

Oregon State Bar

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**2024** Legal Services Program

Accountability  
Report

# Table of Contents

<b>Table of Contents</b> .....	2
<b>Executive Summary</b> .....	5
<b>I. Introduction</b> .....	8
A. LSP Accountability Process .....	8
B. Report Structure.....	11
<b>II. Access to Justice in Oregon</b> .....	13
<b>III. Service Delivery Data</b> .....	15
<b>IV. Findings and Recommendations</b> .....	17
<b>Focus Area 1: Needs Assessment, Priority Setting, and Outreach</b> .....	<b>17</b>
<b>Topic 1: Identifying Community Needs and Developing Responsive Case Priorities</b> ....	<b>17</b>
Finding 1: Providers Utilize a Comprehensive Approach to Identifying Legal Needs.....	17
Finding 2: Providers Adjust Priorities in Response to Community Needs.....	20
Finding 3: Providers Recognize Opportunities to Strengthen the Needs Assessment Process.....	20
Recommendation 1: Providers Should Evaluate and Strengthen Regional Processes for Identifying Community Needs and Setting Case Priorities .....	22
<b>Topic 2: Client Engagement and Outreach Strategies</b> .....	<b>25</b>
Finding 1: Providers Value Engagement with Community and Institutional Partners and Utilize Diverse Strategies.....	25
Finding 2: Providers Recognize the Importance of Communicating Case Priorities and Are Making Efforts to Improve Transparency.....	26
Finding 3: There Are Opportunities to Clarify the Role and Responsibility of Ongoing Outreach.....	27
Recommendation 1: Providers Should Evaluate How Offices Educate Community Partners About their Case Priorities and Acceptance Criteria.....	28
<b>Focus Area 2: Intake and Case Management Processes</b> .....	<b>30</b>
<b>Topic 1: Intake Methods</b> .....	<b>30</b>
Finding 1: Providers Use Varied Intake Pathways .....	30
Finding 2: Intake Availability is Inconsistent .....	31

Finding 3: Providers Recognize the Need to Expand Online Intake Options.....	32
Recommendation 1: Providers Should Evaluate Current Intake Processes and Establish Clear Expectations and Strategies for Community-Informed Intake.....	33
Recommendation 2: Providers Should Explore Technology to Improve Intake, Reduce Barriers for Clients, and Increase Provider Capacity.....	34
<b>Topic 2: Case Acceptance Processes</b> .....	<b>36</b>
Finding 1: There is Variation in the Development and Application of Case Acceptance Criteria .....	36
Finding 2: Providers Use Varied Staffing Models and Processes for Initial Screenings.....	38
Recommendation 1: Providers Should Evaluate Systems for Developing and Applying Case Acceptance Criteria and Screening Protocols.....	39
<b>Topic 3: Case Assignment and Caseload Management</b> .....	<b>40</b>
Finding 1: Providers Have Systems for Case Assignment and Inconsistently Apply Numerical Caseload Benchmarks.....	41
Finding 2: Case Closures Show a Declining Trend.....	41
Recommendation 1: Providers Should Examine Case Closure Trends to Ensure Responsive Service Delivery .....	44
Recommendation 2: Providers Should Review and Refine Current Caseload Standards and Monitoring Processes .....	45
<b>Topic 4: Spectrum of Services</b> .....	<b>46</b>
Finding 1: Providers Use a Mix of Advocacy Methods to Meet the Needs of Low-Income Oregonians .....	46
Finding 2: Providers are Working to Integrate Legal Information Creation .....	49
Recommendation 1: Providers Should Assess Variations in Service Types Across Regional Offices.....	51
Recommendation 2: Providers Should Develop Systems to Ensure Staff Participation in Creating Accessible Legal Information.....	52
<b>Focus Area 3: Organizational Infrastructure</b> .....	<b>53</b>
Finding 1: Providers Utilize Non-Attorneys for Various Tasks and are Exploring New Workforce Options .....	53
Finding 2: Providers are Exploring Better Ways to Integrate Technology and Improve Use of Case Management Systems.....	54

Finding 3: Providers Are Cultivating Supportive Workplace Cultures.....	55
Finding 4: Providers Face Challenges Recruiting and Retaining Staff, Especially Mid-Level Attorneys .....	55
Finding 5: Providers are Ready for Strategic Planning .....	56
Recommendation 1: Providers Should Continue Cultivating Innovative Staffing Models.	57
Recommendation 2: Providers Should Leverage Technology More Effectively in Operations and Service Delivery.....	58
<b>IV. Conclusion</b> .....	59
<b>Appendix: Financial Review</b> .....	61

# Executive Summary

The Oregon State Bar Legal Services Program (LSP) conducts periodic accountability reviews of Oregon's civil legal aid providers: Legal Aid Services of Oregon (LASO), Oregon Law Center (OLC), and the Center for NonProfit Legal Services (CNPLS) (collectively, "Providers"). This oversight responsibility, established by statute in 1996, ensures that state funding supports effective, high-quality legal services for low-income Oregonians.

## Review Process

This accountability review evaluated Providers' performance from 2021, relying on:

- Provider self-assessment narratives
- Case closure and operational data analysis
- Community partner surveys
- Site visits to regional offices
- Document review of site visit office policies and procedures

## Focus Areas

The review concentrated on three key areas of operation:

### **1. Needs Assessment, Priority Setting, and Outreach**

- Identifying community needs
- Establishing case priorities
- Client engagement and outreach strategies

### **2. Intake and Case Management**

- Intake methods and accessibility
- Case acceptance processes
- Case assignment procedures
- Service delivery spectrum

### **3. Organizational Infrastructure**

- Staffing models and workforce development
- Technology integration
- Strategic planning readiness

## Key Findings

The review identified several key findings across focus areas, highlighting both strengths and opportunities for growth. Each day, Providers serve thousands of low-income Oregonians facing critical civil legal challenges, and this review examines how they deliver these essential services.

Key findings include:

- **Community Connection:** Providers maintain strong community connections and use community input to shape service priorities.
- **Operational Variations:** While Providers maintain strong service delivery systems, practices and processes vary across regions.
- **Service Evolution:** Providers are exploring new approaches to service delivery, including innovative staffing models and technological solutions.
- **Strategic Development:** Providers are actively engaged in organizational growth and strategic planning.
- **System Coordination:** Opportunities exist to enhance coordination and create shared approaches across the statewide legal aid network.

## Primary Recommendations

The recommendations fall into three main categories:

### 1. Process Enhancement

- Create centralized support for needs assessments and use results to inform service delivery
- Evaluate and strengthen intake processes with clear benchmarks for accessibility
- Improve communication of priorities and case acceptance criteria to communities and partners
- Develop frameworks to balance and operationalize service types
- Strengthen systems for monitoring caseloads and establishing expectations

### 2. Infrastructure Development

- Invest in technology to support operations and client services
- Implement robust evaluation frameworks and outcome assessments
- Promote workforce development and adopt emerging service models

### 3. System Integration

- Enhance coordination across the Provider network
- Develop shared tools and resources

- Create common frameworks while maintaining local flexibility
- Strengthen statewide service delivery systems

## **Looking Forward**

Providers have demonstrated strong capabilities in delivering essential legal services to their clients, showing deep commitment to expanding access to justice through evolving service strategies, innovative workforce models, and technology exploration. Resource constraints continue to pose significant challenges, yet Providers are well-positioned to build on their progress by coordinating more effectively, modernizing infrastructure, and improving service efficiency. Moving forward will require ongoing collaboration between Providers and system partners to ensure sustainable resources for serving low-income Oregonians.

This report affirms the vital work of Oregon's legal aid Providers and seeks to enable a stronger civil legal aid system and expanded access to justice for Oregon's low-income communities. The full report outlines detailed findings, specific recommendations, and implementation guidance.

# I. Introduction

The Oregon State Bar Legal Services Program (“LSP”), established in 1996, provides fiscal and regulatory oversight of Oregon’s general civil legal aid providers: the Oregon Law Center (“OLC”), Legal Aid Services of Oregon (“LASO”), and the Center for NonProfit Legal Services (“CNPLS”) (collectively, the “Providers”).<sup>1</sup> Operating as an integrated, statewide system of civil legal aid organizations, Providers serve and advocate for the civil legal needs of low-income Oregonians. They address critical issues affecting family stability, housing, finances, employment, and access to essential services like education and health care. With 18 offices across the state, Providers deliver vital civil legal help to low-income Oregonians in all 36 counties.<sup>2</sup>

## A. LSP Accountability Process

LSP monitors and supports Providers to ensure they deliver high-quality, client-centered legal services while maintaining accountability to clients, funders, and the public.<sup>3</sup> Through evaluations, technical assistance, and complaint investigations, LSP assesses whether Providers meet established civil legal aid standards. By collaborating with Providers, LSP helps align services with evolving community needs and changes in the legal landscape, fostering innovation and continuous improvement.

A key part of LSP’s oversight is the periodic accountability review (“Accountability Review”) –a comprehensive assessment of Provider performance based on established standards. This review examines how Providers serve individual clients and address the broader legal needs of low-income communities. It identifies strengths, measures impact, and offers actionable recommendations for improvement.

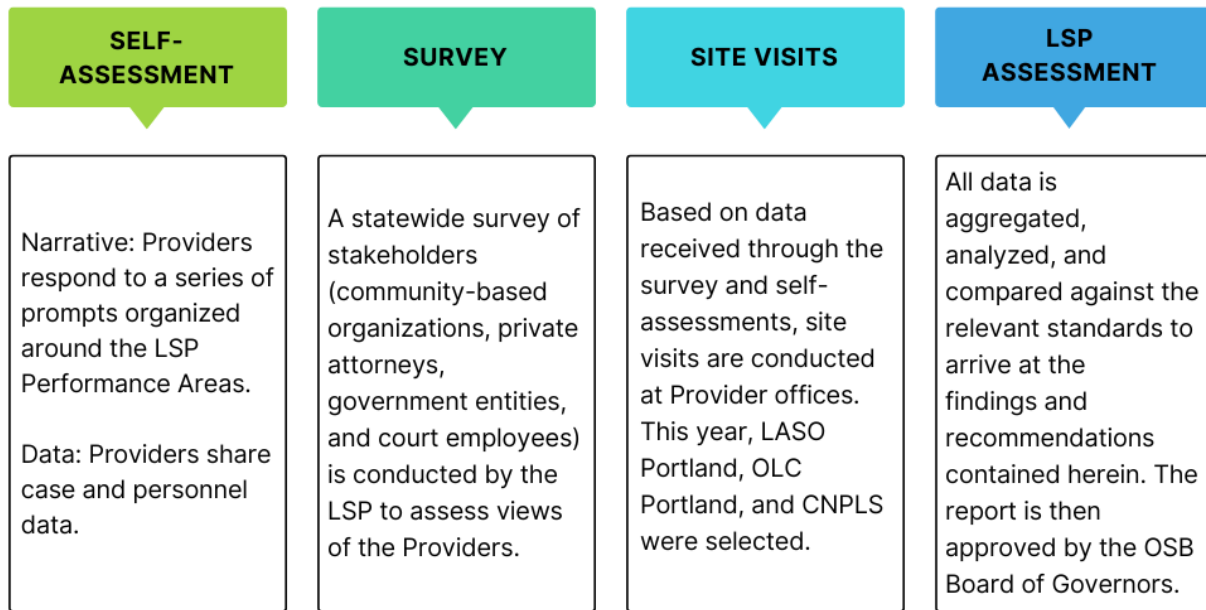
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<sup>1</sup>ORS 9.572 requires the Oregon State Bar to establish a Legal Services Program (“LSP”), including providing standards and guidelines for legal service providers receiving funding and include methods for evaluating those providers. The statute specifies that funding may only be used for the provision of free legal services to low-income individuals and for expenses incurred by the bar in administering the program. Additionally, the Oregon State Bar must appoint a program director and may establish advisory or technical committees to support the program’s operation.

<sup>2</sup> CNPLS operates exclusively in Jackson County, while OLC and LASO maintain a statewide presence through regional offices. OLC has offices in Coos Bay, Grants Pass, Gresham, Hillsboro, Lany County, McMinnville, Portland, Ontario, Salem, St. Helens, and Woodburn. LASO operates offices in Albany, Bend, Roseburg, Hillsboro, Salem, Klamath Falls, Newport, and Portland. Both organizations offer statewide programs, including farmworker, Native American, and tax clinics, to address specific community needs. Additionally, OLC manages a statewide eviction defense program (“EDP”).

<sup>3</sup> The LSP is responsible for ensuring that funds are effectively used to provide high-quality legal services to low-income Oregonians. Under ORS 9.576, the director of the Legal Services Program must periodically review legal service providers receiving program funding to ensure compliance with the standards and guidelines established under ORS 9.57. The accountability process provides the LSP with the information needed to fulfill these oversight responsibilities as outlined in *Oregon State Bar Legal Services Program Standards and Guidelines* revised February 17, 2023, section V.B.

The Accountability Review involves the following data sources and stages:



The process integrates these data sources into a comprehensive evaluation framework.<sup>4</sup> By combining self-assessment narratives and data, community partner survey feedback, and insights from site visits, LSP evaluates Providers’ performance through a thorough and multifaceted lens.<sup>5</sup>

<sup>4</sup> Various documents were collected as part of the process, including self-assessment narratives, and data about case closures, staff, clients, financial information on budgets, revenue sources, and expenditures. For the site visits to OLC and LASO’s Portland offices and CNPLS, LSP gathered additional regional office-level information to better understand their work in the identified focus areas, described on pg. 9. Site visit offices were asked to submit the following documents: case acceptance priorities, including supporting materials from their most recent priority-setting process; case acceptance policies, including intake forms; client or community partner tools/marketing materials; a list of all open cases broken down by handler; turnaway data; guidance and policies regarding staff supervision; and planning materials or tools used to assess programs and policies. During the site visits, LSP staff, committee members and liaisons from Oregon Law Foundation (“OLF”) and Professional Liability Fund (“PLF”) conducted multiple interviews, including with Board members, Executive Directors, Staff Attorneys, Managing Attorneys/Regional Directors, and Support Staff/Paralegals. Site visit participants included OSB staff: Keren Farkas, Sam Palmer-Simon, and Joanna Knee. LSP Committee members: Leslie Kay, Sandy Hansberger, Amy Miller, Julia Fornaciari-Olsen, Kyann Kalin, Ross Williamson, Lee Van Duzer, Caitlyn Kennedy Young, Audrey Faunce. OLF staff: Brooke Thacher. PLF staff: Hong Dao. The staff and Committee members would like to extend our sincerest gratitude to the Providers’ offices that were visited.

<sup>5</sup> The survey was conducted as part of the broader Oregon State Bar Access to Justice Gap Analysis Survey. Providers supplied contact information for the community organizations and attorneys they regularly collaborate with. These groups, along with other relevant community and state agencies, OSB bar members, and court staff, were invited to participate in the survey. A total of 880 responses were received, with respondents representing community organizations (22%), government agencies (17%), court employees (10%), legal aid attorneys (15%), and lawyers in

The review assesses the collected information against key indicators of effective civil legal aid service delivery defined by the Legal Services Program Standards and Guidelines (“LSP Standards and Guidelines”). These indicators reflect principles from the 2021 American Bar Association Standards for the Provision of Civil Legal Aid (“ABA Standards”)<sup>6</sup> and the Legal Services Corporation Performance Criteria (“LSC Performance Criteria”) (collectively, the “Standards.”)<sup>7</sup> The Five LSP Performance Areas focus on:

- **Coordination:** Building a unified, statewide legal services system that removes barriers to access through coordinated efforts across Providers.
- **Client-Centered Services:** Ensuring services are responsive to community needs and prioritize client goals and experiences.
- **Efficiency and Effectiveness:** Maximizing limited resources to reach more clients through strategic and impactful programming.
- **Comprehensive Services:** Providing a full spectrum of legal aid, from brief advice to complex representation, tailored to client needs.
- **High-Quality Legal Representation:** Delivering skilled, compassionate, and effective advocacy that helps clients achieve the best possible outcomes.

By focusing on these principles, the Accountability Review provides a standards-based assessment incorporating national trends and best practices while supporting Providers’ capacity to meet Oregon’s diverse legal needs.

A vital participant in this process is the LSP Committee, a volunteer group that contributes to assessment design, data review, site visits, and the review of this report, ensuring it is a meaningful and actionable evaluation of Provider performance.<sup>8</sup> The completed Accountability Review report is presented to the OSB Board of Governors for approval and shared with partners, ensuring transparency and accountability.

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non-legal-aid professions (37%). Notably, while some questions allowed respondents to provide specific insights on OLC, CNPLS, and LASO, most questions focused on free legal services in Oregon more broadly

<sup>6</sup> Available at [https://www.americanbar.org/content/dam/aba/administrative/legal\\_aid\\_indigent\\_defendants/lsc-sclaid-final-legal-aid-standards-2021.pdf](https://www.americanbar.org/content/dam/aba/administrative/legal_aid_indigent_defendants/lsc-sclaid-final-legal-aid-standards-2021.pdf)

<sup>7</sup> Available at <https://www.lsc.gov/our-impact/publications/other-publications-and-reports/lsc-performance-criteria>.

<sup>8</sup> Other funding partners who provided support and insight to LSP staff during this process include the Oregon Law Foundation (OLF) and the Campaign for Equal Justice (CEJ). OLF, established in 1981, funds law-related charitable programs to provide legal aid to low-income individuals, improve the administration of justice, and promote the study of law. OLF is governed by a board of directors and primarily funds nonprofit organizations through the Interest on Lawyer Trust Accounts (IOLTA) program. CEJ, founded in 1991, supports Oregon’s statewide legal aid programs by providing fundraising, marketing, and educational resources.

## B. Report Structure

This report evaluates Providers' performance since 2021 and is organized into four main sections:

1. **Access to Justice Context:** An overview of the broader environment in which Providers operate, including trends, challenges, and opportunities that influence service delivery and LSP oversight. This section provides context for understanding the findings and recommendations in the Accountability Review.
2. **Service Delivery Data:** A summary of aggregate data showing how Providers collectively served low-income Oregonians since 2021.
3. **Findings and Recommendations:** Key findings from the Accountability Review and recommendations to Providers. These findings and recommendations are structured into three focus areas identified during the multi-stage review process.
  - **Focus Area 1: Needs Assessment and Priority Setting:** This focus area examines how Providers identify community needs, develop responsive case priorities, and implement client engagement and outreach strategies.<sup>9</sup>
  - **Focus Area 2: Intake and Case Management Processes:** This focus area reviews intake methods, case acceptance processes, case assignment, and the spectrum of services offered to clients.<sup>10</sup>
  - **Focus Area 3: Organizational Infrastructure:** This focus area assesses staffing, recruitment and retention, the use of technology, and strategic planning.<sup>11</sup>

Each focus area is further divided into specific topics for detailed examination. Within each topic, we present findings drawn from multiple data sources and provide recommendations aligned with the Standards. Each recommendation includes specific

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<sup>9</sup> This focus area draws on LSP Performance Area 1, 2 and 3; LSC Performance Criteria 1; and ABA Standard 2.3, 3.2, 3.3, 4.1 and 5.1.

<sup>10</sup> This focus area draws on LSC Performance Criteria 1, 2 and 3; LSP Performance Areas 2,3 and 4; and ABA Standard 2.1, 3.2, 3.3, 4.1, 4.10, 5.1, 5.2, 6.2, 6.3.

<sup>11</sup> This focus area draws on LSC Performance Criteria 1 and 4; LSP Performances Areas 1, 4 and 5; and ABA Standard 1.2, 3.1, 4.6, 4.10.

implementation guidance.<sup>12</sup>

This section is narrowed to our identified focus areas, selected as central areas for meaningful improvement, rather than providing a complete summary of all data collected during our review. Additionally, while we include examples from site visits and regional offices to illustrate Providers' work, our evaluation looks at the organizations as a whole rather than individual offices.<sup>13</sup>

4. **Conclusion:** A summary of the key findings and recommendations, along with the next steps for Providers to strengthen Oregon's civil legal aid system and opportunities for OSB assistance to support implementation.

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<sup>12</sup> Generally, findings and standards are kept separate; however, where a finding does not have a corresponding recommendation below it, we have included reference to the applicable standards as an acknowledgment of best practices on those topics.

<sup>13</sup> OLC and LASO operate as a network of multiple offices across the state, with processes at both the organizational and office levels, while CNPLS functions as both the organization and a single office. Throughout this report, we distinguish between these levels by referring to "Provider" for organizational processes and policies and "office" for a specific regional office.

## II. Access to Justice in Oregon

Contextualizing Providers' operating environment is essential to interpreting the findings in this Accountability Review and understanding how we developed our recommendations. During the review period, Providers navigated multiple shifts, including evolving technology, workplace transformations, and leadership transitions, alongside persistent resource constraints and service demands—challenges they continue to address. This section highlights key contextual factors shaping Providers' work, providing an important backdrop for the findings and recommendations that follow.

- **Technology expands service delivery opportunities:** Over the past decade, technological advancements have transformed how legal aid organizations connect with clients and deliver services. The COVID-19 pandemic accelerated the adoption of remote technology tools, enabling Providers to serve clients through virtual platforms. Remote client meetings, virtual representation, and online case management tools are now integral to practice nationwide, including in Oregon. Legal aid organizations nationwide are increasingly exploring new technology—including emerging tools such as generative AI—to enhance intake systems, improve access to legal help, and address efficiency and accessibility challenges. Following this trend, Oregon's Providers are evaluating how these tools can expand their reach and impact.
- **Evolving Workforce Models and Recruitment Challenges:** To address continuing unmet legal needs, the legal aid community is exploring new workforce models, such as Licensed Paralegals ("LP"), justice workers, and alternative pathways to bar admissions.<sup>14</sup> Oregon's Providers have embraced the state's new Supervised Practice Portfolio Examination ("SPPE"), hiring individuals through this pathway to bar admission. These approaches complement traditional service delivery, enabling Providers to serve more clients and meet growing demand.

At the same time, Providers continue to face challenges in recruiting and retaining attorneys, particularly in rural areas, where limited resources and geographic isolation

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<sup>14</sup> Licensed Paralegals (LPs): Since February 2024, the Oregon State Bar has licensed qualified paralegals to provide limited legal services in family law and housing matters, such as divorce, custody, and landlord-tenant cases. Justice Workers: Justice workers are trained individuals who provide limited legal support for civil legal issues. They can take various forms, often working within trusted community organizations or legal aid offices to bridge the gap between underserved populations and the legal system. Supervised Practice Portfolio Examination (SPPE): The SPPE is a new pathway to bar licensure in Oregon, enabling law graduates to become attorneys through supervised apprenticeships. Applicants develop a portfolio of legal work, which is then assessed by the Oregon Board of Bar Examiners (BBX) as an alternative to the traditional bar exam.

make staffing more difficult. These challenges call for creative approaches to recruitment, professional development, and retention. Additionally, there is a growing emphasis on work-life balance, with employees advocating for greater flexibility, such as alternative work schedules and remote work options—factors Providers will need to consider as they refine their workforce strategies.

- **Leadership Transitions Bring New Perspectives:** Recent executive leadership changes at LASO and OLC have introduced fresh perspectives, fostering efforts to reassess organizational systems and expand service accessibility. Meanwhile, CNPLS, after maintaining steady leadership, is more actively engaging in succession planning. Although no specific timeline is set, this proactive approach creates an opportunity for renewed focus on organizational efficiency and strategic priorities.

This evolving landscape shapes LSP's oversight approach and creates challenges and opportunities for enhancing access to justice. Meeting these challenges involves balancing traditional and emerging approaches to address the persistent unmet legal needs of low-income Oregonians. Persistent resource shortages and infrastructure gaps make coordination—a critical element of Oregon's civil legal aid delivery system—even more essential to achieve an effective and efficient system.<sup>15</sup> Strengthening the legal aid system's capacity to meet this evolving landscape will require sustained investment along with strategic solutions and coordination.

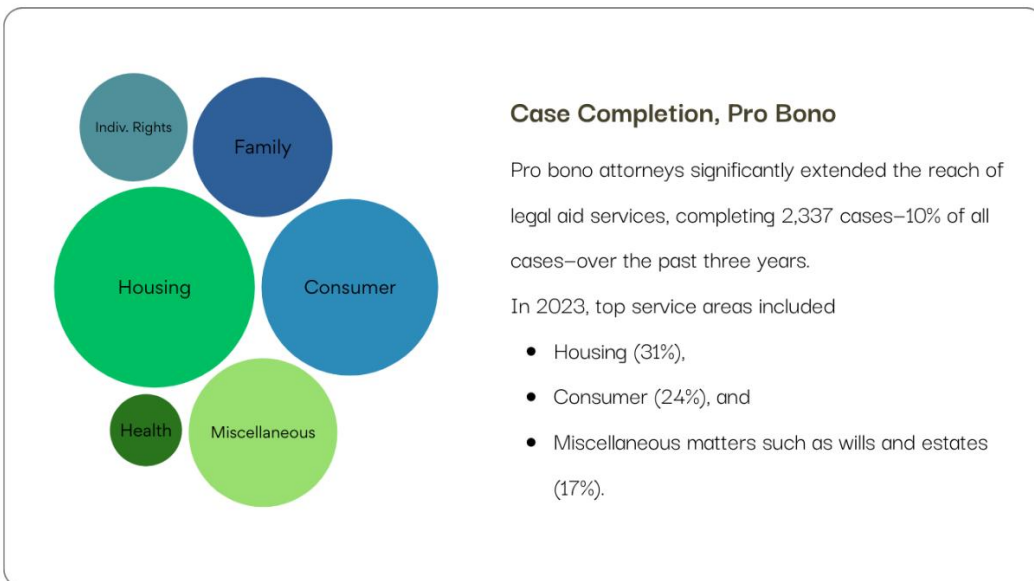
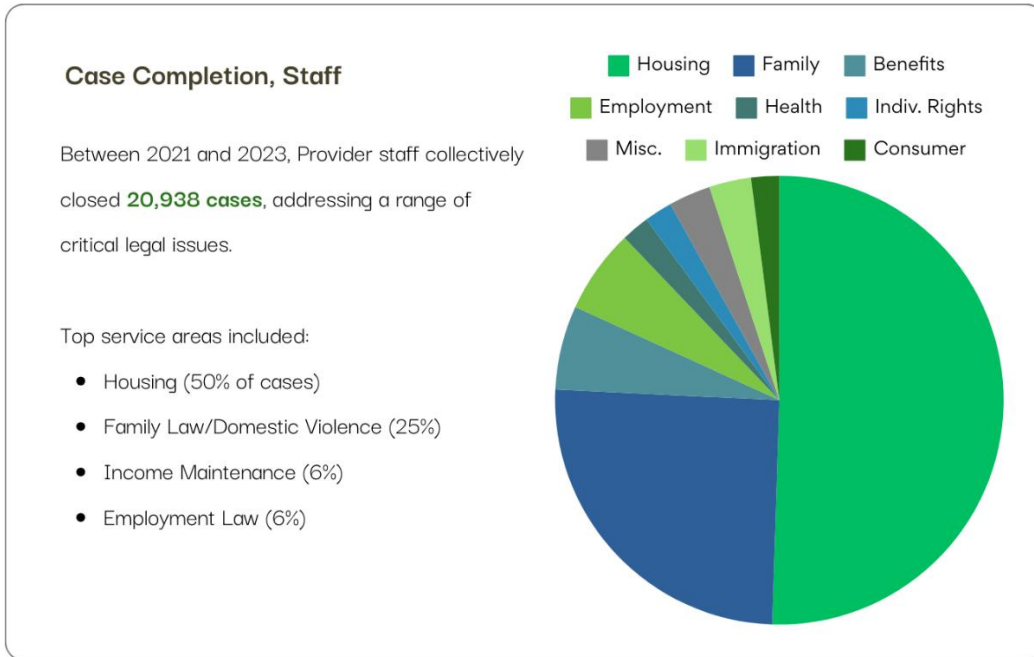
Strong coordination ensures that Providers work together to deliver complementary services, reduce duplication, and maximize available resources. Through joint research, shared materials, collaborative program development, and aligned strategies, this collaborative approach builds a cohesive and efficient statewide network. Evolving technology offers an opportunity to reimagine these connections—using innovative tools and strategies to enhance coordination and reshape service delivery across the network. This principle of coordination—whether explicitly stated or implicitly reflected—underlies the recommendations in this report.

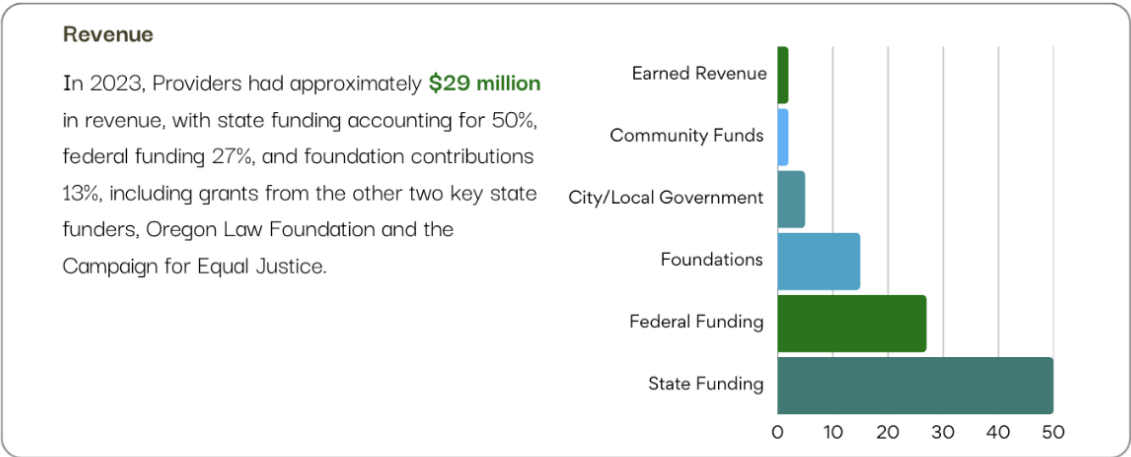
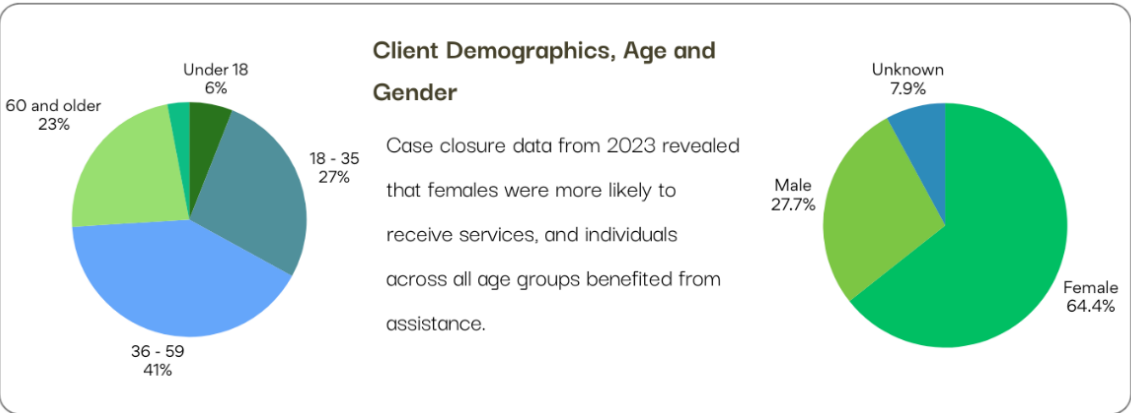
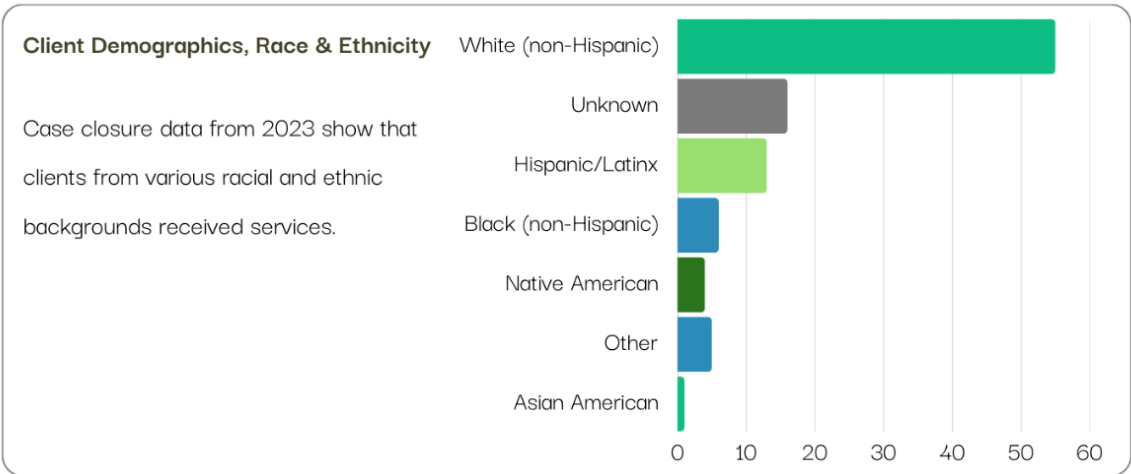
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<sup>15</sup> It is the goal of the OSB LSP that all Providers shall part of an integrated delivery system for civil legal services which incorporates the Mission, Values and Core Capacities set forth in the OSB Civil Legal Services Task Force Final Report, May 1996, Appendix 1. *Oregon Legal Services Program Standards and Guidelines*, Revised February 17, 2023, section III.A.

# III. Service Delivery Data

Before examining our findings and recommendations, this section provides aggregate data from 2021-2023 to illustrate the scope of Providers' legal aid services in Oregon. The following charts present metrics about service delivery, client demographics, and contexts about who Providers serve and how they deliver their services. This high-level overview helps frame our subsequent discussion of focus areas and opportunities for enhancement.





## IV. Findings and Recommendations

### Focus Area 1: Needs Assessment, Priority Setting, and Outreach

#### Topic 1: Identifying Community Needs and Developing Responsive Case Priorities

Understanding and responding to community needs is essential for legal aid organizations to allocate resources effectively and address their client's pressing legal problems. Through community engagement, structured priority setting, and data analysis, they gather input to identify service gaps and unmet legal needs. These insights help organizations develop responsive case priorities and direct limited resources where they are most needed. The assessments should also inform the [organization's case acceptance criteria](#), [intake processes](#), [outreach](#), and the full spectrum of service delivery.

In Oregon, Providers implement these principles using various methods to assess regional needs and establish case priorities, demonstrating their commitment to serving communities. At the same time, differences in approach across offices present opportunities to strengthen alignment and consistency. This section examines how Providers conduct needs assessments and priority setting, offering findings and recommendations to help enhance impact, promote equity, and expand access to legal services for Oregon's low-income communities.

#### ***Finding 1: Providers Utilize a Comprehensive Approach to Identifying Legal Needs.***

Providers rely on multiple data sources to help them identify case priorities, including:

- Client surveys
- Community partner interviews
- Surveys of local attorneys
- Public demographic and poverty data

Providers use this data to assess the legal needs of their target client population and identify the legal resources available to address those needs.<sup>16</sup> During the review period, CNPLS began its assessment, all OLC offices either initiated or completed their processes, and most LASO offices

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<sup>16</sup> The Criteria for Operations, utilized by all Providers, outlines expectations for setting an office's advocacy goals. It states that each office should establish priorities that are: "(1) principally set by clients and client groups; (2) through a method of priority setting that includes a reasonably sampling of client opinion; and (3) regularly done." It also notes that offices should have an adequate plan to implement the priorities.

did as well.

During our site visits, we observed the different methods Providers use and the types of questions they asked, including:

- **Hearing directly from clients:** Providers described using various outreach methods—including mail, text, phone interviews, and email—to survey their target client community. Former and prospective clients were asked questions such as:
  - What problems are affecting your community?<sup>17</sup>
  - Legal Aid is limited in how we can help, but I am going to describe some of the areas we can help in, and I hope you can tell me which of those (pick 3) are the most important to you. We will then talk more about each area and why it's important to you.<sup>18</sup>
  - What three things were the greatest source of stress for you in the last year?<sup>19</sup>

For its most recent assessment, CNPLS reported updating its client survey with plain language in both English and Spanish and leveraging partnerships with local community organizations to improve survey distribution. Moving forward, CNPLS plans to conduct focus groups to gain a more detailed understanding of community concerns.

- **Gathering input from community partners:** Each Provider highlighted efforts to collaborate with community partners, who serve as trusted intermediaries, to better understand local legal needs. For instance, the LASO and OLC Portland Regional offices (“LASO PRO” and “OLC PRO”) conducted in-depth interviews with community partners, engaging approximately 100 and 40 organizations, respectively.<sup>20</sup> The interviews and surveys sought input through questions such as:
  - Was there something [Provider] could have offered/done that would have enabled you to better serve that client?<sup>21</sup>
  - Please share a specific example of a member of your community or one of your clients receiving legal aid from [Provider], whether positive or negative.<sup>22</sup>

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<sup>17</sup> CNPLS Client Survey, 2023-2024.

<sup>18</sup> LASO Portland Regional Office Priority Setting 2021, Client One-on-One Questions.

<sup>19</sup> OLC Portland Regional Office Priority Setting 2024, Client Survey.

<sup>20</sup> Notably, LASO and OLC's Portland Regional Offices serve multiple counties across a large geographic footprint. For example, LASO PRO serves Clackamas County, Multnomah County, Wasco County, Sherman County, and Hood River County.

<sup>21</sup> CNPLS Community Partner Survey, 2023-2024.

<sup>22</sup> CNPLS Community Partner Survey, 2023-2024.

- What are the greatest challenges facing your clients right now?<sup>23</sup>
  - We know that there is a lot of injustice in our community, especially for BIPOC individuals. Are there specific harmful laws, policies, or practices that you think [Provider] should focus attention on?<sup>24</sup>
  - What types of services can [Provider] provide that would be most helpful to your clients (advice, representation, community education, self-help materials, etc.)?<sup>25</sup>
- **Understanding service gaps:** Providers also sought to identify regional gaps in services and shared methods they have used, such as surveying private bar practitioners to determine which cases are less likely to be accepted for representation. These efforts offer valuable insights into gaps in legal help; however, they appeared to rely on anecdotal data, such as referral bounce-backs or feedback from a small sampling of practitioners.
- **Translating data into written priorities (“Advocacy Plans”):** The statewide offices, LASO and OLC, described processes for analyzing collected data and establishing case priorities:
- **OLC PRO** described its recent process, which led to developing its 2025 case priorities. The process, led and designed by its regional director, involved creating surveys, engaging with community partners, and reviewing available data. Staff then convened, along with the Salem OLC office managed by the same regional director, to review the data sources and determine case priorities. The office emphasized balancing input from clients and community partners against internal capacity constraints.
  - **LASO PRO** shared the process it is currently undertaking, which is expected to result in revised case priorities in 2025. This multi-step process, managed by a staff member who serves as project manager, includes practice area workgroups that met independently to identify needs and review information sources. All steps were clearly defined and tracked using an online project management tool, enabling greater transparency and organization. Staff convened at multiple points to analyze available information and synthesize findings. Additionally, project staff reviewed and drew inspiration from examples of case priority and eligibility criteria from other regional offices and jurisdictions.

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<sup>23</sup> LASO Portland Regional Office Priority Setting 2021, Community Partner One-on-Ones.

<sup>24</sup> LASO Portland Regional Office Priority Setting 2021, Community Partner One-on-Ones. OLC Portland Regional Office Priority Setting 2024, Community Partner Interview.

<sup>25</sup> OLC Portland Regional Office Priority Setting 2024, Community Partner Interview.

**CNPLS** shared a well-thought-out process for gathering information through public sources and surveys but did not describe a straightforward method for translating these findings into case priorities. Staff interviews further revealed varied understandings of case priorities, increasing the risk of inconsistent decision-making and reliance on individual discretion.

### ***Finding 2: Providers Adjust Priorities in Response to Community Needs***

While case priorities tend to remain stable year to year, Providers have adapted by incorporating new case types in response to shifting needs and feedback from clients and communities during and between the needs assessment processes.<sup>26</sup>

- **CNPLS** launched a disaster response initiative focused on contractor fraud, which disproportionately affected vulnerable populations.
- **LASO** and **OLC** offices adjusted their priorities based on input from local partners regarding systemic barriers disproportionately affecting BIPOC communities, particularly related to court-imposed debt and expungements. In response, **LASO's** Salem office added these case types to its case acceptance criteria for the first time, while **OLC's** Lane County office placed greater emphasis on court-imposed debt and expungements.
- **OLC's** Lane County office also expanded into employment law due to client surveys, requests from applicants for assistance, and information from community partners. Additionally, OLC's decision to pursue funding for the Low-Income Taxpayer Clinic stemmed from community feedback and recognition that the agency previously housing that program had discontinued involvement.

### ***Finding 3: Providers Recognize Opportunities to Strengthen the Needs Assessment Process***

Statewide legal aid providers, OLC and LASO, demonstrate a strong organizational culture around needs assessment and case priority setting. The Accountability Review also revealed several areas for improvement.

- **Inconsistencies across and within offices:** Assessment methodologies vary between offices, with regional directors often creating their own tools and systems. These differences can lead to inconsistent terminology, operational inefficiencies, and uneven

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<sup>26</sup> These examples highlight how providers maintain stable case priorities while remaining responsive to evolving needs, as outlined in ABA Standard 4.1. id.

engagement from staff, clients, and the community. They can also pose challenges in communicating and interpreting priorities. For example:

- Some offices use the terms "case acceptance criteria" and "case priorities" interchangeably, while others maintain distinct documents and processes.
  - The naming and specificity of case priorities can vary between offices.
  - Staff at **LASO** PRO shared that priorities have not been consistently structured or named across practice groups.
- **Dispersed administrative burden:** The current process seems to place significant administrative demands on regional directors and staff, potentially reducing their capacity for supervision and direct client service. While some offices share knowledge and collaborate, much of the work occurs independently with limited centralized coordination.
- **Reinforcing existing priorities:** Staff and leadership recognized that current assessment practices may unintentionally reinforce existing service priorities and case types rather than capturing the full scope of legal needs in their communities (described as an "echo chamber" effect). For example, some offices limit their assessments to unmet needs within the case types they already handle, excluding areas outside their existing service capacity. This approach may unintentionally overlook emerging legal needs. Additionally, repeated engagement with the same community partners may narrow the perspective on evolving legal challenges, reducing opportunities to identify new or underserved legal issues.
- **Equity concerns:** There was also discussion that variations in assessment tools, community engagement practices, and priority development may create disparities in meaningful access to legal services across the state.

During the review, OLC and LASO leadership acknowledged these challenges and highlighted steps underway to improve their approach. For example, OLC leadership described the new Director of Advocacy role, who is working to provide more centralized support and benchmarks for regional offices conducting assessments and setting priorities. This added infrastructure increases the likelihood that new tools will be effectively adopted, sustained, and implemented.

## ***Recommendation 1: Providers Should Evaluate and Strengthen Regional Processes for Identifying Community Needs and Setting Case Priorities***

This recommendation builds upon the Continued Opportunity identified in the 2021 Accountability Report.<sup>27</sup>

### **Relevant Standards**

Effective needs assessment is central to a Providers' strategic service delivery. ABA Standard 3.1 highlights the importance of deliberate, evidence-based decisions in selecting service delivery methods.<sup>28</sup> Legal aid organizations should systematically assess community needs, considering factors such as population size and distribution, prevalent legal issues, and available resources.<sup>29</sup> This approach enables proactive resource allocation to maximize impact and efficiency. The LSP Standards and Guidelines similarly emphasize that needs assessments should inform not only case priorities but also outreach, staff training, and support services.<sup>30</sup>

The Standards recognize that communities have distinct needs, capacities, and resources, and caution against a one-size-fits-all approach to service delivery.<sup>31</sup> At the same time, they underscore the importance of structured assessment tools and methodologies in improving the accuracy of case priorities, optimizing resource allocation, and fostering equitable service delivery.<sup>32</sup> ABA Standard 3.1 reinforces these principles, emphasizing the value of evidence-based strategies in building a coordinated and impactful legal aid system.<sup>33</sup>

ABA Standard 4.1 stresses the importance of translating identified legal needs into actionable plans. Along with LSP Performance Area 3, it highlights the need to integrate assessment findings into decision-making to ensure service delivery strategies are responsive and implemented equitably. Structured assessments also help organizations adapt to evolving community needs, ensuring sustained effectiveness and fairness.<sup>34</sup>

### **Guidance**

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<sup>27</sup> "Providers should continue working together to create efficiencies in operations and service delivery." Legal Services Program Accountability Review 2021, Pg. 7.

<sup>28</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 3.1.

<sup>29</sup> *Id.*

<sup>30</sup> *Oregon Legal Services Program Standards and Guidelines*, Revised February 17, 2023, section III.D.1.a.

<sup>31</sup> *Oregon Legal Services Program Standards and Guidelines*, Revised February 17, 2023, section I., *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standards 4.1 and 4.11; *Performance Criteria*, Legal Services Corporation, 2018, Performance Area 1.

<sup>32</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standards 3.1 and 4.1.

<sup>33</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 3.1.

<sup>34</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standards 3.1; *Oregon Legal Services Program Standards and Guidelines*, Revised February 17, 2023, section III, B, 5.

Providers are committed to regular needs assessments and are taking steps to refine their processes. Building on existing strengths, Providers can improve accuracy and transparency, prevent duplicative efforts, and support a more coordinated statewide network. The following elements may help achieve this:

- **Shared Tools and Methodology:** Shared tools and methods—such as case priority lists, project plans, uniform terminology, and best practices for client and community engagement—can enhance the accuracy of regional assessments and the cohesion of organizational processes. Well-structured, consistent assessment tools ensure that case priorities are identified using reliable methods while also fostering clearer communication within and between offices. Establishing universally agreed-upon guidelines, templates, and criteria can further improve internal alignment, support effective decision-making, and increase transparency with external partners.

ABA Standard 3.1 highlights the importance of evidence-based and efficient decision-making in service delivery. Shared tools and templates could strengthen this approach by ensuring that assessments, plans, and methodologies are well-constructed and capable of producing high-quality, actionable insights that allocate resources equitably and responsively.

- **Centralized infrastructure and support:** Shared tools and methodologies can help standardize processes and will be most effective when supported by a centralized infrastructure that actively facilitates implementation, oversight, and continuous improvement. Centralized coordination efforts have already shown potential, including through tools like Legal Server, which facilitates standard data collection and management across regional offices. Building on this foundation could further ease administrative burdens on regional offices and promote greater consistency and accuracy in needs assessments and case priority development.

OLC's creation of the new Director of Advocacy position reflects a move towards strengthening centralized support for process development and implementation. Investing in centralized support—such as establishing timelines, tracking assessments, and ensuring that regional processes remain manageable and effective—could also enhance statewide coordination and service delivery.

One example of how centralized tools and processes can strengthen case-priority development is data collection. Providers may benefit from evaluating four key areas in data collection: what data is collected, how it is collected, how it informs case priorities,

and how it measures impact. For example, turnaway data—information about individuals denied assistance—can provide valuable insights about unmet community needs and guide decisions about service expansion or outreach strategies. Currently, collection and use of turnaway data vary across offices: some collect it at the initial screening, others after screening, and some inconsistently or not at all.<sup>35</sup> Staff across multiple offices noted that greater access to this type of information would improve their ability to accurately identify community needs and evaluate the effectiveness of outreach efforts.<sup>36</sup> Centralized support can help facilitate data collection and provide technical assistance to regional offices.

As with similar recommendations regarding centralized support and direction in this Accountability Review, this guidance recognizes the need to balance consistency with responsiveness to regional differences. While tools, criteria, and processes can be shared, regional variations in client populations, office sizes, and practice areas will naturally lead to different outcomes.

- **Documentation of processes:** CNPLS has demonstrated commendable efforts to engage community input through its plain language surveys and planned focus groups. It also collects turnaway data. However, as noted in the 2021 Accountability Report, it remains unclear how CNPLS uses this information to inform its case priorities, case acceptance criteria or other organizational decisions. While CNPLS adopted LASO and OLC’s Criteria for Operations in response to the 2016 and 2018 Accountability Reports, we did not learn how this adoption has influenced its operations, particularly its approach to developing case priorities.<sup>37</sup>

In line with relevant standards, such as ABA 4.1, CNPLS should memorialize and ensure staff understand its method for gathering and analyzing information to develop priorities. As a single county service provider, CNPLS operates in a unique context compared to larger regional providers like LASO and OLC. Its smaller scale allows flexibility to tailor methods to local needs while leveraging shared insights from the

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<sup>35</sup>During this review, LASO PRO shared their new “turn down survey” for clients they are unable to serve. This survey asked several questions, including: “How promptly were you informed about our decision to decline representation? Did you understand the reason(s) provided for why we could not take your case? Were you provided with referrals to other legal resources or organization that might assist you?”

<sup>36</sup> OLC leadership noted that partnerships with OSB LSP and other system partners would also aid in identifying statewide legal needs, for example through Oregon Law Help analytics.

<sup>37</sup> The Criteria of Operations sets out how offices “provide high quality effective advocacy [that has] a significant impact upon the low-income community within the service area and the state.” It lays out the priority setting, intake and case acceptance criteria, management of staff, community engagement, accessibility, pro bono involvement, career development, office systems, LSC regulations (for LASO offices) and finances.

statewide network. Moreover, CNPLS's strong community presence and informal pathways for staying informed about local needs are strengths that could complement a more structured assessment process.

By clearly documenting its case priorities and assessment processes, CNPLS can ensure resources align with community needs, enhance coordination with OLC and LASO, and support the LSP Standards' principle of unified service delivery across Oregon.

## **Topic 2: Client Engagement and Outreach Strategies**

Legal aid organizations are expected to engage with client communities and institutional partners to build trust, increase awareness of available services, and align offerings with community needs. Outreach strategies should be multifaceted, fostering collaborative relationships that help identify client priorities, address access barriers, and ensure culturally and linguistically appropriate services. These efforts are vital to promoting equitable access to legal services and establishing a meaningful presence within the communities served.<sup>38</sup>

Providers in Oregon demonstrate a strong commitment to community engagement through various outreach efforts. As they continue this work, there are opportunities to clarify outreach roles and responsibilities and improve communication of case priorities and acceptance criteria to community partners and the public.<sup>39</sup> This section presents findings and recommendations to help Providers strengthen their outreach strategies to their communities and partners.

### ***Finding 1: Providers Value Engagement with Community and Institutional Partners and Utilize Diverse Strategies***

Providers described partnerships with a broad range of community groups. In alignment with ABA Standard 4.2, which emphasizes engaging community partners to effectively identify and meet client needs, LASO, CNPLS, and OLC staff participate in boards, task forces, and advisory committees that bring them into close contact with relevant community-based organizations.<sup>40</sup> Those interactions enable Providers to develop relationships, share expertise, and influence policies, services, and initiatives that benefit their client communities.

For direct client outreach, offices seem to primarily advertise services and connect with clients through their network of community partners. LASO PRO staff described this approach as being a "secondary responder"—building pipelines through trusted organizations rather than embedding themselves directly within the community.

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<sup>38</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 4.3.

<sup>39</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standards 3.1 and 4.2.

<sup>40</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 4.2.

Beyond gathering community input during the priority-setting process, Providers also shared examples of efforts to maintain ongoing connections with community partners:

- The **OLC** PRO office utilizes platforms such as Facebook Live and Instagram to reach new audiences, a practice encouraged by ABA Standard 4.1. Staff noted that, since the pandemic, trusted intermediaries have increasingly preferred virtual engagement.
- The **LASO** PRO office has cultivated partnerships with safety-net clinics and community health nurses through its medical-legal partnerships. These collaborations integrate legal aid services into healthcare settings, ensuring clients can access critical legal assistance in trusted environments.
- **CNPLS** is deeply embedded in its community, regularly participating in on-site and in-person clinics and tabling events where target client populations naturally gather, including at local shelters and hospice facilities. It also partners with Continuum of Care, where they announce their programs during weekly work group meetings with sheriffs, hospital staff, librarians, and mental health coordinators. Recently, CNPLS has been posting videos on YouTube about family law help.

Providers further described relationships with culturally specific organizations and healthcare organizations, among other efforts, to ensure their outreach is inclusive and responsive to the needs of diverse client populations.<sup>41</sup>

### ***Finding 2: Providers Recognize the Importance of Communicating Case Priorities and Are Making Efforts to Improve Transparency***

Providers acknowledged the critical role of clear communication in helping partners and communities understand their case priorities. They also noted the challenges in effectively sharing this information with the broader community.

LASO PRO, for instance, reported that it does not currently have public-facing materials that describe its case priorities or case acceptance criteria but plans to create an accessible document to share its forthcoming updated case priorities to improve community understanding. Similarly, CNPLS reported relying on its website and tabling at community events

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<sup>41</sup> Based on the survey CNPLS conducted during its needs assessment, partners described their outreach as responsive, compassionate, and highly collaborative. A respondent from a care team highlighted the value of their engagement, sharing an example of a vulnerable client who benefited from CNPLS's support: "The care team, including CNPLS, has stabilized her, and she is in a place to step into non-secure care. This is a huge win." From its 2021 needs assessment, community partners also noted LASO PRO's culturally specific outreach efforts, including its active participation in events like the Fair Housing Catalyst Collaborative Conference. Similarly, OLC PRO's community partners praised its proactive and culturally sensitive outreach, such as offering multilingual Know Your Rights trainings and coordinating mini presentations at the Mexican Consulate to directly reach underserved populations.

to communicate its case priorities but does not have detailed materials for broader community outreach.

Staff at the OLC PRO highlighted the difficulty of communicating the often-competing rationale underlying case priorities. While they actively gather community input to inform these priorities, they acknowledged the complexity of explaining to partners how this feedback influences their decisions. For example, their focus on filling service gaps—such as providing support for green card applications or special education cases when no other legal help is available—demonstrates a thoughtful and strategic approach to addressing underserved needs. However, without clearer explanation, partners who identify other priorities may perceive that their input is overlooked, particularly when objectively recognized high-need areas, such as family law or workers' compensation, are deprioritized.<sup>42</sup>

### ***Finding 3: There Are Opportunities to Clarify the Role and Responsibility of Ongoing Outreach***

The Accountability Review revealed broad staff appreciation for the value of community connections but also uncertainty about the role and purpose of outreach, how to advertise services strategically, and which staff members are responsible for outreach efforts. These tensions may impede action, potentially limiting awareness among populations that could benefit from services and hindering efforts to maintain community trust and visibility, as emphasized in ABA Standard 3.3.<sup>43</sup>

Staff expressed differing views on the necessity and impact of outreach. Some were hesitant to actively pursue outreach, citing the high demand for services that already exceeds capacity and that people generally know how to access their services. Others acknowledged gaps in reaching populations that face systemic barriers, such as immigrant communities, where mistrust of legal systems persists. Staff also noted difficulties in reaching target clients, expressing concern that current practices may inadvertently attract better-resourced clients while failing to engage economically and socially marginalized groups. That said, aside from CNPLS, offices did not seem to reliably track how clients learned about their services, revealing an opening to better understand outreach gaps and how to bridge them more systematically.

Survey feedback indicates a need to increase awareness of legal aid services. Among the community providers surveyed during this Accountability Review, only 27% agreed or strongly

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<sup>42</sup>Among 308 community partners surveyed, only 11% reported involvement in a legal services organization's priority-setting process. When asked about barriers to referral, 43% indicated that case priorities or eligibility requirements do not match community needs. Respondents were neutral, on average, when assessing whether their primary legal aid partner handles cases that align with their clients' legal needs.

<sup>43</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 3.3.

agreed they had enough information to effectively refer clients to legal aid, while most respondents disagreed or strongly disagreed. This finding aligns with a broader pattern: among all 883 respondents surveyed about barriers to accessing justice, "people not knowing how to look for and find legal help when they need it" ranked among the top three obstacles across all regions and respondent types.<sup>44</sup>

OLC leadership discussed the need to align outreach efforts with organizational goals and case priorities by developing regional office-specific outreach plans, emphasizing the importance of effective communication.<sup>45</sup> This strategy could clarify the scope and responsibility of outreach within the organization and strengthen its responsiveness to community needs. Ensuring outreach efforts are clearly defined, regularly evaluated, and tied to identified community needs, as outlined in ABA Standards 3.3 and 4.1, would enhance the organization's ability to maintain trust, improve service awareness, and foster stronger connections with underserved populations.<sup>46</sup>

### ***Recommendation 1: Providers Should Evaluate How Offices Educate Community Partners About their Case Priorities and Acceptance Criteria***

This recommendation builds upon the Continued Opportunity in the 2021 Accountability Report.<sup>47</sup>

#### **Relevant Standards**

ABA Standards emphasize the importance of clearly communicating service priorities and decision-making processes. Effective communication serves multiple essential functions: managing expectations about available services, providing early notification when services aren't available, and facilitating accountability by aligning services with pressing community needs.<sup>48</sup>

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<sup>44</sup> Needs assessments from the site visit offices also captured perspectives on opportunities to improve awareness of legal aid services. Suggestions included providing more regular updates and communication, such as monthly emails or mini-presentations during community events, or other communications to keep partners and clients informed about their legal rights and legal aid services. There was a strong emphasis on increasing targeted outreach to underserved groups, including seniors, BIPOC, and immigrant communities, as well as a request for multilingual and visual outreach materials. Feedback also highlighted the importance of stronger collaborations with community partners and more general information on their websites.

<sup>45</sup> One example of this kind of connection between needs assessment and outreach planning comes from LASO PRO's 2021 priority setting process. Their office developed specific outreach goals focused on reaching vulnerable communities, including plans for co-located services in Madras, Prineville and Redmond, and partnerships with organizations serving BIPOC communities. While promising, it is unclear whether they had capacity to implement it. CNPLS' "implementation plan," similarly names outreach activities as key outputs for each of its main case areas.

<sup>46</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standards 3.3 and 4.1.

<sup>47</sup> "Feedback from the site visits and the survey revealed opportunities for Providers to strengthen stakeholder input, involvement and understanding of the priority setting and case acceptance processes." Legal Services Program Accountability Review 2021, Pg. 11.

<sup>48</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 4.1

Standards 3.3 and 4.1 call for providers to establish themselves as visible and trusted community resources while helping partners understand the available services and how to access them.<sup>49</sup> Standard 4.2 highlights the need for accessible systems to reduce barriers and build trust, while Standard 4.11 emphasizes incorporating client and community feedback to strengthen service delivery and foster accountability.<sup>50</sup>

## Guidance

Providers should evaluate their current processes to identify strategies that improve transparency, clarify organizational decision-making and priorities, and encourage better coordination across offices.

One approach is to develop a public-facing case priorities template that regional offices can customize to reflect their specific priorities. This template should provide plain-language explanations of [case priorities and acceptance criteria](#), along with their rationale, to make the information accessible to clients and community partners. A critical challenge in this process is rethinking priorities from the perspective of how individuals experience legal problems rather than how lawyers traditionally define them—an essential yet complex shift that requires careful consideration.<sup>51</sup>

Clearly explaining how community input shapes program priorities in public-facing materials could increase trust, improve the quality of feedback, and strengthen collaboration with community partners. Additional public education materials, such as website content or outreach presentation slide decks, could further enhance transparency and understanding. To maximize their impact, these materials should be part of a comprehensive communication strategy designed to engage and inform the intended audience effectively.

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<sup>49</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standards 3.3 and 4.1.

<sup>50</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standards 4.2 and 4.11.

<sup>51</sup> This rethinking is so critical because many people do not understand the issues they experience as legal in nature. See, e.g., Rebecca L. Sandefur, *Civil Legal Needs and Public Legal Understanding* (American Bar Foundation and University of Illinois at Urbana-Champaign, 2015), <https://ualr.edu/lawreview/files/2015/01/Sandefur-Public-Legal-Needs-and-Understanding.pdf> (“Among the most important reasons that people do not take their civil justice problems to lawyers or pursue them in courts is that people do not understand these problems to be legal problems.”).

## Focus Area 2: Intake and Case Management Processes

### Topic 1: Intake Methods

An effective intake system is critical for ensuring that individuals seeking help can access services efficiently and equitably. Intake determines who can be served, how they are served, and how Providers allocate limited resources strategically. Legal Aid Standards emphasize that intake processes should be accessible, client-centered, and flexible to meet diverse needs. By offering multiple pathways—such as phone, online, and in-person options—legal aid organizations can reduce barriers and improve access for clients.<sup>52</sup>

Providers in Oregon use a variety of intake strategies to meet community needs, including a centralized phone system for eviction defense and in-person intake at most regional offices. These approaches reflect strong efforts to ensure accessibility and responsiveness. As Providers continue to refine their processes, there are opportunities to enhance consistency across offices and ensure intake systems remain accessible and equitable. This section outlines findings and offers recommendations to help Providers strengthen intake methods and create client-focused and efficient pathways for Oregon’s low-income communities.

#### *Finding 1: Providers Use Varied Intake Pathways*

Providers offer multiple pathways for clients seeking services, such as phone, walk-in hours, off-site clinics, centralized intake for specific programs, and referrals from community partners.

- **CNPLS** utilizes a centrally located office available to the public and offers several co-located intake models at partner sites. Clients can apply for services by mail, in person, or via email using a fillable PDF form.
- **OLC PRO** conducts intake through phone calls and voicemails and offers walk-in intake one afternoon per week. It also receives many intake referrals through community partners. OLC’s statewide tax program and Eviction Defense Program (“EDP”) also use a centralized intake model, routing clients through a single number rather than regional offices.
- Like OLC, **LASO PRO** receives many referrals from established partnerships with community organizations, including a network of domestic violence service providers. The office also offers daily phone intake without a voicemail system and does not currently provide walk-in intake. Staff noted that because the phone queue only holds five callers at a time, some prospective clients may struggle to successfully reach intake

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<sup>52</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standards 4.1 and 4.2.

personnel, particularly those with limited phone access or pay-per-minute plans. **LASO's** statewide tax program uses centralized intake, is piloting online forms to further streamline intake, and is experimenting with a client scheduling tool.

Most regional offices provide walk-in and phone intake during business hours, but none currently offer weekend or after-hours intake. Across Providers:

- **Walk-in Intake:** 35% of the offices provided more than 15 hours weekly, ranging from 0 to 40 hours.
- **Phone Intake:** 60% of offices provided over 25 hours of phone intake, ranging from 7 to 35 hours per week.<sup>53</sup>

### ***Finding 2: Intake Availability is Inconsistent***

After the COVID-19 shutdown, Providers shifted intake processes by reducing walk-in hours and in-person events while increasing reliance on phone and virtual methods. Since restrictions were lifted, most regional offices have not returned to pre-pandemic levels of walk-in or phone intake availability. Between 2020 and 2023, 80% of OLC and LASO regional offices reduced walk-in hours, and 60% reduced phone intake hours.<sup>54</sup> Some offices have also discontinued in-person co-located clinics, instead engaging community partner-referred clients by phone. Staff had mixed opinions on whether resuming on-site collaboration with partners would improve client experiences.

The Providers' Criteria for Operations sets general expectations for walk-in and phone intake but lacks specific guidance on intake hours, voicemail availability, partner engagement, or technology integration.<sup>55</sup> The Criteria appropriately state that intake methods should "best match the needs of client communities [they] are assigned to serve," although the Accountability Review found limited evidence that community intake preferences are

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<sup>53</sup> For phone intake, CNPLS and 56% of OLC offices, as well as 64% of LASO offices, offered more than 25 hours weekly. Additionally, CNPLS, all LASO offices, and 78% of OLC offices provided phone intake on at least three days per week. For walk-in intake, CNPLS, 33% of OLC offices, and 36% of LASO offices offered more than 15 hours of weekly, while CNPLS, 56% of OLC offices, and 36% of LASO offices provided walk-in intake on at least three days per week.

<sup>54</sup> 80% of OLC regional offices reduced walk-in hours and 60% reduced telephone intake hours. 71% of LASO regional offices reduced walk-in hours and 43% reduced telephone intake hours. CNPLS incrementally reopened its office to 5 days a week.

<sup>55</sup> The Criteria of Operations states: "Intake processes should: [...] offer multiple avenues for persons to seek assistance, including telephone and walk-in options where appropriate. Section 3.b.3.

systematically assessed—whether through regional needs assessments, central oversight, or other engagement with community partners.<sup>56</sup>

When asked in the Accountability Review survey about barriers to referring clients to legal aid, only 2% of community organization respondents reported no challenges. Among the remaining respondents, 68% cited issues with intake systems, including limited or inconvenient intake hours, lack of intake options, and unclear referral pathways.<sup>57</sup>

### ***Finding 3: Providers Recognize the Need to Expand Online Intake Options***

Staff at OLC PRO and LASO PRO conveyed enthusiasm for implementing online intake as an additional access point for clients. Some practice groups are already exploring these tools. For example, LASO's Low-Income Taxpayer Clinic ("LITC") has experimented with online appointment booking, and other staff shared an interest in expanding these tools to other service areas.

OLC and LASO leadership also highlighted opportunities to integrate online intake into their broader service models. OLC leadership expressed interest in piloting a kiosk program featuring video-enabled locations for intake and communication, an idea initially explored during the 2019 joint legal aid strategic plan.<sup>58</sup> Meanwhile, LASO leadership emphasized leveraging the redesigned Oregon Law Help platform as a foundation for developing a robust statewide intake system that would streamline and improve intake processes.<sup>59</sup>

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<sup>56</sup> Through its open-ended questions on opportunities to work better together during its needs assessment processes, site visit offices gathered valuable perceptions from community partners and clients on intake processes. LASO PRO's partners suggested the use of local phone numbers to increase response rates and emphasized the importance of "warm handoffs" to ensure smoother transitions between organizations. Similarly, CNPLS partners noted a need for more accessible hours and multilingual resources. For OLC PRO, feedback underscored the need for in-person access to local attorneys, particularly in rural and remote areas, along with bilingual materials to address language barriers. Clients and partners also highlighted the importance of balancing scheduled appointments with drop-in office hours to meet diverse client needs.

<sup>57</sup> Some respondents elaborated upon their responses, noting challenges like, "It is hard to find and give people the information they need about the services in our area. They are both unclear and decentralized," and "It is impossible to understand what people or cases legal aid helps with." Other respondents remarked, "We get great help from our local legal aid program, but the need is not always covered under the services provided by legal aid," and "there is only one office to serve four counties. This makes it hard to access legal aid services for those who don't have reliable transportation."

<sup>58</sup> 2019 Statewide Legal Aid Strategic Plan, October 19, 2019, Pg. 11, Recommendation number 3.

<sup>59</sup> Notably, LASO attempted to secure funding to assess statewide intake systems.

## ***Recommendation 1: Providers Should Evaluate Current Intake Processes and Establish Clear Expectations and Strategies for Community-Informed Intake***

This recommendation builds upon the Continued Opportunity in the 2021 Accountability Report.<sup>60</sup>

### **Relevant Standards**

Per ABA Standards 4.1 and 4.2, legal aid organizations should implement user-centered delivery models, including intake, that are accessible to diverse populations and regularly review and improve them to remain responsive to community needs.<sup>61</sup> The commentary to Standard 4.2 explains that legal aid organizations should offer flexible intake methods, including telephone, online, in-person, and community-based intake, to ensure equitable access and reach all segments of the low-income population.<sup>62</sup>

ABA Standard 4.3 underscores the benefits of a single, statewide intake and triage system to enhance coordination, make services easier for clients to navigate, and improve efficiency. Such a system helps direct clients to appropriate resources, reduces duplication of efforts, and promotes consistent access. Meanwhile, ABA Standard 5.3 reinforces that organizations must minimize barriers to access by ensuring clear communication about available services and establishing timely, mutual contact with clients about the assistance offered.<sup>63</sup>

### **Guidance**

As the 2021 Accountability Report noted, given the recent pandemic-related changes to intake options and the additional remote tools available, this is an ideal time for Providers to review intake workflows. Providers should evaluate which combination of intake methods best serves their communities, including assessing the extent to which traditional approaches, like walk-in intake, align with current needs and capacities. Consistent with the referenced standards and emerging best practices, Providers should examine their intake processes with a focus on client experience, staff workflow, and organizational efficiency.

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<sup>60</sup> “Providers may want to explore developing best practices in intake and case selection process. It could be beneficial to capture and assess variations in office hours, intake forms, timelines for response time to clients, labor division between attorneys and support staff, response based on case type, and procedures for adequately informing community partners of its case acceptance policies. As offices had to move into phone, hybrid, and modified intake approaches it is timely to reconsider best practices.” Legal Services Program Accountability Review 2021, pg. 29.

<sup>61</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standards 4.1 and 4.2.

<sup>62</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 4.2.

<sup>63</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 5.3.

Providers should refine the Criteria of Operations by establishing clearer benchmarks for intake processes. Current variations in intake methods—such as walk-in availability and voicemail options—lead to uneven access statewide, with the challenge especially pronounced for clients who cannot call during standard business hours or face transportation barriers.<sup>64</sup> Centralized support for regional offices in regularly assessing whether their intake methods meet community needs—in line with ABA 5.1 and the Criteria for Operations—could enhance equity and accessibility. Providers should also explore investments in centralized infrastructure, training, and assessment processes to better support and standardize intake practices across regional offices.<sup>65</sup>

In addition to the above, CNPLS should review its reliance on fillable PDF forms only obtainable by calling or emailing the CNPLS office. As the primary vehicle for conducting intakes, without alternatives in place, this method raises accessibility concerns, risks prolonging the application process, and may create additional burdens and confusion for clients. Additionally, the process does not lend itself to prompt screening or expedited handling of emergencies. Replacing or, at a minimum, supplementing this approach with a more streamlined system—such as an online form with branching logic—could improve client outcomes and staff efficiency while aligning with ABA Standard 5.1, which emphasizes timely and equitable service delivery.<sup>66</sup>

### ***Recommendation 2: Providers Should Explore Technology to Improve Intake, Reduce Barriers for Clients, and Increase Provider Capacity***

This recommendation builds upon a Continued Opportunity identified in the 2021 Accountability Report and the recommendation from the 2019 Strategic Plan.<sup>67</sup>

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<sup>64</sup> As part of this process, Providers may want to reassess the role of walk-in intake in their standard intake model and the Criteria for Operations to determine whether it remains a key component of service delivery. Although determinations may be different based on regional decisions, decision frameworks about the role of walk-in intake should be made in a coordinated and consistent manner.

<sup>65</sup> LSC's 2018 assessment found that LASO's intake responsibilities were dispersed across positions without centralized oversight, and the program lacked systematic collection and analysis of key data like call volumes, wait times, and dropped calls. These findings remain relevant and likely apply to OLC and CNPLS as well. Implementing centralized oversight and conducting a business process analysis would help standardize and improve intake efficiency across all offices.

<sup>66</sup> CNPLS already obtained valuable feedback on possible intake improvements during their recent needs assessment. Survey responses highlighted the value of a simplified intake process, with a partner noting that “clients can lose valuable time waiting to see if they will receive representation.” Additionally, staff observed that some clients struggled with digital literacy, which complicated interactions such as completing forms, signing documents, and understanding procedures. However, there was also feedback indicating that once the intake process was explained, it was easy to navigate. One respondent noted, “In some cases, the client was not aware of how to make an application to CNPLS but once it was explained, the client found the process easy.”

<sup>67</sup> “As recommended in the 2019 Strategic Plan, Providers should convene a workgroup to develop an online intake system or other web-enabled legal assistance. [...] Similarly, Providers should revisit investing in a video intake pilot project.” Legal Services Program Accountability Review 2021, pg. 29.

## Relevant Standards

Online intake aligns with the LSC Technology Baselines, and ABA Standards 5.1 and 4.1, which emphasize designing accessible, user-centered intake systems that reduce barriers for potential clients, particularly those with geographic or scheduling barriers.<sup>68</sup> The commentary to these standards highlights that technology can simplify the application process for clients while also improving organizational efficiency, allowing legal aid organizations to serve more people effectively<sup>69</sup>

## Guidance

Providers have numerous opportunities to leverage technological advancements, including:

- **Logic-based online intake systems** to streamline the application process.
- **Generative AI tools and chatbots** to assist with client inquiries and automate responses.
- **Scheduling automations** to simplify appointment booking.
- **Text messaging services** to enhance client communication.

Systems like online intake can reduce the administrative burden of managing after-hours intake and voicemail, while automated triage tools efficiently screen potential clients and link them to appropriate services. Additionally, client scheduling tools can increase client engagement by making appointments more accessible.

Some offices and practice groups are already piloting these tools; adopting a coordinated organizational strategy will ensure consistency and maximize their impact. Both OLC and LASO leadership have highlighted timely opportunities to expand access points through online intake models and kiosks and by leveraging the redesigned Oregon Law Help to further simplify and streamline access to legal help.<sup>70</sup> A coordinated strategy will help Providers standardize these tools, ensuring the greatest impact for clients statewide.

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<sup>68</sup> *Technology Baselines: Technologies That should Be in Place in a Legal Aid Office Today*, Legal Services Corporation, August 2023, sections 9.1, 6.1, 10.1. *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standards 5.1 and 4.1.

<sup>69</sup> *Id.*

<sup>70</sup> This recommendation aligns with the 2018 LSC review of LASO, which suggested implementing earlier triage measures and exploring online triage options.

## Topic 2: Case Acceptance Processes

Legal aid organizations must establish clear, consistent, and transparent criteria for case acceptance to ensure decisions align with client needs and community priorities. While intake systems determine how clients can access services, case acceptance processes guide how resources are allocated to effectively and efficiently address community needs. These processes can help distribute resources equitably, support staff in managing workloads, and reduce client frustration by providing clear guidance on available services and alternative resources when representation is not possible.<sup>71</sup>

Providers in Oregon use various approaches to case acceptance as they strive to align services with community needs. Variations in criteria and practices across offices also present opportunities to improve consistency, efficiency, and effectiveness. This section outlines findings and recommendations to support Providers as they strengthen their case acceptance processes to effectively address the legal needs of Oregon's low-income communities.

### ***Finding 1: There is Variation in the Development and Application of Case Acceptance Criteria***

The Accountability Review found that OLC and LASO's regional offices have established case acceptance processes, with projects within the organizations implementing innovative centralized models. These processes rely upon staff subject matter expertise and include experimentation with models to improve consistency, efficiency, and client experience. For example, OLC PRO and LASO PRO have taken steps to refine their processes by adding clarity to the criteria and exploring frameworks that balance demand with available resources, as discussed below.

We found that regional offices use varied methods to develop, apply, and document case acceptance criteria. Like the [case priority development process](#), these inconsistencies can create challenges related to equity, administrative burden, and community understanding. Differences in terminology and policy application between Provider offices can also complicate coordination and warm handoffs of cases.

We observed that Providers did not have a practice of conveying their case acceptance criteria to external partners. [As with the communication of priorities discussed above](#), this gap may leave communities, particularly those who have provided input during the needs assessment process, frustrated and confused about which matters a Provider may ultimately take on for advice or representation.

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<sup>71</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standards 3.1, 5.1, and 5.2.

Staff and leadership at OLC and LASO have expressed interest in clarifying and, to some degree, centralizing the methods individual offices use to determine case acceptance. LASO leadership, for example, reported working toward a more standardized case assignment process that reduces reliance on attorney experience and fit as a dominant factor in case selection.<sup>72</sup>

The Accountability Review also highlighted promising efforts by Providers to rethink how they structure and develop case acceptance priorities:

- **OLC** PRO implemented a three-step case acceptance model for its updated 2025 Case Acceptance Criteria. The model specifies that investigation and/or brief advice will be provided to cases that meet priorities and financial eligibility, and then, if cases involve “plus factors,” also providing extended services.<sup>73</sup>
- **LASO** PRO is exploring a similar model inspired by Utah’s resource allocation framework for its upcoming updated Case Priorities. That model pairs priority legal areas with service levels—from full representation to referrals—to balance demand and capacity.
- Beyond regional efforts, Providers have developed successful specialized programs with unified intake pathways and case acceptance processes, such as the Public Benefits Hotline (“PBH”), staffed by **OLC** and **LASO**, and the Eviction Defense Program, operated by **OLC**. Staff reported that the PBH model of offering information and advice upfront improves efficiency by helping determine which cases align with organizational priorities and are suitable for extended representation while also providing clients with a better overall experience. Staff similarly reported on the benefit of EDP’s model for triaging case acceptance.<sup>74</sup>

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<sup>72</sup> In their Self-Assessment narrative LASO stated: “We are developing a management system to standardize case assignments, moving away from the current model that relies on attorneys choosing cases based on experience and fit. The new system will be guided by office priorities, staff experience, attorney caseloads, and community needs, enabling a broader range of legal service delivery and promoting internal support and specialization among attorneys”

<sup>73</sup> OLC PRO’s model defines a three-step Case Acceptance process that evaluates eligibility and determines the appropriate level of service. The process begins with a threshold assessment to ensure alignment with priorities and financial eligibility. Cases meeting these criteria may be accepted for investigation and/or brief services. From there, cases with additional “plus factors” advance to Step Three, where further consideration is given based on legal merit, likelihood of success, systemic impact, relation to poverty, and staff development opportunities. At this stage, cases may be approved for extended representation.

<sup>74</sup> OLC leadership reported interest in building upon the Equity Corps of Oregon model, through which they are currently contracted to provide immigration legal help. This approach would involve becoming a navigator to directly connect potential clients with legal services. As OLC noted, “Creating the ability for community-based organizations to connect potential clients directly with legal services is a model that legal aid could adopt for our own services, which would help make our intake process more efficient and more trauma-informed.” Currently, warm handoffs rely on informal relationships between legal aid staff and community partners, which can be disrupted by staff turnover.

When asked about their approach, **CNPLS** staff identified key factors influencing case acceptance, including the availability of other legal help, case complexity, and specific case-type considerations such as the imminent loss of housing or the involvement of children in family law matters. While these factors demonstrate thoughtful consideration, CNPLS has not formalized these in written criteria, risking inconsistencies and misunderstanding for both staff and partners.

### ***Finding 2: Providers Use Varied Staffing Models and Processes for Initial Screenings***

Screening potential clients is an emotionally taxing and time-intensive aspect of a legal aid office's work, as it requires staff to frequently deny services to individuals in crisis. However, with a structured and client-centered approach, screening can be efficient, trauma-informed, and focused on providing meaningful guidance for those seeking legal help. During the Accountability Review, we found that initial screening processes—which assess threshold financial eligibility and case priority parameters and guide intake staff in redirecting and supporting clients who cannot be served—vary across offices.

We observed differences in how administrative and legal staff are utilized, as well as perspectives on the depth and structure of initial screenings. In some offices, attorneys play a significant role in screening, though they report that this reduces the time available for casework. Other offices rely more heavily on administrative staff, who sometimes use decision trees or written guidelines created by their office, while others rely on individual expertise to conduct screenings. For example, LASO PRO implemented an online triage tool to assist intake staff with initial screenings, reserving “high-volume” intake attorneys for more detailed evaluations.<sup>75</sup>

CNPLS uses a multi-step screening process that begins with a preliminary check to confirm that the case aligns with the office's priorities, followed by detailed questionnaires to assess case-specific and financial eligibility.<sup>76</sup> While staff mentioned efforts to expedite approvals, this process appears to place much of the burden on the client, potentially creating barriers for those seeking urgent assistance. Additionally, because financial eligibility is not assessed upfront, ineligible clients may experience delays before being redirected to alternative resources.

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<sup>75</sup> LASO PRO has also implemented an online platform, Twinery, which allows intake staff to use an online questionnaire to conduct intakes and eligibility screening more efficiently with those who call their office looking for help.

<sup>76</sup> CNPLS staff described a retreat where they collaboratively identified the key questions needed to determine client eligibility. They currently use 33 individual questionnaires to assess eligibility.

## ***Recommendation 1: Providers Should Evaluate Systems for Developing and Applying Case Acceptance Criteria and Screening Protocols***

This recommendation builds upon the Continued Opportunity in the 2021 Accountability Report and aligns with previous recommendations on intake, needs assessments, and communication strategies.<sup>77</sup>

### **Relevant Standards**

ABA Standard 4.1 emphasizes the importance of strategically aligning service delivery with identified community needs, while ABA Standard 5.1 highlights the need for accessible and responsive intake systems that minimize access barriers.<sup>78</sup> Per ABA Standard 5.2, documented protocols ensure "consistent and fair application of priorities," fostering trust with partners and clients.<sup>79</sup> ABA Standard 3.3 similarly reinforces the role of transparency in helping staff, partners, and the public better understand service priorities and eligibility criteria.<sup>80</sup> ABA Standards 5.1 and 4.2 underscore the importance of timely eligibility determinations and accessible intake systems, emphasizing that clear protocols improve both client access and internal decision-making.<sup>81</sup> Additionally, ABA Standard 4.10 highlights the value of innovation in designing client-centered systems that adapt to diverse needs while maintaining efficiency.<sup>82</sup>

### **Guidance**

Providers need to define standards for case acceptance and screening. At an organizational level, they should evaluate what makes screening criteria and processes effective, ensuring a well-defined and broadly understood approach across offices. These standards should be informed by key considerations such as timeliness, accessibility, transparency, and capacity, helping offices implement practical and responsive practices to community needs.

The Standards recognize that case acceptance and screening can involve multiple eligibility factors, considerations, and methodologies. Designing an effective system that accounts for these complexities while remaining uniform, objective, and easily understood by staff is challenging. Providers already have a foundation of existing practices to build upon. Developing shared templates and standardized methods—with flexibility for regional customization—can

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<sup>77</sup> "[...] Providers may want to explore developing best practices in intake and case selection process. The site visits revealed different and flexible approaches." Legal Services Program Accountability Review 2021, Pg. 29.

<sup>78</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standards 4.1 and 5.1.

<sup>79</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 5.2.

<sup>80</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 3.3.

<sup>81</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standards 4.2 and 5.1.

<sup>82</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 4.10.

help address this complexity by reducing the administrative burden of creating separate systems while promoting transparency and stronger coordination across offices.

The Standards also emphasize the importance of providing clear guidance for individuals who do not qualify for services. Some regional offices support these clients by referring them to community resources or directing them to legal information tools. Providers should expand on these practices by ensuring that staff have a broad working knowledge of both regional and statewide resources that may benefit ineligible clients. For example, in addition to leveraging locally identified resources, staff should be equipped to connect ineligible clients to statewide services, centralized legal information platforms, or other tools and programs that align with client needs.<sup>83</sup>

For CNPLS, improvements in documenting and structuring case acceptance criteria and screening protocols could provide significant benefits. Decoupling the initial financial eligibility determination from other parts of the screening process—such as confirming financial eligibility during the first contact—could improve workflow and reduce client burden. Although difficult, promptly informing clients of their ineligibility prevents unnecessary delays and confusion. Tools like the Oregon Law Help triage system could facilitate these initial determinations. Further, as a fundamental first step, CNPLS should develop and apply written case acceptance criteria.

Throughout this effort, Providers should consider how technology, ongoing assessment, and building upon promising practices can contribute to stronger models.

### **Topic 3: Case Assignment and Caseload Management**

Maintaining appropriate caseloads and effective monitoring systems is crucial for delivering high-quality legal services and preventing staff burnout. Clear caseload policies help legal aid organizations balance the dual priorities of meeting community needs and supporting a thriving workforce. These policies help staff deliver thorough and competent representation while maintaining manageable workloads. Regular caseload monitoring, along with defined protocols for case opening and closure, enables legal aid organizations to allocate resources efficiently and deliver timely assistance to clients.<sup>84</sup> Tracking and analyzing case closures, amongst other metrics, also helps identify service trends, evaluate resource allocation, and pinpoint opportunities for improvement.<sup>85</sup>

Providers in Oregon assign cases by considering staff capacity, expertise, and interest. While case closure data shows progress in addressing client needs, it also reveals variations in

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<sup>83</sup> This aligns with LSC's 2018 assessment, which found variation in resources that intake staff share with prospective clients and recommended efforts to ensure all intake staff are aware of the latest available resources.

<sup>84</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 6.3.

<sup>85</sup> *Id.*

practices and trends across offices. This section outlines findings and recommendations to support Providers in strengthening their systems for case assignment and closure.

### ***Finding 1: Providers Have Systems for Case Assignment and Inconsistently Apply Numerical Caseload Benchmarks***

LASO and OLC use oversight measures, caseload management software, and ongoing training to responsively oversee attorney casework and balance different advocacy methods. Their offices use a benchmark of 35 cases per attorney (including impact cases) as a standard workload, with 50 cases as the upper limit. They also expect attorneys to dedicate 50% of their time to impact cases.<sup>86</sup> Attorney performance on these measures is assessed during performance reviews. Managers monitor workload distribution through supervisory check-ins, regular open-case review, and staff meetings.

The Accountability Review found that offices typically allocate cases through weekly meetings based on staff capacity and attorney interest. They also schedule emergency or ad hoc meetings or implement fast-track measures when circumstances warrant.

Supervisors reported regularly conducting qualitative evaluations of workload capacity, as outlined in the Criteria of Operations.<sup>87</sup> While the Criteria also include numerical caseload benchmarks, offices did not appear to strongly consider these metrics in their workload management.<sup>88</sup>

### ***Finding 2: Case Closures Show a Declining Trend***

Annual case closures averaged 7,359 in 2022 and 2023, showing some recovery from the pandemic-impacted period of 2020 to 2021, when annual closures averaged 6,446. However, closures remain below the pre-pandemic average of 8,820 closures per year between 2016 and 2019.<sup>89</sup>

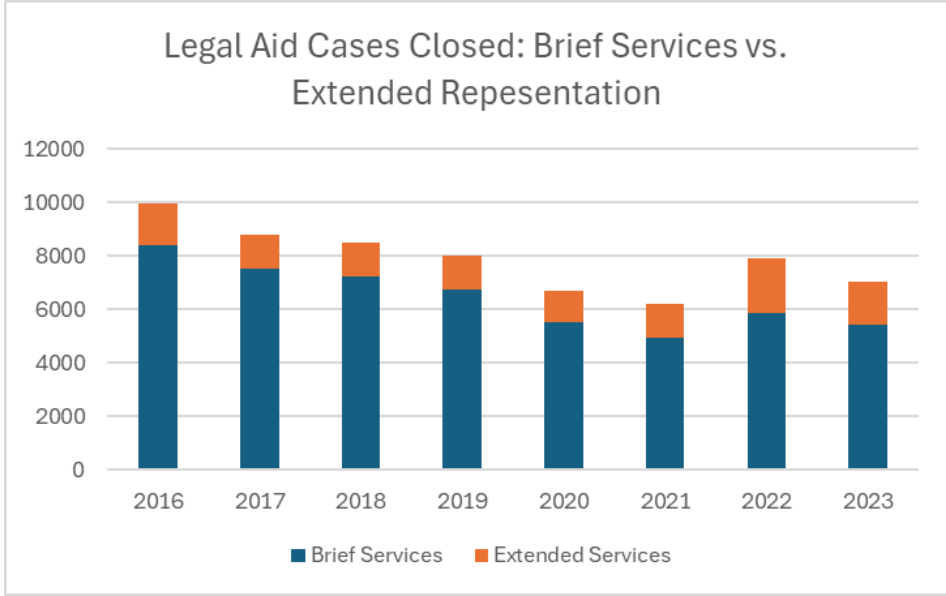
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<sup>86</sup> Criteria of Operations Sections 4.b - 4.c.

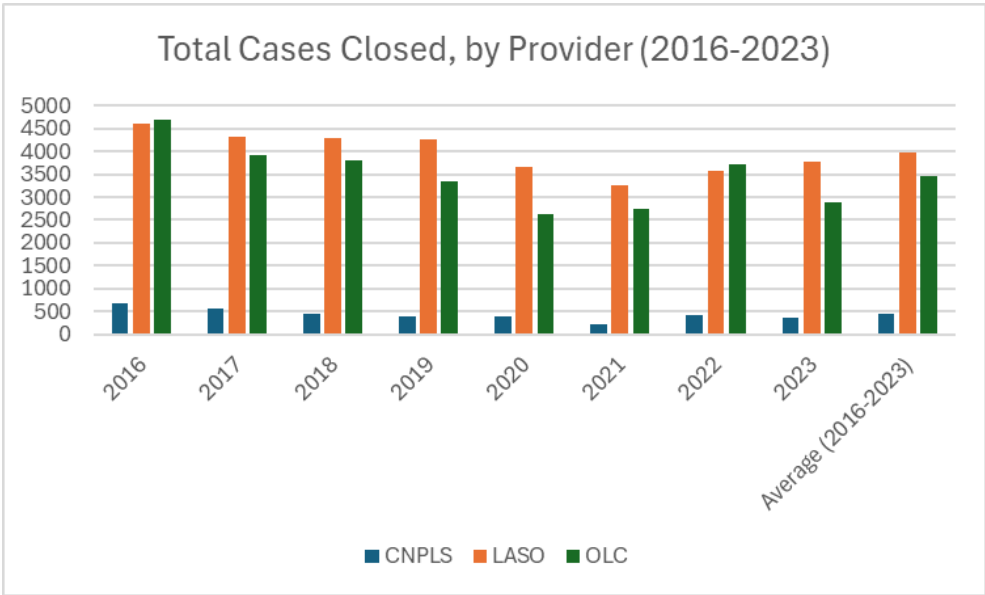
<sup>87</sup> Criteria of Operations Section 4.c.

<sup>88</sup> The Accountability Review of individual case handler workloads, though based on a small sample, aligns with LSC's 2018 finding for LASO that individual caseloads are significantly below the Providers' active caseload guidelines of 35 to 50 cases.

<sup>89</sup> Case closures are not the only, or even the key, indicator of a Provider's performance or impact. However, they remain an important metric to monitor. The ABA Standards, such as Standard 2.1, emphasize that Providers should evaluate their effectiveness through multiple factors, including case volume, the complexity of cases, the quality of outcomes, and the strength of community partnerships. Together, these measures provide a more comprehensive understanding of how well Providers are meeting community needs.

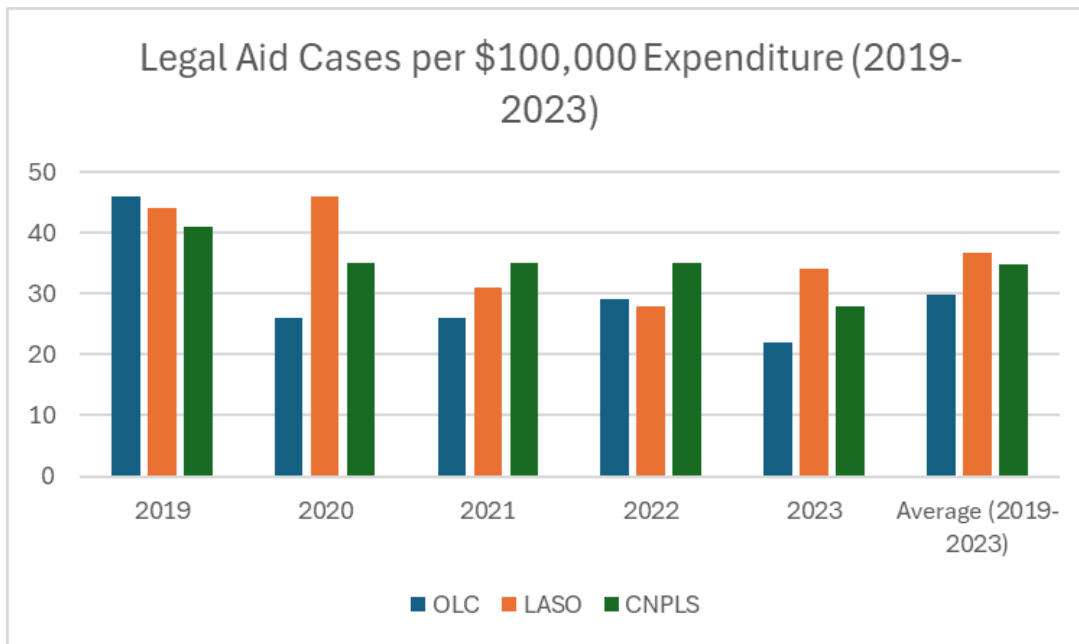


The decline in case closures began before the pandemic and accelerated during the 2020 – 2021 pandemic and associated shutdowns, which disrupted service delivery and limited access. While post-pandemic data shows encouraging signs of recovery, case closures have not yet returned to pre-pandemic levels. There are also variations in case closure trends across Providers.<sup>90</sup>

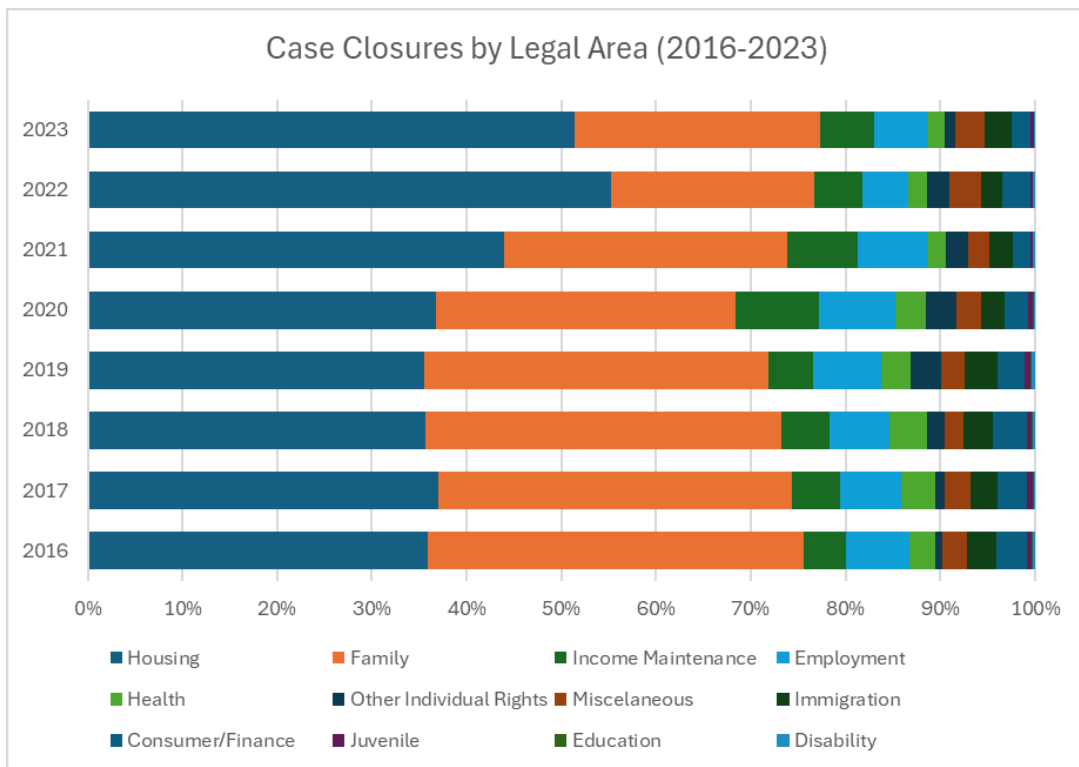


<sup>90</sup> From 2018-2023, the providers experienced steady revenue growth of 49.5% after adjusting for inflation. This includes a significant increase in 2020-2021, likely due to pandemic-related housing assistance funding and residual class action fund awards. All figures are adjusted using the Consumer Price Index (CPI).

Since Providers receive different funding amounts, the chart below shows cases per \$100,000 in expenditure to provide a size-adjusted comparison of service delivery.



Case closures by type show that housing cases have grown significantly as a proportion of total cases closed, while family law cases have decreased during the same period.



In the Accountability Review, several staff expressed concerns that fewer accepted cases may strain relationships with community organizations that rely on timely and consistent legal support to serve their constituents.<sup>91</sup> These challenges may affect Providers' ability to maintain "durable institutional relationships" with community partners, as outlined in ABA Standard 2.7, and may undermine the "efficient and high-quality provision of legal services" emphasized in ABA Standard 4.1.<sup>92</sup>

### ***Recommendation 1: Providers Should Examine Case Closure Trends to Ensure Responsive Service Delivery***

#### **Relevant Standards**

ABA Standard 2.6 emphasizes the importance of evaluating operational systems and work processes, including analyzing delivery methods and caseload data to ensure resources effectively serve client needs.<sup>93</sup> ABA Standard 4.1 calls for service delivery to align with identified priorities, and ABA Standard 6.3 emphasizes quality control and effective workload management.<sup>94</sup> ABA Standard 6.2 guides legal aid organizations in making strategic decisions about resource allocation, requiring them to balance service to individual clients with broader efforts to address systemic issues within their communities.<sup>95</sup>

#### **Guidance**

Providers should analyze the decline in case closures to pinpoint contributing factors and determine if a recalibration is needed. This awareness will enable Providers to explain these trends to community partners, adjust operations, and ensure alignment with organizational goals and client needs.

A review of case closure trends should consider total open and closed cases by service type and practice area, as well as caseloads by case handlers in different regions. Possible influences to consider may include funding shifts, staffing capacity, supervision practices, recruitment challenges, case complexity, or organizational or external policy changes, for example, the increased focus on cases with systemic impact. Gaining these insights will allow Providers to evaluate whether service delivery remains responsive to client needs and organizational objectives while highlighting areas that need adjustment. Providers could also use findings from

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<sup>91</sup> Based on Provider case data reports, total open cases declined by 23% between 2021 and 2023.

<sup>92</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standards 2.7 and 4.1.

<sup>93</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 2.6.

<sup>94</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standards 4.1 and 6.3.

<sup>95</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 6.2.

these reviews to create informed performance benchmarks and establish ongoing systems for monitoring caseload trends.

## ***Recommendation 2: Providers Should Review and Refine Current Caseload Standards and Monitoring Processes***

### **Relevant Standards**

The ABA Standards provide comprehensive guidance on caseload management and service delivery. Standard 6.3 emphasizes strategic case assignment based on staff expertise, capacity, and case complexity.<sup>96</sup> This connects to Standard 6.2, which focuses on building a diverse workforce that understands the needs of communities affected by poverty.<sup>97</sup> Together, these standards prioritize quality representation and impact over case numbers alone.<sup>98</sup>

The LSP Standards and Guidelines and ABA Standard 3.1 emphasize thoughtful resource allocation to deliver meaningful services and create systemic improvements.<sup>99</sup> ABA Standard 5.2 specifically highlights the value of clear, written eligibility criteria to help legal aid organizations balance workloads, guide equitable case assignments, and align staff capacity with community needs.<sup>100</sup> This approach aligns with ABA Standard 3.2's goal of achieving positive outcomes while balancing individual client needs with broader community impact.<sup>101</sup>

### **Guidance**

Providers should develop more detailed caseload standards to establish clear, practical expectations across the organizations. They should also identify the infrastructure needed to consistently implement the standards and create opportunities for ongoing review and adjustment.<sup>102</sup>

While caseloads will naturally vary based on case type, regional needs, staff experience, and case complexity, stronger guidance will promote shared understanding and equitable practices across offices. Detailed guidelines should explain how offices can account for these variations

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<sup>96</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 6.3.

<sup>97</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 6.2.

<sup>98</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standards 6.2 and 6.3.

<sup>99</sup> *Oregon State Bar Legal Services Program Standards and Guidelines* revised February 17, 2023, section III.C.5. *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 3.1.

<sup>100</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 5.2.

<sup>101</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 3.2.

<sup>102</sup> This recommendation aligns with LSC's 2018 Recommendation III.7.17.1, which advised LASO to review caseloads for appropriateness and make necessary adjustment.

while maintaining consistency. Additionally, improving staff familiarity and [use of Legal Server](#) will support effective caseload monitoring and help ensure alignment with organizational goals.

## Topic 4: Spectrum of Services

Scarce resources and the high demand for civil legal aid require legal aid organizations to adopt a deliberate and strategic approach to service delivery. A comprehensive model should effectively and efficiently address diverse client needs, offering a full spectrum of services to achieve meaningful access to justice. This requires legal aid organizations to carefully evaluate and allocate their time, balancing community education, direct advocacy, and systemic impact work to address individual and broader community needs.<sup>103</sup>

In Oregon, Providers employ various advocacy methods, including direct representation, community education, pro bono collaborations, and systemic change initiatives. While these efforts demonstrate a commitment to comprehensive service, Providers would benefit from more detailed principles to guide the various service delivery decisions offices face. This section presents findings and recommendations to help Providers evaluate their service models, ensuring they continuously meet the evolving legal needs of Oregon's low-income communities.

### ***Finding 1: Providers Use a Mix of Advocacy Methods to Meet the Needs of Low-Income Oregonians***

Providers strive to balance the distribution of advocacy methods, such as individual representation, both brief and extended services, and impact work. Through the Accountability Review, Providers shared various examples of advocacy across this spectrum, including:

- **Court Decision:** A domestic violence survivor sought assistance from **CNPLS** after experiencing extensive technological abuse and manipulation by her ex-husband, who had two years prior gained custody of their children that she wished to contest. The ex-husband's control efforts were extensive: he had sabotaged her plans to escape from their marriage, harmed her real estate career prospects, hacked her email and impersonated her in communications with her therapist, and strategically timed the divorce proceedings to coincide with her ensuing psychiatric crisis. Through CNPLS's legal representation, comprehensive evidence including electronic communications and videos was presented to the court, along with supporting testimony from psychiatric care providers. The case concluded successfully with the mother being awarded sole custody and child support, enabling the family to achieve stability free from the father's controlling influence.

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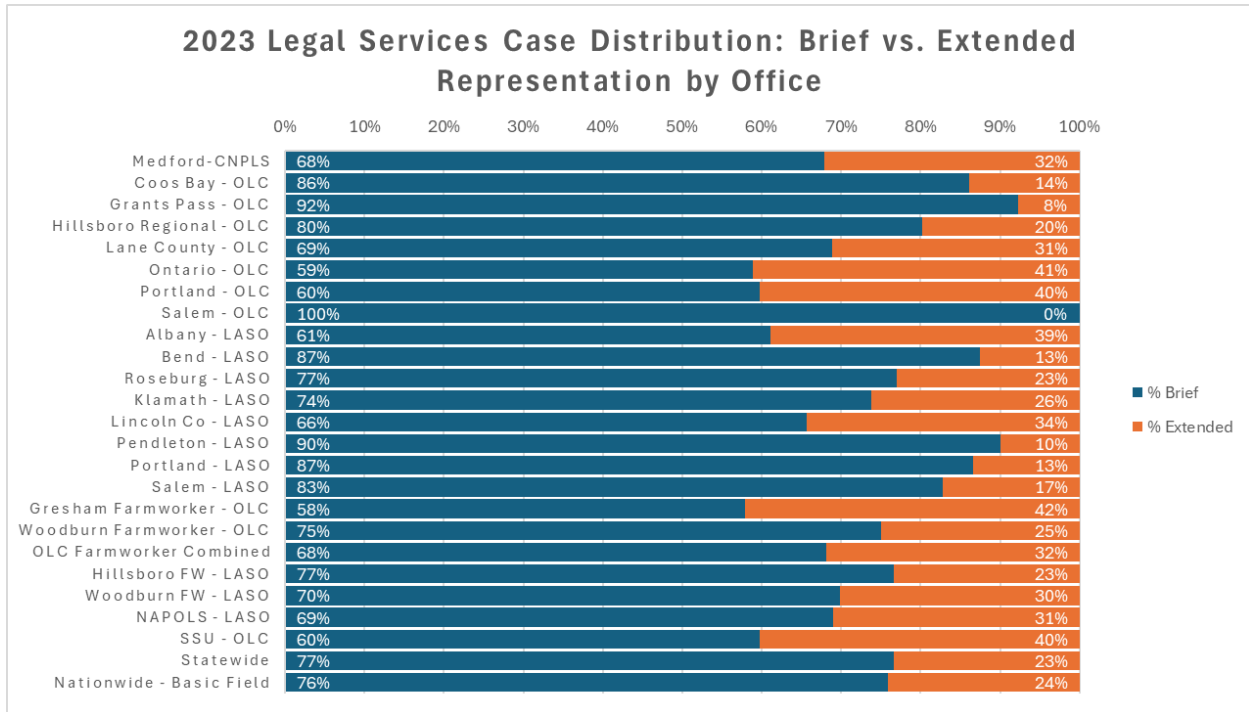
<sup>103</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standards 3.4 and 4.3.

- **Impact Case: LASO** defines an impact case as a case or project that benefits a substantial number of low-income Oregonians. An example of their impact work is *Garcia-Ascencio v. Gonzalez*, in which the Oregon Court of Appeals overturned the trial court's child support calculation against their client. LASO successfully argued that the trial court inappropriately considered client's public assistance, including enrollment in Oregon Health Plan ("OHP") and Supplement Nutrition Assistance Program ("SNAP"). LASO also convinced the Court of Appeals that childcare payments to the client's sister and claiming the children as tax dependents should not have been considered "rebuttal factors," benefiting the opposing party. The court's decision clarified that OHP and SNAP cannot be treated as income, nor can claiming a child as a dependent be considered income when no additional tax benefit is received.
- **Private Attorney Involvement ("Pro Bono"):** LASO continues to provide statewide support for pro bono. In addition to managing various clinics and other pro bono opportunities, during this review period, the LASO Pro Bono team launched the Pro Bono Oregon website. The site is dedicated to promoting and supporting pro bono efforts in Oregon, and connects volunteer attorneys with legal aid pro bono cases and projects. The site also includes an attorney resource library with training materials and resources to assist volunteers.

OLC also supports pro bono and reported hosting various clinics hosted by local law firms. Schwabe Williamson Wyatt provides a clinic serving Spanish-speaking clients in metro Portland and Salem. Miller Nash operates a virtual clinic supporting clients of the Coos Bay OLC Office. Davis Wright Tremaine runs a virtual clinic assisting clients of the Ontario OLC Office. The Lane County OLC Office manages the Senior Law Clinic and utilizes additional volunteers to expand services. The Hillsboro OLC Office coordinates both a Senior Law Project with a panel of local pro bono attorneys and a brief advice clinic with local attorneys in Columbia County. OLC provides administrative support for all clinics and cases.

- **Community Education: OLC and LASO** collectively held 334 community education events annually from 2021 to 2023. For example, LASO attorneys participated in parent nights at various school districts, offering "know your rights" trainings on various legal topics.

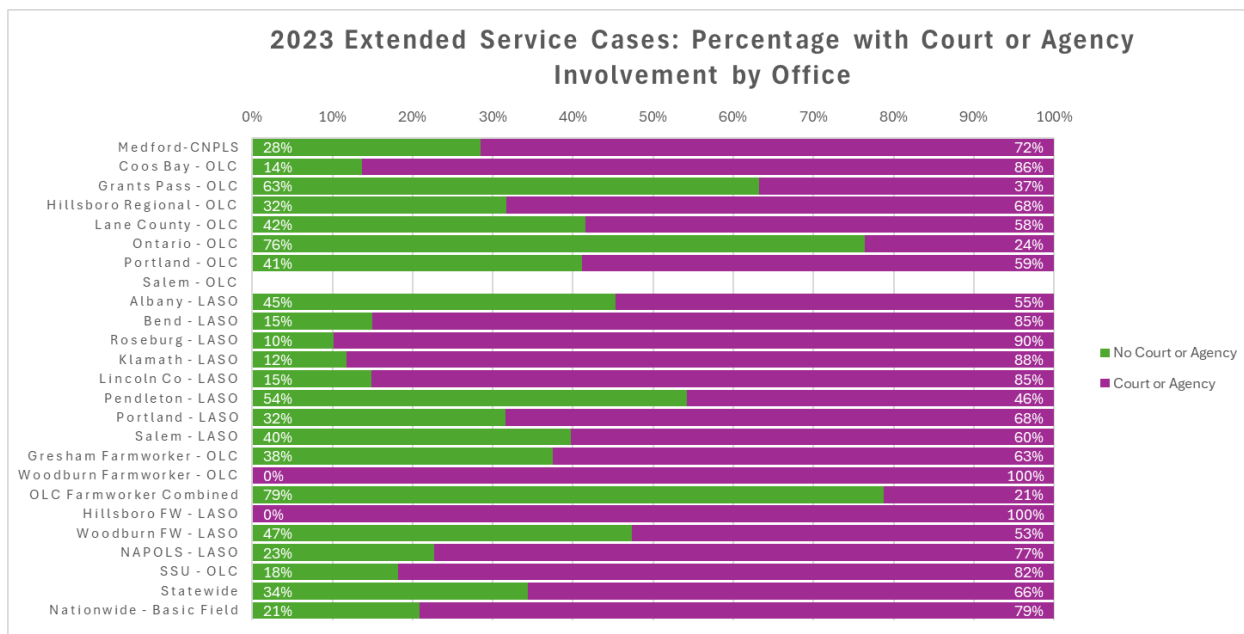
As shown in the chart below, Providers' statewide distribution of case types—including brief services, extended representation, and matters with and without court or agency involvement—aligns with national standards.<sup>104</sup> Some individual offices diverge from national norms, with higher proportions of case closures in brief advice or extended representation.



A similar pattern emerges with extended service cases that involve courts or administrative agencies. Overall, statewide averages align with national trends, with some regional offices showing higher or lower rates of cases with court and agency involvement.<sup>105</sup>

<sup>104</sup> LSC defines a Limited or Brief case where one of the two situations occur: (1) the client only received counsel and advice or (2) in a limited action situation the program took action to address the client’s legal problem, but the action was not so extended as to meet LSC requirements for extended services. An Extended Service case is defined as when one of the following occur: (1) negotiated settlement without litigation; (2) negotiated settlement with litigation; (3) administrative agency decision; (4) court decision- not contested; (5) court decision- contested; (6) court decision- appeals; (7) other closure methods (cases that do not fit into the other categories); (8) extensive services (cases in which the program undertook extensive research, preparation of complex legal documents, extensive interaction with third parties on behalf of an eligible client.

<sup>105</sup> Of note, our collection of case closure did not account for statewide programs with staff centralized in specific regions, particularly Multnomah County. For example, statewide tax programs and the EDP serve clients across Oregon but operate primarily from Portland offices. While this centralization may skew some case closure data toward Portland locations, it likely does not affect the broader pattern of service variation across the state, also observed 2021.



Staff expressed interest in clearer guidance on prioritizing service types within their caseloads or office-level strategies. They also identified opportunities for more insight into which levels of representation are most needed or wanted by the communities they serve to ensure they target their advocacy efforts accordingly. Notably, some of this information surfaced during the needs assessment process, but it is unclear whether that input informs decisions on resulting priority setting or case acceptance policies.<sup>106</sup>

### ***Finding 2: Providers are Working to Integrate Legal Information Creation***

As with other service types, balancing the creation and upkeep of current legal information against direct casework—whether on an individual or office-wide basis—can be challenging without clear expectations and defined priorities. The Oregon Law Help redesign (also called the Portal Project) aimed to address this challenge. Rather than duplicating resources and effort among Oregon Judicial Department (“OJD”), OSB, and Providers, or risking outdated legal information due to diffused maintenance responsibilities, the project brought the groups

<sup>106</sup> In its 2024 Needs Assessment, OLC PRO interviewed community partners, asking: “What types of services can OLC provide that would be most helpful to your clients (advice, representation, community education, self-help materials, etc.)?” Based on responses from 10 partner organizations, most emphasized the need for all service types, with full representation mentioned most often as critical, followed closely by community education, brief advice services, and self-help materials. Similarly, LASO PRO’s 2021 Needs Assessment included an open-ended question asking community partners how they could better work together. Partners suggested service delivery improvements such as Know Your Rights trainings, on-site legal services, and more formalized referral processes, including “warm handoffs.” CNPLS’s survey of community partners echoed these themes, with respondents requesting more community education, improved information on CNPLS’s website, and greater use of brief advice via phone, which they noted was sufficient for some clients

together to unify legal information development and simplify access for Oregonians looking for legal help.

With state funding and LSC grant funding, awarded to LASO, the Oregon Law Help site has been redesigned using user-centered principles and enhanced navigation, including triage functionality that guides users to well-maintained, plain language resources. This aligns with LSC's Technology Baseline Requirements for streamlined access and ABA Standard 4.10, which emphasizes the effective use of technology. The platform also offers the capacity for future integration of online intake and other technology features—such as [leveraging Generative AI](#)—and positions Oregon's statewide legal services system to integrate further. It already supports the statewide system by providing actionable legal information for the many eligible clients who cannot receive direct help, those who face handling their legal problems independently, and those who prefer self-help.

Staff at each Provider organization have collaborated to review and update the site's content, including subject matter review of revised legal information content and participation in the Family Law Task Force to help identify needs for additional content. These efforts have contributed to updated content in high-need legal areas to support the site's 2024 launch.

There remains an opportunity to strengthen coordination and provide clearer guidance to regional offices about organizational commitment to legal information development. During the Accountability Review, staff noted the value of legal information for clients who cannot receive extended service, yet few mentioned regular involvement in creating such resources outside of specific grant requirements or individual initiative. One staff member noted that there is little direction regarding the organization's role in legal information, suggesting to them that it is not an organizational priority; another mentioned that legal information tasks are largely reserved for senior attorneys or centralized in the State Support Unit. Notably, while some offices sought community input on legal information during their needs assessments, it is unclear how that feedback was used to inform organizational priorities or resource allocation.<sup>107</sup>

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<sup>107</sup>During its needs assessment, LASO PRO gathered feedback from clients on the best ways to access legal information. Articles and videos on a website were the most preferred methods, followed by options like booklets, smartphone materials, social media, and live Zoom sessions. In-person access was also emphasized as important by several respondents.

## ***Recommendation 1: Providers Should Assess Variations in Service Types Across Regional Offices***

This recommendation builds upon a Continued Opportunity from 2021.<sup>108</sup>

### **Relevant Standards**

Legal aid providers must balance multiple service approaches to effectively meet community needs. LSC Performance Area 2 Criterion 11 and ABA Standard 2.1 emphasize developing systematic service methods that respond to identified community needs.<sup>109</sup> LSC Performance Area 4, Criterion 2 highlights the importance of clear criteria in determining service levels to ensure equitable access to a full range of legal services.<sup>110</sup> Additionally, ABA Standard 3.4 recognizes that providers must address both individual needs and systemic issues, encouraging organizations to challenge laws, policies, and practices that perpetuate inequities.<sup>111</sup> Together, these standards support a comprehensive approach that combines direct representation, community education, and systemic advocacy.

### **Guidance**

Providers should review current practices and establish clearer guidance for balancing their service spectrum—from brief services to extended representation and community education. This guidance should establish a framework for evaluating how service distribution aligns with community needs identified in assessments. While regional variations are appropriate and expected, offices would benefit from consistent principles for determining and explaining their service mix. These guidelines should define appropriate ranges for different service types, enabling offices to adapt to regional needs while staying aligned with organizational priorities.

Additionally, this evaluation presents an opportunity to evaluate existing benchmarks, including impact work goals, ensuring they align with current community needs and operational realities. This evaluation should include clarifying definitions to support consistent implementation across offices.

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<sup>108</sup> “Cases closed per attorney reflect another spot for programs to explore how different regional needs may call for a different balance of advocacy methods. Providers should continue engaging in needs assessment and strategic planning process to investigate and identify the appropriate mix of services for their region.” Legal Services Program Accountability Review 2021, Pg. 20-1.

<sup>109</sup> *Performance Criteria*, Legal Services Corporation, 2018, Performance Area 2, Criterion 11. *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 2.1.

<sup>110</sup> *Performance Criteria*, Legal Services Corporation, 2018, Performance Area 4, Criterion 2.

<sup>111</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 3.4.

## ***Recommendation 2: Providers Should Develop Systems to Ensure Staff Participation in Creating Accessible Legal Information***

This builds upon a Continued Opportunity from 2021.<sup>112</sup>

### **Relevant Standards**

This recommendation aligns with established standards that recognize legal information as central to effective service delivery. Providing accessible legal information empowers clients to navigate legal issues independently and complements other services ranging from self-help to full representation. ABA Standard 4.3 highlights a legal aid organization’s role in improving legal literacy by creating and disseminating user-friendly legal information, while ABA Standard 3.1 and 3.4 emphasize community engagement and responsiveness to identify and address unmet legal needs, including through developing legal information.<sup>113</sup>

The standards also underscore technology’s critical role in expanding access to legal information. The LSC Technology Baselines and ABA Standards 4.10 stress leveraging technology—including online tools and websites—to reach diverse populations and ensure equitable access through language supports, ADA-compliant websites, and remote access tools.<sup>114</sup> These standards further promote participation in regional and statewide delivery systems that streamline access to the legal aid system, such as coordinated referral systems and centralized portals like Oregon Law Help.<sup>115</sup>

### **Guidance**

Providers should evaluate how legal information fits into staff work plans and office priorities, ensuring they deliver a responsive, comprehensive spectrum of services to their communities. By establishing a structured approach that outlines appropriate levels of staff participation in legal information development, Providers can expand service reach to clients who either cannot receive extended representation or prefer self-help resources. This approach will also support active participation in statewide delivery systems, such as Oregon Law Help, where coordinated efforts and technology-driven solutions can further streamline access to legal support.

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<sup>112</sup> “Robust legal information and pro se assistance are strong complements to direct and systemic representation that- in tandem- can efficiently and strategically remove access barriers within Oregon’s civil legal system.” Legal Services Program Accountability Review 2021, Pg. 26.

<sup>113</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standards 3.1, 3.4, and 4.3.

<sup>114</sup> *Technology Baselines: Technologies That should Be in Place in a Legal Aid Office Today*, Legal Services Corporation, August 2023, section 10.3. *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 4.10.

<sup>115</sup> *Id.*

## Focus Area 3: Organizational Infrastructure

The day-to-day resources an organization relies upon, while often invisible to clients and the public, form the foundation of its ability to fulfill its mission effectively. Modern, reliable technology, a skilled and supported workforce, and a forward-looking vision are essential for a thriving legal services organization. Standards emphasize using technology to enhance client services, streamline operations, and enable data-driven decision-making and efficient resource allocation across the legal aid system.<sup>116</sup>

The Standards also promote a diverse, innovative, and adaptable legal aid organization committed to continuous improvement. A varied, innovative workforce is essential for an effective organization, supported by robust supervision and professional development to ensure high-quality legal representation.<sup>117</sup> Additionally, evaluation systems that monitor outcomes and program quality help ensure that these operational investments produce measurable impact.<sup>118</sup>

Providers in Oregon are exploring ways to strengthen their infrastructure, including innovative staffing models and more effectively leveraging technology for case management and service delivery. These efforts create a strong foundation, but challenges—such as staff recruitment and retention, underutilized technology, and uneven measurement and evaluation practices—present opportunities for growth. This section outlines findings and recommendations to help Providers build on their strengths and create sustainable infrastructures.

### ***Finding 1: Providers Utilize Non-Attorneys for Various Tasks and are Exploring New Workforce Options***

Non-attorney staff play crucial roles at Provider organizations, with significant contributions to both client services and administrative operations:

- At **OLC Portland**, non-attorney staff manage the pro bono program and provide direct support on cases and with client contact.
- **LASO Portland**'s non-attorney staff are deeply involved in intake, outreach, and facilitating brief legal help for clients.
- **CNPLS** relies on non-attorney staff for both administrative and substantive tasks, including strategic case contributions, particularly in their immigration program.

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<sup>116</sup> *Technology Baselines: Technologies That should Be in Place in a Legal Aid Office Today*, Legal Services Corporation, August 2023, section 9.1. *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 4.10 and Standard 2.2

<sup>117</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 6.2

<sup>118</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 6.6

Providers all show interest in exploring new staffing models, including Licensed Paralegals and Oregon’s new supervised admission pathway (“SPPE”). All Providers have begun employing individuals using the SPPE, and Providers are discussing other roles, such as Licensed Paralegals, which may require conversations during their upcoming collective bargaining.<sup>119</sup>

### ***Finding 2: Providers are Exploring Better Ways to Integrate Technology and Improve Use of Case Management Systems***

Providers already use multiple technologies to manage operations and serve clients. During the Accountability Review, they cited several opportunities to better leverage technology in their operations and service delivery, as with [intake](#) and [legal information dissemination](#), [case acceptance](#), and [case monitoring](#). Some specific findings include:

- **Legal server capabilities are not fully utilized:** All Providers use Legal Server for case management, but few fully deploy its tools for case assignment, monitoring, or capacity assessment. Most offices use the platform primarily for basic case tracking rather than its more advanced functionalities—such as tools for workload analysis and real-time capacity tracking. Some staff expressed interest in Legal Server’s automation features that gather client information, apply eligibility criteria, and generate referrals or internal case assignments. Leadership at OLC and LASO proactively shared plans to enhance Legal Server’s use, including additional training on report generation and data analysis to support supervision and caseload monitoring. Meanwhile, CNPLS uses Legal Server to assign cases but does not consistently use it after assignment; some staff still print documents and use physical file folders, while others rely on Excel spreadsheets to track open cases.
- **Generative AI technology has yet to be harnessed:** The Accountability Review revealed mixed perceptions of generative AI’s utility. Most staff had not used it in their day-to-day work, and some expressed skepticism of its application.<sup>120</sup> Notably, the LASO and OLC Board remarked on generative AI as an emerging tool with potential for

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<sup>119</sup> OLC leadership reported that Licensed Paralegals could expand their reach into underserved communities because they have found that the hiring market for those with administrative skills and an interest in doing paralegal-type work, including Spanish speakers is robust, even in rural areas. OLC has an eye to use Licensed Paralegals to open satellite offices.

<sup>120</sup> Staff at Provider organizations use tools to conduct virtual meetings with staff and clients, completing forms including gathering electronic signatures, intakes, and transcriptions. Staff saw potential in using technology to assist with discovery, research, initial drafts of documents and letters, expanding and streamlining intake, and forms completion. The primary barriers to using technology tools were insufficient funding and concerns about the confidentiality of client information.

operations and service delivery. They are actively creating a policy to oversee its possible use.

### ***Finding 3: Providers Are Cultivating Supportive Workplace Cultures***

In general, Providers' staff reported feeling supported in their roles, particularly through access to supervisors and the State Support Unit (SSUs).<sup>121</sup> However, experiences of support vary between Providers:

- **LASO Portland** and **OLC Portland** staff consistently noted the availability of professional development opportunities and responsive management personnel.
- **CNPLS** staff reported less consistent access to supervision and internal training but highlighted partially funded participation in external programs, such as an American Immigration Lawyers Association paralegal training, as a strength.
- **LASO** maintains a social/morale fund and will soon roll out a redesigned professional development policy, which will be accompanied by a larger financial contribution to ensure its impact.

### ***Finding 4: Providers Face Challenges Recruiting and Retaining Staff, Especially Mid-Level Attorneys***

Recruitment and retention of attorneys present ongoing challenges for Providers. This is an area of focus for leadership, staff and the board, who described efforts to review policies and test new strategies for retention and recruitment.

During conversations, Providers reported particular difficulties in recruiting and retaining mid-level or experienced staff. Limited funding constrains Providers' ability to offer competitive salaries, making it challenging to attract and retain attorneys, particularly those with significant experience. ABA 6.2 highlights the importance of staffing continuity for quality and effective legal services.<sup>122</sup> Provider leadership, staff, and Boards shared this sentiment, noting that they believe retaining experienced staff while supporting entry-level team members benefits both work quality and client outcomes.

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<sup>121</sup> Provider's staff reported utilizing the SSU for guidance on cases as well as the invaluable information received from the listserv.

<sup>122</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 6.2.

Providers mentioned a variety of initiatives to address recruitment and retention, including:

- Exit interviews to learn about attrition and create action plans.
- Refining recruitment approaches, including targeting law schools with loan repayment programs.
- Exploring additional incentives for staff situated in rural environments.
- Where possible, opening recruitment to non-attorneys or SPPE applications.

### ***Finding 5: Providers are Ready for Strategic Planning***

Strategic planning is essential for legal aid organizations' forward movement and rearview assessment. It presents a unique opportunity to step off the service treadmill and holistically review what is working, what is not, and where changes can be made. As ABA Standard 2.2 notes, "[t]he plan should detail aspirational goals, measurable objectives and strategies, key performance indicators ("KPIs"), timelines, revenue strategies and projections, and indicate the persons or teams responsible for achievement."

All Providers expressed readiness to begin a collaborative strategic planning effort similar in scope and function to what they have pursued in past years. Amongst the statewide Providers there is particular eagerness, given the relatively recent appointment of their new Executive Directors, Jeremy Aliason (LASO) and Erika Hente (OLC).

Under their 2019 strategic plans, Providers accomplished several goals:

- After identifying a need for a greater presence in Eastern Multnomah County, where many of the county's low-income populations live, **OLC** opened a Gresham office; **LASO** subleases part of the space for its own services.
- **CNPLS** was encouraged to increase the capacity of its immigration program. They have done so by hiring an additional immigration attorney and continuing to expand the types of immigration matters accepted for representation.

The Providers are entering strategic planning with several shared priorities: reviewing staff distributions and office locations using new census data, addressing unfinished items from previous plans, and adjusting budgets based on economic forecasts. OLC and LASO plan to engage a consultant to organize these efforts and incorporate system partner perspectives.

CNPLS shared that a key goal of its planning is to strengthen its referral networks by improving timely communication and referrals from local organizations and syncing with partner organizations' strategic planning efforts. Additionally, CNPLS is developing succession plans for its Executive Director position. Initial discussions suggest dividing her responsibilities among internal and external parties.

As the Standards note, measurement and evaluation are vital components of strategic planning. The Accountability Review found opportunities to expand organizational practices in this area.<sup>123</sup> For example, while LASO and OLC leadership effectively tracked the completion of priorities identified in their strategic plan, additional numerical or qualitative advocacy targets and performance indicators could be developed.<sup>124</sup> The upcoming strategic planning process offers a timely opportunity to build on these practices.<sup>125</sup> We hope this report's findings also provide additional considerations for the Providers' forthcoming strategic planning.

### ***Recommendation 1: Providers Should Continue Cultivating Innovative Staffing Models***

#### **Relevant Standards**

ABA Standard 6.2 states that programs "should recruit and strive to retain diverse staff with the professional skills and knowledge necessary to provide high-quality assistance to persons served, a commitment to providing such assistance, and the capability of communicating effectively with members of the low-income and oppressed communities."<sup>126</sup> ABA Standard 2.2 encourages organizational leadership to "emphasize and model" many characteristics including innovation, while ABA Standard 4.5 notes that non-traditional approaches should be considered to achieve and maintain a diverse workforce reflecting the communities served.<sup>127</sup> ABA Standard

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<sup>123</sup> OLC reported the intentional use of data in the Eviction Defense Program (EDP) to measure its efficiency and effectiveness. This data serves multiple purposes: it identifies statewide trends and court practices to improve services, supports intake triage, and evaluates program efficiency by analyzing FED case outcomes.

<sup>124</sup> Providers do track and report multiple outcomes to OLF and LSP, and likely to other funders as well, although it was unclear from the Accountability Review how those outcomes are tied to service delivery or relied upon for program improvements. For its 2023 annual reporting, Providers reported multiple outcomes, including that their work produced a positive result for clients in 91% of all cases. Among cases where they provided direct representation and safety was of concern, the client was safer 85% of the time. In matters where housing was relevant, clients maintained or obtained housing 83% of the time.

<sup>125</sup> Additionally, ABA standard 3.1 speaks to the need for ongoing assessment of programs, noting that "the only way for an organization to know that its services are having the desired result is to implement methods of observation and data collection to measure the impact of its services. The organization must, as part of its strategic decision-making, implement methods to measure the impact and outcomes of its work. The LSP Performance Criteria also highlights the need to integrate assessment findings into decision-making processes, and to set explicit goals and objectives and develop strategies to achieve them based on those assessments.

<sup>126</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 6.2.

<sup>127</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standards 2.2 and 4.5.

2.2 also emphasizes human resources functions that promote excellence by recruiting and managing a high-performing, diverse workforce.”<sup>128</sup>

## **Guidance**

Providers have demonstrated leadership in exploring innovative workforce opportunities, including Licensed Paralegals and SPPE candidates, to enhance their capacity to serve clients. As they continue this work through their strategic planning, they can build on their experience to identify practice areas where these roles could have the most significant impact. This might include mapping high-demand legal areas or specific case elements where LPs, SPPE candidates, or "justice workers" could develop specialized expertise and integrate effectively into service delivery.

To prepare these new colleagues for success, Providers could initially focus on practice groups that already have strong supervision systems and established training resources. As they expand these innovative roles, Providers can draw on their experience to develop targeted training programs and appropriate compensation structures that reflect the unique contributions of these positions. These investments in innovative staffing models serve as capacity multipliers, helping bridge the justice gap while creating valuable professional development pathways within the legal aid community.

## ***Recommendation 2: Providers Should Leverage Technology More Effectively in Operations and Service Delivery***

### **Relevant Standards**

Multiple ABA standards emphasize technology's pivotal role in modern legal aid organizations. ABA Standard 4.10 highlights technology as a means to enhance accessibility, promote efficiency, and ensure accountability in legal services.<sup>129</sup> Additionally, the LSC Technology Baselines encourage the use of technology to reduce barriers to access, streamline service delivery, and optimize resource allocation.<sup>130</sup>

## **Guidance**

Providers already utilize various technologies, such as Legal Server, but there is potential for more extensive applications to improve service delivery. During the assessment, several participants expressed interest in expanding Legal Server's functionality—for outreach, intake,

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<sup>128</sup> *Id.*

<sup>129</sup> *Standards for the Provision of Civil Legal Aid*, American Bar Association, August 2021, Standard 4.10.

<sup>130</sup> *Technology Baselines: Technologies That should Be in Place in a Legal Aid Office Today*, Legal Services Corporation, August 2023, section

case assignment, and workflow improvements. A comprehensive audit of current usage could help identify training needs and opportunities for deeper integration into daily operations. Existing networks like the Self-Represented Litigant Network (“SRLN”), the Legal Services National Technology Assistance Project (“LSNTAP”), and the LSC technology community regularly share best practices and insights on tools like Legal Server and other technologies and can be a valuable resource to help Providers assess and strengthen their operations.

Providers should also explore Generative AI to address challenges in service delivery and operations. Generative AI tools can streamline administrative and case-handling tasks, such as automating documents, summarizing large texts, and conducting discovery analysis. These tools can also support client engagement, particularly through intake and legal information tools, and could align with opportunities to leverage OLH as a coordinated platform. While operationalizing and integrating these tools can pose challenges and involve costs, cost-effective solutions for legal aid organizations are emerging. Providers might also consider whether the SSU could support Generative AI integration and sustain training efforts, given its existing infrastructure for statewide training.

Strategic adoption of these tools can help Providers maximize innovations and expand their impact. Although not all regional staff need advanced tech expertise, organizations should evaluate how technology can support operational and service goals. Incorporating Generative AI into staff training as part of general skill development can help teams adapt and use these tools efficiently. Integrating Generative AI with systems like Legal Server could also enhance and expand the solutions that Providers are already exploring. While technology cannot solve every challenge, it remains essential for increasing Providers’ reach and capacity to address growing demands.

## **IV. Conclusion**

Over the course of this Accountability Review, we examined Providers’ efforts in three primary areas—Needs Assessment, Priority Setting & Outreach, Intake & Case Management Processes, and Organizational Infrastructure—and found much to commend. Providers’ foundation is their demanding daily work serving thousands of low-income Oregonians facing critical civil legal challenges. Supporting this essential work, they demonstrate an active commitment to enhancing access to justice through new workforce models, emerging technology, and innovative case acceptance processes while strengthening coordination across Oregon’s civil legal aid network. These endeavors reflect an alignment with national standards and illustrate the depth of passion among staff and leadership for achieving meaningful access to justice for low-income Oregonians.

Yet, as highlighted in prior Accountability Reports, some areas remain unaddressed or underdeveloped. From evaluating intake practices and case acceptance criteria to strengthening coordination across regional offices, expanding the use of technology tools, and creating systems to ensure responsive service delivery across the spectrum of services, there are ongoing opportunities to enhance the systems that support Providers' core work. We appreciate the complexity of delivering legal services and encourage Providers to continue pursuing progress in these critical domains. Over the coming review cycle, we look forward to seeing how each organization implements or refines its strategies to strengthen these foundational processes while maintaining its commitment to responsive, high-quality client services. We also invite Providers to reach out for technical assistance and will offer proactive guidance where appropriate, recognizing that legal aid delivery systems function best with collaboration.

At the same time, we recognize that meaningful progress depends on sustainable resources and infrastructure. Providers navigate these challenges while operating under funding constraints that impact their ability to recruit and retain staff, expand services, and implement long-term improvements. Addressing these challenges requires coordinated action between Providers, funders, and system partners, including LSP, to ensure low-income Oregonians can access critical civil legal help when needed.

Additionally, we recognize that this review cannot fully capture the many internal processes, unique local practices, and staff-driven innovations that shape daily operations. Our findings and recommendations should be considered alongside each office's specific realities, staff composition, and local community needs. Not every issue we identified here will apply equally to all offices, nor will all pieces of guidance fit all contexts. As Providers work to strengthen coordination and develop shared approaches, maintaining this balance between systemwide efficiency and local responsiveness will be crucial.

Finally, we commend everyone involved—attorneys, administrative staff, paralegals, leadership, and board members—for their commitment to delivering high-quality legal aid in Oregon. Their willingness to embrace forward-looking solutions, whether by exploring online intake, cultivating supportive workplace cultures, or developing new strategic plans, is a testament to the passion driving this vital work. We hope this report offers both recognition of Providers' accomplishments and constructive guidance for continued refinements that will further strengthen Oregon's civil legal aid system.

## Appendix: Financial Review

As part of the review process, we evaluated the financial health of OLC, LASO, and CNPLS, focusing on recent audits and current and projected revenue and expenditures.

Administrative costs for all three organizations remain within acceptable ranges for their respective sizes and operational scopes. OLC, LASO, and CNPLS allocate between 80% and 90% of their expenditures to program services, with administrative costs proportionally lower than typical nonprofit organizations of their scale. In 2024, OLC reported 9% and LASO 12%, with both organizations projecting 12% for 2025. CNPLS, while operating on a smaller scale, also prioritizes program services, allocating 83% of its expenses to this category in 2024. Its administrative costs were slightly higher at 17%, reflecting its unique operational structure but still emphasizing client services. Across all three organizations, personnel expenses make up the largest share of program costs, aligning closely with the average for LSC-funded organizations, which spend 77.3% of their expenditures on personnel -such as salaries and benefits - and 22.7% on other expenses.

All three Providers project operating deficits in the coming years, primarily driven by anticipated declines in state funding, likely due to uncertainty around continued funding from agencies such as OHCS. While personnel costs, the largest expense category, are projected to decline slightly, they continue to place significant pressure on budgets. These financial challenges highlight the difficulty of sustaining a highly skilled workforce while addressing growing service demands, and uncertainty in funding streams. Despite these pressures, Providers demonstrate a consistent commitment to operational efficiency and maintaining robust client service delivery.

No immediate concerns are raised, but ongoing attention to cost management, strategic planning, and opportunities to coordinate across the system to minimize duplicate expenses and maximize reach will be critical to sustaining their service level and impact.