

From: Zavoras, Catherine <cZavoras@aging.sc.gov>
To: 'Kimberly Harmon'kharmon@wrcog.org
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Watson, Daledwatson@aging.sc.gov
Date: 11/25/2014 3:57:11 PM
Subject: RE: Waccamaw Corrective Action Plan - Legal Services

Kim,

I received the corrective action plan; thank you for the response. The plan addresses some of the areas of concern proactively and I appreciate your efforts; however, before the plan is approved, there are some changes that need to be incorporated. Also, there are some things that were not addressed, so I am going to take the liberty of offering some ideas that may help.

The approach to publicizing through the newsletter is excellent; however, the information that was disseminated was NOT correct. Legal services are targeted to those who are sixty (60) or older and are of greatest economic or social need. While the act emphasizes services to those who are minority or non-English-speaking, the article makes it sound as if ONLY those who are both minority AND in a rural area AND have limited English-speaking ability can receive legal services. The same is true with the news release and with the flyer. All must be corrected before the plan can be approved.

Just a suggestion: Why don't you just say "sixty (60) or older and are of greatest economic or social need." That is correct, and it will not limit the folks who come to you for legal referrals. This is particularly important because based on the number of cases you are handling, unless these are some extremely complex matters or something that will require an inordinate amount of time, you have about \$26,000 to spend and, hopefully, you will be able to serve many more people this year.

Another item that needs to be addressed for approval is how you project that you will expend the full amount of your III-B legal service dollars. You may want to include your Ombudsman in your plan, because the Ombudsman can issue spot and refer facility residents for services, which gives you an additional target population who are already socially isolated.

You did an excellent job on the outreach piece, with scheduling events from different sources. I want to make a suggestion in this area, but I am very happy with what I saw there. The Bar schedules very far out, so be sure you have an ongoing relationship so that they will meet your need in the more distant future.

One piece that was missing in your response is that you did not address assessing the need for services. Although your intake practices do collect detailed information about the client, that does not assess the need for services throughout your region, simply because that assessment only captures people who contact you for services. Please incorporate information in your plan as to how you will assess the need throughout the PSA. Here are some ideas: You may want to include some other types of outreach to accommodate obtaining that information. For example, you might ensure that you staff a table or part of a table at every outreach event, including health fairs, senior events, etc., where someone can provide information and can collect name/information that allows you to evaluate the interest areas and need for legal services from that population. You can collect data on needs and you can also use that as an opportunity to provide information on the services that are available and may be able to get a more comprehensive picture of need. You could do a survey, but one of the things to be aware of is cost. You might also talk with other entities in the area, such as United Way. They often survey their target population about things like "greatest need" so you may be able to get data from them that shows legal as one of the priority needs.

I was very pleased with your MOU in that it provides you with the needed agreement, covers compliance, and the rate negotiated is excellent. Thank you for getting that in order. You also have the ability to use other legal providers if you choose and also establish agreement with them at the same unit rate (a "fall-back" in the event that you don't

have someone readily available from SCLS—I don't know the level of their coverage in your geographic area. Although not a requirement of approval of your plan, please clarify their hours of availability in your region for me.)

Please get your changes to me no later than December 10, 2014 so that I can move forward with approving your plan.

Thanks again for your help on this. I will look forward to receiving the modifications.

Best regards,
Cat

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From: Kimberly Harmon [mailto:kharmon@wrcog.org]
Sent: Monday, November 17, 2014 4:40 PM
To: Zavoras, Catherine
Subject: Waccamaw Corrective Action Plan - Legal Services

Kat, Please see attached letter and attachments for Waccamaw's corrective action plan as requested. Thanks.
Kim

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