGMI reported 1,183 cases which were closed as counsel and advice, brief service, or referred after legal assessment in 1997 although the cases were opened prior to 1997. These “limited service type cases should have been closed relatively close to the date they were opened.”

**d.     LSGMI Response**

The OIG Draft erroneously concludes that all of the “limited service” cases should not have been reported as closed cases in 1997. First, although it may be true that some of the “limited service” cases could have been closed earlier, it cannot be assumed that no services were provided in any of these cases during 1997.

For example, according to the OIG Draft, 409 “limited service” cases were opened in 1996 and closed in 1997. These cases could include a Supplemental Security Income disability case which was opened in November 1996, medical records were requested and received in January and February 1997, legal research was done in March 1997, and the case was closed in April 1997 when it was determined that the client could not qualify for benefits. This case would have been appropriately closed in 1997 as a brief service case because services were provided in 1997. However, according to the OIG Draft this case should not have been reported simply because it was opened in 1996 and closed as a brief service case. This conclusion is erroneous.

The fact is that the CSR closing codes are not adequate to capture information about the scope of services that are provided in these kinds of cases. There is no real category to use when services are of the nature described in the definition of “brief service” yet occur over a longer period of time but do not involve negotiated settlement. LSC programs were always told to categorize cases in the closest category, but they do not always fit neatly.

Second, in stating that none of these cases should have been reported, the OIG Draft retroactively applies the standards used in the new CSR Handbook which was not in effect at the time. Services were, in fact, provided in these cases, and LSGMI did what was customary, i.e we reported these “limited service” cases when they were closed.

Finally, it should be noted that LSGMI closed and reported as closed in 1997 some cases which were in the computer system and which were no longer active. This was done in an effort to "clean up" our computer records so that our open case lists would be more accurate. In all of these cases, services were actually provided to eligible clients, albeit it may have been prior to 1997. However, we were never advised that we could not report them as closed in 1997 and did so in accordance with accepted practice.

## **2. Open Cases**

### **a. OIG Draft**

According to the OIG Draft, LSGMI overstated the number of cases open at year end as 3,313. Specifically, 649 cases which were no longer being serviced had not been closed in the case management system as of December 31, 1997, but were instead closed early in 1998.

### **b. LSGMI Response**

First, the OIG Draft conflicts with the information provided to LSGMI at the exit interview. Specifically, LSGMI was told that there was a "slight variance" (54 cases) between the actual number of open cases (3,259) and the reported number of open cases (3,313). There was no mention of the 649 cases referred to in the OIG Draft.

Second, there is an unavoidable time lag between the time a case is concluded by the attorney and when it is actually closed in the computer. First the attorney concludes the case. Then the case file is reviewed by the attorney's supervisor for quality control purposes to be sure that everything was done correctly. Only then is the case forwarded to the computer department for closing in the computer system.

Because the supervisor reviews the closed files of up to eight attorneys, and because there is only one data entry operator who closes cases in the computer (in addition to other data entry responsibilities), the case closing process may take several months. It is therefore quite possible that a case which is concluded by the attorney in December is not closed in the computer system until after the March 1 grant data report is due to LSC.

None of this changes the fact that the services were in fact provided. And if the cases open at year end are overstated, then cases closed during 1997 are correspondingly understated.

### **3. Private Attorney Involvement Cases**

#### **a. OIG Draft**

According to the OIG Draft, LSGMI understated the PAI cases in the Grant Activity Report because we reported 645 closed PAI cases but our detail listing which was prepared at the time of the OIG visit included 897 closed PAI cases.

#### **b. LSGMI Response**

There is a difference in the number of closed PAI cases because some PAI cases were closed in the computer after March 1, 1998 when the Grant Activity Report was submitted. They were, however, given a 1997 closing date because that is when the services were concluded.

### **4. Duplicate Cases**

#### **a. OIG Draft**

According to the OIG Draft, LSGMI's case management system contains some duplicate records because some clients made multiple requests for assistance which were recorded as separate cases even though the same legal problem was involved. The OIG Draft states that this problem "is potentially significant **if numerous such records are in the system**". However, a reliable estimate of the total duplicate records in the system could not be made.

#### **b. LSGMI Response**

LSGMI submits that the number of duplicate cases in the system was insignificant. In addition, this issue has been resolved.

In the past, some clients were entered into the system **twice**: once when they contacted the office and received services from an intake paralegal, and again when they came into the office to see a case handler and a file was opened. This occurred because the case management system had two different data bases for intake paralegal contacts and attorney files. LSGMI has now merged the two data bases so that this problem will not recur.

It should also be noted that clarification only came from LSC regarding duplicate cases this year.

**5. Incorrect Closing Codes and Dates**

**a. OIG Draft**

According to the OIG Draft, closing dates for 17% of the sample cases did not match the closing dates on the source documents. In addition, reason for closure codes were different for 18% of the sample cases.

**b. LSGMI Response**

LSGMI has determined that the computer operator was, in some cases, improperly closing the case as of the date she input the closing information, rather than as of the date the attorney noted that the case was closed. This problem has been corrected.

The differences in the reason for closure codes was due to data entry operator error. The staff person has been counseled on this issue and a system has been set up to review this information for accuracy in the future.

**6. Advocates Not Assigned to Cases**

**a. OIG Draft**

According to the OIG Draft, LSGMI's case management system did not include the names of responsible attorneys assigned to some old open cases.

**b. LSGMI Response**

Most of these cases were SSI cases which were handled by LSGMI's Social Security Referral Panel. In the past, these cases were kept open in the computer until they were closed by the private attorney. In many cases, the name "Panel" was input instead of the name of the attorney. This practice has ceased. All cases currently open have an attorney assigned.

**7. Case Files Not Found**

**a. OIG Draft**

According to the OIG Draft, LSGMI staff could not find 5 out of 65 case files requested. This is eight percent, not sixteen percent as stated in the executive summary.

**b. LSGMI Response**

LSGMI submits that this is not an unusually high error rate. In addition, as a result

of the OIG visit, LSGMI management became aware that when closed files were recently moved to a new file room, file cabinets were merged but not re-alphabetized properly. This contributed to the inability to locate some files. The files are now in the process of being re-alphabetized correctly.

### **LSGMI Response to OIG Draft Recommendations**

1. We have revised our case reporting system to exclude intake staff contacts from the Grant Activity Report. We will await further guidance from LSC regarding reporting these services as matters as the current reporting system for matters does not apply to non-case handlers.
2. This system is in place.
3. This was done with the 1998 Grant Activity Report.
4. We now check for duplicate cases and will consider implementing the recommended procedure.
5. We will set up a procedure to do this.
6. This is no longer an issue. Open cases are reviewed monthly for accuracy.
7. This is no longer an issue. The inability to locate files was a one time situation which has been rectified.
8. We will implement this recommendation.